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Office of Inspector General
United States Department of State

AUD-GEER-25-11

Office of Audits

March 2025

Audit of the Trans-Sahara Counterterrorism Partnership Program

GLOBAL EMERGENCIES AND EMERGING RISKS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
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What OIG Audited

Established in 2005, the Department of State (Department) Trans-Sahara Counterterrorism Partnership (TSCTP) program is intended to be a whole-of-government approach to combating terrorism and violent extremism in North and West Africa by balancing security activities with diplomatic and developmental efforts to address political, socioeconomic, governance, and developmental challenges. The TSCTP Program Act of 2022 (TSCTP Act) was enacted by Congress in March 2022 and required the development of a comprehensive 5-year strategy for TSCTP program counterterrorism efforts (TSCTP strategy).

The Office of Inspector General (OIG) conducted this audit to determine whether the Department (1) planned and executed an effective TSCTP strategy in accordance with the TSCTP Act and applicable guidance and (2) implemented appropriate modifications in the execution of the TSCTP program to advance performance monitoring, evaluation, and the reporting of TSCTP results.

What OIG Recommends

OIG made four recommendations in this report to improve the development and implementation of the comprehensive TSCTP strategy and to promote TSCTP program leadership and accountability. Based on the Department's response to a draft of this report, OIG considers all the recommendations offered resolved, pending further action. A synopsis of the Department's comments and OIG's reply follow each recommendation in the Audit Results section of this report. The Department's response to a draft of this report is reprinted in its entirety in Appendix B.

March 2025

OFFICE OF AUDITS

GLOBAL EMERGENCIES AND EMERGING RISKS

Audit of the Trans-Sahara Counterterrorism Partnership Program

What OIG Found

The Department provided a TSCTP strategy to Congress that did not fully address required elements specified in the TSCTP Act and in the Department's Foreign Affairs Manual (FAM). In addition, OIG found that the TSCTP strategy did not fully incorporate applicable guidance from the Foreign Assistance Act of 1961. OIG determined that the TSCTP strategy was incomplete, in part, because the Department did not formally designate and authorize a bureau or office to lead the planning, development, and execution of the TSCTP program. Moreover, the TSCTP strategy was incomplete because it was submitted to Congress without the required approval from the Department's Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and Office of Foreign Assistance, which serves as the Department's mandatory clearing office for any strategy documents that qualify with the standards and requirements listed in 18 FAM 301.2, "Department of State Strategic Planning."

OIG determined that the incomplete TSCTP strategy limited the Department's ability to execute a coordinated, whole-of-government approach to combating terrorism and violent extremism in North and West Africa. Furthermore, due to the incomplete TSCTP strategy, OIG was unable to determine whether the Department made performance monitoring, evaluation, and reporting improvements to the TSCTP program. Similarly, missing elements from the TSCTP strategy prevented OIG from determining whether TSCTP program foreign assistance projects were achieving their objectives and contributing to the overarching desired results of the TSCTP program. Until the Department incorporates all required elements and guidance in the TSCTP Act, FAM, and Foreign Assistance Act of 1961 into the TSCTP strategy, the Department will remain ill-equipped to effectively advance security, diplomatic, and developmental counterterrorism goals in North and West Africa.

CONTENTS

| | |
|--|----|
| OBJECTIVE | 1 |
| BACKGROUND | 1 |
| The TSCTP Program: Countering Terrorism and Violent Extremism in North and West Africa . | 1 |
| The TSCTP Act..... | 3 |
| Department Strategic Planning Guidance..... | 5 |
| Foreign Assistance Act of 1961 | 7 |
| Prior OIG Reporting on the TSCTP Program..... | 8 |
| AUDIT RESULTS | 8 |
| Finding A: The Department’s TSCTP Strategy Is Incomplete and Needs Improvement | 8 |
| RECOMMENDATIONS | 24 |
| APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY | 25 |
| Data Reliability | 26 |
| Work Related to Internal Control..... | 26 |
| Prior Office of Inspector General Reports..... | 28 |
| APPENDIX B: DEPARTMENT OF STATE RESPONSE | 30 |
| ABBREVIATIONS | 34 |

OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department) (1) planned and executed an effective Trans-Sahara Counterterrorism Partnership (TSCTP) strategy in accordance with the TSCTP Program Act of 2022¹ (TSCTP Act) and applicable guidance and (2) implemented appropriate modifications in the execution of the TSCTP program to advance performance monitoring, evaluation, and the reporting of TSCTP results.

BACKGROUND

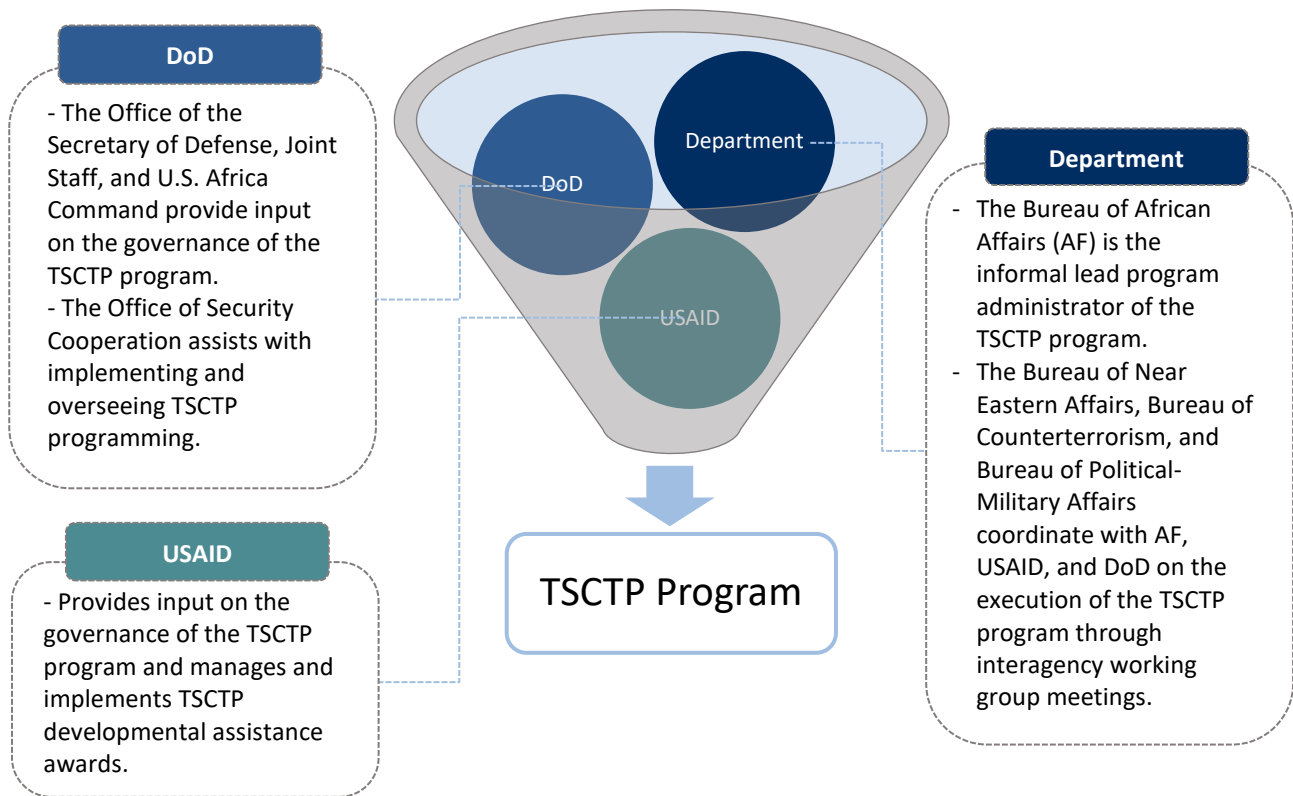
The TSCTP Program: Countering Terrorism and Violent Extremism in North and West Africa

Terrorism and the spread of violent extremism pose significant threats to U.S. national security and foreign policy interests, U.S. partners and allies' interests, and overall stability and prosperity in North and West Africa, a region frequently known as the Sahel-Maghreb. According to the Department, terrorist groups primarily aligned with al-Qa'ida and the Islamic State of Iraq and Syria (ISIS) operating in the Sahel-Maghreb have attacked civilians, civilian infrastructure, humanitarian workers, military outposts, civil servants, politicians, religious institutions, and schools.²

The TSCTP program was established in 2005 as a whole-of-government approach implemented jointly by the Department, the U.S. Agency for International Development (USAID), and the Department of Defense (DoD) to build counterterrorism capacity, improve regional coordination, and address the underlying drivers of radicalization in the Sahel-Maghreb. Figure 1 illustrates the general roles of participating agencies in the TSCTP program.

¹ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

² According to the Department, groups operating in the Sahel and Lake Chad regions include al-Qa'ida in the Islamic Maghreb, the al-Qa'ida-affiliated Jama'at Nusrat al-Islam wal-Muslimin, ISIS-Sahel, ISIS-West Africa, and Boko Haram.

Figure 1: TSCTP Whole-of-Government Approach

Source: OIG-generated based on TSCTP information obtained from AF.

