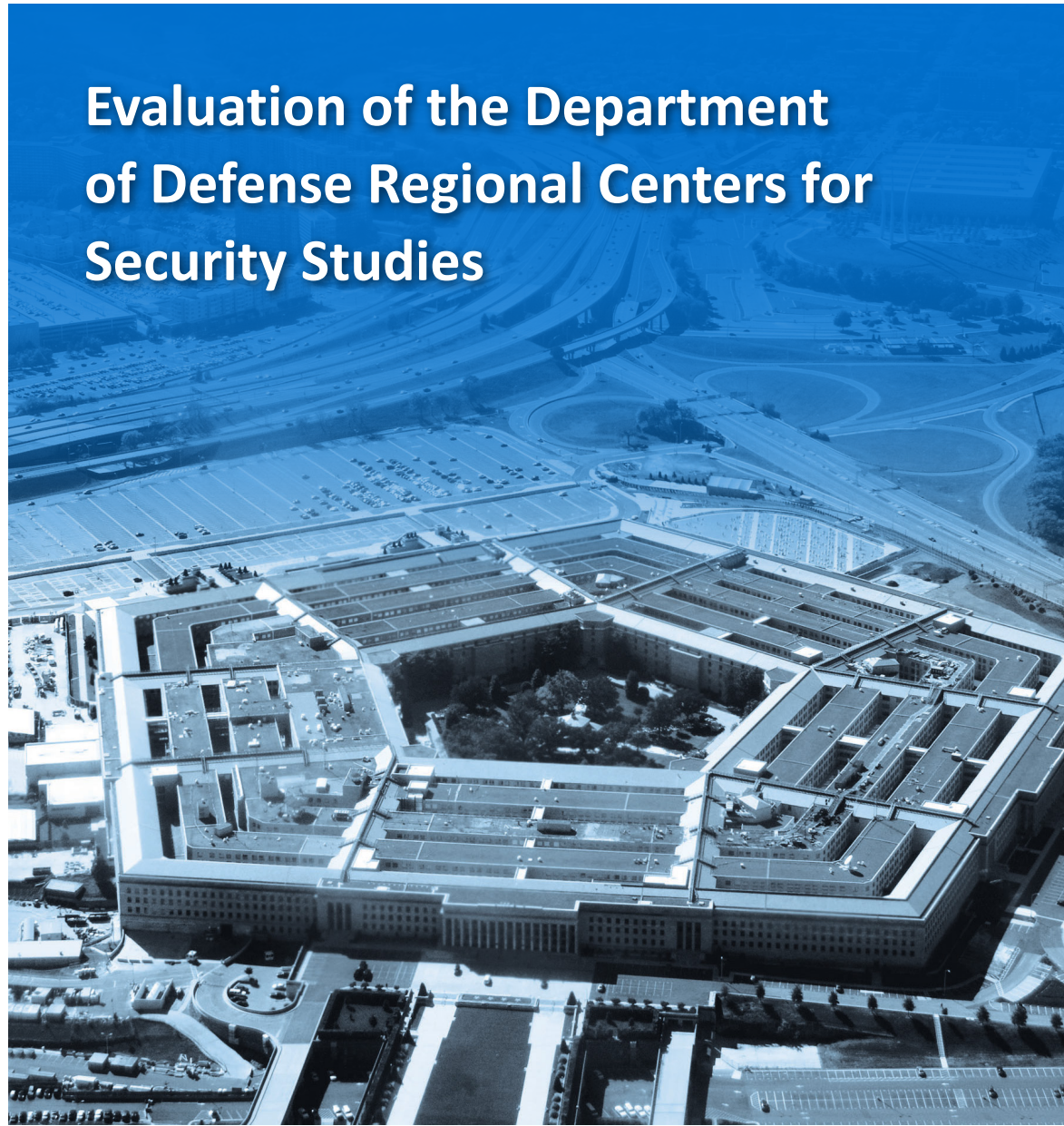




INSPECTOR GENERAL

U.S. Department of Defense

JUNE 10, 2020



Evaluation of the Department of Defense Regional Centers for Security Studies

INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE





Results in Brief

Evaluation of the Department of Defense Regional Centers for Security Studies

June 10, 2020

Objective

The objective of this evaluation was to review the operations and practices of the DoD Regional Centers for Security Studies (RCs) related to the vetting of foreign faculty, nondisclosure agreements, travel, and the payment of fees for guest lecturers (honoraria). We also determined whether the DoD and the RCs implemented the recommendations from prior Government Accountability Office oversight report to develop measures of effectiveness.

