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Audit of the Bureau of Diplomatic Security's Antiterrorism Assistance Program

SECURITY AND INTELLIGENCE DIVISION

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

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What OIG Audited

The Department of State's (Department) Bureau of Diplomatic Security (DS), Office of Antiterrorism Assistance (ATA), has provided counterterrorism training to more than 165,000 law enforcement personnel from more than 150 countries from 1983 through 2024 via the Antiterrorism Assistance Program. The Department's Bureau of Counterterrorism (CT) provides funding, policy formulation, and oversight of the program, and ATA is responsible for program administration and implementation. In FY 2024, the Department allocated \$159 million to carry out the Antiterrorism Assistance Program.

The Office of Inspector General (OIG) conducted this audit to determine whether DS's Antiterrorism Assistance Program achieved its stated goals and objectives in selected partner nations. Specifically, the partner nations selected for this audit were Côte d'Ivoire, Senegal, and Togo.

What OIG Recommends

OIG made 10 recommendations to address the deficiencies identified in the Antiterrorism Assistance Program. On the basis of the Department's responses to a draft of this report, OIG considers nine recommendations resolved, pending further action, and one recommendation unresolved. A synopsis of management's comments to the recommendations offered and OIG's reply follow each recommendation in the Audit Results section of this report. Responses received from DS and CT are included in their entirety in Appendices C and D.

September 2025

OFFICE OF AUDITS

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Audit of the Bureau of Diplomatic Security's Antiterrorism Assistance Program

What OIG Found

OIG was unable to determine whether ATA achieved the stated goals and objectives of its Antiterrorism Assistance Program in selected partner nations because ATA did not collect sufficient data for the indicators in the corresponding partner nation's monitoring plan. For example, collection of certain types of data requires a monitoring visit; however, because no time requirement has been established to conduct a visit, ATA potentially may not perform a monitoring visit for up to 5 years. In addition, ATA did not always submit quarterly program and financial reports to CT in a timely manner, and some program reports did not always document progress related to specific tasks. For example, ATA failed to submit agreed-upon quarterly financial reports to CT from the third quarter of FY 2023 through the fourth quarter of FY 2024.

These deficiencies occurred, in part, because ATA did not develop a sufficient methodology to collect performance-related data and its monitoring and reporting guidance was insufficient. In addition, CT could improve various aspects of its program oversight. Furthermore, the Memorandum of Agreement between CT and DS did not include a mechanism to ensure that ATA met its monitoring and reporting obligations. Additionally, monitoring plans included performance indicators for which no data was collected and CT efforts to develop a quarterly financial report template that was sufficient to capture detailed financial information had not been finalized. Until these deficiencies are addressed, CT and DS cannot demonstrate that the Antiterrorism Assistance Program is helping selected partner nations build critical capabilities to defend against terrorism threats as intended.

OIG also identified Antiterrorism Assistance Program equipment acquired for Senegal that was stored up to 5 years at an ATA warehouse (valued at \$285,205). Fourteen percent of this equipment (valued at \$38,794) had expired, and OIG considers this a questioned cost. In addition, OIG considers the remaining equipment (valued at \$246,411) funds that could be put to better use if management takes appropriate action.

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OBJECTIVE

The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Diplomatic Security's (DS) Antiterrorism Assistance Program achieved its stated goals and objectives in selected partner nations.¹

BACKGROUND

In response to three bombings of U.S. diplomatic and military facilities in Lebanon in 1983, Congress established the International Security and Development Assistance Authorization Act of 1983.² The Act authorized the President to provide assistance to foreign countries to enhance the ability of their law enforcement personnel to deter terrorists and terrorist groups from engaging in acts of international terrorism.³ The Act created the Antiterrorism Assistance Program. Congress established the following three objectives for the Antiterrorism Assistance Program:

- Enhance the antiterrorism skills of friendly countries by providing training and equipment.
- Strengthen the bilateral ties of the United States and friendly governments by offering concrete assistance in deterring terrorism.
- Increase respect for human rights by sharing with foreign civil authorities modern, humane, and effective antiterrorism techniques.⁴

Through the Antiterrorism Assistance Program, DS's Office of Antiterrorism Assistance (ATA) provided counterterrorism training to more than 165,000 law enforcement personnel from more than 150 countries from 1983 through 2024. The training included topics such as bomb detection and disposal, cyberterrorism, tactical medicine, and crisis response. In addition, the Antiterrorism Assistance Program provided equipment, consultations, and mentorships to enhance partner nation law enforcement capabilities. The Antiterrorism Assistance Program was allocated \$161.5 million in FY 2023 and \$159.2 million in FY 2024.

¹ On January 20, 2025, during OIG's audit fieldwork, the President issued a Presidential Action ordering all department and agency heads with responsibility for U.S. foreign development assistance programs to "immediately pause new obligations and disbursements of development assistance funds to foreign countries and implementing non-governmental organizations, international organizations, and contractors pending reviews of such programs for programmatic efficiency and consistency with United States foreign policy." The responsible department and agency heads were ordered to determine within 90 days whether to continue, modify, or cease each foreign assistance program based upon the review recommendations, with the concurrence of the Secretary of State. This pause affected OIG's scope of work and its ability to conduct audit fieldwork in selected partner nations. The pause also impacted the overall Antiterrorism Assistance Program.

² Public Law 98-151, § 101(b)(2) (November 14, 1983), codified at 22 United States Code (U.S.C.) § 2349aa, "General authority."

³ Ibid.

⁴ 22 U.S.C. § 2349aa-1, "Purposes."

Antiterrorism Assistance Program Management and Oversight

Two Department of State (Department) bureaus have significant roles in the management and oversight of the Antiterrorism Assistance Program. Specifically, the Bureau of Counterterrorism (CT) provides funding, policy formulation, and oversight of the program, and ATA administers and implements the program.⁵ According to the Department, CT and ATA work with the Department's regional bureaus and overseas posts to ensure that program activities are focused on countries that face the threat of terrorism, partner nations' operational needs, and U.S. national security interests. In addition, according to the Department, the Antiterrorism Assistance Program is most effective in countries whose governments have the political will and the basic law enforcement capabilities to effectively use and ultimately sustain the advanced training that ATA provides.

Bureau of Counterterrorism

The Department's Foreign Affairs Manual (FAM) states that CT is responsible for international counterterrorism strategy, policy, and operations and for coordinating counterterrorism activities among U.S. government agencies.⁶ CT also is responsible for policy oversight of all Department counterterrorism programs, including the Antiterrorism Assistance Program.⁷ CT is responsible for identifying countries and regions with high terrorist threats and strong political will, where counterterrorism capabilities can be improved to further U.S. national security interests. In addition, as delineated in a Memorandum of Agreement between CT and DS regarding the Antiterrorism Assistance Program, CT is responsible for policy formulation, strategic guidance, and policy and funding oversight.⁸ For example, CT is responsible for developing specific strategic goals for the Antiterrorism Assistance Program, working with ATA to develop country implementation plans (CIP) and performance indicators, and reviewing monitoring data provided by ATA to measure progress.