According to the Bureau of African Affairs (AF), through the TSCTP program, the Department provides foreign assistance to countries in the Sahel-Maghreb to develop and enhance counterterrorism capabilities; investigative capacities; and operational mechanisms of civilian law enforcement, military, judicial sector, border security, and management entities. “These efforts placed emphasis on supporting entities to detect, disrupt, respond to, and prosecute Violent Extremist Organizations (VEO), while respecting human rights.”³

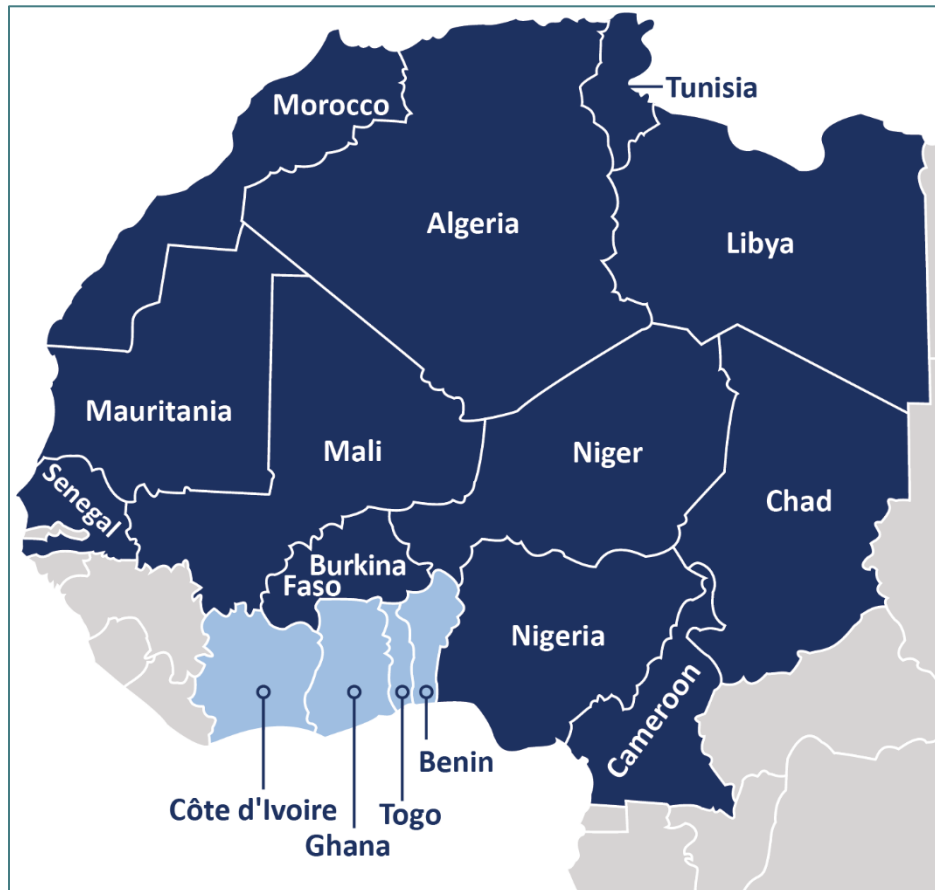
TSCTP Program Partner Countries

From FY 2021 through FY 2023, the Department provided approximately \$157 million in TSCTP program assistance to partner and non-partner countries.⁴ Partner countries that received assistance through the TSCTP program included Algeria, Burkina Faso, Cameroon, Chad, Libya, Mali, Mauritania, Morocco, Niger, Nigeria, Senegal, and Tunisia. According to the Department, TSCTP program assistance also supported the non-partner countries of Benin, Côte d’Ivoire, Ghana, and Togo, which have been affected by terrorist groups operating in the Sahel-Maghreb. Figure 2 depicts the partner and non-partner countries.

³ Report on Monitoring and Evaluation of Programs and Activities for the TSCTP Program, Section 104(f) of the TSCTP Act (Division AA of Public Law 107-103), March 2024.

⁴ A TSCTP progress report submitted to Congress in March 2024 designated countries that received TSCTP program assistance as partner or non-partner countries.

Figure 2: Partner and Non-Partner Countries in the TSCTP Program



- Partner Countries That Have Received TSCTP Funding
- Non-Partner Countries That Have Received TSCTP Funding

Source: Generated by OIG based on information obtained from AF.

The TSCTP Act

The TSCTP Act was passed by Congress on March 15, 2022.⁵ The TSCTP Act emphasized the need for a comprehensive and coordinated interagency approach to addressing security challenges in the Sahel-Maghreb; allocating resources and de-conflict programs; and maximizing the effectiveness of U.S. defense, diplomacy, and development.

TSCTP Delegation of Authority

The TSCTP Act originally required the President to establish and coordinate TSCTP programs, projects, and activities in North and West Africa through a coordinated, interagency approach.⁶

⁵ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.





⁶ Ibid.

On August 12, 2022, the President delegated⁷ leadership of the TSCTP program to the Secretary of State.⁸ According to the Foreign Affairs Manual (FAM), the Secretary may redelegate these authorities to officials who are appointed by and with the advice of the Senate.⁹

Five-Year Comprehensive Strategy for TSCTP Program Counterterrorism Efforts

The TSCTP Act also required the development of a 5-year comprehensive strategy for TSCTP program counterterrorism efforts (TSCTP strategy) no later than 180 days after the passage of the TSCTP Act that balances security activities with diplomatic and developmental efforts to address political, socioeconomic, governance, and developmental challenges in the Sahel-Maghreb. In addition, the TSCTP Act required that the TSCTP strategy include four elements, as shown in Table 1.

Table 1: TSCTP Act Requirements for the TSCTP Strategy

| Four Required Elements | |
|---|--|
|  | (A) A clear statement of objectives of United States counterterrorism efforts in North and West Africa with respect to the use of assistance to combat terrorism and counter violent extremism, including efforts (1) to build military and civilian law enforcement capacity, (2) to strengthen the rule of law, (3) to promote responsible and accountable governance, and (4) to address the root causes of terrorism and violent extremism. |
|  | (B) A plan for coordinating programs through the TSCTP program pursuant to subsection (b)(1) including identifying the agency or bureau of the Department, as applicable, that will be responsible for leading and coordinating each program. |
|  | (C) A plan to monitor, evaluate, and share data about the TSCTP program in accordance with the monitoring and evaluation provisions under sections 3 and 4 of the Foreign Aid Transparency and Accountability Act (FATAA) of 2016. ^a |
|  | (D) A plan for ensuring coordination and compliance with related requirements in United States law, including the Global Fragility Act (GFA) of 2019. ^b |

^a FATAA of 2016, Public Law 114-191.

^b Further Consolidated Appropriations Act, 2020, Public Law 116-94, Title V – Global Fragility.

Source: Generated by OIG based on the Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

⁷ Federal Register, 87 FR 51235.

⁸ According to 18 FAM 201.3-2c(2), “Important Points for Developing Delegations of Authority,” if an authority was originally assigned to the President, there must be a delegation of authority from the President to the Secretary or the Department before a Department of State delegation of authority to a Department officer can be assigned.

⁹ 18 FAM 201.3-2c(2).

Department Strategic Planning Guidance

The Department maintains strategic planning guidance and multiple resources, such as monthly and ad hoc meetings of bureau planners and online resources including the Managing for Results (MfR) framework. The MfR monthly meetings, to which all Department and USAID bureau planners are invited, provide regular updates on strategic planning guidance and have covered “Other Department Strategy” (ODS) requirements. The MfR framework includes the MfR Program Design and Performance Management Toolkit (PD/PM Toolkit), which provides guidance, examples, and templates to help Department bureaus, offices, and posts design their activities in a way that effectively advances broader strategic goals, utilizes monitoring and evaluation, and enables learning that can inform future decisions. Furthermore, “it can be used as a manual for creating and executing a new program, or can be employed mid-program to determine if the effort is on track.”¹⁰

According to the Department, MfR framework products and processes are “intended to help bureaus and missions make informed decisions at the strategic and operational levels and achieve improved outcomes through use of rigorous monitoring and evaluation practices.”¹¹ According to the Department’s internal MfR website, the MfR framework is also used to advance U.S. foreign policy objectives and improve the impact of U.S. foreign assistance allocations. It does this through the coordination and integration of Department-wide functions related to strategic planning, budgeting, program design, performance management, evaluation, and learning. Furthermore, the MfR framework emphasizes the continuous refinement and optimization of Department strategies to ensure they achieve desired results. The Department’s Bureau of Budget and Planning (BP) and Office of Foreign Assistance facilitate and oversee the products and processes associated with the MfR framework.

Department guidance in 18 FAM 301.2, “Department of State Strategic Planning,” incorporates the MfR framework and includes relevant authorities and policies, key required elements, and procedures governing the development, implementation, dissemination, and review of Department strategies. The requirements in 18 FAM 301.2 differ based on whether the strategy is designated as a part of the “core” strategic planning process or ODS strategic planning process.

Core Strategies

The Department’s core strategic planning processes take place at the agency, bureau, and country levels. At the agency level, the Department and USAID Joint Strategic Plan outlines overarching goals and objectives, and it guides bureau and mission planning. At the regional and functional bureau level, the Department and USAID Joint Regional and Functional Bureau Strategies guide priority setting and resource allocation. Country-specific strategies, known as Integrated Country Strategies, guide whole-of-government priorities overseas with input from

¹⁰ Department, PD/PM Toolkit, “Toolkit Purpose and Use” page 3.