Background

The Secretary of Defense is authorized by law to operate DoD RCs as “international venues for bilateral and multilateral research, communication, exchange of ideas, and training involving military and civilian participants,” relating to specified geographic regions of the world.¹

The five RCs are:

- George C. Marshall European Center for Security Studies–Garmisch, Germany, established in 1993;
- Daniel K. Inouye Asia-Pacific Center for Security Studies–Honolulu, Hawaii, established in 1995;
- William J. Perry Center for Hemispheric Defense Studies–Washington, D.C., established in 1997;
- Africa Center for Strategic Studies–Washington, D.C., established in 1999; and
- Near East - South Asia Center for Strategic Studies–Washington, D.C., established in 2000.

Background (cont’d)

DoD Directive 5200.41E, “DoD Regional Centers for Security Studies,” June 30, 2016, states that the RCs support U.S. defense strategy objectives and policy priorities through:

- offering executive development, strategic security studies (to program participants), research, and outreach that foster long-term collaborative relationships;
- developing and sustaining relationships and communities of interest throughout the regions among security practitioners and national security establishments; and
- enhancing enduring partnerships among the nations of the regions with which the regional centers are associated.

The RCs seek to accomplish their mission primarily through resident and in-region programs, including seminars, courses, bilateral workshops, outreach events for alumni of the RC programs, and research publications.

In the DoD, the Under Secretary of Defense for Policy is responsible for the RCs’ policies and activities, providing guidance, direction, and oversight, and coordinating with the geographic combatant commanders on RC-related activities. The regional Assistant Secretaries for Defense are responsible for the development of indicators of success for each of the RCs and for monitoring the centers’ progress toward achieving those indicators. The Under Secretary of Defense for Policy is responsible for providing the RCs with the programming, budgeting, and financial management necessary to support their operations through the Defense Security Cooperation Agency Director, acting as the Executive Agent for the RCs.

Findings

We determined that the RCs did not have measures of effectiveness to indicate progress toward achievement of the RCs’ stated goals, objectives, or strategic outcomes. This occurred because the RCs did not request, and the Office of the Under Secretary of Defense for Policy and the Defense Security Cooperation Agency did not provide, the RCs with the technical assistance and subject matter expertise as required

¹ Section 342, title 10, United States Code.



Results in Brief

Evaluation of the Department of Defense Regional Centers for Security Studies

Findings (cont'd)

by Instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise," January 13, 2017, to develop, use, and report measures of effectiveness. As a result, the RCs could not quantify their contributions to DoD strategic objectives, and the DoD was unable to assess RC progress in supporting DoD and geographic combatant command priorities.

We also determined that the RCs did not follow regulations for the management of their travel programs. We reviewed a random sample of 212 of 2,915 reported trips taken by staff and faculty and determined that all five centers inconsistently complied with certain DoD travel regulations, including not appointing certifying officers to approve travel vouchers and not training certifying officers and routing officials. This occurred because the five RC Directors did not manage their travel programs to ensure consistent compliance. Furthermore, the DSCA Director, as the executive agent for the RCs, did not direct the necessary oversight of the travel programs, leading to the systemic problems with inconsistent compliance at all five RCs. As a result, certifying officers at the RCs assumed financial liability for travel payments without proper authority or training, increasing the risk of improper payments.

We also reviewed RC compliance with regulations governing vetting, non-disclosure agreements, and honoraria, from 2014 through 2018, and determined that:

- the three RCs that employed foreign nationals followed vetting requirements;
- none of the RCs issued a non-disclosure agreement other than the Standard Form 312, "Classified Information Nondisclosure Agreement," which contained a version of the language required by the Whistleblower Protection Enhancement Act of 2012; and
- none of the RCs had paid an honorarium for any single event above the \$2,000 threshold that requires higher-level approval.²

Recommendations

We recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise, required by DoD Instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise," to develop and implement measures of effectiveness that track progress on achieving program outcomes.

We further recommend that the Defense Security Cooperation Agency Director develop and implement a plan to execute its executive agent responsibilities over the Regional Centers' travel program, as required by DoD Directive 5200.41E.

We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel program comply with DoD regulations.

² The Whistleblower Protection Enhancement Act prohibits the use of a non-disclosure agreement that does not contain warning language reaffirming employees' rights under existing statute or executive order to communicate with Congress, report complaints to an inspector general, and avail themselves of other whistleblower protections. This specific language is part of the Standard Form 312, "Classified Information Nondisclosure Agreement," and we therefore excluded those forms from our scope.



