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Office of Inspector General  
United States Department of State

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AUD-AFA-26-13

Office of Audits

April 2026

# **Audit of the Bureau of Diplomatic Security's Oversight of Contractor Performance and Invoice Processing for the Domestic Guard Services Contract**

ACQUISITIONS AND FEDERAL ASSISTANCE DIVISION

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# HIGHLIGHTS

Office of Inspector General  
United States Department of State

AUD-AFA-26-13

## What OIG Audited

The Bureau of Diplomatic Security's (DS) Office of Domestic Facilities Protection (DFP) is responsible for protecting people, information, and property at all domestic Department of State (Department) facilities. Accordingly, DFP is responsible for providing oversight of the domestic guard services contract, which provides a 24-hour guard force to deter unauthorized, illegal, or potentially life-threatening activities directed toward Department employees, visitors, sensitive information, and properties.

The Office of Inspector General (OIG) conducted this audit to determine whether DS administered the domestic guard services contract in accordance with applicable federal and Department standards governing the oversight of contractor performance and invoice processing. The scope of the audit was the domestic guard services contract (Contract 19AQMM21C0066) from May 26, 2021, to March 31, 2025.

## What OIG Recommends

OIG made four recommendations to address the deficiencies identified with the oversight of contractor performance and invoice processing for the domestic guard services contract, including one recommendation to recover questioned costs. Based on DS' response to a draft of this report, OIG considers one recommendation closed and three recommendations resolved, pending further action. A synopsis of management's comments to the recommendations offered and OIG's replies follow each recommendation in the Audit Results section of this report. DS' response to a draft of this report is reprinted in its entirety in Appendix B.

**April 2026**

**OFFICE OF AUDITS**

ACQUISITIONS AND FEDERAL ASSISTANCE DIVISION

**Audit of the Bureau of Diplomatic Security's Oversight of Contractor Performance and Invoice Processing for the Domestic Guard Services Contract**

## What OIG Found

OIG found that DS generally administered the domestic guard services contract (Contract 19AQMM21C0066) in accordance with applicable federal and Department standards governing the oversight of contractor performance and invoice processing. Furthermore, OIG found that DS made a number of improvements to its contract oversight and invoice processing in response to a prior OIG audit published in September 2022, including enhancing documentation related to delegations of authority, establishing and maintaining a (Contracting Officer's Representative's (COR) file, and monitoring contract performance. However, OIG identified additional opportunities for improvement. For example, OIG found that the COR file did not include correspondence with the contractor, non-compliant access control tests were not addressed in accordance with the contract, and invoice reviews were not documented.

These deficiencies occurred, in part, because DS' guidance did not include sufficient information related to maintaining correspondence in the COR file, addressing non-compliant access control tests, or performing and documenting invoice reviews.

Without sufficient detailed guidance, oversight personnel working on the domestic guard services contract may not fully understand their responsibilities in administering and overseeing the contract, which could lead to management failing to achieve its objectives and respond to risk. In addition, without documentary evidence that DS reviewed invoices before approval, the Department will not have reasonable assurance that it spent federal funds in accordance with contract terms or that the contract recipient performed the required activities. Furthermore, OIG is questioning \$6,000 in costs because DS did not deduct \$1,000 from invoices for six failed access control tests, as required by the domestic guard services contract.

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## OBJECTIVE

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The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Diplomatic Security (DS) administered the domestic guard services contract<sup>1</sup> in accordance with applicable federal and Department of State (Department) standards governing the oversight of contractor performance and invoice processing.

## BACKGROUND

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### Office of Domestic Facilities Protection

DS is the law enforcement and security arm of the Department and is responsible for providing a safe and secure environment to conduct U.S. foreign policy. The Office of Domestic Facilities Protection (DFP) within DS is responsible for protecting people, information, and property at domestic Department facilities to ensure a secure working environment. According to the Foreign Affairs Manual (FAM), DFP manages the domestic operational security and security support programs.<sup>2</sup> The Uniformed Protection Division within DFP manages the uniformed protective services guard contracts and oversees domestic guard services.<sup>3</sup> DFP is responsible for overseeing the domestic guard services contract.

### Domestic Guard Services Contract

In May 2021, the Department awarded the domestic guard services contract (Contract 19AQMM21C0066) to Inter-Con Security Systems, Incorporated (Inter-Con), which had been awarded the contract continually since 1997.<sup>4</sup> The domestic guard services contract provides a 24-hour guard force to deter unauthorized, illegal, or potentially life-threatening activities directed toward Department employees, visitors, sensitive information, and properties.<sup>5</sup> The domestic guard services contract is a time-and-materials<sup>6</sup> contract with firm-fixed price<sup>7</sup> components for other direct costs including mobile patrol vehicles, cell phones, and a biometric time and attendance (T&A) system. The primary expenses incurred under time-and-materials contracts are labor costs based on fixed hourly rates charged by the contractor. The domestic guard services contract began on October 1, 2021, and has a maximum performance period of

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<sup>1</sup> Domestic security guard contract (19AQMM21C0066) with Inter-Con, from October 1, 2021, through September 30, 2026.

<sup>2</sup> 1 FAM 262.4-3, "Office of Domestic Facilities Protection (DS/DO/DFP)."

<sup>3</sup> 1 FAM 262.4-3 and 1 FAM 262.4-3(A), "Uniformed Protection Division (DS/DFP/UPD)."

<sup>4</sup> Domestic security guard contract (19AQMM21C0066) with Inter-Con.

<sup>5</sup> Ibid.

<sup>6</sup> Federal Acquisition Regulation (FAR) 16.601(b), "Time-and-materials contracts," states that "[a] time-and-materials contract provides for acquiring supplies or services on the basis of- (1) Direct labor hours at specified fixed hourly rates that include wages, overhead, general and administrative expenses, and profit; and (2) Actual cost for materials."

<sup>7</sup> FAR 16.202-1, "Description," defines firm-fixed price as "[a] price that is not subject to any adjustment on the basis of the contractor's cost experience in performing the contract."