Office of Antiterrorism Assistance

The FAM states that ATA is the primary implementer of the Antiterrorism Assistance Program.⁹ ATA is responsible for program administration and implementation, in coordination with CT.¹⁰ Specifically, ATA is responsible for developing training curricula, selecting trainers, planning and executing training, collecting monitoring data, and submitting quarterly program and financial

⁵ Department, "Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism," November 10, 2020.

⁶ 1 FAM 481.1 (a-b), "Responsibilities."

⁷ 1 FAM 481.1 (d-e).

⁸ Department, "Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism," November 10, 2020.

⁹ 1 FAM 262.5-1, "Office of Antiterrorism Assistance (DS/T/ATA)."

¹⁰ 1 FAM 262.5-1 (1).

reports to CT.¹¹ ATA is also required to develop, implement, and annually update the CIPs.¹² ATA's Assessment and Monitoring Unit is responsible for monitoring each partner nation's progress towards accomplishing stated programmatic objectives.

Department Monitoring Guidance

According to the FAM, the core of program design is constructing the logic of how and why a program or project is intended to work.¹³ Projects must have either a logic model¹⁴ or a project charter that defines the project, justification, scope, stakeholders, and key deliverables.¹⁵ Bureaus must develop a monitoring plan for their programs or projects and incorporate its use into program and project management.¹⁶ Monitoring plans involve regular, ongoing data collection for key performance indicators or milestones to gauge the direct and near-term effects of activities and whether the program is achieving desired results.¹⁷ The monitoring plan should also specify data collection frequency for each indicator.¹⁸ Data for each performance indicator should be collected at the frequency feasible and necessary to effectively manage and monitor progress and results, conduct internal learning, and meet external reporting or communication requirements.¹⁹

Country Implementation Plans

CIPs are the foundation of an ATA training assistance plan for a partner nation.²⁰ In creating a CIP, CT is responsible for defining the context (e.g., threats, scope, and targeted units), country-specific strategic goals, and available and projected budgets. ATA is responsible for translating CT's input into programmatic objectives.²¹ ATA should address each programmatic objective through activities such as training, mentoring, consultations, and equipment grants and should identify which activities support sustainment.²² ATA should then assess the critical capabilities relevant to the country-specific strategic goals and programmatic objectives to develop the

¹¹ Department, "Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism," November 10, 2020.

¹² Ibid.

¹³ 18 FAM 301.4-1 (B), "Definitions."

¹⁴ 18 FAM 301.4-1 (B), "Definitions," states that a logic model is "[a] methodology used for program or project design that focuses on the causal links between project inputs, activities, outputs, short-term outcomes, and long-term outcomes. It is a visual representation that shows the sequence of related events connecting a planned program's or project's objectives with its desired outcomes."

¹⁵ 18 FAM 301.4-2 (e)(4).

¹⁶ 18 FAM 301.4-3 (B)(a), "Monitoring Plans."

¹⁷ 18 FAM 301.4-3 (b), "Monitoring."

¹⁸ "Department of State Program and Project Design, Monitoring, and Evaluation Policy" (November 2017).

¹⁹ Ibid.

²⁰ DS and CT, "TMD Country Implementation Plan," October 23, 2020.

²¹ Ibid.

²² Ibid.

performance monitoring plan, which is included as an annex to the CIP.²³ The CIP is intended to provide critical information as a guiding document and as a basis for planning budget and training, and serves as a source of information for posts when annually updating their Integrated Country Strategies.^{24,25}

AUDIT RESULTS

Finding A: ATA Did Not Collect Sufficient Data To Demonstrate Whether Program Goals and Objectives Were Accomplished in Selected Countries

OIG was unable to determine whether ATA achieved the stated goals and objectives of the Antiterrorism Assistance Program in selected partner nations (Côte d'Ivoire, Senegal, and Togo) because ATA did not collect sufficient data to measure progress towards achieving goals and objectives for the indicators included in each selected partner nation's monitoring plan. OIG also found that ATA did not always submit program or financial reports to CT in a timely manner and that some program reports did not always document progress related to specific tasks.

These deficiencies occurred, in part, because ATA did not develop a sufficient methodology to collect performance-related data and its monitoring and reporting guidance was insufficient. In addition, CT could improve various aspects of its program oversight. Furthermore, the Memorandum of Agreement between CT and DS did not include a mechanism to ensure that ATA met its monitoring and reporting obligations. Additionally, the Antiterrorism Assistance Program monitoring plans included performance indicators for which no data was collected. Lastly, CT efforts to develop a quarterly financial report template that was sufficient to capture detailed financial information had not been finalized. Until these deficiencies are addressed, CT and DS cannot demonstrate that the Antiterrorism Assistance Program is helping the selected partner nations build critical capabilities to defend against terrorism threats as intended.

Collecting Data To Assess Programmatic Goals and Objectives

According to the FAM, bureaus and offices must monitor the performance of their programs and projects, which involves regular, ongoing data collection for performance indicators to gauge the effects of activities and whether they yield desired results.²⁶ The FAM also states that bureaus and offices should ensure that monitoring data are collected, managed, analyzed, and reported to support management needs.²⁷ According to the Memorandum of Agreement between CT and DS, ATA is responsible for monitoring all partner nations with an Antiterrorism

²³ Ibid.

²⁴ 18 FAM 301.2-2, "Definitions," states that an Integrated Country Strategy is a 4-year strategic plan that "articulates whole-of-government priorities in a given country and incorporates higher level planning priorities."

²⁵ DS and CT, "TMD Country Implementation Plan," October 23, 2020.

²⁶ 18 FAM 301.4-3, "Monitoring."

²⁷ Ibid.

Assistance Program and collecting data for all agreed-upon indicators as they relate to ATA training outputs and short-term and long-term outcomes.²⁸ CT is responsible for reviewing and analyzing monitoring the data provided by ATA to measure the progress toward achieving policy objectives.²⁹ Department guidance states that data for monitoring plan performance indicators should be collected at the frequency feasible and necessary to effectively manage and monitor progress and results.³⁰

OIG found that although ATA developed clearly defined programmatic goals and objectives, as required by the FAM,³¹ it did not collect sufficient data to measure progress towards achieving goals and objectives for the indicators included in each selected partner nation's monitoring plans.³² Specifically, OIG reviewed 16 quarterly data spreadsheets used by ATA to track performance in the three partner nations and found that the data in the spreadsheets were insufficient to determine whether the partner nations were meeting Antiterrorism Assistance Program goals and objectives. Each monitoring plan contained 15 performance indicators³³ for each program functional area such as border security. For 10 of these indicators, ATA was required to collect data through a training skills audit or a monitoring visit; however, there was no required frequency for conducting these functions.³⁴ ATA personnel stated that training skills audits were rarely performed. The three indicators requiring data from a training skills audit were not included in any of the spreadsheets that OIG reviewed, indicating that ATA was not tracking progress in achieving those indicators. Additionally, it was difficult for OIG to determine whether the selected partner nations were achieving desired program results because ATA only collected some but not all required data at the conclusion of ATA-provided training courses on a quarterly basis.