Results in Brief

Evaluation of the Department of Defense Regional Centers for Security Studies

Management Comments and Our Response

We did not receive comments from the Under Secretary of Defense for Policy. Therefore, the recommendation to provide the Regional Centers with the technical assistance and subject matter expertise to develop and implement performance measures to track progress on achieving program outputs and outcomes remains open and unresolved. We request that the Under Secretary of Defense for Policy provide comments in response to the final report by July 9, 2020.

While not required to comment on the finding related to the development of performance measures, all five Regional Centers for Security Studies provided comments in response to the draft report. To review summaries of regional centers comments on this finding, please refer to the Management Comments and Our Response section of this report.

The Directors of the Africa Center, Asia-Pacific Center, Marshall Center, and Near East-South Asia Center agreed with the overall finding on their travel programs. The Director of the Perry Center partially agreed with the finding. Specifically, the Perry Center Director stated that the tone and tenor of our analysis gave the impression that the training of routing officials and certifying officers was lacking and deficient and that this put the Government at risk for fraud, waste, and abuse. We considered the Perry Center Director's comments and updated language in the finding to reflect that some routing officials could document required travel training.

The Defense Security Cooperation Agency Director agreed with the recommendation to develop and implement a plan to execute executive agent responsibilities over the Regional Centers' travel program. Furthermore, the Director proposed a corrective action plan, which states that an immediate data call will ensure compliance with the appointments and training documents at the Regional Centers and that the Defense Security Cooperation Agency has drafted an update to the Defense Security Cooperation Agency Travel Directive 7002.5. These proposed actions resolve the recommendation. We will close the recommendation when the Defense Security Cooperation Agency provides documentation to verify that corrective actions are taken.

All five Directors of the Regional Centers for Security Studies agreed with the recommendation to develop an inspections process to verify that their travel programs comply with DoD regulations and described corrective actions to their travel programs that their respective organizations already completed as well as additional planned future actions. Therefore, the recommendation is resolved but will remain open. We will close the recommendation when we verify that the Regional Centers for Security Studies took corrective actions.

Please see the Recommendations Table on the next page for the status of recommendations.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Undersecretary of Defense for Policy	A	None	None
Defense Security Cooperation Agency Director	None	B.1	None
Director, Africa Center for Strategic Studies	None	B.2	None
Director, Daniel K. Inouye Asia-Pacific Center for Security Studies	None	B.2	None
Director, George C. Marshall European Center for Security Studies	None	B.2	None
Director, Near East – South Asia Center for Strategic Studies	None	B.2	None
Director, William J. Perry Center for Hemispheric Defense Studies	None	B.2	None

Note: The following categories are used to describe agency management’s comments to individual recommendations.

- **Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – OIG verified that the agreed upon corrective actions were implemented.



**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

June 10, 2020

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR POLICY
DIRECTOR, DEFENSE SECURITY COOPERATION AGENCY
DIRECTOR, AFRICA CENTER FOR STRATEGIC STUDIES
DIRECTOR, DANIEL K. INOUE ASIA-PACIFIC CENTER FOR
SECURITY STUDIES
DIRECTOR, GEORGE C. MARSHALL EUROPEAN CENTER FOR
SECURITY STUDIES
DIRECTOR, NEAR EAST - SOUTH ASIA CENTER FOR STRATEGIC
STUDIES
DIRECTOR, WILLIAM J. PERRY CENTER FOR HEMISPHERIC
DEFENSE STUDIES

SUBJECT: Evaluation of the Department of Defense Regional Centers for Security Studies
(Report No. DODIG-2020-090)

This final report provides the results of the DoD Office of Inspector General's evaluation. We previously provided copies of the draft report and requested written comments on the recommendations. We considered management's comments on the draft report when preparing the final report. These comments are included in the report.

The report contains a recommendation that is considered unresolved because the Under Secretary of Defense for Policy did not provide a response to the report. Therefore, as discussed in the Recommendations, Management Comments, and Our Response section of this report, Recommendation A remains open. We will track this recommendation until an agreement is reached on the actions to be taken to address the recommendation and adequate documentation has been submitted showing that the agreed-upon action has been completed.

DoD Instruction 7650.03 requires that recommendations be resolved promptly. Therefore, please provide us within 30 days your response concerning specific actions in process or alternative corrective actions proposed on the recommendation. Your response should be sent to either [REDACTED] if classified SECRET.