5 years (base year plus 4 option years). As of March 2025, the Department paid \$437 million for domestic guard services.

## **Contract Administration and Oversight Responsibilities**

The Federal Acquisition Regulation (FAR), Department of State Acquisition Regulation, and Department policies describe the roles and responsibilities of government personnel who award, administer, and oversee contracts. According to the Foreign Affairs Handbook (FAH), the Contracting Officer (CO) is the U.S. government's authorized agent for working with contractors and has sole authority to solicit proposals and negotiate, award, administer, modify, or terminate contracts.<sup>8</sup> The CO performs duties at the request of the office that requires the contract and relies on that office for technical support concerning the products or services being acquired.<sup>9</sup> The CO may designate, in writing, a Contracting Officer's Representative (COR), who will have limited authority to act on behalf of the CO.<sup>10</sup> COR duties include the following:

- Monitoring the contractor's technical progress and the expenditure of resources relating to the contract.
- Performing inspections and accepting the work on behalf of the U.S. government.
- Resolving technical issues arising under the contract that fall within the scope of the COR's authority and referring any issues that cannot be resolved without additional cost or time to the CO.
- Reviewing and approving the contractor's vouchers or invoices after adequately verifying the costs against documentation.<sup>11</sup>

In addition, the CO may appoint a Government Technical Monitor (GTM) to assist the COR in monitoring contractor performance.<sup>12</sup> The COR and GTM are the critical operational-level monitors of contractor performance in the field and must identify issues requiring the CO's attention.<sup>13</sup> The functions of the COR and GTM are critical to ensuring that the Department only pays for conforming goods and services.<sup>14</sup>

## **Contract Oversight Activities**

According to the FAH, the COR is responsible for developing quality assurance procedures.<sup>15</sup> In addition, according to the FAR, a quality assurance surveillance plan should be prepared and

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<sup>8</sup> 14 FAH-2 H-141(a), "Responsibilities of the Contracting Officer."

<sup>9</sup> Ibid.

<sup>10</sup> 14 FAH-2 H-141(b)(4).

<sup>11</sup> 14 FAH-2 H-142(b)(8), (9), (11), and (15), "Responsibilities of the Contracting Officer's Representative (COR)."

<sup>12</sup> Department of State Acquisition Regulation 642.271(a), "Government Technical Monitor (GTM)."

<sup>13</sup> 14 FAH-2 H-111, "Purpose."

<sup>14</sup> 14 FAH-2 H-114(a), "COR Work Commitments."

<sup>15</sup> 14 FAH-2 H-523(b), "Quality Assurance."

should specify work requiring surveillance and the method of surveillance.<sup>16</sup> DS' Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer (SOP) included a quality assurance surveillance plan to monitor, evaluate, and manage the contractor's performance.<sup>17</sup> The quality assurance surveillance plan detailed various monitoring techniques, including the following:

- Contract Oversight Visits: Random inspections conducted biannually at the Department's domestic facilities in the national capital area and outer regions and annually at passport facilities.
- Access Control Testing: Covert testing for prohibited items and personnel validation in which role players are used to assess the security guards' effectiveness and efficiency in securing federal facilities and protecting employees, classified information, and Department property.
- Training Contract Oversight Visit: Annual review of the contractor-provided training program to assess quality and relevance, as well as effectiveness in meeting the learning needs of the guard force.
- Post Inspections: Inspections that GTMs complete twice daily to ensure contractor compliance with selected sections of the contract, including the performance work statement, special contract requirements, and the guard schedule.
- Biometric Inspections: Daily inspection of the contractor's T&A data to verify that posts are staffed or scheduled in accordance with the contract.
- Invoice Review: Reviews of each invoice to confirm whether the services were provided and acceptable.

## **Biometric Time and Attendance System**

Inter-Con implemented a biometric T&A system in accordance with the domestic guard services contract beginning on November 1, 2021. The T&A system is paperless, allowing individual users to begin and end their shift using a mobile device. In addition, the T&A data is cloud-based and updated in real time, allowing Department officials to ensure that security guards are at post during the scheduled times. Timesheets and invoicing data are automatically created from the T&A data and compared against the guard schedule authorized by the Department.

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<sup>16</sup> FAR 46.401, "General."

<sup>17</sup> The SOP was effective as of October 19, 2022.

## AUDIT RESULTS

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### **Finding A: DS Improved Its Oversight and Administration of the Domestic Guard Services Contract in Response to Prior Audit Findings, but Additional Improvements Are Needed**

OIG found that DS generally administered the domestic guard services contract in accordance with applicable federal and Department standards governing the oversight of contractor performance and invoice processing. Furthermore, DS made a number of improvements to its contract oversight and invoice processing in response to a prior audit that OIG performed in FY 2022, including enhancing documentation related to delegations of authority, establishing and maintaining a COR file, and monitoring contract performance.<sup>18</sup> However, OIG identified additional opportunities for improvement. For example, OIG found that the COR file did not include correspondence with the contractor, non-compliant access control tests were not addressed in accordance with the contract, and invoice reviews were not documented.

These deficiencies occurred, in part, because DS' SOP did not include sufficient guidance related to maintaining correspondence in the COR file, addressing non-compliant access control tests, or performing and documenting invoice reviews. Without a sufficiently detailed SOP, oversight personnel working on the domestic guard services contract may not fully understand their responsibilities in administering and overseeing the contract, which could lead to management failing to achieve its objectives and respond to risk. In addition, without documentary evidence that invoices were reviewed by the COR before approval, the Department will not have reasonable assurance that federal funds were being spent in accordance with contract terms or that the contract recipient performed the required activities. Based on contractual requirements, OIG identified a total of \$6,000 from the invoices of the domestic guard contractor that DS should have deducted for six failed access control tests (i.e., \$1,000 for each failed test). Therefore, OIG considers the \$6,000 to be questioned costs.

