



# Evaluation of the Bureau of Diplomatic Security's Global Canine Services Center Contract Expansion

## INTRODUCTION

The Department of State (Department), Bureau of Diplomatic Security (DS), Office of Overseas Protective Operations (OPO) is responsible for the protection of people visiting or working for and with the Department domestically and abroad. DS relies on explosive detection canines, and their handlers, as an important part of its ability to provide protective services in its operations worldwide. Prior to 2019, DS contractors under the Worldwide Protective Services (WPS) program provided trained canines and handlers for overseas security details. DS also contracted with Michael Stapleton Associates (MSA)<sup>1</sup> to validate the scent proficiency of canine teams at a validation center in Winchester, Virginia.

In 2019, DS modified its WPS contracts to remove the responsibility for the provision of canines and expanded the MSA contract to include not only the validation of canine teams, but also the procurement, imprinting, and training of canines for its canine program, currently called the Global Canine Services (GCS) program.<sup>2</sup> The Office of Inspector General (OIG) became aware of this change in 2019 when the former DS/OPO Director requested a meeting with OIG personnel to inform them of DS leadership's approval of the expansion plan and to solicit OIG input.<sup>3</sup> Given the magnitude of the MSA contract expansion—from \$95 million to \$250 million—and the apparent conflict of interest involved when a single contractor both trains and validates canines, OIG initiated this evaluation in June 2021. OIG reviewed DS's decision to combine the procurement, imprinting, training, and validation of canines under a single existing contract. OIG also reviewed DS's oversight of the GCS program and how it ensures that the training and subsequent validation by a single

contractor remain independent. OIG conducted this evaluation in accordance with the Quality Standards for Inspection and Evaluation (January 2012) as issued by the Council of the Inspectors General on Integrity and Efficiency.

## BACKGROUND

### HISTORY OF THE GCS PROGRAM

DS/OPO is responsible for the WPS program and awarded the first WPS contract in September 2010. DS awarded a follow-on contract, referred to as WPS II, in 2016.<sup>4</sup> The WPS program fulfills a Department initiative to plan, organize, establish, deploy, and operate contractor-provided personal protection, guard, and support services at special conditions posts.<sup>5</sup> Canines and their handlers are a component of the WPS program used at certain high-threat locations abroad where they regularly conduct searches and inspect vehicles, packages, and luggage for signs of explosives.

The canine component of the WPS program has evolved from a contractor-provided to a DS-controlled operation. Initially, WPS program contractors owned the canines and were responsible for procurement, imprinting, training, validation, and utilization of the canines at security points in countries, including Afghanistan and Iraq. In 2010, OIG examined three DS canine programs in South Asia and the Middle East and found systemic problems that directly affected the safety and security of U.S. government personnel and installations.

### PRIOR OIG REVIEWS

MERO-A-10-05 (March 2010); MERO-A-10-11 (September 2010); MERO-I-10-14 (September 2010)

**Finding:** OIG found systemic weaknesses in canine test procedures that called into question the ability of the canines to effectively detect explosives. The contractors did not test for all mandated scents and used old materials to train and test canines.

**Recommendation:** DS employ an independent canine expert to annually verify the detection capabilities of the contractor's canines and determine whether the contractor is complying with odor recognition proficiency standards.

Following OIG's reviews, DS/OPO conducted its own assessment of canine teams used in Kabul, Afghanistan, in 2013 and found that only 2.5 percent of canines could pass its odor recognition tests. In September 2014, DS contracted with MSA to establish the Canine Validation Center (CVC) to improve the operational effectiveness of canine teams and services and to correct deficiencies identified by OIG in 2010. The contract required MSA to evaluate, validate, and certify canine teams' proficiency levels under the Department's explosives odor detection testing standards. All WPS contractors had to send their canine teams to the CVC to be validated before deployment to high-threat posts around the world.

In addition to its responsibilities for canines for the WPS program, DS/OPO entered into a 2016 Memorandum of Agreement (MOA) with DS's Office of Antiterrorism Assistance (ATA) for explosive detection canine courses and trainings to be conducted at CVC on behalf of DS/ATA. The Department's ATA program provides training and equipment to foreign countries under the Foreign Assistance Act of 1961, as amended, to enhance the ability of their law enforcement personnel to deter and counter terrorism.<sup>6</sup> The provision of canines is one component of the overall ATA program. DS/OPO expanded the contract with MSA

to include the procurement, imprinting, and training of canines for the ATA program.<sup>7</sup> From 2016 to 2019, DS/OPO used MSA and the CVC to procure, imprint, train, and validate the proficiency of canines for the ATA program, but WPS contractors continued to procure, imprint, and train canines for the WPS program, with MSA providing the independent validation at the CVC. In 2019, DS/OPO changed the name of the CVC to the Diplomatic Security Canine Training and Operations Center to better align with its mission.

On October 31, 2019, DS, through the responsible contracting officer (CO), notified WPS contractors that DS would modify their contracts to remove the responsibility for the canine component from the WPS program. The CO letter stated that, effective November 16, 2019, DS would transition from the use of WPS contractor canines to government-owned and provided canines.<sup>8</sup> DS again modified and expanded MSA's contract to include the procurement, imprinting, and training of canines, now for the WPS program. On March 24, 2022, DS again changed the name of the former CVC to the Global Canine Services Center (GCSC). Although the name changed over time, for consistency, we refer to the center as the GCSC in this report.