The Defense Security Cooperation Director and the Directors of the five Regional Centers for Security Studies agreed to address the recommendation presented to them in the report; therefore, the recommendations are considered resolved and remain open. As described in the Recommendations, Management Comments, and Our Response section of this report, we will close Recommendations B.1 and B.2 when we receive documentation verifying that agreed-upon actions were taken to implement the recommendations. Therefore, please provide us your response concerning specific actions in process or completed on the recommendations within 90 days. Send your response to either [REDACTED]

if unclassified, or [REDACTED] if classified SECRET. If you have any questions or would like to meet to discuss the evaluation, please contact [REDACTED]. We appreciate the cooperation and assistance received during the evaluation.

A handwritten signature in cursive script that reads "Carolyn R. Hantz".

Carolyn R. Hantz

Assistant Inspector General for Evaluations
Programs, Combatant Commands, and
Overseas Contingency Operations

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Introduction

Objective

The objective of this evaluation was to review the operations and practices of the DoD Regional Centers for Security Studies (RCs) related to vetting of foreign faculty, nondisclosure agreements, travel, and the payment of fees for guest lecturers (honoraria). We also determined whether the DoD and the RCs implemented the recommendations from prior Government Accountability Office (GAO) and RAND Corporation reports to develop measures of effectiveness.

Background

We began this evaluation after receiving a complaint to the DoD Hotline that alleged “reprisal, discrimination, mismanagement, senior official misconduct, and violations of laws, rules, and regulations by officials at the William J. Perry Center for Hemispheric Defense Studies.” The DoD Office of Inspector General (OIG) extensively examined this complaint, conducting various interviews, reviewing numerous documents, and assessing work done by the Defense Security Cooperation Agency (DSCA), the Office of the Under Secretary of Defense for Policy (USD[P]), and the Joint Staff Office of Inspector General regarding the same complaint. After a thorough review of those materials, including the findings in an Army Regulation 15-6 investigation and the Joint Staff Office of Inspector General review of this matter, the DoD OIG Office of the Deputy Inspector General for Administrative Investigations concluded that the complaint did not warrant further investigation and advised the complainant of the reasons for not conducting further investigation. However, the DoD OIG decided to initiate this evaluation to assess the current operations of the RCs.

In conducting this evaluation, we examined other reviews of the RCs that pertained to the achievement of RC objectives. A 2011 report by the DoD’s Office of Cost Assessment and Program Evaluation recommended the elimination of the RCs. In response, the Office of the Secretary of Defense asked the RAND Corporation to conduct a study on the overall impact of the RCs.³ In 2014, RAND reported “...universal agreement that the [regional] centers [made] positive contributions to U.S. interests and [were a] cost effective way of advancing DoD security cooperation....” However, RAND recommended that the RCs and their stakeholders develop a comprehensive set of measures of effectiveness, improve data collection and analysis, and consider additional tools for measurement and analysis of RC actions and outcomes.

³ RAND Study, “Evaluating the Impact of the Department of Defense Regional Centers for Security Studies,” 2014.

The conference report accompanying the 2013 National Defense Authorization Act mandated that the GAO conduct a study of the RCs. The resulting report in June 2013 compared RCs' activities to those of other DoD training and education organizations and evaluated the "extent to which [the] DoD has developed and implemented an approach to oversee and assess the RCs' progress in achieving DoD priorities."⁴ The report recommended that the DoD develop an approach to assess the RCs' progress in achieving DoD priorities, including identifying measureable goals, objectives and performance metrics, and a methodology for using this performance information.

The Five Regional Centers for Security Studies Are International Venues for Information Exchange Relating to Geographic Regions

The five DoD RCs are authorized by law to serve as "international venues for bilateral and multilateral research, communication, exchange of ideas, and training involving military and civilian participants," relating to specified geographic regions of the world.⁵ The five RCs are:

- George C. Marshall European Center for Security Studies (Marshall Center) – Garmisch, Germany, established in 1993;
- Daniel K. Inouye Asia-Pacific Center for Security Studies (Asia-Pacific Center) – Honolulu, Hawaii, established in 1995;
- William J. Perry Center for Hemispheric Defense Studies (Perry Center) – Washington, D.C., established in 1997;
- Africa Center for Strategic Studies (Africa Center) – Washington, D.C., established in 1999; and
- Near East - South Asia Center for Strategic Studies (Near East - South Asia Center) – Washington, D.C., established in 2000.