#### ***Delegations of Authority and COR Certifications Documented***

The FAR states that COs shall “designate and authorize, in writing and in accordance with agency procedures, a [COR] on all contracts and orders other than those that are firm fixed price.”<sup>19</sup> The Department of State Acquisition Regulation states that COs may designate technically qualified personnel as their authorized representatives to assist in the administration of contracts.<sup>20</sup> In addition, the FAH states that the CO will review “the technical qualifications and the certification status of the [COR] nominee.”<sup>21</sup> If the nominee is approved,

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<sup>18</sup> OIG, *Audit of the Bureau of Diplomatic Security's Oversight of Contractor Performance and Invoice Processing for the Domestic Guard Services Contract* (AUD-SI-22-37, September 2022).

<sup>19</sup> FAR, 1.602-2(d), “Responsibilities.”

<sup>20</sup> Department of State Acquisition Regulation, § 642.270(a), “Contracting Officer's Representative (COR).”

<sup>21</sup> 14 FAH-2 H-143.2(a)(2), “COR Appointment Procedures.” According to 14 FAH-2 H-113(c), “Qualifying as a COR: Federal Acquisition Certification: Contracting Officer's Representative (FAC-COR),” CORs and GTMs establish technical expertise by earning a COR certification that requires relevant training and experience.

the CO prepares a COR delegation memorandum that outlines the scope of the COR's authority to act on behalf of the CO including duties, responsibilities, and prohibitions.<sup>22</sup> Specifically, the COR delegation memorandum must "identify the limitations on the COR's authority" and "specify the contract and the period covered by the designation."<sup>23</sup>

OIG found that the COR, alternate COR,<sup>24</sup> and 16 GTMs had properly authorized delegation of authority memoranda. This is an improvement from the FY 2022 audit, where OIG reported that 2 out of 26 GTMs (7.7 percent) did not have properly authorized delegation of authority memoranda.<sup>25</sup>

### ***COR File Established and Maintained but Incomplete***

According to the FAH, the COR must maintain a file for each contract.<sup>26</sup> The purpose of the COR file is to provide easy access to technical contract information and work progress and to ease the transition to a new COR, if one is appointed.<sup>27</sup> In addition, the FAH requires CORs to maintain a COR file containing pertinent details and information about the contract, including the following:

- COR's designation of authority memorandum
- Procurement package
- Solicitation (and any amendment to it)
- Technical and cost proposals from the winning contractor
- Contractor's work plan
- Contract and all modifications to it
- Correspondence and synopses of telephone calls to and from the contractor
- Interim and final technical reports
- Documentation of acceptability of deliverables
- Documentation of on-site visit results
- Memoranda regarding period performance affecting payment
- Copies of all invoices<sup>28</sup>

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<sup>22</sup> 14 FAH-2H-143.2(a)(2), "COR Appointment Procedures."

<sup>23</sup> 14 FAH-2H-143.2(a)(3)(a and b).

<sup>24</sup> The alternate COR assists the COR with contract administration duties, including establishing and maintaining COR files, monitoring and inspecting Inter-Con's progress and performance, and reviewing and approving invoices.

<sup>25</sup> AUD-SI-22-37, page 6.

<sup>26</sup> 14 FAH-2 H-517(a), "Standard Contracting Officer's Representative (COR) Working File," and 14 FAH-2 H-142(b)(16), "Responsibilities of the Contracting Officer's Representative (COR)."

<sup>27</sup> 14 FAH-2 H-517(a).

<sup>28</sup> 14 FAH-2 H-517(a).

Further, DS' SOP specifies that all email or chat communications, including communication where technical guidance regarding contract performance to be undertaken is discussed, must be included in the file.<sup>29</sup>

OIG found that the COR established and generally maintained a COR file in accordance with federal and Department standards. Specifically, the COR file included the COR's designation of authority memorandum, the procurement package, the solicitation and amendments to it, technical and cost proposals from the winning contractor, the contract and all modifications to it, interim technical reports, documentation of acceptability of deliverables, documentation of on-site visit results, memoranda regarding periodic performance affecting payment, and copies of all invoices. This is an improvement from the FY 2022 audit, where OIG reported the assigned COR did not properly establish or maintain a COR file.

Although OIG found that the COR file reviewed for this audit generally complied with requirements, it did not include key correspondence with the contractor. For example, the COR file did not include documentation related to actions taken by the COR to address contract non-compliance or changes to the billing cycle. In some instances, correspondence was maintained in individual email accounts that was available upon OIG request. However, in other cases, the DS official communicated via telephone or in person, and the DS official did not document the meeting as required. Although the COR stated that DS was developing a process to ensure that DS maintains email communication with contractors in the COR file, additional guidance is needed to ensure that copies of relevant correspondence (including e-mails) and records of conversations (including phone calls and in-person meetings) with the domestic guard services contractor are included in the COR file.

### ***Contract Oversight Activities Designed and Implemented***

According to the FAH, contractors are primarily responsible for contract performance, but the CO and COR have an interest in monitoring contractor performance.<sup>30</sup> The COR is responsible for developing quality assurance procedures, verifying whether the services conform to contract quality requirements, and maintaining quality assurance records.<sup>31</sup> The COR can monitor the contractor's work through inspections, including spot checks, scheduled inspections, random sampling of routine functions, contract monitoring and user reports, and periodic review of a contractor's quality control program.<sup>32</sup>

OIG found that DS designed and implemented a quality assurance program to oversee domestic guard services contract performance in accordance with federal and Department standards. Furthermore, DS described the quality assurance program that it designed in the SOP. To assist with the implementation of the program, DS created standardized forms that were intended to be used to record oversight activities. In addition, OIG found that DS implemented its quality

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<sup>29</sup> DS SOP IV (C)(3)(f), "Other Correspondence/Memo for Records."

<sup>30</sup> 14 FAH-2 H-521(a), "Elements of Contract Administration."

