



OIG HIGHLIGHTS

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What OIG Inspected

On April 15, 2013, OIG initiated a review of the Accountability Review Board process, which included a review of the Benghazi Accountability Review Board recommendations. The resulting report (*Special Review of the Accountability Review Board Process*) and classified annex were issued in September 2013. The report contains 20 formal and 8 informal recommendations.

From January 15 to March 18, 2015, OIG conducted a compliance followup review of the *Special Review of the Accountability Review Board Process*.

What OIG Recommended

OIG reissued one recommendation from the 2013 inspection report, that the Under Secretary of State for Management, in coordination with the Bureau of Diplomatic Security and the Bureau of Overseas Buildings Operations, develop minimum security standards that must be met prior to occupying facilities located in designated high-risk, high-threat locations and include these minimum standards for occupancy in the *Foreign Affairs Handbook* as appropriate.

~~SENSITIVE BUT UNCLASSIFIED~~

August 2015

OFFICE OF INSPECTIONS

Compliance Followup Review of the Special Review of the Accountability Review Board Process

What OIG Found

- The Department of State has complied with all the formal and informal recommendations of the 2013 *Special Review of the Accountability Review Board Process*, except one, which has been reissued in this report.
- The Department of State has implemented regulatory and procedural changes to delineate clearly who is responsible for implementation, and oversight of implementation, of Accountability Review Board recommendations. The Under Secretary for Management, in coordination with the Under Secretary for Political Affairs, is responsible for implementation of Accountability Review Board recommendations. The Deputy Secretary for Management and Resources is responsible for overseeing the Department's progress in Accountability Review Board implementation, which places accountability for implementation at an appropriately high level in the Department of State.
- The Office of Management Policy, Rightsizing, and Innovation manages the Accountability Review Board function. The Accountability Review Board process review report was critical of the Office of Management Policy, Rightsizing, and Innovation's recordkeeping and files of past Accountability Review Boards. The Office of Management Policy, Rightsizing, and Innovation has since revised its Accountability Review Board recordkeeping guidelines. These revised guidelines have yet to be tested, as no Accountability Review Board has met since the Benghazi Accountability Review Board, which issued its report in December 2012.



OIG

Office of Inspector General

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August 2015

Compliance Followup Review of the Special Review of the Accountability Review Board Process

DOMESTIC OPERATIONS AND SPECIAL REPORTS

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CONTENTS

KEY FINDINGS	1
CONTEXT	2
EVALUATION OF COMPLIANCE.....	3
ACCOUNTABILITY REVIEW BOARD PROCESS.....	3
Information Flow.....	3
Improving Regulatory Guidance.....	5
Interagency Cooperation.....	6
Annual Assessments and Reports.....	6
Personnel Performance.....	7
IMPLEMENTATION OF BENGHAZI ACCOUNTABILITY REVIEW BOARD RECOMMENDATIONS	7
Strengthening Security at High-Risk, High-Threat Posts	7
Minimum Security Standards.....	9
Tripwires.....	10
Training.....	10
Information Sharing.....	11
Outside Reviews.....	11
CFR RECOMMENDATION	12
APPENDIX A: SCOPE AND METHODOLOGY.....	13
Purpose and Scope.....	13
Methodology.....	13
APPENDIX B: STATUS OF 2013 INSPECTION FORMAL RECOMMENDATIONS	14
APPENDIX C: STATUS OF 2013 INSPECTION INFORMAL RECOMMENDATIONS.....	20
ABBREVIATIONS	21
INSPECTION TERMS AND DEFINITIONS.....	22
CFR TEAM MEMBERS.....	24

KEY FINDINGS

- The Department of State has complied with all the formal and informal recommendations of the 2013 *Special Review of the Accountability Review Board Process*, except one, which has been reissued in this report.
- The Department of State has implemented regulatory and procedural changes to delineate clearly who is responsible for implementation, and oversight of implementation, of Accountability Review Board recommendations. The Under Secretary for Management, in coordination with the Under Secretary for Political Affairs, is responsible for implementation of Accountability Review Board recommendations. The Deputy Secretary for Management and Resources is responsible for overseeing the Department's progress in Accountability Review Board implementation, which places accountability for implementation at an appropriately high level in the Department of State.
- The Office of Management Policy, Rightsizing, and Innovation manages the Accountability Review Board function. The Accountability Review Board process review report was critical of the Office of Management Policy, Rightsizing, and Innovation's recordkeeping and files of past Accountability Review Boards. The Office of Management Policy, Rightsizing, and Innovation has since revised its Accountability Review Board recordkeeping guidelines. These revised guidelines have yet to be tested, as no Accountability Review Board has met since the Benghazi Accountability Review Board, which issued its report in December 2012.

CONTEXT

Following the September 11–12, 2012, attack on U. S. Government facilities in Benghazi, Libya, then-Secretary of State Hillary Rodham Clinton convened an Accountability Review Board (ARB) to examine the facts and circumstances surrounding the attack, in accordance with Title III of the Omnibus Diplomatic and Antiterrorism Act of 1986, as amended, 22 U.S.C. § 4831 *et seq.*, and 12 *Foreign Affairs Manual* (FAM) 030. The board, which Ambassador Thomas R. Pickering (Ret.) chaired, provided its findings to the Secretary on December 18, 2012, in two reports—one unclassified and one classified.¹ The unclassified report was subsequently released to the public on December 20, 2012. The unclassified report contains 24 recommendations. The classified report repeats most of the unclassified report's recommendations but has a total of 29 recommendations.