Because no time requirement has been established to conduct a monitoring visit, ATA personnel stated that they may not perform monitoring visits for up to 5 years.³⁵ The Antiterrorism Assistance Program began for Côte d'Ivoire and Togo in FY 2024 and for Senegal in FY 2005. ATA personnel stated that they did not conduct monitoring visits in Côte d'Ivoire and Togo because the programs were too new. Therefore, ATA collected data for only 5 of 15 indicators throughout FY 2024 for each of these two partner nations. Furthermore, ATA

²⁸ Department, "Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism," November 10, 2020.

²⁹ Ibid.

³⁰ "Department of State Program and Project Design, Monitoring, and Evaluation Policy" (November 2017)

³¹ 18 FAM 301.4-2 (d)(3).

³² Performance indicators from the ATA monitoring plans are included in Appendix B.

³³ Of the 15 performance indicators, 7 were output indicators, 4 were short-term outcome indicators, and 4 were long-term outcome indicators.

³⁴ Three indicators required data collected from a training skills audit, and seven indicators required data collected from a monitoring visit.

³⁵ ATA officials stated that ATA used a methodology to select countries for monitoring visits based on multiple factors such as program size, number of participants trained, number of course deliveries, date of last monitoring visit, and known travel or security restrictions.

personnel conducted a monitoring visit to Senegal in the first quarter of FY 2023 but only collected data for 5 of 7 indicators.³⁶ For example, ATA personnel did not collect data regarding the percentage of participants who reported using learned skills during their jobs. If a training skills audit or a monitoring visit is not conducted during a quarter, then the monitoring data will generally indicate “not applicable,” making it impossible to measure progress towards achieving program goals and objectives.

ATA Quarterly Program and Financial Reporting

According to the Memorandum of Agreement between CT and DS, ATA is responsible for submitting quarterly program and financial reports to CT using an online platform.³⁷ ATA is required to submit the reports within 1 month of the quarter closing date, using an agreed-upon template.³⁸ In addition, the quarterly program reports are required to identify ATA program activities, and the quarterly financial reports are required to be certified by DS’s Office of the Chief Financial Officer.³⁹

OIG found that ATA did not always submit timely quarterly program reports to CT. Specifically, of the 16 quarterly program reports that OIG reviewed, 10 (63 percent) were submitted between 1 and 4 weeks late. In addition, OIG was unable to determine the dates that two quarterly program reports were submitted. OIG also found that ATA’s quarterly program reports did not always document progress related to specific tasks from the CIPs, making it difficult to determine whether ATA was progressing in those tasks. For example, the Côte d'Ivoire CIP stated that ATA would purchase vehicles for proper operational deployment and intervention. However, none of the four FY 2024 quarterly program reports that OIG reviewed for Côte d'Ivoire mentioned vehicle purchases. In addition, the Senegal CIP included a task related to curriculum development. However, none of the four FY 2024 quarterly program reports for Senegal mentioned whether this task was accomplished.

OIG also found that ATA did not submit agreed-upon quarterly financial reports to CT from the third quarter of FY 2023 through the fourth quarter of FY 2024.⁴⁰ ATA personnel stated that they did not prepare quarterly financial reports because ATA was severely short staffed and would prepare the reports once it had filled several vacant positions. In addition, OIG found that three of the selected quarterly financial reports, prepared in FY 2023, were not certified by DS’s Office of the Chief Financial Officer as required and did not include detailed financial information. Instead, these three financial reports only provided an overview of funding by

³⁶ The previous monitoring visit to Senegal occurred in FY 2019.

³⁷ Department, “Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism,” November 10, 2020.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ ATA submitted quarterly financial reports for the fourth quarter of FY 2024 for Côte d'Ivoire, Senegal, and Togo to OIG on January 23, 2025. OIG did not include these reports in its analysis because they were prepared in response to an OIG request. Additionally, the reports were more than 80 days late.

appropriation; therefore, users could not determine how the funds were spent. CT personnel stated that ATA's quarterly financial reports were a "mystery" and were difficult to understand.

Causes of Deficiencies Identified

One reason for the deficiencies identified in this report was that ATA had not developed a sufficient methodology to collect performance-related data without a monitoring visit. ATA personnel stated that the best method to determine program success is by conducting monitoring visits. However, because no time requirement had been established for conducting a monitoring visit, ATA personnel stated that they may not perform a visit to a partner nation for up to 5 years.⁴¹ The duration of each Antiterrorism Assistance Program varies; therefore, it is possible that ATA personnel might never perform a monitoring visit for certain programs depending on the program's duration. ATA personnel stated that they could infer some level of success by using ATA's logic model for performance oversight. However, ATA personnel also stated that, outside of outputs and success stories,⁴² it is difficult to determine whether a partner nation achieved programmatic goals and objectives. Furthermore, ATA personnel stated that they had discussed developing criteria that overseas posts could use to provide feedback in the absence of a monitoring visit. CT personnel stated that they were revising the Memorandum of Agreement with DS to focus on indicator levels and longer-term outcomes instead of focusing on outputs.

Another reason for the deficiencies identified was that ATA's monitoring and reporting guidance was insufficient. ATA's policy for indicator data collection and reporting was comprised of one sentence: ATA indicator data collection and reporting will be conducted by the unit responsible for the specific indicator data at the prescribed frequency shown in each monitoring plan.⁴³ This policy was not sufficient to ensure that indicator data were consistently collected, documented, and reviewed. Additionally, ATA's policy for joint planning and reporting required ATA to create quarterly reports using an agreed-upon template identify Antiterrorism Assistance Program activities and funding in the report, and submit the report to CT within 1 month after the quarter ended.⁴⁴ However, the policy did not identify who within ATA should track specific CIP tasks that were considered necessary to support or accomplish specific goals and objectives. Furthermore, the policy did not include instructions for preparing, submitting, and reviewing quarterly program and financial reports.

In addition, CT could improve various aspects of its program oversight to ensure that ATA conducts sufficient monitoring and reporting. CT personnel stated that ATA's quarterly monitoring data for performance indicators, as well as quarterly program and financial reports

⁴¹ ATA officials stated that ATA used a methodology to select countries for monitoring visits based on multiple factors such as program size, number of participants trained, number of course deliveries, date of last monitoring visit, and known travel or security restrictions.

⁴² "Success stories" are a long-term outcome monitoring plan performance indicator used to document partner nation success following a monitoring visit. ATA, "2022 Monitoring Program Summary," January 9, 2023.

⁴³ ATA, "TMD Indicator Data Collection and Reporting," June 15, 2020.

⁴⁴ "CT and DS – Joint Planning and Reporting," November 23, 2020.

provided by ATA, were insufficient, incomplete, or difficult to understand. For example, CT personnel stated that ATA only collected data for some of the output indicators included in the performance monitoring plans. According to CT personnel, CT should have provided more oversight, but it was short-staffed. For example, instead of holding ATA accountable for not providing the required quarterly financial reports, CT officials stated that they requested financial information from ATA on an ad hoc basis.