Under the new model, MSA procures, imprints, and trains new canines and then DS accepts the canines into its GCS program upon successful passage of an evaluation. The canines, which are now government-furnished equipment (GFE), are paired with WPS contractor-provided handlers. The GFE canine-WPS handler pairs must then pass an MSA-administered validation test at the GCSC before deployment. The canines remain government property as long as they remain in the GCS program.

### RELEVANT STANDARDS FOR PERFORMANCE MANAGEMENT AND INTERNAL CONTROLS

Prior to February 2018, the Department used the Performance Management Guidebook to provide officials with performance management tools, resources, and best practices with a “longer-term goal of creating a culture within State that bases decision-making on evidence, data, and accountability.” In February 2018, the Department replaced the Performance Management Guidebook as part of its Managing for Results Framework, which provides similar guidance on the use of data to drive decision-making.<sup>9</sup>

The Government Accountability Office’s Standards for Internal Control in the Federal Government provides a framework for establishing and maintaining an effective internal control system. Specifically, the Standards identify components and principles that “support the effective design, implementation, and operation of the associated components and represent requirements necessary to establish an effective internal control system.”<sup>10</sup>

## CONTRACT MANAGEMENT AND OVERSIGHT

DS operates its GCSC through an indefinite-delivery/indefinite-quantity (IDIQ) contract and task order with MSA. The WPS contracts from which DS removed the responsibility for the canine procurement, imprinting, and training components when it added those functions to the GCSC contract, also operate through IDIQ contracts and task orders.<sup>11</sup>

The Office of Acquisitions Management (AQM) is responsible for awarding and administering contracts and task orders. The Department’s Foreign Affairs Handbook (FAH) states that the CO is the “Government’s authorized agent for dealing with contractors and has the sole authority to solicit proposals, negotiate, award, administer, modify, or terminate contracts . . .”<sup>12</sup> DS/OPO is responsible for implementing the GCS and WPS programs, including providing management, oversight, operational guidance, and funding, as

well as nominating a contracting officer’s representative (COR). A CO may delegate specific authorities to the CORs and is responsible for ensuring that the CORs exercise their delegated authorities and maintain records that support the administration of the contract.<sup>13</sup>

## CONTRACT MODIFICATIONS

Over the course of a contract, the Department may need to alter the terms of its agreement with the contractor. In these cases, the CO must prepare and issue a contract modification.<sup>14</sup> To accomplish this, the FAH requires the CO to review the proposed modification to “determine whether it is consistent with the existing contract and to ensure that the equities of the existing relationship are preserved.”<sup>15</sup> Before initiating a modification, the CO must determine if the proposed effort is within the scope of the existing contract. This means that the contemplated change must generally relate to the work originally specified in the contract.<sup>16</sup>

ACCORDING TO 14 FAH-2 H-534, REQUESTS FROM THE COR FOR THE CO TO INITIATE A CONTRACT MODIFICATION GENERALLY CONTAIN THE FOLLOWING INFORMATION:

1. The contractor’s name and address;
2. An explanation of the circumstances that resulted in the need for the modification;
3. A full description of the work to be changed or modified;
4. An independent U.S. government cost estimate, if the modification involves a cost change, plus a certification of funds availability from the cognizant finance office if costs increase; and
5. The estimated total time necessary to accomplish the required services if the time must be extended.

## RESULTS

### DS/OPO DIRECTOR'S PREFERENCES DROVE CONTRACT EXPANSION

In September 2017, the DS/OPO Director tasked the WPS Division Chief with creating a “white paper” that would include the “soup to nuts” concept for the Department to purchase and train canines for WPS vendors. The DS/OPO Director instructed that “cost savings [be] only part of the discussion” and “oversight and quality of product should be major factors in the concept supporting the why factor.” At the time of the tasking, the DS/OPO Director had been director for about 2 months, having just moved there from his previous position as DS/ATA Director. In that position, he had initiated the MOA between DS/ATA and DS/OPO to facilitate the canine procurement and training for the DS/ATA program in 2016.

From October 2017 to January 2019, DS/OPO staff prepared multiple drafts of a white paper under the direction of the DS/OPO Director. The DS/OPO Director criticized early drafts prepared by WPS staff and, in July 2018, he reassigned the white paper to a new staff assistant, who became the principal author on what would be the final version.