In a December 18, 2012, letter to the Senate Foreign Relations Committee, the Secretary noted her acceptance of all the recommendations of the Benghazi ARB, and the U.S. Department of State (Department) undertook immediate action toward their implementation. On December 19, 2012, the Executive Secretariat (S/ES) issued a memorandum with 64 specific tasks that various Department offices and bureaus must take to address the recommendations. However, as noted in the Office of Inspector General's (OIG) subsequent review of the ARB process, some of the Benghazi ARB recommendations are subject to interpretation and some of the subsequent tasks S/ES issued do not appear to align with the intent of the corresponding ARB recommendation.²

On April 15, 2013, OIG initiated a review of the ARB process, which included a review of the Benghazi ARB recommendations. OIG issued the resulting report and classified annex in September 2013.³ The report contains 20 formal and 8 informal recommendations. For the status of the 20 formal recommendations, see Appendix B. For the status of the informal recommendations, see Appendix C. Thirteen of the formal recommendations and five of the informal recommendations are related to the ARB process. The remaining seven formal and three informal recommendations mirror or are closely related to the Benghazi ARB recommendations. As stated in the ARB process review report, the ARB process team's rationale for issuing these recommendations was that the action taken to date on some of the Benghazi ARB recommendations did not appear to align with the intent of the recommendations and some Benghazi ARB recommendations did not appear to address the underlying security issues adequately. The classified annex to the report provides an assessment of the Department's implementation of the recommendations of the Benghazi ARB as of the date of the review. Its focus is on the implementation of the 64 tasks S/ES issued in response to the Benghazi ARB recommendations. It contains no OIG recommendations.

¹ *Report of the Accountability Review Board* – Benghazi, September 11–12, 2012.

² *Special Review of the Accountability Review Board Process*, Report No. ISP-I-13-44A, September 2013, page 20.

³ *Ibid.*

After the publication of OIG's *Special Review of the Accountability Review Board Process* (ARB Process Review) in September 2013, the Department shifted responsibility for compliance with several of the recommendations among bureaus and ultimately the Office of Management Policy, Rightsizing, and Innovation (M/PRI) took ownership of compliance oversight. OIG determined that a compliance followup review (CFR) was needed to evaluate the extent of implementation of all formal and informal recommendations assigned for action to the Department. In addition to the recommendations of the ARB process review report, the OIG CFR team reviewed the implementation of suggestions made to enhance the effectiveness of the ARB process in a May 29, 2014, internal memorandum from the Inspector General to the Deputy Secretary for Management and Resources (D/MR).

EVALUATION OF COMPLIANCE

At the start of this CFR, 10 of the 20 formal recommendations in the 2013 review of the ARB process were closed, 4 were resolved, and 6 were unresolved. Of the unresolved recommendations, only one—Recommendation 17—is related to a Benghazi ARB recommendation. As a result of the findings of the CFR, Recommendation 17 is reissued. This report closes all other recommendations.

ACCOUNTABILITY REVIEW BOARD PROCESS

The 2013 OIG review of the ARB process was initiated to assess the process by which ARBs are established, staffed, supported, and conducted as well as the measures to track implementation of ARB recommendations. The resulting report included 13 formal recommendations and 5 informal recommendations involving issues related to the ARB process. The OIG CFR team addressed the status of implementation of these recommendations.

Information Flow

Formal Recommendations 1, 2, 3, and 9—as well as Informal Recommendations 1 and 3—concern the flow of information within the Department and from the Department to Congress. The recommendations introduce additional reporting requirements for all incidents that might meet the criteria to convene an ARB, as well as a more clearly defined list of congressional recipients for the Secretary's Report to Congress. The recommendations intend to better inform decisionmakers within the Department and congressional leadership.

In December 2014, M/PRI revised its ARB recordkeeping guidelines regarding those records to be retained and safeguarded. However, because no ARB has convened since Benghazi, these revised guidelines remain untested. Although these guidelines require recording and transcribing telephone interviews, they do not mandate verbatim transcripts of all interviews, including in-person meetings, as the Inspector General suggested in his May 29, 2014, memorandum to the D/MR.

In compliance with Recommendation 1, the OIG CFR team found that M/PRI now drafts an action memo for the Secretary after every Permanent Coordinating Committee (PCC) meeting detailing the PCC decision, even if the PCC does not recommend convening an ARB.

The ARB process review report states that in those instances when the PCC⁴ did not recommend the convening of an ARB, past PCCs discussed alternative reviews that the Bureau of Diplomatic Security (DS) or other bureaus could conduct. The report notes that nothing precluded the PCC from doing this, but no formal process was in place for doing so. Recommendation 2 of the ARB process review report requires that M/PRI establish guidelines for the PCC for tasking alternative reviews, and Recommendation 3 recommends the establishment of procedures for disseminating the reviews. M/PRI disagreed that the authorities of the PCC, as stated in 12 FAM 032.1, include tasking alternative reviews. Rather, according to M/PRI, the PCC's role is limited to making recommendations to the Secretary regarding the convening of an ARB. However, in preparing its recommendations to the Secretary, the PCC could include as much information as it deems necessary, such as the committee's view that an alternative review might be helpful.