Furthermore, the Memorandum of Agreement between CT and DS did not include a mechanism to hold ATA accountable for meeting its monitoring and reporting obligations and did not describe CT's responsibilities related to quarterly program and financial reporting.⁴⁵ The Memorandum of Agreement states that "[d]ivergence of opinion that may develop concerning the translation of policy guidance objectives into specific training programs, or the impact of specific training programs on policy objectives will be resolved by the responsible Deputy Assistant Secretary-level officials in CT and DS, in consultation with the appropriate regional bureau as needed."⁴⁶ However, the agreement does not include a method to resolve other matters that may arise between CT and DS. Furthermore, the agreement includes only ATA's responsibilities related to reporting. In February 2025, CT officials provided a draft Memorandum of Agreement between CT and DS that included substantial changes.⁴⁷ However, CT did not include a mechanism that could be used to ensure that ATA met its monitoring and reporting obligations or describe CT's responsibilities regarding quarterly reporting in the updated Memorandum of Agreement.

Additionally, the Antiterrorism Assistance Program monitoring plans included performance indicators for which no data was collected. According to ATA personnel, three performance indicators in the monitoring plan, which were not included in the quarterly monitoring data, were related to the training skills audit. ATA personnel stated that these indicators were for a pilot program that was rarely implemented. Additionally, ATA personnel stated that they kept the performance indicators in the monitoring plans in case the pilot program was implemented in the future, but they may remove the training skills audit performance indicators.

Lastly, CT efforts to develop a quarterly financial report template that was sufficient to capture detailed financial information had not been finalized. CT personnel stated that CT and ATA were actively developing a more useful quarterly financial reporting template.

Deficiencies Negatively Impact Antiterrorism Assistance Program Efforts

The issues identified during the audit increase the risk that CT and DS will be unable to effectively manage and monitor progress and results for the Antiterrorism Assistance Program

⁴⁵ Department, "Department of State Memorandum of Agreement Between the Office of Antiterrorism Assistance of the Bureau of Diplomatic Security and the Office of Programs of the Bureau of Counterterrorism," November 10, 2020.

⁴⁶ Ibid.

⁴⁷ CT personnel stated this draft was provided to ATA for comment, but CT had not received a response from ATA as of April 18, 2025.

activities in Côte d'Ivoire, Senegal, and Togo. Additionally, CT and DS will be unable to gauge the effects of Antiterrorism Assistance Program activities and assess whether the program is achieving desired results. OIG concluded that, until the deficiencies identified are addressed, CT and DS will not be able to demonstrate that the Antiterrorism Assistance Program is helping the selected partner nations build critical capabilities to defend against terrorism threats as intended. OIG is therefore offering the following recommendations.

Recommendation 1: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a methodology to collect Office of Antiterrorism Assistance performance-related data for the Antiterrorism Assistance Program in the absence of monitoring visits to partner nations.

Management Response: DS partially agreed with the recommendation, stating that ATA has already implemented a structured methodology to collect performance-related data in the absence of in-person monitoring visits. ATA stated that this methodology includes using remote data collection tools, logic models, and theories of change that follow Department policies and best practices. ATA indicated that its methodology is aligned with 18 FAM 301.4. Additionally, ATA stated that it employs a prioritization formula to direct monitoring visits to countries with the greatest need by considering factors such as program maturity, operational constraints, and available resources. ATA indicated that it may encounter operational challenges when considering remote data collection, such as information security concerns expressed by partner nations, unreliable internet connectivity, in-country security concerns, language or digital literacy barriers, budget reductions, and U.S. foreign policy priority shifts.

OIG Reply: On the basis of DS's response to the recommendation, OIG considers this recommendation unresolved and will pursue resolution of the recommendation during the audit compliance process. In the Audit Results section of this report, OIG stated that ATA collected some performance-related data; however, the data collected for the indicators included in the monitoring plans was insufficient to measure progress in achieving the goals and objectives. OIG provided details of the performance data that was missing from 16 quarterly data spreadsheets that ATA used to track performance at three selected partner nations. OIG's finding demonstrates the need for ATA to develop and implement a methodology to obtain performance-related data more effectively. This recommendation will be considered resolved when DS provides a plan of action for addressing the recommendation or provides an acceptable alternative that fulfills the intent of the recommendation. This recommendation will be closed when OIG receives documentation demonstrating that DS has developed and implemented a methodology to collect ATA performance-related data for the Antiterrorism Assistance Program in the absence of monitoring visits to partner nations.

Recommendation 2: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include information related to consistently collecting, documenting, and reviewing indicator data for activities in partner nations.

Management Response: DS agreed with the recommendation, stating that it will coordinate with CT “to update ATA policies, procedures, and guidance, to include information related to the consistent collection, documentation, and review of indicator data concerning ATA activities in partner nations.”

OIG Reply: On the basis of DS’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 DS has updated ATA policies, procedures, and guidance to include information related to consistently collecting, documenting, and reviewing indicator data for activities in partner nations.

Recommendation 3: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include instructions for preparing, submitting, and reviewing quarterly program and financial reports and describe roles and responsibilities related to tracking specific tasks in the country implementation plans.

Management Response: DS agreed with the recommendation, stating that it will coordinate with CT “to update ATA policies, procedures, and guidance for preparing, submitting, and reviewing quarterly program and financial reports, and describing roles and responsibilities related to tracking specific tasks in the country implementation plans.”

OIG Reply: On the basis of DS’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 DS has updated ATA policies, procedures, and guidance to include instructions for preparing, submitting, and reviewing quarterly program and financial reports and describing roles and responsibilities related to tracking specific tasks in the country implementation plans.

Recommendation 4: OIG recommends that the Bureau of Counterterrorism develop and implement a strategy to improve its oversight of program and financial reports provided by the Office of Antiterrorism Assistance for the Antiterrorism Assistance Program.

Management Response: CT agreed with the recommendation, stating that it will address the recommendation in coordination with DS as appropriate.

OIG Reply: On the basis of CT’s concurrence with the recommendation, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that CT has developed and implemented a strategy to improve its oversight of program and financial reports provided by ATA for the Antiterrorism Assistance Program.

Recommendation 5: OIG recommends that the Bureau of Counterterrorism (CT), in coordination with the Bureau of Diplomatic Security (DS), update the Memorandum of Agreement between CT and DS for the Antiterrorism Assistance Program to include a

mechanism to ensure that the Office of Antiterrorism Assistance meets its monitoring and reporting obligations and to describe CT's responsibilities related to quarterly program and financial reporting.

Management Response: CT agreed with the recommendation, stating that it will address the recommendation in coordination with DS as appropriate.

OIG Reply: On the basis of CT's concurrence with the recommendation, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that CT has updated the Memorandum of Agreement between CT and DS for the Antiterrorism Assistance Program to include a mechanism to ensure that ATA meets its monitoring and reporting obligations and to describe CT's responsibilities related to quarterly program and financial reporting.

Recommendation 6: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update Office of Antiterrorism Assistance performance monitoring plans to ensure that all performance indicators are necessary to assess program performance.