DoD Directive 5200.41E states that the RCs will support defense strategy objectives and policy priorities through:

- offering executive-development strategic security studies (to program participants) and research and rigorous outreach programs that foster long-term collaborative relationships;
- developing and sustaining relationships and communities of interest throughout the regions among security practitioners and national security establishments, especially in defense; and
- enhancing enduring partnerships among the nations of the regions.⁶

⁴ GAO-13-606, "Building Partner Capacity: Actions Needed to Strengthen DoD Efforts to Assess the Performance of the Regional Centers for Security Studies," June 2013, Highlights page.

⁵ Section 342, title 10, United States Code (2017), "Regional Centers for Security Studies," (10 U.S.C. § 342).

⁶ DoD Directive 5200.41E, "DoD Regional Centers for Security Studies," June 30, 2016, page 1.

The RCs seek to accomplish their mission primarily through resident and in-region programs, including seminars, courses, bilateral workshops, alumni outreach events, and research publications.

Management Responsibilities for Regional Centers for Security Studies

DoD Directive 5200.41E gives the USD(P) the responsibility to advise the Secretary of Defense on RC policies and activities; provide guidance, direction, and oversight to the RCs; and coordinate with the geographic combatant commanders on RC-related activities. The regional Deputy Assistant Secretaries of Defense are required to develop indicators of success for each of the RCs and monitor the RCs' progress toward achieving those indicators. The geographic combatant commands are tasked with serving as advocates for the RCs in engagements with military counterparts and ministries of defense within their areas of responsibility. Finally, the Directive designates the DSCA Director as the Executive Agent for the RCs. The DSCA Director provides programming, budgeting, and financial management of the resources necessary to support RC operations under the authority, direction, and control of the USD(P).

Finding A

The Regional Centers for Security Studies Did Not Have Measures of Effectiveness

The RCs did not have measures of effectiveness to indicate progress toward achievement of the RCs' stated goals, objectives, or strategic outcomes.

This occurred because the RCs did not request, and the OUSD(P) and the DSCA did not provide the RCs with, the technical assistance and subject matter expertise required to develop, use, and report measures of effectiveness, as required by DoD Instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise," January 13, 2017.

As a result, RCs could not quantify their contributions to DoD strategic objectives, and the DoD was unable to assess RC progress in supporting DoD and geographic combatant command priorities.

The Five Regional Centers for Security Studies Did Not Have Measures of Effectiveness

The RCs did not have measures of effectiveness to indicate progress toward achievement of stated goals, objectives, or strategic outcomes. The DoD is required to "maintain a program of assessment, monitoring, and evaluation in support of security cooperation programs and activities."⁷ The DoD defines measure of effectiveness as "an indicator used to measure a current system state, with change indicated by comparing multiple observations over time."⁸ Two prior reports highlight the importance of measures of effectiveness within the RCs.

The GAO report recommended that the DoD develop an approach to assess the RCs' progress in achieving DoD priorities, including identifying measureable goals, objectives, and performance metrics, and a methodology for using this performance information to inform agency management and Congress of that progress.

In addition, a RAND research study stated that, while the RCs made positive contributions to U.S. interests and were a cost effective way of advancing DoD security cooperation, the RCs should consider developing measures of effectiveness, improving data collection and the analysis of that data, and consider additional tools for measurement and analysis of RC effectiveness.

⁷ Section 383, title 10, United States Code, "Assessment, Monitoring, and Evaluation of Programs and Activities," 2016.

⁸ "DoD Dictionary of Military and Associated Terms," July 2019.

We determined that, although each RC developed goals, objectives, or strategic outcomes linked to DoD strategic policy and guidance, none of the RCs had a comprehensive program of measures of effectiveness that tracked progress in achieving expected results. For example, one stated outcome of the Near East–South Asia Center is “mitigating emerging threats,” which directly supports a published National Security Strategic Outcome; however, the center did not measure progress toward this outcome. Without the ability to measure their achievement of results, the RCs could not quantify their contributions to DoD strategic objectives.

The Regional Centers Did Not Request, and the OUSD(P) and the DSCA Did Not Provide the Regional Centers for Security Studies With, Assistance

The RCs did not request, and the Office of the Under Secretary of Defense for Policy (OUSD(P)) and the DSCA did not provide the RCs with, the technical assistance and subject matter expertise required to develop, use, and report measures of effectiveness. DoD Instruction 5132.14 assigns the USD(P) responsibility for the “oversight and management of the security cooperation AM&E [assessment, monitoring, and evaluation] enterprise.”⁹ The same instruction outlines that the USD(P) will serve as a resource to all DoD Components for technical assistance and subject matter expertise and also provide DoD-wide guidance, tools, and templates on all aspects of assessment, monitoring, and evaluation.