<sup>31</sup> 14 FAH-2 H-523(b).

<sup>32</sup> 14 FAH-2 H-522.1(c), "Progress or Status Reports."

assurance program for the domestic guard contract by using various monitoring techniques to verify whether domestic guard services conformed to contract quality requirements, including contract oversight visits, access control testing, and spot checks. This is an improvement from the FY 2022 audit, where OIG reported the CORs and GTMs monitored contractor performance for the domestic guard services contract inconsistently and in an ad hoc manner.<sup>33</sup>

#### *Contract Oversight Visits*

OIG found that DS designed a process for domestic guard contract oversight visits. According to the SOP, GTMs should complete domestic guard contract oversight visits at each building location at least annually. In addition, GTMs should complete a checklist, post inspection form, and a summary of each visit in a trip report. Using the checklist, the GTM should indicate whether the contractor is compliant with various contract requirements at each location. For example, the GTM should determine whether personnel at each location are properly equipped in accordance with the contract and whether the contractor has prepared and supplied orders for each post at the location. Using the post inspection form, GTMs are supposed to indicate whether each post at the location and each guard at the post are meeting contract requirements. For example, GTMs should determine whether post logbooks are completed and whether the guard at each post is properly conducting access control activities. The GTMs should prepare a trip report including a summary of the contract oversight visit, any concerns that were noted in the checklist or post inspection forms, and conversations with contractor personnel to address identified concerns. The alternate COR provided a completed post inspection tracker, a post inspection results spreadsheet, and a completed trip report to document the implementation of the domestic guard contract oversight visit process.

#### *Access Control Testing*

OIG found that DS designed a plan for access control testing, including covert testing for prohibited items and personal validation.<sup>34</sup> DS initially implemented access control testing in September 2024. OIG found that DS performed 12 access control tests at 6 different domestic Department facilities from September 2024 to March 2025. According to the alternate COR, DS anticipates that it will test a few times each month; however, at the time of this audit, DS was still refining and codifying its formal process for access control testing. The results of access control tests are recorded in DS' access control testing form, which includes the type of test and prohibited item used, as well as whether the guard was compliant or not compliant.

#### *Spot Checks*

OIG found that DS designed a process for spot checking the contractor's implementation of requirements included in the domestic guard services contract. Spot checks are a supplemental method of monitoring contractor performance that may be used when a GTM identifies a deficiency, observation, or contractor behavior requiring corrective action outside of a formal

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<sup>33</sup> AUD-SI-22-37, page 7.

<sup>34</sup> DS would have employees "role play" a situation to assess the security guards' effectiveness and efficiency in preventing unauthorized access to the Department's domestic facilities.

post inspection. DS implemented the spot-checking process in January 2025. OIG found that DS performed 21 spot checks from January to March 2025. The results of spots checks are recorded in DS' GTM spot check form, which includes the post, the name of the guard, contractual discrepancies, and any actions taken to resolve concerns.

***Poor Contractor Performance Generally Addressed but Changes Needed***

According to the FAH, the CO and COR have an interest in monitoring contractor performance because unsatisfactory performance may jeopardize a program.<sup>35</sup> CORs' responsibilities for administering contracts include ensuring contractors perform the required work, as well as documenting and keeping the CO apprised of unsatisfactory performance.<sup>36</sup> COs' responsibilities include resolving issues of unsatisfactory performance.<sup>37</sup> A COR can monitor the contractor's work through inspections.<sup>38</sup> The domestic guard services contract states that a negative incentive, expressed as a deduction to the invoice, should be levied for each instance of unacceptable performance, including a deduction of \$1,000 that should be levied for every instance the contractor does not prevent unauthorized access.<sup>39</sup>

OIG found that DS generally addressed poor contractor performance related to the domestic guard contract in accordance with Department standards. For example, DS documented actions taken to resolve poor performance identified during post inspections, spot checks, and biometric inspections. In addition, DS documented actions taken to address an incident that involved a missing set of keys to Department facilities that was not immediately reported. Specifically, guards involved were demoted, terminated, and suspended. Also, a GPS location system was added to track all key rings. Further, DS documented actions taken to address a security breach that involved allowing an unidentified foreign national unescorted access to a Department facility. Specifically, guards were demoted and terminated.

However, DS did not provide OIG documentation that demonstrated actions had been taken to resolve non-compliant access control tests. Of the 12 access control tests performed between September 2024 to March 2025, there were 6 identified instances of non-compliance. Specifically, DS officials identified guards who failed to identify and prevent facility access to "role players" armed with four firearms, an edged weapon, and one magazine loaded with firearm ammunition. The COR stated that DS officials verbally communicated the results of access control tests to the contractor and the security guards involved immediately following the tests. For one instance of non-compliance, a DS official provided OIG with a document that the contractor had completed that recommended a suspension for the security guard involved. However, DS could not demonstrate that the recommendation was accepted or that the suspension was implemented. Additionally, the COR and alternate COR stated that invoice

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<sup>35</sup> 14 FAH-2 H-521(a).

<sup>36</sup> 14 FAH-2 H-511, "Administration;" 14 FAH-2 Exhibit H-513, "Contract Administration Responsibilities of the Contracting Officer's Representative (COR) and the Contracting Officer (CO)."

<sup>37</sup> 14 FAH-2 Exhibit H-513.

<sup>38</sup> 14 FAH-2 H-522.1(c).