Management Response: DS agreed with the recommendation, stating that it will "conduct a strategic review of all performance indicators to ensure their relevance and utility." However, DS stated that "context-specific indicators, even if not expected to produce regular data, are reasonable and consistent with performance monitoring standards. ATA will create a separate section for these indicators for use in specialized circumstances."

OIG Reply: On the basis of DS'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 DS has reviewed and updated ATA performance monitoring plans to ensure that all performance indicators are necessary to assess program performance.

Recommendation 7: OIG recommends that the Bureau of Counterterrorism (CT), in coordination with the Bureau of Diplomatic Security (DS), finalize the quarterly financial reporting template for the Office of Antiterrorism Assistance in accordance with the Memorandum of Agreement between CT and DS.

Management Response: CT agreed with the recommendation, stating that it will address the recommendation in coordination with DS as appropriate.

OIG Reply: On the basis of CT's concurrence with the recommendation, OIG considers this recommendation resolved, pending further action. This recommendation will be closed when OIG receives documentation demonstrating that CT has finalized the quarterly financial reporting template for ATA.

OTHER MATTER

Unused Equipment Acquired for the Program Expired

OIG found equipment acquired from 2019 through 2023 for the Antiterrorism Assistance Program in Senegal, valued at \$285,205, stored in an ATA warehouse. The equipment included weapons, ammunition, and body armor. Some of the equipment, totaling \$38,794 (14 percent), had expired. Additionally, other equipment, totaling \$62,151 (22 percent), will expire by 2030. CT personnel stated that they were unaware that unused equipment for Senegal was stored at the ATA warehouse.

This situation occurred because ATA policies and procedures regarding equipment acquisition and reassignment were insufficient. Specifically, ATA's standard operating procedures⁴⁸ did not include a requirement to notify CT about excess equipment. Additionally, the policies and procedures did not include a requirement to determine whether other partner nations were suitable recipients of excess equipment or whether ATA's Logistics Unit could determine another user for the equipment. Additionally, ATA's standard operating procedures did not require ATA to consider using the equipment before acquiring new, similar equipment. ATA personnel stated that they planned to resolve the issues related to the expired equipment. ATA personnel also stated they were updating policies and procedures to prevent this issue from reoccurring. OIG is questioning the cost of the expired equipment acquired for Senegal and located at the ATA warehouse, valued at \$38,794, because that equipment expired. OIG also considers the value of the remaining unexpired equipment, totaling \$246,411, to be funds that could be put to better use because the equipment could be used if management takes appropriate action.

Recommendation 8: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update equipment-related policies and procedures for the Antiterrorism Assistance Program to address how to handle excess equipment, including a timeframe for reassigning or determining the disposition of excess equipment.

Management Response: DS agreed with the recommendation, stating that it has drafted updates to its standard operating procedures. Once these standard operating procedures are finalized, ATA will submit them to OIG for review.

OIG Reply: On the basis of DS'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 DS has reviewed and updated equipment-related policies and procedures for the Antiterrorism Assistance

⁴⁸ ATA, "Procurement and Logistics Section Procurement Standard Operating Procedures," undated; "Equipment Only Orders Standard Operating Procedure," July 3, 2024; "Inventory Management Using the First In, First Out System Standard Operating Procedure," May 4, 2022; and "Reassignment of Grant Equipment from Cancelled Activities Standard Operating Procedure," December 6, 2016.

Program to address how to handle excess equipment, including a timeframe for reassigning or determining the disposition of excess equipment.

Recommendation 9: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a plan to use, or dispose of, as appropriate, the \$246,411 in unexpired equipment acquired for the Antiterrorism Assistance Program in Senegal and stored at an Office of Antiterrorism Assistance warehouse. This amount is considered funds that could be put to better use.

Management Response: DS partially agreed with the recommendation, stating that the “equipment will be provided to support units that were previously trained in that discipline as lifecycle replacement and sustainment equipment.” However, DS does not believe that these funds could be put to better use because the funds were correctly obligated to purchase the equipment for the bona fide need at the time of purchase.

OIG Reply: On the basis of DS’s response to the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The United States Code (5 U.S.C. § 405(a)(5), “Reports,”) states that recommendations that funds be put to better use means that “funds could be used more efficiently if management . . . took actions to implement and complete the recommendation.”⁴⁹ Therefore, funds can be obligated correctly and can still be considered funds that could be put to better use at a later point in time. This recommendation will be closed when OIG receives documentation demonstrating that DS has developed and implemented a plan to use, or dispose of, as appropriate, the unexpired equipment acquired for the Antiterrorism Assistance Program in Senegal and stored in an ATA warehouse.

Recommendation 10: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, dispose of the expired equipment that was acquired for the Antiterrorism Assistance Program in Senegal and stored at an Office of Antiterrorism Assistance warehouse, valued at \$38,794. OIG considers this amount a questioned cost because the equipment expired, and it expired because of insufficient oversight and policy guidance.

Management Response: DS partially agreed with the recommendation, stating that the expired ballistic plates will be used during training exercises that do not involve live ammunition, thus providing a use for the expired ballistic plates. DS stated that ATA is updating its standard operating procedures for improved inventory management of items that expire. However, DS does not believe that these funds could be put to better use because the funds were correctly obligated to purchase the equipment for the bona fide need at the time of purchase. Once properly purchased, the equipment cannot be reprogrammed. ATA is developing and implementing a method to track expiration dates and to use inventory management methods so that equipment does not expire because of insufficient oversight and policy guidance.

⁴⁹ 5 U.S.C § 405(a)(5), “Reports.”

OIG Reply: On the basis of DS's response to the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. Like OIG's reply regarding Recommendation 9, 5 U.S.C. § 405(a)(5), states that recommendations that funds be put to better use means that "funds could be used more efficiently if management . . . took actions to implement and complete the recommendation." Therefore, funds can be obligated correctly and can still be considered funds that could be put to better use at a later point in time. This recommendation will be closed when OIG receives documentation demonstrating that DS has disposed of or otherwise used the expired equipment that was acquired for the Antiterrorism Assistance Program in Senegal and stored at an ATA warehouse.

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a methodology to collect Office of Antiterrorism Assistance performance-related data for the Antiterrorism Assistance Program in the absence of monitoring visits to partner nations.

Recommendation 2: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include information related to consistently collecting, documenting, and reviewing indicator data for activities in partner nations.

Recommendation 3: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include instructions for preparing, submitting, and reviewing quarterly program and financial reports and describe roles and responsibilities related to tracking specific tasks in the country implementation plans.

Recommendation 4: OIG recommends that the Bureau of Counterterrorism develop and implement a strategy to improve its oversight of program and financial reports provided by the Office of Antiterrorism Assistance for the Antiterrorism Assistance Program.

Recommendation 5: OIG recommends that the Bureau of Counterterrorism (CT), in coordination with the Bureau of Diplomatic Security (DS), update the Memorandum of Agreement between CT and DS for the Antiterrorism Assistance Program to include a mechanism to ensure that the Office of Antiterrorism Assistance meets its monitoring and reporting obligations and to describe CT's responsibilities related to quarterly program and financial reporting.

Recommendation 6: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update Office of Antiterrorism Assistance performance monitoring plans to ensure that all performance indicators are necessary to assess program performance.