To meet the intent of Recommendation 2, M/PRI has included in its instructions to the PCC chair a reminder to PCC members that if the PCC votes not to convene an ARB, the PCC should decide whether to recommend that the Secretary request an alternative review. To further highlight the possibility of an alternative review, M/PRI has included guidance on alternative reviews in its meeting invitation to PCC members.

Recommendation 3 states that M/PRI should provide the Secretary and bureaus a report on the outcome of alternative reviews when an ARB is not recommended. Because the Secretary has the authority to task alternative reviews, the Secretary will automatically receive the outcome of the review. The Secretary would then decide on appropriate distribution within the Department. Meanwhile, Informal Recommendation 3 requires broader circulation of ARB reports as well as the Secretary's report to Congress. The M/PRI position is that these reports belong to the Secretary and their dissemination should be at the Secretary's discretion. OIG continues to believe that the Secretary should exercise discretion and circulate ARB reports and subsequent reports to Congress more widely within the Department.

Informal Recommendation 1 recommends that M/PRI be designated an addressee on all security-related incident reports. However, DS noted in their response that such a blanket inclusion would result in M/PRI being inundated with a broad spectrum of spot reports, the bulk of which would be largely irrelevant to the PCC deliberative process. Instead, M/PRI met with the director of the Operations Center to revise M/PRI's alert subscriptions list to ensure M/PRI receives the relevant notifications regarding overseas security incidents.

⁴ As described in 12 FAM 032.1, the PCC is the body that recommends to the Secretary that an ARB convene, or not convene, in response to a security-related incident.

Recommendation 9 tasks S/ES with creating a baseline list of congressional recipients for the Secretary's report to Congress. That list is now more clearly specified and included in regulations governing the ARB process.

Improving Regulatory Guidance

Recommendations 4, 5, 10, and 11—as well as Informal Recommendations 2, 4, and 5—concern regulatory guidance on additional reporting by and better defined parameters for the PCC and on institutionalized responsibility for implementation of ARB recommendations.

In response to Recommendation 4, the Under Secretary for Management amended 12 FAM 030 to require vetting and reporting security-related incidents, which do not result in convening a PCC. Those cases will be communicated to the Secretary. These FAM updates also addressed the need for standard operating procedures for the PCC required by Informal Recommendation 2, supplemented by separate instructions provided to PCC members in their invitation materials and meeting agendas.

Recommendation 5 recommends establishing written criteria to define the key terms "serious injury," "significant destruction of property," and "at or related to a U.S. mission abroad." The 2013 OIG inspection team found that ambiguity in the terminology had led to their inconsistent application as criteria in decisions to convene ARBs. M/PRI defined the terms in a 2013 memo to members of the PCC, describing changes to PCC procedures.

Informal Recommendation 4 addresses report classification and paragraph marking, which the 2013 OIG inspection team found to be inconsistently applied. The OIG CFR team found that existing procedures for report classification were not properly applied in the case of the Benghazi ARB, as that report was routed directly to the Secretary, rather than through M/PRI. In this respect, the Benghazi ARB was an anomaly. M/PRI is responsible for classifying ARB reports and taskers, according to 12 FAM 030.

Recommendations 10 and 11 recommend institutionalizing the oversight of the implementation of ARB recommendations as a responsibility of D/MR. M/PRI's revision of 12 FAM 030 and addition of 12 *Foreign Affairs Handbook* (FAH)-12 now clearly delineate who is responsible for managing the ARB process and who is responsible for oversight of implementation of ARB recommendations. The Deputy Secretary's responsibility for overseeing implementation of ARB recommendations places accountability for implementation at an appropriately high level in the Department. The ARB process review report was critical of M/PRI's recordkeeping and files of past ARBs. M/PRI has since revised its ARB recordkeeping guidelines. These revised guidelines have yet to be tested, because no ARB has convened since the Benghazi ARB, which issued its report in December 2012.

Informal Recommendation 5 of the ARB process review report recommends that D/MR work in tandem with M/PRI to address Benghazi ARB recommendations specifically. D/MR held two senior-level meetings on the matter and directed quarterly implementation meetings among staff of the Under Secretary for Management and M/PRI, which report to D/MR.

Interagency Cooperation

Recommendation 6 recommends that the Department seek greater assurances from the Department of Defense (DOD) in providing investigative reports of security-related incidents that involve Department personnel. The Department makes its requests via Executive Secretary memorandum to the equivalent DOD addressee, in accordance with 5 FAH-1 H-120. The DOD counterpart has been responsive in delivering requested materials in all the recent instances, including the incident in Zabul Province, Afghanistan. M/PRI will continue to monitor DOD responses to requests for reports in the future.

Annual Assessments and Reports

Recommendations 7, 8, and 20 provide for annual assessments of the ARB process and implementation as well as broader involvement in selecting ARB participants.