<sup>39</sup> Domestic security guard contract (19AQMM21C0066) with Inter-Con, Attachment 02, page 2.

deductions were not levied against the contractor for non-compliant access control tests as required by the contract because DS had only implemented the process in September 2024, and DS continued to formalize detailed procedures for implementing the tests. However, based on the contract's negative incentive requirements, DS should have deducted \$6,000 from the invoices of the domestic guard contractor (i.e., \$1,000 for each of six failed tests). Therefore, OIG considers the \$6,000 in invoice deductions related to six non-compliant access control tests during the audit period to be questioned costs.<sup>40</sup>

***Invoice Processing Improved, but Invoice Reviews Were Not Documented***

According to the FAH,<sup>41</sup> the COR is responsible for reviewing and approving the contractor's invoices after adequately verifying the costs against supporting documentation. The FAM states that "supporting documentation is required to ensure that all payments are authorized, accurate, legal, correct, and that the goods were actually received or services actually performed."<sup>42</sup> In addition, the domestic guard services contract required the contractor to transition from handwritten T&A reports to an electronic biometric T&A system.<sup>43</sup>

OIG found that the contractor implemented a biometric T&A system in accordance with the contract, which allowed DS officials to review invoices in a more efficient and effective manner. T&A system data are cloud-based and updated in real time, allowing DS officials to perform daily oversight of time charged to ensure that security guards are at post during scheduled times. In addition, invoice data are automatically pulled from the T&A system, decreasing the likelihood of invoicing errors and allowing DS officials to efficiently perform a comprehensive invoice review prior to approving invoices for payment.

OIG reviewed the labor hours worked for 10 employees<sup>44</sup> from each of 3 paid invoices<sup>45</sup> dated from December 6, 2021, to May 1, 2024, to determine whether documentation was sufficient to support the approval for payment. OIG found that the 30 employees' timesheets selected for review reconciled to the 2,391 hours billed on the invoices. Furthermore, for the 3 invoices, OIG verified that all of the 38 fixed hourly rates charged in the invoices for the employees matched the rates permitted by the contract. However, OIG also found that DS officials did not maintain records to demonstrate that invoice reviews had been performed for the invoices that OIG

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<sup>40</sup> 2 Code of Federal Regulations § 200.1, "Questioned cost," defines questioned cost as an amount, expended or received from a Federal award, that in the auditor's judgment is noncompliant or suspected noncompliant with Federal statutes, regulations, or the terms and conditions of the Federal award; at the time of the audit, lacked adequate documentation to support compliance; or appeared unreasonable and did not reflect the actions a prudent person would take in the circumstances.

<sup>41</sup> 14 FAH-2 H-142(b)(15).

<sup>42</sup> 4 FAM 423.4-3(A), "Purpose and Scope."

<sup>43</sup> OIG's prior audit (AUD-SI-22-37, page 8) found that the supporting documentation for one invoice contained over 3,000 handwritten pages of T&A reports.

<sup>44</sup> In addition to security guards, numerous other Inter-Con employees, such as site supervisors and armorers, worked on the domestic guard services contract.

<sup>45</sup> Appendix A provides details of the sample selection.

reviewed for this audit. Although the COR provided OIG with a demonstration of how they perform an invoice review, including the specific steps that DS staff use in the T&A system to verify the invoice billed hours, additional guidance is needed to ensure CORs formally document the invoice reviews verifying that all payments are authorized and correct. This is a significant improvement from the FY 2022 audit, where OIG reported that DS did not perform adequate invoice reviews and did not have sufficient supporting documentation to justify invoice approval.<sup>46</sup> In addition, the FY 2022 audit identified numerous errors during OIG's invoice review, including incorrect numbers of hours worked and lack of approval for overtime.<sup>47</sup>

### ***Incomplete Standard Operating Procedures***

Although DS improved its internal controls since the FY 2022 audit, DS could make additional improvements to internal controls to further strengthen the administration and oversight of the domestic guard contract. Specifically, OIG concluded that the deficiencies identified during this audit occurred because DS' SOP needs additional guidance to achieve desired outcomes. For example, the SOP indicated that communication with the contractor must be maintained in the COR file but did not specify a method to ensure that relevant emails, phone conversations, and in-person communication were documented in the COR file. In addition, the SOP stated that the COR should collaborate with the contractor to resolve deficiencies identified during access control testing but did not include a process to notify the contractor about non-compliant tests or resolve the deficiencies identified during testing in accordance with the contract. Furthermore, the SOP did not require documentation of the invoice reviews that the DS official performed. In addition, although the SOP included instructions on the invoice review process, the instructions did not describe the full scope of the activities involved. Specifically, the COR demonstrated what they considered to be a comprehensive invoice review process; however, the process that the COR demonstrated was more extensive than what was described in the SOP and included specific steps that the SOP's general instruction did not capture.

After OIG identified these issues, on August 28, 2025, DS officials updated the SOP to include a process for addressing failed access control tests. The updated process for addressing failed access control tests includes notifying the contractor in writing about the issue, requiring the contractor to provide a remediation plan, reviewing and approving the remediation plan, and escalating with the CO if the contractor fails to address vulnerabilities in the agreed-upon timeline. However, the updated process did not include levying deductions to the invoice for failed access control tests, as required by the contract.

### ***Effect of the Deficiencies***

Without a sufficiently detailed SOP, oversight personnel working on the domestic guard services contract may not fully understand their responsibilities in administering and overseeing the contract, which could lead to management failing to achieve its objectives and ineffectively

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<sup>46</sup> AUD-SI-22-37, page 8.

<sup>47</sup> Ibid.

responding to risk. In addition, until the deficiencies identified in this audit are corrected, the Department will not have assurance that vulnerabilities identified during access control testing have been resolved, which could lead to a failure in DS' responsibility to protect people, information, and property at domestic Department facilities. Furthermore, without documentary evidence that invoices were reviewed before approval, the Department will not have reasonable assurance that federal funds were being spent in accordance with contract terms or that contract recipient performed the required activities. Additionally, OIG is questioning \$6,000 in costs associated with six failed access control tests identified during this audit.

OIG is therefore offering the following recommendations:

**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security modify its Standard Operating Procedures: Contracting Officers Representative, Government Technical Monitor, and Domestic Security Officer to include procedures to ensure that copies of relevant correspondence (including emails) and records of conversations (including phone calls and in-person meetings) with the domestic guard services contractor are included in the Contract Officer's Representative's file.