¹¹ 18 FAM 301.1-1a, “MfR Introduction.”

all members of a mission's country team.¹² Collectively, the Joint Strategic Plan, Joint Regional Strategies, Functional Bureau Strategies, and Integrated Country Strategies are considered the Department's core strategic plans. According to the FAM, the content of strategic plans should be grounded in evidence and analysis, developed collaboratively with stakeholders, sufficiently focused and realistic to facilitate decision-making, and aligned with higher level strategies such as the National Security Strategy and Joint Strategic Plan.¹³

Other Department Strategies

All non-core developed strategies, including those mandated by Congress, are considered ODS. In 2019, the Department issued guidance in the FAM that established ODS development requirements, key elements, and standards that follow the MfR framework.¹⁴ According to ODS guidance, strategies are defined as planning documents that include clear desired results,¹⁵ a hierarchy of goals,¹⁶ subordinate objectives,¹⁷ and associated performance measures.¹⁸ Furthermore, according to the FAM, any products not adhering to these requirements must be called something other than a "strategic plan," such as a "tactical plan" or "operational framework."¹⁹ FAM guidance requires an ODS to include nine key elements as described in Table 2.

¹² A country team is an interagency group made up of the heads of each Department section in the embassy and the heads of the other U.S. government agencies represented at post.

¹³ 18 FAM 301.2-4(A), "Key Elements and Standards for Core Strategy Documents."

¹⁴ 18 FAM 301.2-4(B), "Key Elements and Standards for ODS Documents."

¹⁵ For the purposes of this report, OIG uses the term "desired results" to refer to the highest order outcome or end state to which a program is intended to contribute.

¹⁶ For the purposes of this report, OIG uses the term "goals" to refer to broad, visionary, long-term, and non-resource dependent statements that, if successful, will contribute towards achieving the desired results of a program.

¹⁷ For the purposes of this report, OIG uses the term "objectives" to refer to specific, measurable, achievable, relevant, and time-bound statements that will contribute towards achieving the goal(s) of a program.

¹⁸ 18 FAM 301.2-4(B)a.

¹⁹ 18 FAM 301.2-1c, "Purpose."

Table 2: ODS Requirements**Nine Required Elements Per 18 FAM 301.2-4(B)**

| | |
|--|---|
| | <p>1. Agencies' Roles and Responsibilities: The strategy must include a clear description of the lead and contributing bureaus' and/or agencies' roles and responsibilities.</p> <p>2. Interagency Coordination Mechanisms: The strategy must describe how the strategy was coordinated within the Department and with other departments and agencies.</p> |
| | <p>3. Integration With National, Agency, Regional, and Sectoral Strategies: For example, a strategy focused on a sub-region should be linked to the appropriate Joint Regional Strategy, any applicable functional bureau strategy goals and objectives, and the National Security Strategy and/or the Joint Strategic Plan.</p> <p>4. Expectations for Lower Level Strategies: Expectations for lower level strategies such as country strategies or for operational/tactical plans (i.e., office or component level) that support those strategies.</p> |
| | <p>5. Desired Results: The end state the strategy is expected to achieve.</p> |
| | <p>6. Hierarchy of Goals and Subordinate Objectives: Logical framework that links a strategy's goals, objectives, and/or subordinate activities.</p> <p>7. Activities To Achieve Desired Results: Planned steps and activities to achieve results.</p> |
| | <p>8. Milestones and Performance Indicators: Strategies must include or reference illustrative milestones and/or performance indicators, which may be derived from existing performance management plans already developed by bureaus.</p> |
| | <p>9. Monitoring and Evaluation Plans: Strategies must include a plan to assess progress towards achieving goals and objectives. This component may be part of the actual strategy or referenced and incorporated as a series of follow-on documents that are regularly reviewed.</p> |

Source: Generated by OIG based on 18 FAM 301.2-4(B)b(1).

Foreign Assistance Act of 1961

The Foreign Assistance Act of 1961, as amended, was enacted to promote U.S. foreign policy, security, and the general welfare of the United States by assisting other countries in their efforts to promote development; build economic, political, and social institutions; and improve quality of life.²⁰ The Foreign Assistance Act of 1961 also emphasized that development is primarily the responsibility of countries receiving U.S. foreign assistance and that U.S. foreign assistance is intended to support, not replace, the self-help efforts of these countries.

²⁰ Foreign Assistance Act of 1961, Public Law 87-195.

Prior OIG Reporting on the TSCTP Program

OIG issued two prior reports related to the TSCTP program that contributed to the initiation of this audit. In April 2020, OIG reported²¹ that three TSCTP projects, valued at approximately \$22.8 million, had performance work statements that did not meet Department standards. This led to OIG questioning \$14.6 million spent by the Department. OIG made a total of seven recommendations to improve the development of work statements and to increase subject matter expertise among TSCTP officials. As of November 2023, OIG considered all seven recommendations implemented and closed.

In September 2020, OIG reported²² that AF was not monitoring TSCTP contracts and not ensuring assistance provided to partner countries was being used to build counterterrorism capacity. OIG considered \$201.6 million spent on six contracts as potential wasteful spending due to mismanagement and inadequate oversight. In addition, OIG questioned almost \$109 million because of lack of supporting documentation for invoices. Furthermore, OIG found that AF was not effectively coordinating with stakeholders to execute a whole-of-government approach. OIG made 13 recommendations to improve the monitoring and coordination of TSCTP projects. As of November 2023, 12 recommendations were implemented and closed. One recommendation remained open pending further action.²³

AUDIT RESULTS

Finding A: The Department's TSCTP Strategy Is Incomplete and Needs Improvement

OIG found that the Department provided a TSCTP strategy to Congress that did not fully address the four required elements specified in the TSCTP Act²⁴ and eight of nine related ODS requirements specified in Department FAM guidance.²⁵ In addition, OIG found that the TSCTP strategy did not fully incorporate applicable guidance from the Foreign Assistance Act of 1961.²⁶ OIG determined that the TSCTP strategy was incomplete, in part, because the Department did not formally designate and authorize a bureau or office to lead the planning, development, and execution of the TSCTP program. Moreover, the TSCTP strategy was

²¹ OIG, *Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects* (AUD-MERO-20-29, April 2020).

²² OIG, *Audit of the Department of State Bureau of African Affairs Monitoring and Coordination of the Trans-Sahara Counterterrorism Partnership Program* (AUD-MERO-20-42, September 2020).

²³ OIG recommended that AF establish and implement memoranda of understanding with the Office of Security Cooperation and other partners, as applicable, to describe roles and responsibilities for coordinating, executing, and monitoring TSCTP projects in the countries where TSCTP is implemented, including establishment of a structure for communicating and coordinating in-country.

²⁴ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

²⁵ 18 FAM 301.2-4(B)b(1).

²⁶ Foreign Assistance Act of 1961, Public Law 87-195.

incomplete because it was submitted to Congress without the required approval from the Department’s Strategic Planning and Performance Team. This team, comanaged by BP and the Office of Foreign Assistance, serves as the Department’s mandatory clearing office for any strategy documents that qualify with the standards and requirements listed in 18 FAM 301.2. As a result, the incomplete TSCTP strategy limited the Department’s ability to execute a coordinated, whole-of-government approach to combating terrorism and violent extremism in the Sahel-Maghreb. Furthermore, because of the incomplete TSCTP strategy, OIG was unable to determine whether the Department made performance monitoring, evaluation, and reporting improvements to the TSCTP program. Similarly, missing elements from the TSCTP strategy prevented OIG from determining whether foreign assistance projects were achieving their objectives and contributing to the overarching desired results of the TSCTP program. OIG therefore concludes that until the Department incorporates all required elements and guidance in the TSCTP Act, FAM, and Foreign Assistance Act of 1961 into the TSCTP strategy, the Department will remain ill-equipped to effectively advance security, diplomatic, and developmental counterterrorism goals in the Sahel-Maghreb.

The TSCTP Strategy Did Not Fully Address Requirements in the TSCTP Act, FAM, and Foreign Assistance Act of 1961

Although the Department developed and provided to Congress a TSCTP strategy assisting “partners in West and North Africa to increase their immediate and long-term capabilities to address terrorist threats and counter and prevent the spread of violent extremism while respecting human rights”—including an introduction to the threat of terrorism and violent extremism in the Sahel-Maghreb, goals, and objectives—OIG found that the TSCTP strategy the Department provided to Congress did not include all requirements. Specifically, it did not fully address four key required elements specified in the TSCTP Act,²⁷ eight of nine ODS requirements specified in the FAM,²⁸ or guidance included in the Foreign Assistance Act of 1961.²⁹ In addition, OIG found that the TSCTP strategy was submitted to Congress on November 17, 2022, 67 days after the deadline mandated by the TSCTP Act.³⁰

Goals, Objectives, and Subordinate Activities



The TSCTP Act and FAM require the TSCTP strategy to include a clear statement of goals, objectives, and subordinate activities that are linked through a logical framework to achieve desired results, as previously shown in Tables 1 and 2. In addition, the TSCTP Act states that TSCTP program efforts “shall be coordinated with counterterrorism and counter-extremism activities and programs in the areas of defense,

²⁷ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

²⁸ 18 FAM 301.2-4(B)b(1).

²⁹ Foreign Assistance Act of 1961, Public Law 87-195.

³⁰ The TSCTP Act was passed on March 15, 2022, and required the TSCTP strategy to be submitted to Congress no later than 180 days after the date of the enactment of the TSCTP Act. Therefore, the TSCTP strategy was due to Congress no later than September 11, 2022. Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

diplomacy, and development carried out by other like-minded donors and international organizations in the relevant country.”³¹

According to the PD/PM Toolkit, although the terms “goals” and “objectives” are often used interchangeably, each serves a different purpose. The PD/PM Toolkit states that goals are broad and should be a response to the strategic challenge or purpose of the TSCTP program but may not necessarily be achieved within the timeframe of the program.³² The TSCTP strategy included five goals, as described in Figure 3.

Figure 3: Goals Listed in the TSCTP Strategy



Source: Generated by OIG based on the TSCTP strategy submitted to Congress.