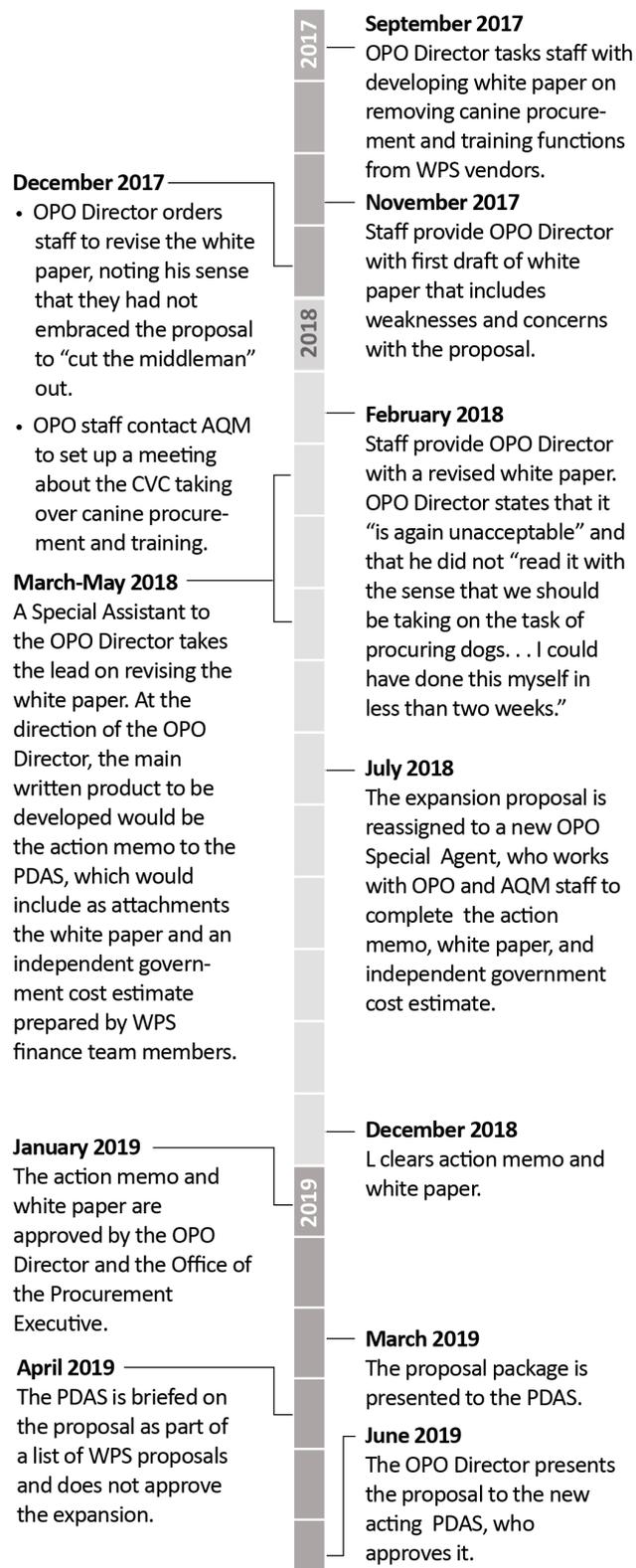
In January 2019, the white paper was cleared within DS/OPO, AQM, and the Office of the Legal Adviser (L). In March 2019, it went to the DS Principal Deputy Assistant Secretary (PDAS) through an action memo cleared by the Deputy Assistant Secretaries of relevant DS offices, and officials from DS/OPO, AQM, and L.<sup>17</sup> However, the PDAS did not approve the expansion; the DS/OPO Director told other officials in an email that the notion of removing canine procurement, imprinting, and training from WPS vendors “was dismissed entirely and we cannot move forward.” He added that the PDAS “shot [] down” the idea of the GCSC purchasing canines and that “it will not happen.” Less than 2 months after the PDAS

rejected the proposal, however, another official became Acting PDAS, and the DS/OPO Director sought and received approval to move canine procurement, imprinting, and training from WPS vendors to MSA. The Acting PDAS formally approved the action memo in July 2019.

According to the former CO who oversaw the modification of the GCSC and WPS contracts, the modification of the GCSC contract to include procurement, imprinting, and training of canines did not require a new procurement because it did not change the scope of the contract. DS/OPO was not required to provide a full procurement request package as it would for a new procurement, but AQM had to draft a Justification and Approval document to receive approval at various levels in the Office of the Procurement Executive and L.<sup>18</sup> The justification noted that the government’s needs could only be satisfied by the incumbent contractor (MSA) for the immediate period of the active IDIQ and the remaining option year to be exercised, and that the Department was incapable of meeting mission requirements without contractor support at the GCSC.<sup>19</sup> Additionally, the former CO told OIG that awarding an all-new contract rather than modifying the existing contract would have led to additional costs and a disruption of operations for the GCS program.

AQM modified the GCSC and WPS contracts and, on October 31, 2019, the CO sent letters to the WPS contractors notifying them of the change from canines being contractor-acquired property (CAP) to GFEs. The letters gave an anticipated completion date of August 2020 for the transition and provided instructions for rotating out the CAP canines and having the WPS contractors’ handlers attend training at the GCSC for pairing and certification with GFE canines. According to DS, the GCS program completed its transition from CAP to GFE canines on March 11, 2021.<sup>20</sup> Figure 1 contains a timeline of DS/OPO’s development of its proposal to expand the GCSC.

**FIGURE 1: TIMELINE OF DS/OPO’s GCSC PROPOSAL**



**DS FAILED TO DEMONSTRATE THAT PROGRAM PERFORMANCE INFORMATION DROVE ITS PURSUIT OF THE GCSC CONTRACT EXPANSION**

Based on documents provided by DS/OPO and emails reviewed by OIG, OIG found no evidence that the DS/OPO Director conducted any documented review of program performance data prior to ordering the development of the white paper in September 2017.