**Management Response:** DS concurred with the recommendation and stated that it had implemented procedures to capture and retain relevant correspondence between DS and Inter-Con. Specifically, the updated procedures include the establishment of an email account to receive and archive relevant email correspondence. In addition, the procedures require the COR to prepare and transmit a summary of phone calls and in-person communication to the central email account.

**OIG Reply:** Based on DS' concurrence with the recommendation and stated actions, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that DS finalized the updates to its Standard Operating Procedures to include procedures to ensure that copies of relevant correspondence and records of conversations with the domestic guard services contractor are included in the COR's file.

**Recommendation 2:** OIG recommends that the Bureau of Diplomatic Security update its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to formalize a process to address non-compliance identified during access control testing that includes levying invoice deductions as described in the domestic guard services contract. The process should include guidance on documenting the results of actions taken.

**Management Response:** DS concurred with the recommendation, stating that it will update its Standard Operating Procedures to establish a formal process for addressing non-compliance issues identified during access control testing.

**OIG Reply:** Based on DS' concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that DS updated its Standard Operating Procedures to formalize a process to address non-compliance identified during the access control testing.

**Recommendation 3:** OIG recommends that the Bureau of Diplomatic Security revise its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to detail the specific processes its Contracting Officer's Representatives should use to perform invoice reviews, including documenting the invoice review in the Contracting Officer's Representative's file.

**Management Response:** DS concurred with the recommendation, stating that it had revised its Standard Operating Procedures to establish procedures for COR invoice reviews and documentation. For example, the revised process includes a methodology for selecting and reviewing charges and documentation. Furthermore, the procedures require the COR to maintain an invoice log and discrepancy documentation.

**OIG Reply:** Based on DS' concurrence with the recommendation and stated actions, OIG considers this recommendation resolved pending further action. This recommendation will be closed when OIG receives documentation demonstrating that DS revised its Standard Operating Procedures to detail the specific processes its CORs should use to perform invoice reviews, including documenting the invoice review in the COR's file.

**Recommendation 4:** OIG recommends that the Bureau of Diplomatic Security (1) determine whether the \$6,000 in questioned costs related to domestic guard services (Contract 19AQMM21C0066) for six instances of non-compliance identified during access control tests are allowable and (2) recover any costs determined to be unallowable.

**Management Response:** DS concurred with the recommendation, stating that it reviewed the six instances of non-compliance identified during access control testing. Following its review, DS determined that the instances of non-compliance occurred when the bureau operated the access control testing program as a pilot effort to evaluate the effectiveness of the approach and identify areas requiring procedural refinement. DS stated that it did not levy invoice deductions for instances of non-compliance with access control testing while evaluating the methodology. Based on its review, DS determined that the questioned costs for the six instances of non-compliance were allowable costs.

**OIG Reply:** Based on DS' concurrence with the recommendation and its determination that the questioned costs were allowable (see Appendix B), OIG considers this recommendation closed and no further action is required.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security modify its Standard Operating Procedures: Contracting Officers Representative, Government Technical Monitor, and Domestic Security Officer to include procedures to ensure that copies of relevant correspondence (including emails) and records of conversations (including phone calls and in-person meetings) with the domestic guard services contractor are included in the Contract Officer's Representative's file.

**Recommendation 2:** OIG recommends that the Bureau of Diplomatic Security update its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to formalize a process to address non-compliance identified during access control testing that includes levying invoice deductions as described in the domestic guard services contract. The process should include guidance on documenting the results of actions taken.

**Recommendation 3:** OIG recommends that the Bureau of Diplomatic Security revise its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to detail the specific processes its Contracting Officer's Representatives should use to perform invoice reviews, including documenting the invoice review in the Contracting Officer's Representative's file.

**Recommendation 4:** OIG recommends that the Bureau of Diplomatic Security (1) determine whether the \$6,000 in questioned costs related to domestic guard services (Contract 19AQMM21C0066) for six instances of non-compliance identified during access control tests are allowable and (2) recover any costs determined to be unallowable.

## APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

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The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Diplomatic Security (DS) administered the domestic guard services contract<sup>1</sup> in accordance with applicable federal and Department of State (Department) standards governing the oversight of contractor performance and invoice processing.

OIG conducted this audit from April 2025 to February 2026 in the Washington, DC, metropolitan area. The issuance of this report was delayed due to the lapse in appropriations, which began October 1, 2025, and ended November 12, 2025. The scope of the audit was the administration and oversight of DS' domestic guard services contract 19AQMM21C0066 with Inter-Con Security Systems, Incorporated, (Inter-Con) from May 26, 2021, to March 31, 2025. OIG conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

To obtain background information, including criteria, OIG researched and reviewed federal laws and regulations, as well as policies related to the Department's domestic guard services contract. Specifically, OIG reviewed the Foreign Affairs Handbook, Foreign Affairs Manual, Federal Acquisition Regulation, and DS' Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer. In addition, OIG interviewed DS and Inter-Con personnel. Further, OIG reviewed and analyzed documentation including the domestic guard services contract and related modifications.

Additionally, OIG reviewed the Contracting Officer's Representative's (COR) file, delegation of authority memoranda, documentation detailing oversight of contractor performance, and a sample of invoices with corresponding supporting documentation. Furthermore, OIG reviewed the results of monitoring activities performed, including post inspections results, spot check results, and access control testing results. OIG also reviewed documentation detailing DS' communication with the contractor related to concerns. Finally, OIG analyzed supporting documentation for expenditures selected for testing and assessed the contract invoice approval process.

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<sup>1</sup> Domestic security guard contract (19AQMM21C0066) with Inter-Con from October 1, 2021, to September 30, 2026.