The PD/PM Toolkit states that objectives should be narrower in scope compared to goals, achievable within the timeframe of the program, and inclusive of all SMART principles: specific, measurable, achievable, relevant, and time-bound.³³ Although the TSCTP strategy included five goals, OIG found that the objectives under each of the goals in the TSCTP strategy were not inclusive of all SMART principles. For example, to “build security forces’ capacity in the region to

³¹ Ibid.

³² Department, PD/PM Toolkit, “Develop Program Goals and Objectives” page 28.

³³ Ibid.

conduct intelligence-based operations” was listed as an objective under Goal 1 of the TSCTP strategy. However, this TSCTP objective, and others like it, did not include the SMART principle of being time-bound. In another example, to “improve the interoperability of TSCTP partners and enhance their capability to conduct effective cross-border operations through bilateral and multilateral cooperation” was listed as an objective under Goal 1. This TSCTP objective is not specific, measurable, or time-bound.³⁴

Furthermore, according to the PD/PM Toolkit, activities are defined as measurable actions or steps taken to achieve the program’s goals and objectives.³⁵ Although the TSCTP strategy included goals and objectives, OIG found no link was established in the strategy between the goals, objectives, and day-to-day subordinate activities of Department bureaus and offices, other federal agencies, and other like-minded donors and international organizations involved in TSCTP programming. For example, to “improve governments’ methods for screening travelers at major land, sea, and airports of entry across the region” was listed as an objective under Goal 2. However, the TSCTP strategy does not elaborate on what specific Department foreign assistance project(s) and TSCTP program subordinate activities will support this objective and overarching goal. Similarly, to “strengthen governments’ capacity to identify and protect critical infrastructure through improved threat monitoring and response” was listed as an objective under Goal 3. However, the TSCTP strategy does not identify what specific foreign assistance project(s) and TSCTP program activities will help achieve this objective.

During the audit, OIG requested and obtained from AF a spreadsheet of all TSCTP activities awarded since the date of the enactment of the TSCTP Act. OIG also requested that the spreadsheet include an explanation of how each activity supported TSCTP goals and objectives. AF coordinated with USAID and other Department bureaus to develop and contribute to the spreadsheet. Despite this effort, OIG ultimately found that the provided spreadsheet was missing requested data. Specifically, 33 of 58 activities (approximately 57 percent) in the spreadsheet provided to OIG were missing an explanation of how the activity supports TSCTP goals and objectives. Although the remaining 25 activities were linked to specific goal(s) and objective(s), the explanations did not specifically describe how each activity would support the listed goal(s) and objective(s). An AF official informed OIG that the spreadsheet was incomplete, in part, because they did not receive input from the Bureau of Counterterrorism (CT) and the Bureau of International Narcotics and Law Enforcement Affairs (INL). As a result, OIG was unable to evaluate whether all activities awarded since the date of the enactment of the TSCTP Act aligned with TSCTP goals and objectives included in the TSCTP strategy.

³⁴ According to the PD/PM Toolkit, a specific objective describes the desired result in concrete and clear terms such that anyone reading it should interpret it in the same way. Similarly, a measurable objective can be evaluated and/or assessed against some standard such that it is possible to know when the objective is met.

³⁵ Department, PD/PM Toolkit, “Develop Activities” page 32.

Roles, Responsibilities, and a Coordination Plan for the TSCTP Program



The TSCTP Act and FAM require the TSCTP strategy to include clear roles, responsibilities, and a detailed coordination plan between all TSCTP program participants across the Department and other federal agencies, as previously shown in Tables 1 and 2.

Department Roles, Responsibilities, and Coordination Efforts

Although the TSCTP strategy referred to AF leading the Department’s TSCTP team through the Sahel-Maghreb Standing Interagency Working Group, OIG found that as of January 2025, AF did not have any formal leadership authority for the TSCTP program in the Department’s internal Delegations of Authority database. Moreover, the TSCTP strategy did not describe the respective roles and responsibilities of participating Department bureaus and offices, despite multiple bureaus within the Department executing foreign assistance to support the TSCTP program.

In the absence of designated TSCTP program leadership, AF officials informed OIG that they unofficially assumed the lead for TSCTP program activities despite not having authority to direct other bureaus to actively participate in TSCTP program. AF officials also said that AF informally led the development of the TSCTP strategy in addition to existing responsibilities even though AF lacked formal authority to direct and hold multiple agencies and bureaus accountable to ensure Department and interagency TSCTP efforts were organized, nonduplicative, coordinated, and in support of TSCTP program goals and objectives.

Department officials across AF, CT, and the Bureau of Political-Military Affairs (PM) also told OIG that there was room for improvement in coordinating programming from Department funding accounts that include funds specifically identified for TSCTP efforts in a manner that targets high-risk areas and supports TSCTP program goals and objectives. Department officials from AF, CT, and PM informed OIG that each funding account that includes funds specifically identified for TSCTP efforts—Developmental Assistance (DA), Economic Support Funds (ESF), Nonproliferation, Antiterrorism, Demining, and Related Programs – Antiterrorism Assistance (NADR-ATA), and Peacekeeping Operations (PKO)—is managed independently by TSCTP participants from the Department or USAID in the absence of a centralized, guiding authority over the TSCTP program.

USAID and DoD Roles, Responsibilities, and Coordination Efforts

OIG also found that the TSCTP strategy did not include clearly defined roles and responsibilities of other federal agencies involved with the TSCTP program. Implementing foreign assistance to execute the TSCTP program requires a collaborative effort from the Department, USAID, and DoD. Each agency has statutory authorities, priorities, and responsibilities for their contributions to the TSCTP program. Although the TSCTP strategy stated that TSCTP is implemented jointly by the Department, USAID, and DoD, roles and responsibilities for the three agencies were not defined in the strategy. In March 2023, OIG received a separate

document from AF, as part of a prior OIG audit (AUD-MERO-20-42), that outlined the general roles and responsibilities of TSCTP program participants across the Department, USAID, and DoD. However, the FAM requires the roles and responsibilities of the lead and contributing participants to be explicitly included in the strategy.³⁶ In addition, although the separate document provided by AF included the roles and responsibilities of DoD, OIG found that the attached clearance memorandum did not include approval signatures from any DoD personnel.

Furthermore, OIG found that the TSCTP strategy did not describe how agencies would coordinate their respective efforts to advance TSCTP goals and objectives. According to the PD/PM Toolkit and the FAM, coordinated strategic planning can help reduce the risk of lost time and resources,³⁷ promote more desirable TSCTP outcomes,³⁸ promote lasting relationships with foreign counterparts,³⁹ and provide greater accountability.⁴⁰ Therefore, it is important to ensure that all TSCTP participants across the Department, USAID, and DoD are represented to coordinate TSCTP strategy development, execution, and communication plans. Although the TSCTP strategy stated that AF will be responsible for interagency coordination through the Sahel-Maghreb Standing Interagency Working Group, the TSCTP strategy did not include a detailed description of how a whole-of-government approach would be implemented. Furthermore, the TSCTP strategy did not include a clear description of how the planning, development, and execution of the strategy was coordinated within the Department and with other federal agencies by AF. An AF official informed OIG that the lack of DoD participation in the development of the TSCTP strategy was due to the TSCTP Act not requiring DoD participation. The same AF official also informed OIG that USAID did not play a role in the development of the TSCTP strategy despite USAID regularly participating in TSCTP working group meetings and managing a portion of TSCTP programming.

In addition, according to an AF official, the first meeting of the TSCTP interagency working group after passage of the TSCTP Act was in June 2023.⁴¹ At this meeting, working group participants included officials from multiple Department bureaus and USAID, but DoD personnel were not present. According to the June 2023 meeting notes obtained by OIG, working group participants also acknowledged that TSCTP interagency coordination had been inconsistent and there was room for improving information sharing and programmatic deconfliction efforts across the Department, USAID, and DoD. Furthermore, according to officials from AF, CT, and PM who participated in the working group meetings, the working group meetings were primarily for information sharing purposes, but they did not yield meaningful results because of a lack of formal program leadership and coordination of TSCTP program efforts and resources.

³⁶ 18 FAM 301.2-4(B)b(1)(a).

³⁷ Department, PD/PM Toolkit, "Align Programs To Advance Existing Strategies" page 8.

³⁸ 18 FAM 301.2-1(a).

³⁹ 7 FAM 511a(3).

⁴⁰ 18 FAM 301.2-1(a).

⁴¹ An AF official cited staffing vacancies as the reason why the Department did not hold a TSCTP interagency working group meeting earlier than June 2023.

An AF official informed OIG that there were no TSCTP interagency working group meetings held after the passage of the TSCTP Act with participating Department bureaus and agencies that aligned with the timeline of the TSCTP strategy's development between March 2022 through November 2022. Instead, according to an AF official, multiple Department bureaus developed different sections of the TSCTP strategy.

Partner and Non-Partner Country Roles, Responsibilities, and Coordination Efforts

According to the Foreign Assistance Act of 1961, development is the primary responsibility of the recipient country receiving U.S. foreign assistance, and recipient countries are expected to contribute their own resources and efforts towards development goals.⁴² After reviewing the TSCTP strategy and interviewing Department officials, OIG was unable to identify the difference between a "partner" and "non-partner" country receiving TSCTP program assistance. As of May 2024, according to an AF official, the definitions of a "partner" and "non-partner" country had not been established in the TSCTP strategy, and the Department had yet to determine whether any changes would be made to the active list of TSCTP partners despite a recent Department progress report and internal TSCTP program portal citing "democratic backsliding" and Section 7008 funding restrictions currently in effect in certain countries across the Sahel-Maghreb.⁴³ Similarly, OIG found that the TSCTP strategy did not include a clear description of the roles, responsibilities, and expectations of "partner" and "non-partner" countries receiving TSCTP program assistance.