Recommendation 7: OIG recommends that the Bureau of Counterterrorism (CT), in coordination with the Bureau of Diplomatic Security (DS), finalize the quarterly financial reporting template for the Office of Antiterrorism Assistance in accordance with the Memorandum of Agreement between CT and DS.

Recommendation 8: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update equipment-related policies and procedures for the Antiterrorism Assistance Program to address how to handle excess equipment, including a timeframe for reassigning or determining the disposition of excess equipment.

Recommendation 9: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a plan to use, or dispose of, as appropriate, the \$246,411 in unexpired equipment acquired for the Antiterrorism Assistance Program in Senegal and stored at an Office of Antiterrorism Assistance warehouse. This amount is considered funds that could be put to better use.

Recommendation 10: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, dispose of the expired equipment that was acquired for the Antiterrorism Assistance Program in Senegal and stored at an Office of Antiterrorism Assistance warehouse, valued at \$38,794. OIG considers this amount a questioned cost because the equipment expired, and it expired because of insufficient oversight and policy guidance.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this audit to determine whether the Bureau of Diplomatic Security's (DS) Antiterrorism Assistance Program achieved its stated goals and objectives in selected partner nations.

OIG conducted this audit from October 2024 to April 2025 in the Washington, DC, metropolitan area. The scope of this audit was the Antiterrorism Assistance Program in Côte d'Ivoire, Senegal, and Togo during FY 2023 and FY 2024. On January 20, 2025, during audit fieldwork, a Presidential Action¹ was issued ordering all department and agency heads with responsibility for U.S. foreign development assistance programs to "immediately pause new obligations and disbursements of development assistance funds to foreign countries and implementing non-governmental organizations, international organizations, and contractors pending reviews of such programs for programmatic efficiency and consistency with United States foreign policy." The responsible department and agency heads were ordered to determine within 90 days whether to continue, modify, or cease each foreign assistance program based upon the review recommendations, with the concurrence of the Secretary of State. The pause in U.S. foreign development assistance and its impact on the Antiterrorism Assistance Program affected OIG's ability to conduct audit fieldwork in selected partner nations. Specifically, OIG's scope was limited because it could not travel to the three countries selected for review or meet with personnel working in these countries.

Except for this scope limitation, 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 for the audit, OIG reviewed the Foreign Assistance Act of 1961,² the Department's Foreign Affairs Manual (FAM), and bureau-specific standard operating procedures and guidance. OIG also obtained and reviewed Department strategies and plans related to the Antiterrorism Assistance Program, including Functional Bureau Strategies for DS, the Bureau of Counterterrorism (CT), and the Bureau of African Affairs (AF); Regional Frameworks; Integrated Country Strategies; Country Implementation Plans (CIP); and Capability Assessments.

To determine whether the Antiterrorism Assistance Program achieved its stated goals and objectives in selected partner nations, OIG met with Antiterrorism Assistance Program stakeholders, including personnel in AF, CT, and DS. Additionally, OIG obtained and reviewed

¹ Executive Order 14169, Reevaluating and Realigning United States Foreign Aid, January 20, 2025.

² Public Law 87-195, September 4, 1961.

Antiterrorism Assistance Program documentation, including monitoring data, quarterly program reports, and quarterly financial reports.

Data Reliability

OIG used electronically processed data provided by DS’s Office of Antiterrorism Assistance (ATA) in Microsoft Excel format, titled “FY23 and FY24 Program Allocations,” to judgmentally select a sample of partner nations to review. To assess the data reliability, OIG interviewed knowledgeable ATA personnel and compared the FY 2024 amounts that ATA provided to the amounts in the CIPs for Côte d'Ivoire, Senegal, and Togo. OIG did not identify any significant discrepancies in the FY 2024 data. OIG concluded the data were sufficiently reliable for the purpose of selecting a sample of partner nations for review.

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*³ 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.

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

Components	Principles
Control Activities	Principle 10: Management should design control activities to achieve objectives and respond to risks. Principle 12: Management should implement control activities through policies.

³ Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

Components	Principles
Monitoring	Principle 16: Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

Source: Generated by OIG 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 reviewed criteria, interviewed Department personnel, conducted a walkthrough of an ATA equipment warehouse, and reviewed documents to obtain an understanding of the internal controls related to the components and principles identified as significant for this audit. OIG also assessed the design and implementation of key internal controls. Specifically, OIG

- Assessed program goals and objectives in the CIPs to determine whether they were clearly defined and measurable.
- Reviewed monitoring plans and performance indicators to determine whether they were established, clearly defined, and measurable.
- Reviewed quarterly program and financial reports to determine whether they reported information in accordance with requirements accurately, sufficiently, and in a timely manner.
- Reviewed quarterly program reports and supporting documentation to determine whether program goals and objectives were fulfilled in accordance with requirements.

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

OIG's sampling objectives were to judgmentally select (1) a sample of partner nations from DS's Antiterrorism Assistance Program that were allocated funding in FY 2024 and (2) a sample of quarterly program reports, financial reports, and monitoring data points to review for accuracy, timeliness, and sufficiency.

ATA Partner Nations Selected for Review

The Department allocated \$159 million in FY 2024 to carry out the Antiterrorism Assistance Program in 43 partner nations across six regions worldwide, with approximately \$47 million dedicated to counterterrorism efforts in 10 partner nations in the AF region. OIG judgmentally selected the AF region because, of the six regions, it had the largest allocated dollar value for Antiterrorism Assistance Program training in FY 2024. As detailed in Table A.2, OIG judgmentally selected three partner nations in Africa to review.

Table A.2: Summary of Selected Partner Nations for Review

Partner Nation	FY 2024 Allocation
Côte d'Ivoire	\$10,000,000
Senegal	\$4,000,000
Togo	\$6,500,000
Total	\$20,500,000

Source: Generated by OIG from FY 2024 training data provided by ATA.

ATA Quarterly Program Reports, Financial Reports, and Monitoring Data Selected for Review

OIG reviewed the quarterly program and financial reports as well as quarterly monitoring data points for the three selected partner nations from October 1, 2022, through September 30, 2024.⁴ Table A.3 provides information on the number of quarterly program reports, financial reports and monitoring data points that OIG reviewed.

Table A.3: Number of Quarterly Program Reports, Financial Reports, and Monitoring Data Points Selected for Review by Partner Nation

Partner Nation	Period of Selection	Total Quarterly Program Reports	Total Quarterly Financial Reports	Total Quarterly Monitoring Data Points
Côte d'Ivoire	October 1, 2022, to September 30, 2024	4	0	4
Senegal	October 1, 2022, to September 30, 2024	8	3	8
Togo	October 1, 2022, to September 30, 2024	4	0	4
Total		16	3	16

Source: Generated by OIG based on program and financial report data provided by ATA.