## **Data Reliability**

### ***Global Financial Management System***

During the audit, OIG used electronically processed data from the Department's Global Financial Management System<sup>2</sup> to select a sample of domestic guard services invoices, which served as the basis for identifying and testing the hours that employees, primarily security guards, worked and invoiced. OIG conducted a data reliability assessment of the information. The audit team interviewed the COR and resource management officials to gain an understanding of the process for generating a list of paid invoices and the invoice review and approval process. OIG performed electronic testing by randomly selecting invoices and verifying the amounts matched Global Financial Management System data. OIG concluded that the data were sufficiently reliable for the purpose of identifying and selecting a sample of invoices for testing employee<sup>3</sup> hours included on those invoices.

### ***Time and Attendance System***

OIG used electronically processed data from Inter-Con's time and attendance system to reconcile employee hours included on sampled invoices to timesheets. OIG conducted a data reliability assessment of the information. The audit team interviewed the COR, alternate COR, and personnel from Inter-Con and received a demonstration of the time and attendance software to understand the system and its capabilities, including system controls. The team obtained documentation on the time and attendance software. The team performed electronic testing by selecting employees from a sample of invoices and tracing the hours to timesheets. All employees' hours reconciled without exception. Based on this work, OIG concluded that the data were sufficiently reliable for the purpose of verifying labor costs included on invoices, including whether the invoiced hours reconciled to the hours recorded in Inter-Con's time and attendance system.

## **Work Related to Internal Control**

During the audit, OIG considered a number of factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on its consideration, OIG determined that internal control was significant for this audit. OIG then considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*<sup>4</sup> to identify internal controls that were significant to the audit objective. Considering internal control in the context of a comprehensive internal control framework can help auditors determine whether underlying internal control deficiencies exist.

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<sup>2</sup> The Global Financial Management System is the Department's accounting system of record that processes all domestic accounting data.

<sup>3</sup> In addition to security guards, numerous other Inter-Con employees, such as site supervisors and armorers, worked on the domestic guard services contract.

<sup>4</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

For this audit, OIG concluded that three of five internal control components from the *Standards for Internal Control in the Federal Government*—Control Environment, Control Activities, and Monitoring—were significant to the audit objective. The Control Environment component is the foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity’s information system. The Monitoring component relates to activities management establishes and operates to assess the quality of performance over time and promptly resolve the findings of audits and other reviews. In addition, OIG concluded that four of the principles related to the selected components were significant to the audit objective, as described in Table A.1.

**Table A.1: Internal Control Components and Principles Identified as Significant**

<b>Components</b>	<b>Principles</b>
Control Environment	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives.
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
Monitoring	Management should remediate identified internal control deficiencies on a timely basis.

**Source:** OIG-generated from an analysis of internal control components and principles from the Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

OIG then reviewed criteria, interviewed Department officials, and reviewed contract documentation to obtain an understanding of the internal controls related to the components and principles identified as significant for this audit. OIG assessed the design and implementation of key internal controls. Specifically, OIG:

- Obtained and reviewed delegation letters for the Contracting Officer, CORs, and Government Technical Monitors to establish whether responsibility was assigned and authority was delegated.
- Reviewed Department policies and procedures to determine whether control activities were designed for contract administration.
- Reviewed supporting documentation for selected invoices to determine whether invoices were properly supported and reviewed prior to approval.
- Reviewed and assessed documentation detailing oversight of contractor performance.
- Reviewed and assessed contract documentation to determine the extent to which DS addressed contract non-compliance.

Internal control deficiencies identified during the audit that are significant within the context of the audit objective are presented in the Audit Results section of this report.

## Sampling Methodology

The sampling objective was to select invoices for testing to determine whether documentation was sufficient to support the approval for payment. OIG used nonstatistical sampling with a simple random sampling design to select 30 employees from 3 randomly selected invoices. Specifically, OIG selected a sample of employees associated with Inter-Con invoices that were paid between December 2021 and March 2025, to reconcile the employees’ hours worked and invoiced to timesheets. OIG selected 10 employees from each of the 3 invoices for a total of 30 different employees for review.

### Invoice Selection Methodology

OIG obtained a list of 437 invoices from the Department related to the domestic guard services contract that were paid between December 2021 and May 2025. OIG did not consider any invoices valued at less than \$25,000 to reduce the chance that a selected invoice would include only non-labor costs. The invoices valued at less than \$25,000 accounted for less than 1 percent of the contract value. In addition, OIG excluded 14 invoices that the Department provided that were outside OIG’s scope period. Of the remaining 343 invoices, OIG randomly selected 3 invoices for testing.<sup>5</sup>

### Employee Selection Methodology

OIG used a random sampling design to select 10 employees from each of the 3 invoices as shown in Table A.2.

**Table A.2: Number of Employees Selected**

Number	Invoice Number	Number of Employees	
		Included in Invoice	Employees Selected
1	BD0064037	945	10
2	BD0090268	42	10
3	BD0316620	18	10
<b>Total</b>		<b>1,005</b>	<b>30</b>

Source: OIG-generated based on data obtained from invoices from DS.

## Prior Office of Inspector General Reports

In September 2022, OIG reported<sup>6</sup> that the Department did not administer the domestic guard services contract in accordance with applicable federal and Department standards. Specifically, OIG found an incomplete COR file, lack of delegations of authority for two Government Technical Monitors, and inconsistent monitoring. For example, the COR file did not include a copy of the contract or its modifications, a complete list of personnel assisting the COR, and

<sup>5</sup> OIG considered its time and resource constraints when determining sample size to review.

<sup>6</sup> OIG, *Audit of the Bureau of Diplomatic Security’s Oversight of Contractor Performance and Invoice Processing for the Domestic Guard Services Contract* (AUD-SI-22-37, September 2022).

copies of all invoices. In addition, OIG found inadequate invoice reviews that lacked supporting documentation to justify invoice approval. Moreover, OIG reviewed supporting documentation for three invoices and found numerous issues, including mathematical errors, incorrect numbers of hours worked, and lack of approval for overtime. OIG made six recommendations, all of which have been implemented and closed.