Moreover, the DS/OPO Director directed his staff to draft the white paper *to support* his proposal, rather than to provide an evaluation of the proposal based on performance data and agency goals or needs. The DS/OPO Director criticized early drafts of the white paper for failing to support his proposal. For example, in February 2018, the DS/OPO Director criticized a draft for not more forcefully advocating for the procurement of canines, “This is again unacceptable. I don’t read it with the sense that we should be taking on the task of procuring dogs.” Those early drafts included sections on weaknesses, obstacles, and threats connected to the proposal that were not included in the final version.

By deciding to pursue a significant programmatic change without adequately reviewing existing performance data or other relevant quality information, and then directing staff to build a proposal to support that change, DS failed to adhere to the Performance Management Guidebook’s instruction to use performance information to make management decisions. As a result, DS risked adopting a program change that was unconnected to agency needs and would fail to accomplish the agency’s desired goals and objectives.

Source: OIG analysis of Department information.

**ACCORDING TO THE DEPARTMENT'S  
PERFORMANCE MANAGEMENT GUIDEBOOK**

- Performance information should be used systematically to assess progress in achieving results and to make management decisions.
- It is important that the necessary information be available, when required, for decision-making.

## DS LACKED DOCUMENTED EVIDENCE TO SUPPORT STATEMENTS MADE IN ITS EXPANSION PROPOSAL

The final proposal package sent to the DS PDAS consisted of an action memo, the white paper, and a spreadsheet that included an independent government cost estimate and information on the proposed timelines for the transition.

The action memo and white paper included a number of statements critical of WPS vendors and supportive of MSA. OIG requested from DS all evaluations and assessments of the GCSC or WPS vendors that supported the action memo and white paper. OIG also requested all documentation showing that the WPS vendors were not meeting contract expectations or requirements as described in the white paper.

The documentation DS provided OIG failed to sufficiently support most of the statements made in the action memo and white paper concerning WPS vendor performance. For example, the action memo stated that WPS vendors managed the canine requirement to provide the most profit, "which leads to the careless expediting of training." However, OIG did not identify any relevant documents among those DS provided that referenced expedited training.

In addition, the action memo states that the GCSC "has evidence of canines rejected by the [GCSC] for use on the DS/ATA programs" that were then

procured by WPS vendors for validation, which shows "WPS vendors procuring less than capable canines." Again, OIG found no support for this statement or conclusion in the documents that DS provided.

Similarly, the action memo states, "The [GCSC] has established itself to be a leader in the procurement, imprinting, and training of canines based on DS/ATA's success." OIG requested any assessments or evaluations of the ATA canine program, as well as any performance data on MSA's role in the ATA procurement and training, which would be relevant to determining whether MSA should be given the canine procurement and training functions for the WPS program. DS provided country-specific evaluations of ATA partners but had no data on the ATA program as a whole or on MSA's role in the procurement and training of ATA canines.

Finally, according to the white paper, overseas sustainment of odor recognition training was "found routinely to be intermittent at best." DS provided documentation supporting this statement for two task orders. Specifically, monthly COR checklists for those task orders show multiple instances of a failure to meet required detection training from April 2018 to January 2019. However, this is partially contradicted for one of the task orders by a November 2018 Program Management Review, which noted that such failure was historical and that the contractor met the training requirement at the time of the review. Moreover, the 2018 Program Management Reviews for three other WPS vendors showed them as "fully compliant" on training requirements.

These findings point to a lack of internal controls related to evaluating performance, using quality information to inform decisions, and fully documenting this information for both the ATA and WPS programs, as they relate to canine procurement and training. In addition to obtaining relevant data that "are reasonably free from error

and bias and faithfully represent what they purport to represent,”<sup>21</sup> internal control standards recognize the importance of documenting that data.<sup>22</sup> The set of documentation provided to OIG on canine-related program performance for both WPS and ATA suggest internal control deficiencies in DS’s GCS program.

**ACCORDING TO FEDERAL INTERNAL CONTROL STANDARDS (GAO-14-704G)**

- Management should use quality information to evaluate performance and achieve its objectives.
- Quality information is appropriate, current, complete, accurate, accessible, and provided on a timely basis.
- Documentation is a necessary part of an effective internal control system.
- Effective documentation establishes and communicates the who, what, when, where, and why, and also provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel, as well as a means to communicate that knowledge, as needed, to external parties.

In March 2023, DS/OPO officials told OIG that DS/OPO reviews the overall effectiveness of the GCS program during its biannual Program Management Reviews of the GCSC contract. DS/OPO officials also said, as new DS project needs arise, DS would determine the impact to the GCS program and whether canines would be needed. Given OIG’s findings that DS lacked documentation demonstrating that its most recent expansion of the GCSC was based on performance data, OIG notes that it will be important for any future DS evaluations of, and programmatic changes to, the GCS program to be governed by the Department’s Managing for Results Framework.

**ACCORDING TO THE DEPARTMENT’S MANAGING FOR RESULTS FRAMEWORK (18 FAM 301.1)**

- Sound management is an ongoing activity to ensure our investments achieve those goals efficiently and effectively.
- Monitoring and data collection efforts should be integrated through the life of a program, project, or process, as they inform ongoing adjustments and improvements, as well as provide data and topics for evaluation.

**DS EXPANSION PLAN DID NOT CONSIDER RISK OR CHANGES TO PROGRAMMATIC REQUIREMENTS**

OIG reviewed the action memo and white paper that DS used to support its decision to remove the responsibility for canine procurement, imprinting, and training from the WPS vendor contracts and expand the GCSC contract. The review shows that—contrary to federal internal control standards—DS’s analysis did not consider the potential risk of a significant decrease in the number of canines caused by the elimination of one or more task orders, or the subsequent burden it would incur because of its ownership of those canines.