Recommendation 7 concerns the requirement outlined in 12 FAM 032.1 a. for annual PCC meetings to review the ARB process. The ARB process review report noted that the annual “housekeeping” meeting of the PCC combined discussions of specific incidents with the required process review in a way that did not satisfy FAM requirements. However, the OIG CFR team found that the agenda items for these meetings have been sufficiently clarified, with the process review indicated as the primary agenda item. Given the difficulty of scheduling meetings of a PCC comprising Department principals and participants from other agencies, combining topics with an organized agenda is a reasonable approach to satisfying the requirement.

Recommendation 8 tasks S/ES with an annual call to Department Under Secretaries and assistant secretaries for names of potential ARB participants to ensure that good candidates not be overlooked. The memorandum has been distributed requesting the necessary submissions, and though responses have been meager, M/PRI maintains the list of names as a running roster of potential nominees.

Recommendation 20 recommends that M/PRI coordinate with DS and the Bureau of Intelligence and Research (INR) to develop an annual report to the Deputy Secretary outlining implementation of ARB recommendations. The intent of the recommendation is to keep the Secretary and Department principals informed of the status of ARB implementation. The new requirement in 12 FAM 036.3 c.—for the ARB/PCC to provide a report to the Deputy Secretary and D/MR on the implementation status of all past ARB recommendations and note any trends—complies with the intent of Recommendation 20.

Personnel Performance

Recommendation 19 tasks M/PRI, in coordination with the Bureau of Human Resources and the Office of the Legal Adviser, to prepare clear guidelines for ARBs on recommendations dealing with issues of poor personnel performance. M/PRI has revised its standing guidance to ARB members, referring them to the Department's new leadership principles in 3 FAM 1214, 4138, and 4532 when documenting instances of unsatisfactory performance or poor leadership. The Department further codified this ARB authority by expanding the list of grounds for taking disciplinary or separation action against an employee, including "conduct by a senior official that demonstrates unsatisfactory leadership in relation to a security incident under review by an [ARB] convened pursuant to 22 U.S.C. 4831." In addition, in January 2013 the Department began seeking an amendment to the ARB statute (22 U.S.C. 4834(c)) to provide explicitly that unsatisfactory leadership may be a basis for disciplinary action and that the ARB would have the appropriate authority to recommend such action. No change to the statute has yet been made.

IMPLEMENTATION OF BENGHAZI ACCOUNTABILITY REVIEW BOARD RECOMMENDATIONS

As previously noted, the 2013 OIG ARB process review report also contains seven formal and three informal recommendations that mirror or are closely related to the Benghazi ARB recommendations. The ARB process review team's rationale for issuing these recommendations was that the action taken to date on some of the Benghazi ARB recommendations did not appear to align with the intent of the recommendations and some Benghazi ARB recommendations did not appear to address the underlying security issues adequately. The OIG CFR team addressed the status of these recommendations.

Strengthening Security at High-Risk, High-Threat Posts

The ARB process review report made two recommendations for strengthening security at high-risk, high-threat (HRHT) posts—Recommendation 12, to implement a plan to strengthen security beyond reliance on host government security support, and Informal Recommendation 6, to continue to develop the nascent Vital Presence Validation Process (VP2) as a mechanism for assessing the proper balance between acceptable risk and expected outcomes. The OIG CFR team confirmed the implementation of these recommendations, which are closed.

Although DS has not developed a plan for strengthening security at HRHT posts as Recommendation 12 recommends, it has undertaken several initiatives directed at the recommendation's intent, including enhanced personnel training, increased use of the Deliberate Planning Process, expansion of the Marine security guard (MSG) program and revision of its mission, and closer coordination and cooperation with DOD.

Guided by a panel of senior DS special agents and outside organizations, DS updated its former High Threat Tactical Course to create a suite of mandatory courses for DS agents assigned to

HRHT locations, drawing on lessons learned from the attacks in Benghazi, Libya, and Herat, Afghanistan. The cornerstone of these courses is the "High Threat Operations Course" (HT-310), which, as of October 1, 2013, was made mandatory for all DS agents at grades FS 04 through 06 who are assigned to HRHT locations. Similar, but shorter duration courses (HT-310E and HT-315) are required for senior and mid-level DS agents assigned to such locations.

The Deliberate Planning Process is a structured process for strategic, operational, and tactical planning patterned after the U.S. Army's Military Decision Making Process. Although it was introduced in DS's Directorate of International Programs in 2011, DS did not fully embrace it until after the creation of the High Threat Programs Directorate in November 2012. Since then, the Deliberate Planning Process has been used for the reopening of Embassy Bangui and other DS operations at HRHT posts.

The Department, in coordination with DOD, has added 20 new MSG detachments, and Marine Corps Headquarters has created the Marine Security Augmentation Unit. Although some HRHT posts still lack MSG detachments, for example, because of the lack of host government approval, the Department has made progress in deploying new detachments and increasing the size of existing detachments. As described in Annex W of the June 2013 revision of the memorandum of agreement between the Department and the U.S. Marine Corps, the primary mission of the Marine Security Augmentation Unit is to augment security at U.S. diplomatic facilities overseas during periods of increased threat. The June 2013 revision of the memorandum of agreement also includes a revision of the MSG mission. In the previous version, the MSG's primary mission was to prevent the compromise of classified information. Their secondary mission was the protection of personnel and facilities. In the revised memorandum of agreement, the mission of the MSG is to protect mission personnel and prevent the compromise of national security information.