## APPENDIX B: BUREAU OF DIPLOMATIC SECURITY RESPONSE

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United States Department of State

Washington, D.C. 20520

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April 8, 2026

### Info Memo for Arne B. Baker, Acting – OIG

FROM: DS – Todd M. Wilcox

OW

SUBJECT: Bureau of Diplomatic Security (DS) Responses to the Office of Inspector General (OIG) Audit of the Bureau of Diplomatic Security's Oversight of Contractor Performance and Invoice Processing for the Domestic Guard Services Contract

Below are the Bureau of Diplomatic Security (DS) responses to recommendations 1-4 of the subject report.

**Recommendation 1:** OIG recommends that the Bureau of Diplomatic Security modify its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to include procedures ensuring copies of relevant correspondence, including emails, and records of conversations, including phone calls and in-person meetings with the domestic guard services contractor, remain in the Contracting Officer's Representative (COR) file.

**DS Response 04-08-2026:** The Bureau of Diplomatic Security (DS) concurs with this recommendation. DS implemented procedures to capture and retain relevant contract correspondence within the COR file. The updated procedures establish a contract correspondence email account used to archive communications related to contract performance and administration.

Under this process, relevant communications with the contractor include the contract correspondence email account on all email exchanges. This ensures communications remain centrally captured and preserved for contract administration purposes.

For verbal communications, including phone calls and in-person discussions, the COR prepares a brief summary of the discussion and transmits the summary to the contract correspondence email account. This ensures documentation of key discussions affecting contract performance remains preserved.

On a monthly basis, correspondence maintained within the contract correspondence email account is collected and incorporated into the COR file to maintain a complete administrative record of contract-related communications. This procedure ensures contract oversight documentation remains available for contract administration reviews and audits.

**Recommendation 2:** OIG recommends that the Bureau of Diplomatic Security update its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to formalize a process to address non-compliance identified during access control testing, including levying invoice deductions described in the domestic guard services contract. The process should include guidance on documenting results of actions taken.

**DS Response 04-08-2026:** The Bureau of Diplomatic Security (DS) concurs with this recommendation. DS will update the applicable Standard Operating Procedures to establish a formal process for addressing non-compliance identified during access control testing. The updated procedures will outline steps for identifying, documenting, and elevating instances of non-compliance and coordinating with the Contracting Officer regarding potential remedies permitted under the contract.

The revised procedures will also include guidance for documenting testing results, corrective actions taken, and any contract remedies applied, including invoice deductions where appropriate and authorized under the contract.

**Recommendation 3:** OIG recommends that the Bureau of Diplomatic Security revise its Standard Operating Procedures: Contracting Officer's Representative, Government Technical Monitor, and Domestic Security Officer to detail the specific processes CORs should use to perform invoice reviews, including documenting the invoice review within the COR file.

**DS Response 04-08-2026:** The Bureau of Diplomatic Security (DS) concurs with this recommendation. DS revised the Standard Operating Procedures (SOPs): Contracting Officer's Representative (COR), Government Technical Monitor (GTM), and Domestic Security Officer to establish standardized procedures for COR invoice review and documentation.

The updated SOP requires CORs to review invoices and record payment recommendations within the Invoice Processing Platform (IPP), which captures the COR identity, approval date, invoice number, invoice amount, and approval action.

The SOP defines a consistent review methodology. CORs must verify that services occurred during the billed period, that charges align with contract requirements and CLINs, and that supporting documentation substantiates billed services. CORs review labor using a four (4) to five (5) day sampling method per invoice period, providing approximately 30 percent coverage, and review 100 percent of labor and supporting documentation for the selected days. High-risk items, including A&E labor and prior discrepancies, are reviewed in full.

The SOP also requires CORs to document the review by highlighting all records associated with the selected sample days and maintaining a COR file with an invoice log and discrepancy documentation.

These updates establish clear, repeatable procedures and ensure invoice review actions are documented within IPP and the COR file in accordance with FAR recordkeeping requirements.

**Recommendation 4:** OIG recommends that the Bureau of Diplomatic Security (1) determine whether the \$6,000 in questioned costs related to domestic guard services under Contract 19AQMM21C0066 for six instances of non-compliance identified during access control tests are allowable and (2) recover any costs determined to be unallowable.

**DS Response 04-08-2026:** The Bureau of Diplomatic Security (DS) concurs with the intent of this recommendation. However, DS reviewed the six instances of non-compliance identified during access control testing associated with Contract 19AQMM21C0066. These events occurred during the initial implementation phase of the access control testing program, when the Bureau was validating testing procedures and confirming the reliability of the testing methodology.

During this period, the program operated as a pilot effort to evaluate the effectiveness of the testing approach and identify areas requiring procedural refinement. Because the testing process remained under evaluation, DS did not levy invoice deductions while the system and methodology were being validated.

Based on this review, DS determined the questioned costs remain allowable. The Bureau subsequently refined the access control testing program and established

procedures to address non-compliance and apply contract remedies when appropriate.

**Attachments**

- Tab 1 – Draft Domestic Guard Services Contract Report
- Tab 2 – Transmittal Memo
- Tab 3 – COR Invoices
- Tab 4 – Updated SOP Language for Recommendation 1
- Tab 5 – Updated SOP Language for Recommendation 3

Approved: DS – Todd M. Wilcox, A/S

[NW]

Analyst: DS/MGT/PPD – Cierra Edwards, Policy Analyst/Volume  
Coordinator, (b) (6) @state.gov, (b) (6) Teams)

Cleared:

Bureau	Name	Clearance Status
DS/DSS	Nicholas Collura	OK
M:	Jeremy Holliman	OK
M/EX:	Charles Hall	OK
GA/AP	Rachel Gaspard	OK
GA/AM	Mark Motta	OK

## ABBREVIATIONS

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CO	Contracting Officer
COR	Contracting Officer's Representative
DFP	Office of Domestic Facilities Protection
DS	Bureau of Diplomatic Security
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAR	Federal Acquisition Regulation
GTM	Government Technical Monitor
OIG	Office of Inspector General
T&A	time and attendance

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