A Plan to Monitor, Evaluate, and Share Data



A "plan to monitor, evaluate, and share data and learning about the [TSCTP] Program in accordance with monitoring and evaluation provisions under sections 3 and 4 of the [FATAA] of 2016"⁴⁴ is also required by the TSCTP Act.⁴⁵ Similarly, the FAM states that each ODS must include a plan to assess progress towards achieving goals and objectives, and this plan may be part of the actual strategy or referenced and incorporated as a series of follow-on documents that are regularly reviewed.⁴⁶ Although the TSCTP strategy stated that TSCTP-funded programs will adhere to monitoring and evaluation standards set forth in the FATAA of 2016,⁴⁷ OIG found that the TSCTP strategy did not include a specific assessment plan detailing how progress towards achieving goals and objectives would be monitored, measured, and used to inform future TSCTP programming.

⁴² Foreign Assistance Act of 1961, Public Law 87-195.

⁴³ Section 7008 is a legal provision in annual Department appropriations legislation that restricts U.S. foreign assistance funding to governments following a coup d'état. According to the Department, Burkina Faso, Mali, and Niger are currently subject to Section 7008 restrictions on receiving foreign assistance funding.

⁴⁴ FATAA of 2016, Public Law 114-191.

⁴⁵ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

⁴⁶ 18 FAM 301.2-4(B)b(1)(c).

⁴⁷ FATAA of 2016, Public Law 114-191.

Furthermore, although the TSCTP strategy stated that monitoring of TSCTP efforts includes “regular and consistent communication between program managers and implementers, embassies, and partner nation stakeholders and beneficiaries,” the TSCTP strategy did not clearly identify all TSCTP program participants’ roles and responsibilities for monitoring. Moreover, although the TSCTP strategy stated that lessons learned and best practices identified from program evaluations will be integrated into the design of TSCTP projects, OIG found the TSCTP strategy did not include a plan to facilitate information sharing of monitoring and evaluation efforts among TSCTP program participants.

A Plan for Ensuring Coordination and Compliance With the GFA of 2019 and Other Applicable Federal Regulations



A “plan for ensuring coordination and compliance with related requirements in [U.S.] law, including the [GFA] of 2019”⁴⁸ is required by the TSCTP Act.⁴⁹ Although the TSCTP strategy stated that “TSCTP programming in [GFA] countries will be coordinated through existing GFA coordination mechanisms led by [the Department’s] Bureau of Conflict and Stabilization Operations,” OIG found that the TSCTP strategy did not specify the nature and frequency of these GFA coordination mechanisms and how they would ensure compliance with related requirements in the GFA of 2019.⁵⁰ OIG also found that the TSCTP strategy did not include a specific plan identifying and ensuring compliance with other related federal regulations.

Integration With Relevant National, Agency, Regional, and Sectoral Strategies



According to the Government Accountability Office, to improve strategic alignment between all related strategies, “each strategy should address (1) integration with relevant sectoral strategies and (2) integration with relevant higher- or lower-level strategies. Strategies that do not consistently address elements related to strategic integration do not clearly show whether objectives and activities align with existing strategic priorities at the government-wide, sectoral, regional, and country levels.”⁵¹ The FAM reinforces this notion; however, the TSCTP strategy did not demonstrate specific linkages with other relevant strategies.⁵²

According to the FAM, a strategy focused on a sub-region should be linked to the appropriate Joint Regional Strategy, any applicable Functional Bureau Strategy goals and objectives, the

⁴⁸ The GFA of 2019 required the establishment of a 10-year “Global Fragility Strategy” to contribute to the stabilization of conflict-affected areas, address global fragility, strengthen the effectiveness of U.S. foreign policy efforts, and prevent extremism and violent conflict. Further Consolidated Appropriations Act, 2020, Public Law 116-94, Title V – Global Fragility.

⁴⁹ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

⁵⁰ Further Consolidated Appropriations Act, 2020, Public Law 116-94, Title V – Global Fragility.

⁵¹ Government Accountability Office, *Foreign Assistance: Better Guidance for Strategy Development Could Help Agencies Align Their Efforts* (GAO-18-499, July 12, 2018), page 11.

⁵² 18 FAM 301.2-4(B)b(1)(b).

National Security Strategy, and the Joint Strategic Plan.⁵³ Although the TSCTP strategy stated that the goals and objectives were “synchronized with overarching U.S. strategies, including the U.S. Strategy for Sub-Saharan Africa . . . and in [sic] individual Integrated Country Strategies,” it did not showcase specific linkages aligning the TSCTP strategy with these overarching strategies. In addition, the TSCTP strategy should identify and demonstrate a linkage to relevant USAID and DoD strategies because the TSCTP strategy represents a whole-of-government approach to countering terrorism and violent extremism in the Sahel-Maghreb.

Expectations for Lower Level Strategies



According to the FAM, the TSCTP strategy must clearly lay out the expectations for how lower level (i.e., office or component level) strategies or operational/tactical plans can support implementation of the strategy.⁵⁴ Although the TSCTP strategy stated that the goals and objectives were “synchronized with . . . the Sahel-Maghreb Strategy,” it did not showcase specific linkages aligning the TSCTP strategy with the Sahel-Maghreb strategy. Furthermore, the TSCTP strategy classified the Sahel-Maghreb strategy as an overarching strategy. However, OIG determined that the Sahel-Maghreb strategy cannot be designated as an overarching strategy because it is not a part of the Department’s higher level core strategies. According to 18 FAM 301.2-4e, “Strategic Planning Process Requirements and Hierarchy,” the Department’s higher level core strategies include the Joint Strategic Plan, Joint Regional Strategy, Functional Bureau Strategy, and Integrated Country Strategies. Other relevant higher level strategies also include the National Security Strategy and Joint Strategic Plan.

The TSCTP strategy also included a statement that U.S. embassies and USAID missions across the Sahel-Maghreb can advance TSCTP objectives through “multilateral and bilateral cooperation, public diplomacy, development and humanitarian objectives,” but specific linkages to the individual Integrated Country Strategies were not established. Similarly, the TSCTP strategy did not include any tie to relevant lower level USAID and DoD strategies. The TSCTP Act also requires strategic alignment with partner country counterterrorism, counterextremism, and development strategies to the extent practicable, but the TSCTP strategy included no reference to aligning with those strategies.⁵⁵

Desired Results



The FAM requires the TSCTP strategy to clearly articulate desired results, or “the end state the strategy is expected to achieve.”⁵⁶ OIG found that the TSCTP strategy included a statement of desired results. The strategy stated that “TSCTP assists partners in West and North Africa to increase their immediate and long-term

⁵³ Ibid.

⁵⁴ Ibid.

⁵⁵ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

⁵⁶ 18 FAM 301.2-4(B)b(1)(c).

capabilities to address terrorist threats and counter and prevent the spread of violent extremism while respecting human rights.”

Milestones and Performance Indicators



The FAM also requires illustrative milestones and/or performance indicators to be included or referenced in the TSCTP strategy.⁵⁷ However, OIG found that the TSCTP strategy did not include or reference any specific milestones and performance indicators that could be used to measure whether the TSCTP strategy is achieving the objectives, goals, or overarching desired results over a specified period of time.

The Department Did Not Designate Formal Leadership Authority for the TSCTP Program Beyond the Secretary of State

OIG determined that the TSCTP strategy was incomplete, in part, because the Department did not further delegate leadership of the TSCTP program to an official with the authority to lead the coordination of multiple Department bureaus and engage in coordination with relevant USAID and DoD leadership. Formal leadership of the TSCTP program was delegated from the President to the Secretary of State on August 12, 2022,⁵⁸ but that authority had not been further delegated to another official as of January 2025.

FAM procedures outline the process for redelegating authority that was delegated to the Secretary of State by the President.⁵⁹ To determine who was leading the TSCTP program, OIG reviewed the Department’s internal Delegations of Authority database, contacted the Office of Directives Management responsible for managing the database, and interviewed officials participating in the TSCTP program. According to an official in the Office of Directives Management, no formal delegation was registered. To formally delegate authority, the authorizing officer must approve and sign the delegation memorandum and return it to the originating office for processing. The Office of Directives Management then reviews the delegation, assigns a delegation number, records and processes the delegation, transmits it to the Federal Register, notifies the appropriate offices, and then posts the delegation on the Office of Directives Management internal website to communicate the delegation of authority.⁶⁰

According to the Government Accountability Office’s *Standards for Internal Control in the Federal Government*, management should establish an organizational structure, assign responsibility, and delegate authority to achieve the objectives.⁶¹ Furthermore, according to the FAM, the Deputy Secretary of State for Management and Resources serves as principal adviser to the Secretary of State in the formulation and conduct of all resource allocation and

⁵⁷ 18 FAM 301.2-4(B)b(1)(c).

⁵⁸ Federal Register, 87 FR 51235.

⁵⁹ 18 FAM 201.3-2, “Important Points for Developing Delegations of Authority.”

⁶⁰ Ibid.

⁶¹ GAO-14-704G, September 2014, “Principle 3 – Establish Structure, Responsibility, and Authority,” page 27.

management activities of the Department. The Deputy Secretary of State for Management and Resources also assists in carrying out the Secretary of State's authority and responsibility for the overall direction, coordination, and supervision of operational programs of the Department, including foreign assistance programs.⁶² Therefore, the Secretary of State should work with the Deputy Secretary for Management and Resources to determine what level of authority is needed for each key role and delegate authority to the extent required to achieve TSCTP program goals and objectives.