Under the authority, direction, and control of the USD(P), and as the assigned DoD Executive Agent for the RCs, the DSCA Director is required to:

- provide programming, budgeting, and financial management of the resources necessary to support the operation of the RCs;
- review RC program management, management practices, administrative activities, and performance in achieving DoD resourcing objectives; and
- facilitate, enhance, and support the RCs’ missions and activities through the coordination of DSCA programs and program management capabilities and delegation of authorities, as appropriate, within applicable law and DoD policy guidance.¹⁰

⁹ DoD Instruction 5132.14, “Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise,” January 13, 2017, page 5.

¹⁰ DoD Directive 5200.41E, “DoD Regional Centers for Security Studies,” June 30, 2016, page 8.

However, USD(P) and DSCA officials stated that the DSCA had not given the RCs the technical assistance or subject matter expertise necessary to develop performance measures because they lacked personnel and technical expertise within their offices. Officials at all five RCs stated that they had not received this technical assistance and subject matter expertise. Furthermore, we found no evidence that the RCs requested assistance from the USD(P) or the DSCA.

Regional Centers for Security Studies Could Not Quantify Their Contributions to DoD Strategic Objectives

RCs could not quantify their contributions to DoD strategic objectives and the DoD was unable to assess RC progress in supporting DoD and geographic combatant command priorities. The RAND Corporation also noted in its 2014 research study report that, in RAND's view, the RCs could not quantify the extent to which they added value, and the absence of such information made it difficult to measure the RCs' impact over time. While the RCs had goals, objectives, and strategic outcomes, they did not have a methodology for assessing progress in achieving those goals, objectives, and strategic outcomes.

The lack of measurable goals and objectives, metrics for assessing performance, or a methodology to assess the RCs' progress to achieving DoD priorities led to the RCs' limited reporting on the progress and effectiveness of their programs and operations. The RCs did not develop performance measures, that included measures of effectiveness and that resulted in the RCs' inability to communicate progress toward achievement of specific goals to management, which in turn hindered evidence-based decision making by the USD(P) for programming future resources.

Management Comments on the Finding and Our Response

The Directors at all five RCs provided comments on Finding A.

Africa Center for Strategic Studies Comments

The Director of the Africa Center disagreed with our analysis, stating that the Center measured progress on a quarterly and annual basis, and achieved expected results through assessments of program evaluations, monitoring research, and communications metrics. The Director also stated that the Office of the OUSD(P) and the DSCA provided the Center with strategic guidance and assistance through informal and routine communications. Finally, the Director stated that the

Africa Center consistently articulated and demonstrated its value to the DoD and U. S. Africa Command through the annual program plan, which identified goals, objectives, and strategic outcomes aligned with the National Defense Strategy, the DoD's Africa Strategy, and the U. S. Africa Command Campaign Plan.

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments

The Director of the Asia-Pacific Center partially agreed with the finding. The Director disagreed with portions of our analysis, stating that the Asia-Pacific Center was working to develop measures of effectiveness in consultation with the Office of the OUSD(P) and the DSCA. The Director also stated that, while the Center required updated formal guidance regarding measures of effectiveness, regular communication with stakeholders regarding program guidance and accomplishments ensured that the Center's actions and activities support higher-level goals and objectives. Finally, the Director stated that the Center consistently articulated and demonstrated its value to the DoD and U.S. Indo-Pacific Command by executing its approved annual program.

George C. Marshall European Center for Security Studies Comments

The Director of the Marshall Center disagreed with our analysis, stating that the Center established a return on investment model and provided resources expended per course participant. These metrics were all directly linked to Marshall Center Lines of Effort and reflected OUSD(P) and German Federal Ministry of Defense priorities. The Director also stated that the office of the OUSD(P), the DSCA, and other stakeholders provided guidance and feedback on programmatic activities to facilitate enhance and support the Centers mission. Finally, the Director stated that the Center routinely demonstrated its value to the DoD and the German Federal Ministry of Defense by supporting higher-level plans and priorities and executing the Center's approved annual program plan.

Near East-South Asia Center for Strategic Studies Comments

The Director of the Near East-South Asia Center disagreed with our analysis, stating that the Center developed and continued to improve measures of effectiveness. The Director also stated that the Near East-South Asia Center linked programming efforts directly to the DoD and U.S. Central Command strategy, guidance, and input. The Director further stated that the Center received continuous feedback from stakeholders and assessed areas that provided the most impact for DoD investment. Finally, the Director stated that the Center's programmatic investments create long-term relationships that directly impact U.S. goals and objectives in the region and enhance the capacity of regional partners.