An additional area of security improvement beyond reliance on the host government has been the Department's closer relationship with DOD, whose personnel have been involved in every Department contingency operation at an HRHT post since the Benghazi attack. Furthermore, DS agents are now embedded in DOD expeditionary forces.

VP2 has become a fully functioning process, managed by M/PRI. The Secretary approved it in April 2014 and formally announced it in September 2014 in cable 14 State 113508 and Department Notice 2014_09_141.

As stated in 2 FAH-3 H-112, a VP2 analysis must articulate that the Department has:

- (1) Developed a defined, attainable, and prioritized mission based on U.S. national interests;
- (2) Undertaken an assessment of the risk (e.g., potential for significant loss of life, property, or national capability occurring as a result of an act or acts of terrorism or political violence directed against a U.S. mission presence) and resources needed to mitigate risk to the maximum extent possible;
- (3) Explicitly accepted those risks that cannot be mitigated;

- (4) Developed recommended conditions for the U.S. Government presence in this location, including an identification of residual risks and highlighting any gaps; and
- (5) Weighed the needs of U.S. policy against the risks facing U.S. personnel and considered whether adjustments to the U.S. presence must be made.

The use of VP2 in opening or reopening posts at HRHT locations has also been codified in 2 FAM 423 and 2 FAM 410. OIG's Office of Audits is conducting a comprehensive review of VP2 concurrent with this review, the results of which will appear in a separate report.

Minimum Security Standards

Recommendation 17 of the ARB process review report recommended that the Department develop minimum security standards that must be met prior to occupying facilities in HRHT locations. The Department rejected this recommendation, stating that existing Overseas Security Policy Board standards apply to all posts and that separate security standards for HRHT posts would not provide better or more secure operating environments. Furthermore, recognizing that Overseas Security Policy Board standards cannot be met at all locations, the Department has a high threshold for exceptions to these standards and the waiver and exceptions process requires "tailored mitigation strategies in order to achieve the intent of the standards."⁵

Although OIG acknowledges the Department's assertion of a "high threshold for exceptions," the Department's response does not meet the recommendation's requirement for standards that must be met prior to occupancy. As was noted in the ARB process review report, "...occupying temporary facilities that require waivers and exceptions to security standards is dangerous, especially considering that the Department occupies these facilities long before permanent security improvements are completed."⁶ As the Department has not identified minimum security standards that must be met prior to occupancy, Recommendation 17 is being reissued.

Recommendation CFR 1: The Office of the Under Secretary of State for Management, in coordination with the Bureau of Diplomatic Security and the Bureau of Overseas Buildings Operations, should develop minimum security standards that must be met prior to occupying facilities located in Department of State-designated high-risk, high-threat environments and include new minimum security standards of occupancy in the *Foreign Affairs Handbook* as appropriate. (Action: M, in coordination with DS and OBO)

Tripwires

The ARB process review issued three recommendations pertaining to tripwires— Recommendation 13, for DS, in coordination with the regional bureaus, to review existing

⁵ M/PRI memo to OIG/ISP Robert Peterson, dated June 18, 2014, page 13

⁶ OIG report, ISP-I-13-44A, page 29

tripwires and their corresponding action plans; Recommendation 14, for the then newly created Tripwires Committee to review all tripwire plans for all missions, starting with the HRHT posts; and Recommendation 15, for the Under Secretary for Management to provide guidance to the field regarding the development of tripwires at post and their review in Washington. The OIG CFR team confirmed the implementation of these recommendations, which are closed.

In response to Recommendation 13, DS's Emergency Planning Branch reviews tripwires as part of its annual review of all posts' emergency action plans via its Crisis and Emergency Planning Application. Although DS's Emergency Planning Branch does not examine tripwires to the extent that the Tripwires Committee does (see paragraph below), it does review them to ensure that tripwires have been entered into the Crisis and Emergency Planning Application and that they appear to be current and reasonable.

In response to Recommendation 14, the Office of Crisis Management Support has planned for the Tripwires Committee, which is under the Office of Crisis Management Support, to review the tripwires and associated responses of all HRHT posts annually, in addition to a different segment each year of non-HRHT posts, with the intent, over time, of reviewing all posts in the latter category. In 2014, the Tripwires Committee reviewed the tripwires and associated responses of all HRHT posts, as well as those of 15 non-HRHT posts. As of this CFR, the Tripwires Committee had begun its second annual review of all HRHT posts, as well as an additional 16 non-HRHT posts. As described in 13 State 141538, the Tripwire Committee, which includes representatives from the appropriate regional bureau, DS, INR, and the Bureaus of Consular Affairs, Political-Military Affairs, and others, conducts comprehensive reviews of posts' tripwires and their responses.

In response to Recommendation 15, guidance to the field was provided in 13 State 10347, dated February 2, 2013, which describes the purpose and creation of tripwires; 13 State 79817, dated July 31, 2013, which describes the functioning of the Tripwires Committee; and 13 State 141538, which sets forth the requirement for annual reviews of the tripwires of all HRHT posts, as well as a select number of non-HRHT posts.