**ACCORDING TO FEDERAL INTERNAL CONTROL STANDARDS (GAO-14-704G)**

- Management should identify, analyze, and respond to risks related to achieving defined objectives.
- As part of risk assessment or a similar process, management analyzes and responds to identified changes and related risks in order to maintain an effective internal control system.

The closing of Embassy Kabul in August 2021, and the subsequent termination of the two WPS task orders for operations in Kabul, eliminated approximately 40 percent of the canine teams from DS/OPO's GCS program. All of the evacuated canines were now owned by the Department. Because DS did not consider the risk of significant changes in programmatic requirements, it owned and was responsible for maintaining more canines than it needed, a burden that previously would have fallen on the WPS vendors.

Following the evacuation from Afghanistan, because the GCSC could not accommodate all of the returning canines, DS had to rely on a local pet retreat to lodge the additional canines. DS told OIG that 98 canines from Afghanistan needed new assignments. As of March 2023, DS reported that seven remained housed at the GCSC. The rest were moved to other Department programs, given to law enforcement organizations, or adopted. Despite having to find new assignments or new homes for its canines from Afghanistan and because canines will be aging out of the GCS program, DS/OPO will need to authorize the procurement of new canines for the program in the near future. The GCS Program Manager said DS/OPO plans to authorize the procurement of 43 canines in fiscal year 2023 and another 40 canines in fiscal year 2024.

In October 2022, DS provided OIG with documentation on "multiple continued costs" for the sustainment of the evacuated canines, but it did not provide specific dollar amounts for these costs—unexpected kenneling and continued health, welfare, safety, and training for the canines. DS also did not quantify the costs avoided through the elimination of two of the five WPS task orders. However, in March 2023, a DS/OPO official estimated that the elimination of the two task orders will save the Department approximately \$2.1 million in costs for housing and care for those canines. While cost was not the only reason for expanding the GCSC contract, DS's cost estimates did not realistically consider all contingencies.

## FOLLOWING THE EXPANSION, DS ADDED STAFF TO INCREASE OVERSIGHT OF THE GCS PROGRAM

DS officials told OIG that having GFE canines under the GCS program means that DS has more oversight and involvement in the process for canine procurement, imprinting, training, and testing. DS does not have to monitor canine programs within four separate contracts and can focus oversight on the single contractor operating out of the GCSC. DS cited increased oversight as one of the main drivers for modifying the GCS program.

DS currently has eight full-time equivalent staff working on the GCS program, some who work on the operations side and others who monitor contract compliance. Five of the staff work full time at the GCSC, including three canine subject matter experts and two security specialists, one of whom is a COR for the GCSC contract. Another two government technical monitors oversee the GCS program in Iraq. The Section Chief for the GCS program splits time between the GCSC and DS headquarters.

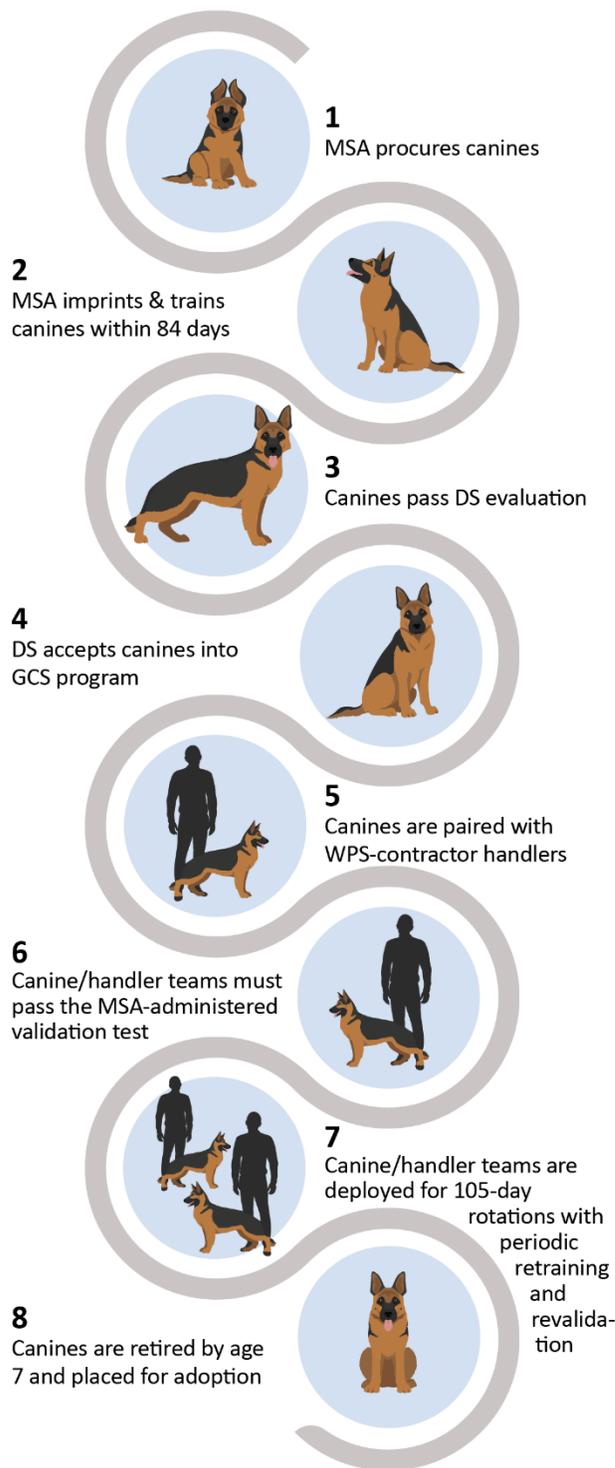
According to DS officials, DS/OPO staff participate in day-to-day activities at the GCSC and continually monitor the program and MSA's performance. Additionally, DS/OPO's Policy and Special Programs Division Chief said they review staffing during monthly discussions with the DS/OPO Director. However, DS does not have written, documented assessments of staffing needs. Rather, the GCSC Branch Chief and former COR confirmed to OIG that staffing reviews are verbal discussions rather than formal, documented assessments.