William J. Perry Center for Hemispheric Defense Studies Comments

The Director of the Perry Center partially agreed with our analysis, stating that the Center recognized the need for additional guidance regarding measures of effectiveness across the RCs and that the OUSD(P) and the DSCA should provide technical assistance and subject matter expertise. The Director also stated that the Center communicated with the OUSD(P) and the DSCA regarding regular support and assistance but had not received specific guidance on the development of an assessment, monitoring, and evaluation program. Finally, the Director disagreed with our analysis that the RCs could not demonstrate their value to the DoD and the geographic combatant commands, stating that the Center demonstrated value by executing its approved annual program of academic classes, workshops, and key leader engagements, yielding the opportunity to provide information, articulate U.S. policy, and reinforce relationships with key leaders.

Our Response

The Directors of Africa Center, Marshall Center, and Near East- South Asia Center disagreed with our finding that the RCs could not quantify their value or impact and were also unable to measure their contributions to DoD strategic objectives. The Directors of the Asia-Pacific Center and the Perry Center partially agreed with our conclusions and described actions taken to measure their Center's effectiveness and demonstrate their value.

We reviewed their comments and determined that the comments did not affect the accuracy of our report. Our report found that each RC developed goals, objectives, or strategic outcomes linked to DoD strategic policy and guidance. However, we also determined that none of the RCs had measures of effectiveness that tracked progress in achieving the goals, objectives, or strategic outcomes they developed. The DoD defines measure of effectiveness as "an indicator used to measure a current system state, with change indicated by comparing multiple observations over time." None of the RCs provided information during the evaluation, or in response to the draft report, that represented accomplishment of tasks or efforts over time (measures of effectiveness). The RCs could not provide the measures of effectiveness because the RCs did not request, and the OUSD(P) and the DSCA did not provide the RCs with the technical assistance and subject matter expertise required to develop, use, and report measures of effectiveness. Therefore, we did not make changes to this section of the report.

Recommendation, Management Comments, and Our Response

Recommendation A

We recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise indicated by DoD Instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise," to develop and implement performance measures to track progress on achieving program outputs and outcomes.

Management Comments Required

The Under Secretary of Defense for Policy did not respond to the recommendation in the report. Therefore, the recommendation is open and unresolved. We request that the Under Secretary of Defense for Policy provide comments on the final report by July 10, 2020

Finding B

The Regional Centers for Security Studies Did Not Follow Regulations for Travel Program Management

We reviewed a sample of 212 of 2,915 trips for compliance with selected travel regulations and determined that:

- certifying officers at four of the five RCs were not properly appointed, as required by the DoD Financial Management Regulation and the Defense Travel System (DTS) Regulations;
- certifying officers at all five of the RCs, and routing officials at three of the five RCs, could not document that they had completed the training required by DTS Regulations; and
- travelers at three of the five RCs did not provide sufficient justification for some pre-audit flags on completed travel vouchers, as required by DTS Regulations.

This occurred because the RC Directors did not manage their travel program to ensure compliance with DoD regulations, and the DSCA Director, as the executive agent for the RCs, did not direct the necessary oversight of the travel programs. This led to systematic and inconsistent compliance with the regulations at all five RCs.

As a result, certifying officers at the RCs assumed financial liability for 130 trips without proper authority or training, which increased the risk of improper travel payments.

The Regional Centers for Security Studies Did Not Follow Regulations for Management of Their Travel Programs

The RCs did not consistently follow regulations in the management of their travel programs. We reviewed a random sample of 212 of the 2,915 reported trips taken from 2014 to 2018 by staff and faculty assigned to the five RCs. See Appendix A for a further discussion of our methodology.

We examined whether:

- certifying officers listed on the travel vouchers were properly appointed as required by the DoD Financial Management Regulation and the DTS Regulations;

- routing officials and certifying officers who approved travel vouchers in 2018 had completed training, as required by the DTS Regulations; and
- pre-audit flags in travel vouchers had appropriate justifications, as required by the DTS Regulations.¹¹

In our random sample of 212 trips from the five RCs, we found instances of non-compliance in each of the three tests listed above.

Certifying Officers at Four of the Five Regional Centers Lacked Proper Appointments

Certifying officers at the Africa Center, the Marshall Center, the Near East–South Asia Center, and the Perry Center did not have proper appointments. Certifying officers in the DoD must have written authorization from agency heads to certify vouchers, which are requests for reimbursement of expenses incurred in the performance of any official travel.¹² DoD Components must appoint certifying officers using Department of Defense Form 577 “Appointment / Termination Record – Authorized Signature,” (DD Form 577).¹³ Certifying officers check the accuracy of facts in the voucher and supporting documents, verify compliance with the Joint Travel Regulations, and determine the legality of the payment before they approve the voucher for disbursement. Certifying officers then approve vouchers in DTS.