Training

Recommendation 16 of the ARB process review report recommended that the Foreign Service Institute, in coordination with DS, develop a comprehensive program of security, crisis management, and risk management training, with emphasis on personnel assigned to HRHT posts. The OIG CFR team confirmed the implementation of this recommendation, which is closed.

In response to this recommendation, the Foreign Service Institute created a working group with DS to collaborate in the development of high-threat and risk management training. The deans of the Schools of Professional and Area Studies and of Leadership and Management and the Deputy Assistant Secretary of DS's Training Directorate are the co-chairs. The working group met about monthly during 2013–2014, but having resolved most of the training issues, they now meet on a quarterly basis. Through this collaborative effort, a number of courses related to risk

management, security training, and training for high-risk posts have either been prepared and given or are in progress.

Information Sharing

The ARB process review report contains two recommendations on information sharing—Informal Recommendation 8, for INR to continue to formulate enhanced reporting criteria for HRHT posts and to report these criteria to these posts, and Recommendation 18 for INR to assess the security of HRHT posts, drawing from all available intelligence community (IC) sources. The OIG CFR team confirmed the implementation of these recommendations, which are closed.

Although the ARB process review report assigned INR action on both of these recommendations, the responsibility for these actions more properly belongs to DS's Office of Intelligence and Threat Analysis (ITA), as prescribed in 1 FAM 262.6-1. That said, INR and ITA work together closely, and INR keeps ITA fully informed of threat-related information it receives from the IC. With regard to enhanced reporting for HRHT posts since the Benghazi attack, coordination among INR, ITA, and the High Threat Programs Directorate has been enhanced and DS and INR have become involved in the VP2 process, which assesses risk versus gain in the assignment of personnel to HRHT locations, and they are active participants in the High Threat Post Review Board. The requirement for ITA to use all-source intelligence in assessing terrorist activities and threats directed at U.S. Government facilities is specified in 1 FAM 262.6-1(2). Since the Benghazi incident, DS's Threat Investigations and Analysis Directorate, which includes ITA, has improved its access to all-source intelligence through increased IC connectivity within the DS Command Center and the assignment of representatives of various IC elements to the Center.

Outside Reviews

Informal Recommendation 7 of the ARB process review report recommended that the Under Secretary for Management widely circulate two post-Benghazi reports within the Department for review and comment—the *Report on Diplomatic Security Organization and Management* ("Green Report"), dated May 2013, and the Sullivan Report, dated August 29, 2013—which has been done. On August 1, 2014, the Department formally announced that it had accepted 38 of the Sullivan Report's 40 recommendations. The Department also accepted 30 of the 35 recommendations in the Green Report. Two recommendations were not accepted, and decisions on three of the recommendations were pending at the time of this review. The OIG CFR team confirmed the implementation of this recommendation, which is closed.

CFR RECOMMENDATION

Recommendation CFR 1: The Office of the Under Secretary of State for Management, in coordination with the Bureau of Diplomatic Security and the Bureau of Overseas Buildings Operations, should develop minimum security standards that must be met prior to occupying facilities located in Department of State-designated high-risk, high-threat environments and include new minimum security standards of occupancy in the *Foreign Affairs Handbook* as appropriate. (Action: M, in coordination with DS and OBO)

APPENDIX A: SCOPE AND METHODOLOGY

This CFR was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by OIG for the Department and the Broadcasting Board of Governors.

Purpose and Scope

The Office of Inspections provides the Secretary of State, the Chairman of the Broadcasting Board of Governors, and Congress with systematic and independent evaluations of the operations of the Department and BBG. CFRs assess the inspected entities' compliance with recommendations made in previous inspections and verify whether agreed-upon corrective actions for recommendations issued in previous reports were fully and properly implemented.

Methodology

During the course of this CFR, the inspectors: 1) reviewed recommendations issued in the original inspection report and reported corrective actions; 2) collected and reviewed documentation and conducted those interviews necessary to substantiate reported corrective actions; and 3) reviewed the substance of the report and its findings and recommendations with offices, individuals, and activities affected by this review.

For this CFR, the team conducted 62 interviews and reviewed an additional 189 items of documentation.

APPENDIX B: STATUS OF 2013 INSPECTION FORMAL RECOMMENDATIONS

Recommendation 1: The Office of Management Policy, Rightsizing and Innovation should draft an action memorandum for the Secretary's signature that details the Permanent Coordinating Committee's decision regardless if an Accountability Review Board is recommended. (Action: M/PRI)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 2: The Office of Management Policy, Rightsizing and Innovation should coordinate with the Permanent Coordinating Committee members to establish guidelines that broaden the committee's ability to task alternative reviews. (Action: M/PRI)

Pre-CFR Status: Unresolved.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 3: The Office of Management Policy, Rightsizing and Innovation should implement a procedure to provide to the Secretary and relevant bureaus a report on the outcome of alternative reviews in those instances in which the Permanent Coordinating Committee does not recommend an Accountability Review Board. (Action: M/PRI)