Prior to the expansion of the GCS program, DS had limited oversight of canines used by WPS contractors. The WPS vendors procured, imprinted, and trained canines for the WPS program with little DS oversight. Under the expanded program, DS now has more involvement in the procuring,

imprinting, and training of canines. The GCSC task order outlines the number of GFE canines that must be trained and deployed or ready for deployment with the WPS program. When a need for canine procurement arises, MSA submits a canine procurement trip request to DS and purchases canines from a DS-approved breeder. While DS has oversight of the breeder used and therefore knows the reputation of the quality of the canines, MSA still maintains much of its autonomy to select the canines based on its assessment of drive, trainability, and health. At this stage of the lifecycle of the canine, DS has limited oversight but also limited liability as the canines are owned by MSA.

Once the canines arrive at the GCSC and complete a required medical quarantine, MSA has 42 to 84 days to imprint and train the canines for DS approval. While MSA is responsible for all training, DS/OPO staff said a DS employee is always on the floor monitoring MSA’s performance. Once trained, canines must successfully complete a DS evaluation on all odor and detection scenarios. If the canine successfully completes the evaluation, DS accepts it into the GCS program. DS/OPO pays MSA \$11,000 per canine and the canine can be returned to MSA during the first 30 days after deployment if the canine is unable to perform properly in the field. Once the canine is accepted into the GCS program, DS maintains full oversight of the canine until its retirement. See Figure 2 for the lifecycle of the canine in the GCS program.

FIGURE 2: DS GCS PROGRAM LIFECYCLE



Source: OIG analysis of Department information.

## DS ISSUED POLICIES RELATED TO GCS PROGRAM OVERSIGHT MORE THAN 2 YEARS AFTER EXPANSION

While DS now has standard operating procedures (SOPs) for the GCS program, no written formal policies existed for the first 7 years of operations. Although DS has relied on the GCSC since 2015, initially for validation of WPS vendor canine teams and later for procuring, training, and validation of government-provided canines, it did not issue SOPs for the GCS program to guide DS and GCSC personnel until June 2022. Without documented policies that detailed the roles and responsibilities for both DS and contractor employees working at the GCSC, DS lacked necessary internal controls to effectively manage the separation between the training and imprinting of canines with the independent validation of canine-handler pairs. Documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system.

### ACCORDING TO FEDERAL INTERNAL CONTROL STANDARDS (GAO-14-704G)

- Documentation is a necessary part of an effective internal control system.
- Management should document and communicate policies and procedures to staff to enforce management's directives, achieve the entity's objectives, and address related risks.

In the absence of documented operational guidance, DS officials said they relied on the statements of work in MSA's contracts to oversee operations at GCSC. Additionally, MSA maintains its own operating procedures, called the Security Operations Management System (SOMS), that guide its responsibilities at the GCSC. Neither the statement of work nor the SOMS would have aided in the effective oversight of GCSC operations to ensure that the original purpose of the canine center— independent validation of odor detection

capabilities—remained independent.<sup>23</sup> When one contractor is both training and imprinting canines and then certifying their ability to detect, there is an apparent conflict of interest that must be properly managed and documented.

DS officials acknowledged there could be a conflict of interest but said that DS staff responsible for GCS program oversight ensure there is a firewall in place between the training side and validation side of operations at the GCSC. According to DS officials, MSA staff who imprint and train the canines do not then conduct validation testing. Additionally, DS officials told OIG that DS/OPO staff monitor and oversee the entire lifecycle of the GCS program and directly manage operations at the GCSC to prevent conflicts from occurring. However, as discussed above, until DS issued SOPs in June 2022, the role of DS/OPO employees in managing the separation of duties for MSA staff was not documented and was done informally, potentially allowing conflicts to be introduced.