Prior Office of Inspector General Reports

In May 2020, OIG reported⁵ that DS and CT had established a monitoring and evaluation process for the Antiterrorism Assistance Program and improved coordination with the Bureau

⁴ DS was not required to prepare quarterly program reports, quarterly financial reports, or quarterly monitoring reports for FY 2023 for Côte d'Ivoire and Togo because these programs did not begin until FY 2024. DS was required to prepare four quarterly program reports, four quarterly financial reports, and four monitoring reports for Côte d'Ivoire and Togo for FY 2024 and eight quarterly program reports, eight quarterly financial reports, and eight monitoring reports for Senegal for FY 2023 and FY 2024. OIG obtained all required quarterly program reports and monitoring reports and 3 of the required 16 quarterly financial reports. According to ATA personnel, ATA did not prepare or submit quarterly financial reports to CT from the third quarter of FY 2023 to the fourth quarter of FY 2024.

⁵ OIG, *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).

of Democracy, Human Rights, and Labor to ensure that countries were eligible for assistance. In addition, OIG reported that DS established standard operating procedures for contract oversight, including a standardized reporting process. Furthermore, OIG reported that DS implemented a process to ensure it properly recorded weapons and equipment transfers in a manner appropriate for the partner country. However, OIG found that DS and CT needed to take additional steps to ensure personnel followed the established monitoring and evaluation process and accurately reported program results in accordance with Department policy. Specifically, in the East Asia Pacific region, OIG found that neither DS nor CT consistently established baseline data and performance targets or reported outcome data for the Antiterrorism Assistance Program. Furthermore, they did not establish sustainability measures and timelines to determine when partner countries could sustain their antiterrorism programs without U.S. government support, nor did they include information about Antiterrorism Assistance Programs funded with regional and Department of Defense funds in quarterly progress reports. The four recommendations offered in the report have been implemented and closed.

In June 2020, OIG reported⁶ that CT's monitoring and evaluation framework did not fully comply with the Department's standards. Specifically, the bureau had not developed performance management plans for 13 of its 15 major programs. Furthermore, OIG reported that federal agency implementing partners did not submit quarterly program and financial reports or submitted fewer than required, which contributed to weaknesses in funds control and program management. Additionally, CT personnel did not always include monitoring documentation in federal assistance awards files to show whether a recipient performed the award in accordance with the statement of work. The seven recommendations offered in the report have been implemented and closed.

⁶ OIG, *Inspection of the Bureau of Counterterrorism's Foreign Assistance Program Management* (ISP-I-20-14, June 2020).

APPENDIX B: ANTITERRORISM ASSISTANCE PROGRAM PERFORMANCE INDICATOR DATA COLLECTION AND REPORTING REQUIREMENTS

The Office of Antiterrorism Assistance (ATA) is required to collect performance indicator data for each functional area and each objective identified in the country implementation plan. Figure B.1 provides the performance indicators from the ATA monitoring plans.

Figure B.1: Performance Indicators From ATA Monitoring Plans

Row #	Indicator	Data Source	Data Collection/Inputting		Reporting		Indicator Type
			Frequency	Unit(s) Responsible	Frequency	Unit Responsible	
1	Number of participants that completed ATA-provided training Unit: Number; Disaggregate: Gender	Class roster, STARS database, Training Delivery Reports (TDRs)	Daily	TED TCD	Quarterly	AMU	Output
2	Percentage of ATA-provided training courses where scores increased by at least 25% from the Pre- to Post-Knowledge Survey (Test) Unit: Number, Percentage	TDRs, Pre- and Post-Knowledge Survey (Test) Scores	Daily	TED TCD	Quarterly	AMU	Output
3	Number of participants that completed ATA-provided sustainment (e.g., Instructor Development, Train-the-Trainer, Curriculum Writing, etc.) training Unit: Number; Disaggregate: Gender	SNAPSHOT database	Quarterly	AMU	Quarterly	AMU	Output
4	ATA-assisted in-country infrastructure enhancements provided (e.g., infrastructure improvements at Regional Training Centers or in individual Partner Nations, or for K-9 programs) Unit: Nominal (Yes/No)	TMD PM	Quarterly	TMD	Quarterly	AMU	Output
5	ATA-provided mentor/senior counterterrorism advisor deployed Unit: Nominal (Yes/No)	TMD PM	Quarterly	TMD	Quarterly	AMU	Output
6	Percentage of participants that completed mentor-led/mentee-assisted instruction who received an overall score of 80% or greater on the training skills audit Unit: Number, Percentage	Training Skills Audit Scores	Following Training Audit	AMU	Following Training Audit	AMU	Output
7	Percentage of participants that completed mentee-led/mentor-assisted instruction for training who received an overall score of 80% or greater on the training skills audit Unit: Number, Percentage	Training Skills Audit Scores	Following Training Audit	AMU	Following Training Audit	AMU	Output
8	Percentage of ATA-trained participants who reported using skills and/or knowledge learned from ATA-provided training Unit: Number, Percentage	Monitoring Visit: Survey, interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Short-term Outcome

Row #	Indicator	Data Source	Data Collection/Inputting		Reporting		Indicator Type
			Frequency	Unit(s) Responsible	Frequency	Unit Responsible	
9	Percentage of ATA-trained participants who reported sharing the ATA-provided curriculum with others Unit: Number, Percentage	Monitoring Visit: Survey, interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Short-term Outcome
10	Percentage of ATA-trained participants who reported still using ATA-provided equipment Unit: Number, Percentage	Monitoring Visit: Survey, interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Short-term Outcome
11	Percentage of ATA-trained participants who reported improved capabilities due to an ATA-provided mentor Unit: Number, Percentage	Monitoring Visit: Survey, interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Short-term Outcome
12	PN incorporated the ATA-provided curriculum into training programs, SOPs, and/or exercise standards Unit: Nominal (Yes/No)	Monitoring Visit: Interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Long-term Outcome
13	ATA-trained participants who completed ATA-provided sustainment training and then conducted antiterrorism instruction to others Unit: Nominal (Yes/No)	Monitoring Visit: Interview	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Long-term Outcome
14	Success stories related to ATA-provided training are documented Unit: Nominal (Yes/No)	Monitoring Visit: Interview, Research	Following Monitoring Visit	AMU	Following Monitoring Visit	AMU	Long-term Outcome
15	Percentage of ATA-trained participants that independently conducted instruction and received an overall score of 80% or greater on the training skills audit Unit: Number, Percentage	Training Skills Audit Scores	Following Training Audit	AMU	Following Monitoring Visit	AMU	Long-term Outcome

Source: Department of State, Bureau of Diplomatic Security, "TMD Indicator Data Collection and Reporting," June 15, 2020.

APPENDIX C: BUREAU OF DIPLOMATIC SECURITY RESPONSE



United States Department of State

Washington, D.C. 20520

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Read by _____

September 10, 2025

Info Memo for Inspector General Arne B. Baker – Acting

FROM: DS – Paul R. Houston, Senior Bureau Official

SUBJECT: Bureau of Diplomatic Security Response to the Office of
Inspector General (OIG) Audit of the Antiterrorism Assistance
Program

Below is the Bureau of Diplomatic Security's response to Recommendations 1, 2, 3, 6, 8, 9 and 10 of the subject Report:

Recommendation 1: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a methodology to collect Office of Antiterrorism Assistance performance-related data for the Antiterrorism Assistance Program in the absence of monitoring visits to partner nations.