Pre-CFR Status: Unresolved.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 4: The Office of the Under Secretary of State for Management, in coordination with the Office of the Legal Adviser, should amend 12 FAM 030 to codify a transparent and fully documented process for vetting security-related incidents to identify those that do not warrant convening the Permanent Coordinating Committee and ensuring that this information is communicated to the Secretary. (Action: M, in coordination with L)

Pre-CFR Status: Open.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 5: The Office of the Under Secretary of State for Management, in coordination with the Office of the Legal Adviser should establish written guidelines for the Permanent Coordinating Committee regarding criteria for "serious injury," "significant

destruction of property," and "at or related to a U.S. mission abroad." (Action: M, in coordination with L)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 6: The Office of the Under Secretary of State for Management should contact the Department of Defense counterpart and request that the Department of Defense fulfill its statutory obligation to provide the Department of State with investigation reports of security-related incidents that involve Department of State personnel. (Action: M)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 7: The Office of Management Policy, Rightsizing and Innovation should convene annual meetings of the Permanent Coordinating Committee to specifically review and assess the committee's work. (Action: M/PRI)

Pre-CFR Status: Open.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 8: The Executive Secretariat, in coordination with the Office of Management Policy, Rightsizing and Innovation, should annually task the Under Secretaries and Assistant Secretaries in the Department of State to provide potential nominees to serve on Accountability Review Boards. (Action: S/ES, in coordination with M/PRI)

Pre-CFR Status: Open.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 9: The Executive Secretariat, in coordination with the Office of Legislative Affairs, should create a baseline list of congressional recipients to whom a copy of the Secretary's Report to Congress is delivered. (Action: S/ES, in coordination with H)

Pre-CFR Status: Open.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 10: The Bureau of Administration should amend 1 FAM 30 to institutionalize the Deputy Secretary for Management and Resources' responsibility for oversight of implementation of the Accountability Review Board recommendations. (Action: A)

Pre-CFR Status: Unresolved.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 11: The Bureau of Diplomatic Security should amend 12 FAM 032 to reflect the Deputy Secretary for Management and Resources' oversight responsibility of the Office of Management Policy, Rightsizing and Innovation for implementation of Accountability Review Board recommendations. (Action: DS)

Pre-CFR Status: Unresolved.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

Recommendation 12: The Bureau of Diplomatic Security should implement a plan to strengthen security beyond reliance on host government-security support at high-risk, high-threat posts. (Action: DS)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 13: The Bureau of Diplomatic Security, in coordination with the regional bureaus, should on an urgent basis, complete its survey of existing tripwires and their corresponding action plans, starting with high-risk, high-threat posts. (Action: DS, in coordination with AF, EAP, EUR, 10, NEA, SCA, WHA)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 14: The Office of the Under Secretary of State for Political Affairs, in coordination with the Office of the Under Secretary of State for Management, should direct that the newly established Tripwires Committee meet on an urgent basis to review and approve the tripwires plans for all missions, starting with high-risk, high-threat posts. (Action: P, in coordination with M)

Pre-CFR Status: Closed-acceptable compliance

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 15: The Office of the Under Secretary of State for Management should issue new guidance clarifying the process by which tripwires are, in the first instance, developed at post and approved in Washington and emphasizing that tripwire plans, once duly approved, will serve as the definitive blueprint for the immediate actions to be taken by posts when a tripwire is tripped. (Action: M)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 16: The Foreign Service Institute, in coordination with the Bureau of Diplomatic Security, should develop a comprehensive program of security, crisis management, and risk management training for Department personnel, with an emphasis on those assigned to or having responsibility for high-risk, high-threat posts. (Action: FSI, in coordination with DS)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 17: The Office of the Under Secretary of State for Management, in coordination with the Bureau of Diplomatic Security and the Bureau of Overseas Buildings Operations, should develop minimum security standards that must be met prior to occupying facilities located in Department of State-designated high-risk, high-threat environments and include new minimum security standards of occupancy in the Foreign Affairs Handbook as appropriate. (Action: M, in coordination with DS and OBO)

Pre-CFR Status: Unresolved.

CFR Findings: Reissued. See Minimum Security Standards section of report and Recommendation CFR 1.

Recommendation 18: The Bureau of Intelligence and Research should assess the security environments at high-risk, high-threat posts, drawing on information from all available sources, including the intelligence community, with a view to informing security decisions. (Action: INR)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 19: The Office of Management Policy, Rightsizing and Innovation, in coordination with the Bureau of Human Resources and the Office of the Legal Adviser, should prepare clear guidelines for Accountability Review Boards pertaining to the drafting and handling of recommendations dealing with issues of poor performance of Department of State personnel. (Action: M/PRI, in coordination with DGHR and L)

Pre-CFR Status: Closed-acceptable compliance.

CFR Findings: CFR team confirmed the pre-CFR implementation status. Recommendation remains closed.

Recommendation 20: The Office of Management Policy, Rightsizing and Innovation, in coordination with the Bureau of Diplomatic Security and the Bureau of Intelligence and Research, should develop an annual report to the Deputy Secretary outlining implementation of Accountability Review Board recommendations, with an emphasis on identifying problems, the way forward, and the impact of the Department of State's global security program. (Action: M/PRI, in coordination with DS and INR)

Pre-CFR Status: Unresolved.