The Department accepts the canines as government property after the canines are imprinted, trained, and pass a DS evaluation. And, while DS/OPO employees monitor the canine evaluations, MSA employees set up and administer the tests. According to DS/OPO staff, the Department does not sign paperwork to accept a canine as government property until MSA proves the canine can pass every testing scenario. Accordingly, DS officials said GFE canines are already proven proficient on odor recognition before they are put through a validation test. DS officials said validation testing is intended to check the proficiency of the handler in recognizing a canine's scent detection and working as a team because the canine has already passed a more stringent evaluation to be accepted by DS into the GCS program. Therefore, DS presumes a failed validation test is the fault of the handler.<sup>24</sup>

For the validation test, DS/OPO staff said DS uses a randomizer to choose the test pattern, including

what scents are placed for detection and where the scents are in the testing site. The randomizer also chooses the order of the canine teams for testing. According to DS/OPO staff, this randomizer is how the validation testing remains independent, as MSA employees would not decide any part of the testing scenario. Additionally, DS/OPO staff said the MSA Deputy Program Manager for validation reports directly to DS, and not to MSA leadership, for purposes of testing. Finally, DS/OPO staff said the actual testing site is roped off, creating a physical barrier from other MSA staff not involved in validation testing. DS/OPO staff said the room used for validation testing is monitored by security cameras and a DS/OPO staff member observes both the setup of testing scenarios and the actual validation tests. According to DS staff, these measures ensure the validation testing remains independent.

GCS program operations are now documented in SOPs, which DS/OPO officials said are reviewed on a rolling basis over the course of a year. However, because DS/OPO issued its written SOPs when OIG's fieldwork for this evaluation was well underway, this review does not assess the effectiveness of the SOPs in ensuring the validation testing process remains free from conflict.<sup>25</sup> OIG determined that it would be premature to assess the implementation and effectiveness of the SOPs directly after issuance.

## CONCLUSION

In 2019, DS began a massive overhaul to its GCS program by modifying the WPS contracts to remove the requirement that canines be contractor-provided. Now, DS owns and provides the canines needed to fulfill WPS requirements in high-threat countries. In order to facilitate the change, the Department expanded the GCSC contract to add the requirement for MSA to procure, train, imprint, and then validate all the canines used in the WPS program. However, DS did not have evidence that it modified its GCS program

using performance-based data and could not provide documentation to support statements in its justification outlining the program changes. DS's expansion plan also did not identify potential risks or changes to program needs, a failure that became evident after the drawdown of Kabul when DS had to find new purposes for the government-owned canines supporting that mission. Additionally, while DS hired new staff to oversee and manage the expanded operations at the GCSC, DS did not issue written policies to guide oversight until more than 2 years after the expansion.

OIG undertook this evaluation to examine the process that led DS to expand its GCS program, and how the expanded program ensures the independence of training and validation. Because the Department already modified the GCSC contract and corresponding WPS vendor contracts and because DS very recently issued SOPs intended to ensure the validation testing process remains free from conflict, OIG is not making any recommendations in this report. However, OIG hopes this report will inform DS's ongoing management of the GCS program. In light of the past issues identified by previous OIG work and given the initial purpose of the GCSC contract to create an independent canine validation center, it is important for DS leadership to provide continued oversight of GCSC operations to prevent conflicts of interest, to include the appearance of such conflicts. Additionally, it is also important for DS to obtain and rely on quality performance data and identify risks prior to subsequent program changes.



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## APPENDIX

### SCOPE AND METHODOLOGY

The Office of Inspector General (OIG) initiated this evaluation to review (1) the Bureau of Diplomatic Security's (DS) decision to combine the procurement, imprinting, training, and validation of explosive detection canines under a single existing contract, and (2) DS's oversight of the GCS program and how it ensures that the training and subsequent validation by a single contractor remains independent.

To conduct its work, OIG reviewed requirements in Department directives issued in the Foreign Affairs Manual (FAM) and Foreign Affairs Handbook (FAH), the Performance Management Guidebook, and the Managing for Results Framework, along with the Government Accountability Office's Standards for Internal Control in the Federal Government. OIG analyzed documents from the Office of Acquisition Management (AQM) and DS on the decision to expand the Global Canine Services (GCS) program and modify related contracts. OIG also reviewed Department and contractor guidance on the GCS program to determine whether it addresses oversight and independence. OIG interviewed DS and AQM officials responsible for GCS contract management and program oversight. Additionally, OIG interviewed representatives from the four Worldwide Protective Services vendors with canine components about their experience with the changes to DS's GCS program. OIG traveled to the GCS Center in Winchester, VA, to interview Department personnel and conduct a site visit. OIG conducted this evaluation in accordance with the Quality Standards for Inspection and Evaluation (January 2012) as issued by the Council of the Inspectors General on Integrity and Efficiency.

OIG received technical comments from OPE on a draft of this report. OIG reviewed and incorporated the technical comments into the final report.

### ACKNOWLEDGEMENTS

*OIG's Amy Bowser (Senior Investigative Counsel), Jeremy Brown (Evaluations Officer), Julie E. Silvers (Evaluations Officer), and Brian Volsky (Senior Investigative Counsel) contributed to this evaluation.*

### ABBREVIATIONS

AQM	Office of Acquisition Management
ATA	Office of Antiterrorism Assistance
CAP	Contractor Acquired Property
CO	contracting officer
COR	contracting officer representative
CVC	Canine Validation Center
DS	Bureau of Diplomatic Security
DS/OPO	Bureau of Diplomatic Security's Office of International Programs, Office of Overseas Protective Operations
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
GCS	Global Canine Services
GCSC	Global Canine Services Center

## ABBREVIATIONS (CONTINUED)

GFE	Government Furnished Equipment
IDIQ	indefinite-delivery/indefinite-quantity
L	Office of the Legal Adviser
MSA	Michael Stapleton Associates
OIG	Office of Inspector General
PDAS	Principal Deputy Assistant Secretary
SOMS	Security Operations Management System
SOPs	standard operating procedures
WPS	World Protective Services

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## END NOTES

<sup>1</sup> Michael Stapleton Associates does business under the name MSA Security.