DS Response (09/10/2025): The Office of Antiterrorism Assistance (ATA) partially concurs with this recommendation. ATA has already implemented a structured methodology to collect performance-related data in the absence of in-person monitoring visits. This methodology includes utilizing remote data collection tools, logic models, and theories of change that follow Department of State policies and best practices. ATA's methodology is in alignment with 18 FAM 301.4 and both 18 FAM 301.4 and ATA's Indicator Data Collection and Reporting Requirements Chart are included as attachments to this response. ATA also employs a prioritization formula to direct monitoring visits to countries with the greatest need by considering factors such as program maturity, operational constraints, and available resources. It is important to note that ATA may encounter operational challenges when considering remote data collection such as information

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security concerns expressed by partner nations, unreliable internet connectivity, in-country security concerns, language or digital literacy barriers, budget reductions, and U.S. foreign policy priority shifts.

ATA respectfully requests additional explanation regarding FAM or other official guidance, references, and citations pertaining to the specific insufficiencies of methodology identified during this audit. This detailed feedback will assist ATA in determining which additional actions are required and help it effectively address the recommendation in a timely manner.

Recommendation 2: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include information related to consistently collecting, documenting, and reviewing indicator data for activities in partner nations.

DS Response (09/10/2025): ATA agrees with OIG's recommendation and will coordinate with the Bureau of Counterterrorism to update ATA policies, procedures, and guidance, to include information related to the consistent collection, documentation, and review of indicator data concerning ATA activities in partner nations.

Recommendation 3: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, update Office of Antiterrorism Assistance policies, procedures, and guidance to include instructions for preparing, submitting, and reviewing quarterly program and financial reports and describe roles and responsibilities related to tracking specific tasks in the country implementation plans.

DS Response (09/10/2025): ATA agrees with OIG's recommendation for ATA to coordinate with the Bureau of Counterterrorism to update ATA policies, procedures, and guidance for preparing, submitting, and reviewing quarterly program and financial reports, and describing roles and responsibilities related to tracking specific tasks in the country implementation plans.

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Recommendation 6: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update Office of Antiterrorism Assistance performance monitoring plans to ensure that all performance indicators are necessary to assess program performance.

DS Response (09/10/2025): ATA agrees with OIG's recommendation and agrees to conduct a strategic review of all performance indicators to ensure their relevance and utility. However, ATA respectfully requests that the OIG audit report acknowledge that context-specific indicators, even if not expected to produce regular data, are reasonable and consistent with performance monitoring standards. ATA will create a separate section for these indicators for use in specialized circumstances while ensuring monitoring plans remain comprehensive.

Recommendation 8: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism (CT), review and update equipment-related policies and procedures for the Antiterrorism Assistance Program to address how to handle excess equipment, including a timeframe for reassigning or determining the disposition of excess equipment.

DS Response (09/10/2025): ATA agrees with OIG's recommendation that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, review and update ATA equipment-related policies for addressing how to handle excess equipment, including a timeframe for reassigning or determining the disposition of excess equipment. ATA has drafted updates to its SOPs and has provided initial copies to OIG. Once those SOPs are finalized, ATA will submit to OIG for review.

Recommendation 9: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, develop and implement a plan to use, or dispose of, as appropriate, the \$246,411 in unexpired equipment acquired for the Antiterrorism Assistance Program in

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Senegal and stored at an Office of Antiterrorism Assistance warehouse. This amount is considered funds that could be put to better use.

DS Response (09/10/2025): ATA partially concurs with this recommendation. ATA has coordinated with CT and internally to secure funding to ship the equipment. The equipment will be provided to support units that were previously trained in that discipline as lifecycle replacement and sustainment equipment. However, ATA does not concur that these funds could be put to better use. The funds were correctly obligated to purchase the equipment for the bona fide need at the time of purchase. Once properly purchased, the funds are no longer available for a "better use." As two Department lawyers have advised ATA "*...the restrictions of the appropriations used to purchase equipment do not carry over to the disposition of such equipment when it becomes excess to the needs of the program for which it was acquired. To put it another way, appropriations law governs the expenditure of funds, not the use and disposition of Government property.*"

Recommendation 10: OIG recommends that the Bureau of Diplomatic Security, in coordination with the Bureau of Counterterrorism, dispose of the expired equipment that was acquired for the Antiterrorism Assistance Program in Senegal and stored at an Office of Antiterrorism Assistance warehouse, valued at \$38,794. OIG considers this amount a questioned cost because the equipment expired, and it expired because of insufficient oversight and policy guidance.

DS Response (09/10/2025): ATA partially concurs with this recommendation. The expired ballistic plates valued at \$38,794 will be shipped and used by the units during training exercises that do not involve live ammunition, such as room-clearing with Simunitions and other related activities, thus providing a use for the expired ballistic plates. ATA is updating its SOPs for improved inventory management of items that expire and will provide those SOPs to OIG once they are completed. However, ATA does not concur that this purchase is a questioned cost. The funds were correctly obligated to purchase the equipment for the bona fide need at the

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time of purchase. Once properly purchased, unless the Program Manager cancels the delivery, the equipment cannot be reprogrammed. ATA is developing and implementing a method to track expiration dates and to use inventory management methods so that equipment does not expire because of insufficient oversight and policy guidance.

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Approved: DS – Paul Houston, SBO

[RET] 9.10.25

Analyst: DS/MGT/PPD – Lauren Morris email - (b) (6) @state.gov

Cleared: DS/DSS: JSweeney (ok)
DS/EX: JSchools (ok)
DS/EX/CFO: KTynan (ok)
DS/EX/MGT: JMater (ok)
DS/MGT/PPD: THouser (ok)
DS/MGT/PPD-Policy: ARay (ok)
DS/HTP: SDixon (ok)
DS/IP: BHale (ok)
DS/T: TLeeds (ok)
DS/TIA: JBush (ok)
M: JHolliman (ok)
M/EX: Bob Collins (ok)

APPENDIX D: BUREAU OF COUNTERTERRORISM RESPONSE



United States Department of State

Washington, DC 20520

September 8, 2025

Dear Ms. Sherry Fullwood:

Thank you for working with CT to address our concerns with the original draft report (Audit of the Bureau of Diplomatic Security's Antiterrorism Assistance Program). We are satisfied with the new draft and the changes made. Regarding the recommendations for which CT has primary responsibility—4,5, and 7—CT intends to address those as recommended and in coordination with DS as appropriate. CT is happy to work in coordination with DS on the recommendations for which they have primary responsibility as well.

Best wishes,

Marianne Toussaint

Marianne S. Toussaint
Director, Office of Programs
Bureau of Counterterrorism
U.S. Department of State

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ABBREVIATIONS

ATA	Office of Antiterrorism Assistance
CIP	Country Implementation Plan
CT	Bureau of Counterterrorism
DS	Bureau of Diplomatic Security
FAM	Foreign Affairs Manual
OIG	Office of Inspector General
U.S.C.	United States Code

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