CFR Findings: CFR team confirmed implementation. Recommendation closed.

APPENDIX C: STATUS OF 2013 INSPECTION INFORMAL RECOMMENDATIONS

Informal Recommendation 1: The Bureau of Diplomatic Security should include the Office of Management Policy, Rightsizing and Innovation as an addressee on all security-related incident reports.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 2: The Office of Management Policy, Rightsizing and Innovation should implement a standard operating procedure outlining the role and responsibility of the Permanent Coordinating Committee.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 3: The Executive Secretariat should circulate Accountability Review Board reports and the Secretary's subsequent report to Congress more widely within the Department of State.

CFR Findings: Closed-acceptable non-compliance.

Informal Recommendation 4: The Executive Secretariat should coordinate with the Bureau of Diplomatic Security to establish a process to properly classify and paragraph mark Accountability Review Board reports and taskers.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 5: The Office of the Deputy Secretary of State should work in tandem with the Office of Management Policy, Rightsizing and Innovation to streamline the Benghazi Accountability Review Board implementation process.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 6: The Office of the Under Secretary of State for Political Affairs and the Office of the Under Secretary of State for Management should continue to oversee plans to develop the Vital Presence Validation Process, with a view to establishing a permanent mechanism for assessing the proper balance between acceptable risk and expected outcomes in high-risk, high-threat posts.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 7: The Office of the Under Secretary of State for Management should widely circulate the results of the Grant Green report and the Sullivan panel within the Department for review and comment.

CFR Findings: Closed-acceptable compliance.

Informal Recommendation 8: The Bureau of Intelligence and Research should continue to formulate enhanced reporting criteria covering high-threat posts and communicate those criteria to posts.

CFR Findings: Closed-acceptable compliance.

ABBREVIATIONS

ARB	Accountability Review Board
CFR	Compliance followup review
D/MR	Deputy Secretary for Management and Resources
Department	U.S. Department of State
DOD	U.S. Department of Defense
DS	Bureau of Diplomatic Security
FAH	<i>Foreign Affairs Handbook</i>
FAM	<i>Foreign Affairs Manual</i>
HRHT	High-risk, high-threat
IC	Intelligence community
INR	Bureau of Intelligence and Research
ITA	Office of Intelligence and Threat Analysis
M/PRI	Office of Management Policy, Rightsizing, and Innovation
MSG	Marine security guard
OIG	Office of Inspector General
PCC	Permanent Coordinating Committee
S/ES	Executive Secretariat
VP2	Vital Presence Validation Process

INSPECTION TERMS AND DEFINITIONS

Compliance Response: A written response from the action office to which a recommendation has been assigned for action, informing OIG of agreement or disagreement with the recommendation. Comments indicating agreement shall include planned corrective actions and, where appropriate, the actual or proposed target dates for achieving these actions. The reasons for any disagreement with a recommendation must be explained fully. Where disagreement is based on interpretation of law, regulation, or the authority of officials to take or not take action, the response must include the legal basis.

Final Action: The completion of all actions that the management of an action office, in its management decision, has concluded is necessary to address the findings and recommendations in OIG reports.

Finding: A conclusion drawn from facts and information about the propriety, efficiency, effectiveness, or economy of operation of a post, unit, or activity.

Management Decision: When the management of an action office for an OIG recommendation informs OIG of its intended course of action in response to a recommendation. If OIG accepts the management decision, the recommendation is considered resolved. If OIG does not accept the management decision and the issue cannot be resolved after a reasonable effort to achieve agreement, the Inspector General may choose to take it to impasse.

Open Recommendation: An open recommendation is either resolved or unresolved (see definitions of recommendation status below).

Recommendation: A statement in an OIG report requiring action by the addressee organizations or officials to correct a deficiency or need for change or improvement identified in the report.

Recommendation Status:

Resolved: Resolution of a recommendation occurs when:

- The action office concurs with the recommendation (a management decision has been accepted by OIG), but the action office has not presented satisfactory evidence that it has implemented the recommendation or some alternative course of action acceptable to OIG;
- The action office informs OIG that it disagrees with all or part of the recommendation, and OIG agrees to accept partial compliance or noncompliance; or
- Impasse procedures have led to a positive or negative final management decision.

Unresolved: An unresolved recommendation occurs when the action office:

- Has not responded to OIG;
- Has failed to address the recommendation in a manner satisfactory to OIG;

- Disagrees with the recommendation and did not suggest an alternative acceptable to OIG; or
- Requests OIG refer the matter to impasse, and the impasse official has not yet issued a decision.

Closed: A recommendation is closed when one of the following situations applies:

- OIG formally notifies the action office that satisfactory evidence of final action (i.e., information provided by the action office that confirms or attests to implementation) on an OIG recommendation has been accepted. The closing of a recommendation from an OIG report does not relieve the responsible manager of the obligation to report to OIG any changed circumstances substantially affecting the problem areas addressed in the recommendation or report and the effectiveness of agreed actions to correct these problems;
- OIG acknowledges to the action office that an alternative course of action to the action 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;
- OIG agrees partial implementation is acceptable and has been completed; or
- OIG agrees that noncompliance is acceptable.

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