<sup>2</sup> Imprinting refers to the process where canines are trained to recognize specific explosive odors.

<sup>3</sup> OIG personnel informed the DS/OPO Director that OIG generally does not provide input into management decisions in order to preserve OIG's independence.

<sup>4</sup> The WPS contracts were preceded by the Worldwide Personal Protective Services (WPPS) and WPPS II contracts. DS awarded the WPPS contract in 2000 to provide protective security services in the former Yugoslavia, Palestinian Territories, and Afghanistan. In 2005, the Department awarded the WPPS II contract to provides personal protective services in Afghanistan to the U.S. Ambassador, Embassy Kabul Foreign Service Officers performing official duties, visiting government and non-government personnel on U.S. government business, and individuals or groups directly supporting development or reconstruction work related to the U.S. Agency for International Development.

<sup>5</sup> 12 FAM 281; 12 FAH-3 H-011.

<sup>6</sup> 22 U.S.C. § 2349aa.

<sup>7</sup> OIG reviewed the care and welfare of canines in the ATA program in 2018-19 and found deficiencies in DS's oversight of the canines after deployment. OIG concluded that the Department lacked policies and standards governing the ATA canine program. The Department routinely provided canines to foreign partners without signed written agreements that outline standards for minimum care, retirement, and use of the canines, and the Department conducted health and welfare follow-ups infrequently and inconsistently. ESP-19-06 (September 2019).

<sup>8</sup> The Department awarded the original WPS contract to eight contractors in September 2010 to provide protective movement and static security services in high-risk and high-threat environments. The WPS contract was an indefinite-delivery/indefinite-quantity contract under which contractors competed for specific task orders awarded under the contract. In February 2016, the Department awarded a

follow-on contract to seven contractors to provide a continuation of the security services.

<sup>9</sup> 18 FAM 301.1. Because DS/OPO began developing the expansion proposal prior to February 2018, OIG evaluated the GCSC expansion against the Performance Management Guidebook, which contained fewer requirements.

<sup>10</sup> GAO-14-704G, September 2014, page 8.

<sup>11</sup> At the start of this evaluation, five WPS task orders had canine components—task orders 2, 3, 6, 8, and 9, in Afghanistan and Iraq. After the drawdown of Afghanistan in the fall of 2021, the Department terminated WPS task orders 6 and 8 in Kabul, Afghanistan, for convenience.

<sup>12</sup> 14 FAH-2 H-141(a).

<sup>13</sup> FAR § 1.602-2. See also OIG, *Audit of the Bureau of Diplomatic Security's Invoice Review Process for Worldwide Protective Services Contracts* (AUD-MERO-18-47, June 2018).

<sup>14</sup> 14 FAH-2 H-531(a).

<sup>15</sup> 14 FAH-2 H-531(d).

<sup>16</sup> 14 FAH-2 H-533(a).

<sup>17</sup> The former CO who oversaw the modifications told OIG the program office had to provide an analysis or study of the proposed changes and why the office is requesting the modification. The former CO told OIG that, given the magnitude of change DS requested, the documents DS provided were appropriate to support the modification.

<sup>18</sup> According to the FAH, other than full and open competition is the least competitive, and therefore the least desirable, method of acquiring supplies and services. Under this method, a bid or proposal is solicited from one, or very few, sources. Detailed justification and approvals are required to document the choice of other than full and open competition as a means of acquisition. See 14 FAH-2 H-224.

<sup>19</sup> See 41 U.S.C. § 3304(a)(I) as implemented by the FAR Subpart 6.302-1 titled, "Only One Responsible Source and No Other Supplies or Services Will Satisfy Agency Requirements."

<sup>20</sup> According to DS, the canine transition was delayed when, due to COVID, travel was halted for 2 months and WPS pairing courses stopped for 2 weeks. This added a significant

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amount of time as a result of halted travel and then limited seating once travel restarted.

<sup>21</sup> GAO-14-704G, September 2014, § 13.04.

<sup>22</sup> GAO-14-704G, September 2014, § 3.09.

<sup>23</sup> OIG's prior work called for independent verification of canines' detection abilities. See *Audit of the Bureau of Diplomatic Security Baghdad Embassy Security Force* (MERO-A-10-05, March 2010), and *Review of the Bureau of Diplomatic Security's Oversight of Explosives Detection Canine Programs* (MERO-I-10-14, September 2010).

<sup>24</sup> Handler-canine teams get three attempts to pass the validation tests. If the pair does not pass the tests after three

attempts, they may continue in a 14-day course and retest on any previously failed test components. If the team is unable to successfully pass the tests within six attempts, DS disbands the team and withdraws them from the GCS program.

<sup>25</sup> During this review, OIG learned that DS had entered a contract with Federal Management Partners (FMP) to develop SOPs for the canine program. FMP received the task order for the work as a subcontractor under a larger IDIQ contract the Department has with All Native Group. These SOPs were issued in June 2022. OIG received copies of the SOPs in October 2022.