The TSCTP Strategy Was Not Approved by the Department's MfR Strategic Planning and Performance Team Before Being Sent to Congress

OIG also determined that the TSCTP strategy was incomplete because the strategy was submitted to Congress without the required coordination and clearance from the Department's MfR Strategic Planning and Performance Team (MfR Team). According to the FAM, bureaus or offices involved in the development of congressionally mandated strategies are required to coordinate with the Department's MfR Team prior to beginning their work.⁶³ The MfR Team provides clearance for the proposed ODS once confirming it (1) does not conflict with existing Department strategies, (2) aligns with related higher and lower level Department strategies, and (3) includes the nine required ODS elements before advancing through the final clearance process.⁶⁴

According to the Department's clearance memorandum for the TSCTP strategy, an Office of Foreign Assistance official cleared the final TSCTP strategy sent to Congress. However, officials from the MfR Team were not a part of this clearance process. According to 2 FAM 1200, "Action and Clearance Procedures," each Department bureau or office carrying out a specific task or proposed action has the individual responsibility to determine and obtain required clearances that apply to their specific task or proposed action. In addition, 2 FAM 1200 also gives each Department bureau or office the flexibility to determine whether it would be beneficial to obtain additional clearances from other Department bureaus or offices that may have a substantial interest in the specific task or proposed action. This flexibility is designed to promote information sharing within the Department and ensure that clearance processes do not overburden Department operations.

Officials from the MfR Team informed OIG that compliance with applicable FAM requirements is the responsibility of individual Department bureaus and offices involved in the development of strategy documents. They stated that they did not have any correspondence in their records from the Department pertaining to the development of the TSCTP strategy. MfR Team representatives told OIG that they have multiple internal control mechanisms in place to promote Department-wide knowledge of 18 FAM 301.2 requirements, including regular

⁶² 1 FAM 032, "Deputy Secretary of State for Management and Resources (D-MR)."

⁶³ 18 FAM 301.2-4(B)c, The MfR Team is jointly managed by officials from BP and the Office of Foreign Assistance and serves as the Department's mandatory clearing office for any strategy documents that qualify with the standards and requirements listed in 18 FAM 301.2, "Department of State Strategic Planning."

⁶⁴ 18 FAM 301.2-4(B)c-d.

outreach through Department notices, monthly bureau planner meetings, and a Strategic Planning and Performance Management training course (PA315)⁶⁵ offered through the Foreign Service Institute that includes 18 FAM 300, “Strategic Direction and Management,” requirements in its curriculum. MfR officials also stated that, according to their records, AF’s Strategic Planning Coordinator has not taken the PA315 course, which is currently not required for Strategic Planning Coordinators across Department bureaus and offices. Yet, the TSCTP strategy was sent to Congress without the MfR Team ever having the opportunity to provide input on and clear the TSCTP strategy.

Despite it being explicitly stated in the FAM, some Department officials involved in the TSCTP program told OIG that they were unaware of these requirements. Furthermore, MfR Team officials informed OIG that it is “relatively common” for strategy documents to be cleared without input from the MfR Team despite the team being a mandatory coordination office for strategy development per standards and requirements listed in 18 FAM 301.2, “Department of State Strategic Planning.” OIG also found that 2 FAM 1200 does not list the MfR Team as a mandatory clearing office for any strategy documents that qualify with the standards and requirements listed in 18 FAM 301.2, “Department of State Strategic Planning.”

An Incomplete TSCTP Strategy Creates Significant Challenges to U.S. Foreign Policy and National Security Interests in the Sahel-Maghreb

The Department’s failure to develop a comprehensive TSCTP strategy that fully addresses requirements and applicable guidance in the TSCTP Act, FAM, and Foreign Assistance Act of 1961 creates a wide range of significant risks that can undermine U.S. foreign policy and national security interests in the Sahel-Maghreb. For example, an incomplete TSCTP strategy compromises the Department’s ability to execute a coordinated, whole-of-government approach to combating the increasingly complex threat of terrorism and violent extremism in the Sahel-Maghreb. According to the U.S. Intelligence Community, terrorists continue to maintain an interest in conducting attacks using chemical, biological, and radioactive materials against U.S. persons, allies, and interests worldwide.⁶⁶ The 2024 Annual Threat Assessment of the U.S. Intelligence Community also highlighted “the shift of the center of gravity in the Sunni global jihad to Africa.”⁶⁷ Furthermore, the Department reported⁶⁸ that terrorist groups operating in the Sahel-Maghreb carried out at least 1,010 terrorist attacks in 2022 alone in Burkina Faso, Cameroon, Chad, and Niger; “hundreds” of other attacks have occurred in Mali and Nigeria as well. According to the Department’s TSCTP strategy, terrorist attacks in the Sahel-Maghreb have resulted in deaths, injuries, abductions, and the capture and destruction of

⁶⁵ The Strategic Planning and Performance Management course number offered through the Foreign Service Institute is PA315. According to the course description, this course is intended to help strategic planning and program/project performance management staff develop skills and techniques that align with the Department’s MfR framework.

⁶⁶ Annual Threat Assessment of the U.S. Intelligence Community, February 5, 2024, Office of the Director of National Intelligence, “Global Terrorism” page 38.

⁶⁷ Ibid.

⁶⁸ Country Reports on Terrorism 2022, Department of State, CT.

property. To counter this threat and advance security, diplomatic, and developmental counterterrorism activities in TSCTP partner and non-partner countries, it is urgent and vital for the Department to improve its TSCTP strategy by ensuring it fully incorporates key requirements from the TSCTP Act, FAM, and Foreign Assistance Act of 1961.

In addition, when specific foreign assistance activities and projects are not linked to the TSCTP strategy's goals and objectives, the Department faces an increased risk that its limited resources are allocated in a manner that does not advance the goals and objectives of the TSCTP program. Similarly, without specific milestones and performance indicators that cover the TSCTP efforts of the Department, USAID, and DoD, the Department is ill-equipped to measure whether TSCTP program efforts are achieving desired results. Furthermore, the lack of clear roles and responsibilities of the Department, USAID, DoD, partner countries, and non-partner countries involved in the TSCTP program stifles interagency and international cooperation to address the ever-evolving threat of terrorism and violent extremism in the Sahel-Maghreb. Collectively, an incomplete TSCTP strategy also has the potential to undermine public trust in the TSCTP program, the Department, and the U.S. government.

OIG Cannot Measure Success of the TSCTP Program

According to a March 2024 TSCTP progress report submitted to Congress, the Department encouraged Congress and all program offices managing TSCTP funds to “reevaluate the [TSCTP program’s] long-term viability and sustainability considering the democratic backsliding in some [partner countries], the dearth of regional cooperation, and other U.S. government competing priorities (e.g., SPCPS [Strategy to Prevent Conflict and Promote Stability]).”⁶⁹ Since elements were missing from the TSCTP strategy, OIG was unable to determine whether the Department made performance monitoring, evaluation, and reporting improvements to the TSCTP program. Similarly, missing elements from the TSCTP strategy prevented OIG from determining whether TSCTP program foreign assistance projects were achieving their objectives and contributing to the overarching desired results. Until the Department incorporates all required elements and guidance in the TSCTP Act, FAM, and Foreign Assistance Act of 1961 into the TSCTP strategy, the Department will remain ill-equipped to effectively advance security, diplomatic, and developmental counterterrorism goals in the Sahel-Maghreb. To develop and implement a comprehensive TSCTP strategy, achieve desired outcomes, and promote TSCTP program leadership and accountability, OIG is making the following four recommendations:

Recommendation 1: OIG recommends that the Deputy Secretary of State for Management and Resources immediately formally designate and establish leadership responsibilities for the Trans-Sahara Counterterrorism Partnership (TSCTP) program, in accordance with 18 Foreign Affairs Manual 201.3, “Delegations of Authority,” to a position that has authority to lead, coordinate, and execute all TSCTP projects and activities within the Department of

⁶⁹ Report on Monitoring and Evaluation of Programs and Activities for the TSCTP Program, Section 104(f) of the TSCTP Act (Division AA of Public Law 107-103), March 2024.

State and coordinate interagency TSCTP efforts with the United States Agency for International Development and the Department of Defense.

Management Response: The Senior Official performing the duties of the Under Secretary for Management concurred with the recommendation,⁷⁰ stating that the Bureau of Conflict and Stabilization Operations (CSO) will be formally designated as the office with leadership responsibilities for the TSCTP program in accordance with 18 FAM 201.3, “Delegations of Authority.” In addition, the Senior Official stated, “CSO will have the authority to lead coordination on the TSCTP strategy and associated activities within the Department of State and coordinate interagency TSCTP efforts with [USAID] and [DoD].” The response also noted that “individual project/program management will remain with relevant bureaus but align under the CSO-led strategy and coordination effort.”

OIG Reply: Based on the Department’s 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 the Department has delegated and established leadership responsibilities for the TSCTP program to CSO, as described in the Department’s response to this recommendation.

Recommendation 2: OIG recommends that the designated Department of State (Department) leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) coordinate with the Department’s Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, to revise the comprehensive 5-year strategy for TSCTP program efforts to include all elements required by the TSCTP Program Act of 2022; 18 Foreign Affairs Manual 301.2, “Department of State Strategic Planning;” and the Foreign Assistance Act of 1961.

Management Response: The Senior Official performing the duties of the Under Secretary for Management concurred with the recommendation and stated that CSO “will coordinate with the Department’s Managing for Results Strategic Planning and Performance Team to revise the comprehensive 5-year strategy for TSCTP program efforts to include all elements required by the TSCTP Program Act of 2022, 18 FAM 301.2, ‘Department of State Strategic Planning,’ and the Foreign Assistance Act of 1961.”

OIG Reply: Based on the Department’s 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 CSO has coordinated with the Department’s Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, to revise the comprehensive 5-year strategy for TSCTP program efforts

⁷⁰ The Senior Official performing the duties of the Under Secretary for Management provided comments in response to a draft of this report in the absence of an appointed Deputy Secretary of State for Management and Resources, as of March 5, 2025. See Appendix B for a copy of the response, reprinted in its entirety.

to include all elements required by the TSCTP Program Act of 2022; 18 FAM 301.2, “Department of State Strategic Planning;” and the Foreign Assistance Act of 1961.

Recommendation 3: OIG recommends that the designated Department of State leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) develop and implement procedures that includes completion of the Foreign Service Institute’s Strategic Planning and Performance Management training course (PA315) to ensure bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy are aware of applicable Foreign Affairs Manual requirements related to strategic planning.

Management Response: The Senior Official performing the duties of the Under Secretary for Management concurred with the recommendation and stated that CSO “will assess how best to abide by the recommendation . . . to ensure key stakeholders have a broader overview of the applicable FAM requirements related to strategic planning.”

OIG Reply: Based on the Department’s 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 CSO has developed and implemented procedures for personnel to complete the Foreign Service Institute’s Strategic Planning and Performance Management training course (PA315) to ensure personnel at bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy are aware of applicable FAM requirements related to strategic planning.

Recommendation 4: OIG recommends the Executive Secretariat modify 2 Foreign Affairs Manual (FAM) 1200, “Action and Clearance Procedures,” to include the Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, as a mandatory clearing office for any strategy documents that meet the requirements listed in 18 FAM 301.2, “Department of State Strategic Planning.”

Management Response: The Senior Official performing the duties of the Under Secretary for Management concurred with the recommendation and stated that the “Executive Secretariat will modify 2 FAM 1200, ‘Action and Clearance Procedures,’ to include the Managing for Results Strategic Planning and Performance Team, as a mandatory clearing office for any strategy documents that meet the requirements [of] 18 FAM 301.2 . . . unless such requirement is eliminated.”

OIG Reply: Based on the Department’s 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 the Executive Secretariat has modified 2 FAM 1200, “Action and Clearance Procedures,” to include the Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, as a mandatory

clearing office for any strategy documents that meet the requirements listed in 18 FAM 301.2, "Department of State Strategic Planning."

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Deputy Secretary of State for Management and Resources immediately formally designate and establish leadership responsibilities for the Trans-Sahara Counterterrorism Partnership (TSCTP) program, in accordance with 18 Foreign Affairs Manual 201.3, "Delegations of Authority," to a position that has authority to lead, coordinate, and execute all TSCTP projects and activities within the Department of State and coordinate interagency TSCTP efforts with the United States Agency for International Development and the Department of Defense.

Recommendation 2: OIG recommends that the designated Department of State (Department) leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) coordinate with the Department's Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, to revise the comprehensive 5-year strategy for TSCTP program efforts to include all elements required by the TSCTP Program Act of 2022; 18 Foreign Affairs Manual 301.2, "Department of State Strategic Planning;" and the Foreign Assistance Act of 1961.

Recommendation 3: OIG recommends that the designated Department of State leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) develop and implement procedures that includes completion of the Foreign Service Institute's Strategic Planning and Performance Management training course (PA315) to ensure bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy are aware of applicable Foreign Affairs Manual requirements related to strategic planning.

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APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this audit to determine whether the Department of State (Department) (1) planned and executed an effective Trans-Sahara Counterterrorism Partnership (TSCTP) strategy in accordance with the TSCTP Program Act of 2022¹ (TSCTP Act) and applicable guidance and (2) implemented appropriate modifications in the execution of TSCTP to advance performance monitoring, evaluation, and the reporting of TSCTP results.

OIG conducted this audit from February through September 2024 in the Washington, DC, metropolitan area. 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 objectives. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

To obtain background information, OIG reviewed requirements outlined in the TSCTP Act, the Department's Foreign Affairs Manual (FAM), the Foreign Assistance Act of 1961,² the Foreign Aid Transparency and Accountability Act (FATAA) of 2016,³ the Global Fragility Act of 2019,⁴ and bureau-specific standard operating procedures and guidance. OIG also obtained, reviewed, and analyzed other Department Managing for Results⁵ resources available on the Department's online U.S. Foreign Assistance Resource Library, including the Program Design and Performance Management Toolkit and Program Design and Performance Management Workbook.

To answer the audit objectives, OIG obtained and evaluated the Department's TSCTP strategy and other documentation supporting the transmittal of the TSCTP strategy to Congress as required by the TSCTP Act. OIG interviewed Department officials within the Office of Foreign Assistance, the following bureaus: Administration, African Affairs (AF), Budget and Planning, Counterterrorism, Diplomatic Security, International Narcotics and Law Enforcement Affairs, Near Eastern Affairs, and Political-Military Affairs. OIG also interviewed Department officials to learn about the involvement of the U.S. Agency for International Development (USAID) and Department of Defense in the planning and development process of the TSCTP strategy.

¹ Consolidated Appropriations Act, 2022, Public Law 117-103, Division AA – TSCTP Program Act of 2022.

² Foreign Assistance Act of 1961, Public Law 87-195.

³ Foreign Aid Transparency and Accountability Act of 2016, Public Law 114-191.

⁴ Further Consolidated Appropriations Act, 2020, Public Law 116-94, Title V – Global Fragility.

⁵ Managing for Results is the Department's approach to planning, budgeting, program design, performance management, evaluation, and learning.

Data Reliability

OIG used information provided by AF as part of its audit evidence, including the TSCTP strategy and transmittal documentation submitted to Congress on November 17, 2022. OIG designed procedures to obtain reasonable assurance over the relevance, reliability, and validity of the information provided. For example, OIG verified the final submission of the TSCTP strategy and related documentation to Congress with officials from the Bureau of Legislative Affairs, which is responsible for the coordination of all legislative activity for the Department. In addition, OIG reviewed the Department's Delegations of Authority Database and verified that a formal delegation of authority for the TSCTP program did not exist as of January 2025. OIG also confirmed the nonexistence of the delegation with an official in the Office of Directives Management, which is responsible for managing the database. Overall, OIG determined that, for the intended use, the data and information obtained were sufficient and appropriate for the purposes of the audit objectives.

OIG also used computer-processed data to support conclusions presented in this report. Specifically, OIG requested and obtained from AF a spreadsheet of all TSCTP activities awarded since the date of the enactment of the TSCTP Act. OIG also requested that the spreadsheet include an explanation of how each activity supported TSCTP goals and objectives. AF coordinated with USAID and other Department bureaus to develop and contribute to the spreadsheet. Despite this effort, OIG found that the provided spreadsheet was incomplete and missing requested data. However, OIG determined that the data provided were sufficiently reliable for the purpose of meeting the audit objectives because the incomplete spreadsheet clearly demonstrated that TSCTP program activities had not been fully linked to the goals and objectives in the TSCTP strategy as required by the TSCTP Act and Foreign Affairs Manual.

Work Related to Internal Control

During the audit, OIG considered several factors, including the subject matter of the project, to determine whether internal control was significant to the audit objectives. 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*⁶ to identify internal controls that were significant to the audit objectives. Considering internal control in the context of a comprehensive internal control framework can help auditors to determine whether underlying internal control deficiencies exist.

For this audit, OIG concluded that two of five internal control components from the *Standards for Internal Control in the Federal Government*—Control Environment and Control Activities—were significant to the audit objectives. 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

⁶ Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

through policies and procedures to achieve objectives and respond to risks in the internal control system. OIG concluded that two of the principles related to the selected components were significant to the audit objectives, as described in Table A.1.

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

| Components | Principles |
|---------------------|--|
| Control Environment | <ul style="list-style-type: none"> • Principle 3 - Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives. |
| Control Activities | <ul style="list-style-type: none"> • Principle 10 - Management should design control activities to achieve objectives and respond to risks. |

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

OIG interviewed Department officials, reviewed applicable Department policies and procedures, and analyzed the Department’s TSCTP strategy to obtain an understanding of the internal controls related to the components and principles identified as significant for this audit. OIG performed the following procedures to assess the design of key internal controls:

- To determine whether the Department assigned formal responsibilities for the TSCTP program and established a documented organizational structure to achieve desired results, OIG:
 - Determined whether the Secretary of State had delegated formal leadership of the TSCTP program.
 - Obtained and evaluated the current roles and responsibilities of the lead and contributing Department bureaus and other federal agencies.
 - Assessed current Department and interagency coordination on TSCTP program activities through the TSCTP Standing Interagency Working Group.

- To determine whether the Department designed control activities to achieve TSCTP program objectives and respond to risks, OIG:
 - Evaluated the Department TSCTP strategy’s compliance with TSCTP Act and FAM requirements to determine whether the strategy included:
 - A statement of goals, objectives, and/or subordinate activities that are linked through a logical framework.
 - A specific assessment plan to monitor, evaluate, and facilitate information sharing of TSCTP program activities in accordance with the FATAA of 2016.⁷
 - A plan for ensuring coordination and compliance with related requirements in United States law, including the Global Fragility Act of 2019.⁸

⁷ FATAA of 2016, Public Law 114-191.

⁸ Further Consolidated Appropriations Act, 2020, Public Law 116-94, Title V – Global Fragility.

- An explanation for how the TSCTP strategy aligns with other higher and lower level strategies.
 - A description of desired end results.
 - Planned steps and activities that support the achievement of desired results for the TSCTP program.
 - Detailed milestones and performance indicators.
- Evaluated whether the TSCTP strategy incorporated guidance from the Foreign Assistance Act of 1961, as amended.⁹

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

Prior Office of Inspector General Reports

Review of Department of State Foreign Assistance Tracking Capabilities (ISP-I-21-09, December 2020). OIG conducted a follow-up review of OIG's 2017 report *Compliance Follow-Up Review: Department of State is Still Unable to Accurately Track and Report on Foreign Assistance Funds* (ISP-C-17-27). OIG reported that the Office of Foreign Assistance did not assess the full range of potential effects its proposed data collection changes would have on bureaus that manage foreign assistance. In addition, the Office of Foreign Assistance did not adequately communicate and train bureaus on how to implement proposed data collection changes to improve foreign assistance tracking. OIG made three recommendations addressing issues of the proposed data collection changes. As of November 2023, all three recommendations had been implemented and closed.

Audit of the Department of State Bureau of African Affairs Monitoring and Coordination of the Trans-Sahara Counterterrorism Partnership Program (AUD-MERO-20-42, September 2020). OIG reported that AF was not monitoring TSCTP contracts and was not ensuring assistance provided to host countries was being used to build counterterrorism capacity. OIG considered \$201.6 million spent on six contracts as potential wasteful spending due to mismanagement and inadequate oversight. In addition, OIG questioned almost \$109 million because of lack of supporting documentation for invoices. Furthermore, OIG reported that AF was not effectively coordinating with stakeholders to execute a whole-of-government initiative. OIG made 13 recommendations to improve the monitoring and coordination of TSCTP projects. As of November 2023, 12 recommendations had been implemented and closed. One, Recommendation 10, remained open and was considered resolved pending further action.

Compliance Follow-Up Review: Bureau of African Affairs' Foreign Assistance Program Management (ISP-C-20-23, May 2020). OIG conducted a compliance follow-up review of the Department's implementation of recommendations issued in the OIG report *Inspection of the Bureau of African Affairs' Foreign Assistance Program Management* (ISP-I-18-02). OIG reported that AF needed to take additional steps to improve its foreign assistance program management and close the remaining recommendations from the previous report. In addition, OIG reported

⁹ Foreign Assistance Act of 1961, Public Law 87-195.

that AF needed to document its foreign assistance business process, expand its guidance for reclassifying Peacekeeping Operations funds, and establish controls to help ensure proper federal assistance award oversight documentation. OIG reissued one recommendation from ISP-I-18-02, revised and reissued one recommendation from ISP-I-18-02, and made one new recommendation addressing ongoing grants officer representative monitoring deficiencies. As of December 2023, all three recommendations had been implemented and closed.

Follow-Up Audit of Department of State Efforts To Measure, Evaluate, and Sustain Antiterrorism Assistance Objectives in the Bureau of East Asian and Pacific Affairs (AUD-MERO-20-32, May 2020). OIG reported that Bureau of Diplomatic Security and Bureau of Counterterrorism needed to take additional steps to ensure the established monitoring and evaluation process is followed and desired program results are achieved and accurately reported in accordance with Department policy. OIG made four recommendations to the Bureau of Diplomatic Security and Bureau of Counterterrorism to improve the execution of the Antiterrorism Assistance program in the East Asian and Pacific Affairs region. As of December 2023, all four recommendations had been implemented and closed.

Management Assistance Report: The Bureau of African Affairs Should Improve Performance Work Statements and Increase Subject Matter Expertise for Trans-Sahara Counterterrorism Partnership Projects (AUD-MERO-20-29, April 2020). OIG reported that three TSCTP projects, valued at approximately \$22.8 million, had performance work statements that did not meet Department standards. This led to OIG questioning \$14.6 million spent by the Department. The deficiencies OIG identified with the performance work statements occurred because the Contracting Officer's Representatives and program support contractors did not have the technical knowledge needed to develop well-defined performance work statements. OIG made seven recommendations to improve the development of work statements and to increase subject matter expertise among TSCTP personnel. As of November 2023, all seven recommendations had been implemented and closed.

APPENDIX B: DEPARTMENT OF STATE RESPONSE



United States Department of State
*Under Secretary of State
for Management*
Washington, D.C. 20520

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March 5, 2025

Read by _____

Information Memorandum

TO: A/OIG – Sandra J. Lewis

FROM: Senior Official Tibor Nagy (M) 

SUBJECT: Response to Draft Report – Audit of the Trans-Sahara
Counterterrorism Partnership Program (AUD- GEER-25-XX)

Thank you for the opportunity to provide an update for the subject report.

Recommendation 1: OIG recommends that the Deputy Secretary of State for Management and Resources immediately formally designate and establish leadership responsibilities for the Trans-Sahara Counterterrorism Partnership (TSCTP) program, in accordance with 18 Foreign Affairs Manual (FAM) 201.3, “Delegations of Authority,” to a position that has authority to lead, coordinate, and execute all TSCTP projects and activities within the Department of State and coordinate interagency TSCTP efforts with the United States Agency for International Development and the Department of Defense.

Management Response (3/5/2025):

The Department of State accepts the recommendation, noting that the action went to the Under Secretary for Management (M) in the absence of the Deputy Secretary of State for Management and Resources. M will formally designate the Bureau of Conflict and Stabilization Operations (CSO) as the office with leadership responsibilities for the TSCTP, in accordance with 18 FAM 201.3, “Delegations of Authority. CSO will have the authority

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to lead coordination on the TSCTP strategy and associated activities within the Department of State and coordinate interagency TSCTP efforts with the United States Agency for International Development and the Department of Defense. Individual project/program management will remain with the relevant bureaus but align under the CSO-led strategy and coordination effort.

Recommendation 2: OIG recommends that the designated Department of State (Department) leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) coordinate with the Department's Managing for Results Strategic Planning and Performance Team to revise the comprehensive 5-year strategy for TSCTP program efforts to include all elements required by the TSCTP Program Act of 2022; 18 FAM 301.2, "Department of State Strategic Planning;" and the Foreign Assistance Act of 1961.

Management Response (3/5/2025): The Department concurs with the recommendation. The TSCTP lead office to be formally designated, CSO, will coordinate with the Department's Managing for Results Strategic Planning and Performance Team to revise the comprehensive 5-year strategy for TSCTP program efforts to include all elements required by the TSCTP Program Act of 2022, 18 FAM 301.2, "Department of State Strategic Planning," and the Foreign Assistance Act of 1961.

Recommendation 3: OIG recommends that the designated Department of State leader of the Trans-Sahara Counterterrorism Partnership (TSCTP) program (as identified in Recommendation 1) develop and implement procedures that includes completion of the Foreign Service Institute's Strategic Planning and Performance Management training course (PA315) to ensure bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy are aware of applicable FAM requirements related to strategic planning.

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Management Response (3/5/2025): The Department concurs with the recommendation. CSO, the lead office to be designated, will assess how best to abide by the recommendation. A possible approach may be to have key staff from CSO and other bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy attend the PA315 training to ensure that those responsible for the redevelopment and future modification of the TSCTP strategy are aware of applicable FAM requirements related to strategic planning. Also, staff from CSO and other bureaus and offices responsible for the redevelopment and future modification of the TSCTP strategy will attend TSCTP Standing Interagency Working Group (SIWG) to ensure key stakeholders have a broader overview of the applicable FAM requirements related to strategic planning.

Recommendation 4: OIG recommends the Executive Secretariat modify 2 FAM 1200, "Action and Clearance Procedures," to include the Managing for Results Strategic Planning and Performance Team, co-managed by the Bureau of Budget and Planning and the Office of Foreign Assistance, as a mandatory clearing office for any strategy documents that meet the requirements listed in 18 FAM 301.2, "Department of State Strategic Planning.

Management Response (3/5/2025): The Executive Secretariat will modify 2 FAM 1200, "Action and Clearance Procedures," to include the Managing for Results Strategic Planning and Performance Team, as a mandatory clearing office for any strategy documents that meet the requirements 18 FAM 301.2 requirement, unless such requirement is eliminated.

I have the authority to take this action pursuant to Delegation of Authority 514 and 573.

Approved: M – Tibor Nagy [TN]

I **confirm** the drafter received guidance on this paper’s intent, objectives, topics, scope, and structure. **Yes** **No**

Drafted: M/SS/PGP/SG – Hugo Jimenez, (b) (6)

Cleared:

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| M/SS/PGP/SG: | Todd Tiffany | (OK) |
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ABBREVIATIONS

| | |
|---------------|--|
| AF | Bureau of African Affairs |
| BP | Bureau of Budget and Planning |
| CSO | Bureau of Conflict and Stabilization Operations |
| CT | Bureau of Counterterrorism |
| DA | Developmental Assistance |
| DoD | Department of Defense |
| ESF | Economic Support Funds |
| FAM | Foreign Affairs Manual |
| FATAA | Foreign Aid Transparency and Accountability Act |
| GFA | Global Fragility Act |
| INL | Bureau of International Narcotics and Law Enforcement Affairs |
| MfR | Managing for Results |
| NADR-ATA | Nonproliferation, Antiterrorism, Demining, and Related Programs – Antiterrorism Assistance |
| ODS | Other Department Strategy |
| OIG | Office of Inspector General |
| PD/PM Toolkit | Program Design and Performance Management Toolkit |
| PKO | Peacekeeping Operations |
| PM | Bureau of Political-Military Affairs |
| TSCTP | Trans-Sahara Counterterrorism Partnership |
| USAID | U.S. Agency for International Development |

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