We found that more than half of the certifying officers who approved the random sample of trips we reviewed were not properly appointed via a DD Form 577.

- The Africa Center could not provide DD Forms 577 for the employees who certified 30 of the 40 trips taken by its staff and faculty in our sample.
- The Marshall Center incorrectly appointed individuals on the DD Form 577 as departmental accountable officials instead of certifying officers for 43 of 44 trips in our sample. Departmental accountable officials are “responsible for providing Certifying Officers with information, data, or services that are directly relied upon by the certifying officer in the certification of vouchers for payment.”¹⁴ Departmental accountable officials cannot approve vouchers; only properly appointed certifying officers can approve vouchers.

¹¹ We limited our review to training certificates for certifying officers and routing officials from the trips that occurred in 2018 because the RCs stated that they only retained training records for current routing officials and certifying officers.

¹² DoD 7000.14R, “DoD Financial Management Regulation,” volume 5, “Disbursing Policy,” chapter 1, “Purpose, Organization, and Duties,” section 010303, “Accountable Officials,” November 2017.

¹³ DoD 7000.14R, “DoD Financial Management Regulation,” volume 5, “Disbursing Policy,” chapter 5, “Certifying Officers, Departmental Accountable Officials, And Review Officials,” section 050401, “Appointment/ Termination Record – Authorized Signature,” July 2017.

¹⁴ DoD 7000.14R, “DoD Financial Management Regulation,” volume 5, “Disbursing Policy,” chapter 1, “Purpose, Organization, And Duties,” section 010303, “Accountable Officials,” November 2017.

- The Near East–South Asia Center did not provide DD Form 577 appointments for two officials who certified 40 of 41 trips in our sample. After we identified the discrepancies, the Near East–South Asia Center properly appointed one of its certifying officers using a new DD Form 577 and provided it to us.
- Certifying officers at the Perry Center had signed DD Form 577s but approved the vouchers for 2 of 41 sampled trips prior to the effective date of their appointments.

All of the employees who certified trips for the Asia–Pacific Center had signed DD Forms 577 and were properly appointed as certifying officers.

Routing Officials and Certifying Officers Could Not Always Document Required Travel Training

Routing officials at the Africa Center, the Marshall Center, and the Near East–South Asia Center, and certifying officers at all five of the RCs, could not provide documentation verifying completion of required travel training. DTS regulations require that authorizing officials and routing officials complete the following four training courses.

- About DTS
- DTS Travel Documents (DTS 101)
- Travel Policies
- The DTS Approval Process

However, the regulations also state that DTS users can follow an alternate training plan, as established by their DoD Component.¹⁵ Personnel at the Africa Center and the Near East–South Asia Center stated that they followed the requirements of the DTS regulations, while personnel at the Asia–Pacific Center, the Marshall Center, and the Perry Center said they used an alternative combination of DTS classes. We limited our request for training certificates to 2018, as RCs stated that they only retained training records for current routing officials and certifying officers.

Routing officials have the responsibility to review and digitally sign DTS documents before authorizing officials review the documents. Routing official functions in the DTS include:

- verifying lines of accounting and the sufficiency of funds;
- checking compliance with the Joint Travel Regulations, DoD Component guidance, and mission requirements; and
- reviewing pre-audit flags to verify traveler justifications.¹⁶

¹⁵ Defense Travel System Regulations, Table 2, “Training,” October 2017, page 3-18.

¹⁶ Defense Travel System Regulations, section 030404, “Routing Official,” October 2017.

Of the five routing officials at the Africa Center and the one routing official at the Near East–South Asia Center active in our travel sample, none could provide documentation verifying completion of the required travel training. For the Marshall Center, only one of the six routing officials in our sample could provide verifying documentation of the required travel training. The Asia-Pacific Center and the Perry Center provided documentation verifying completion of required travel training for all their routing officials for the trips in our sample.

Joint Travel Regulations define the authorizing official as the individual “who directs travel and is responsible for the funding.”¹⁷ In addition to the DTS training requirements, the DoD Financial Management Regulation requires that certifying officers “complete an approved Certifying Officer Legislation training course applicable to their mission area prior to their appointment and refresher training annually, and provide proof of completion to their supervisor. Evidence of having completed this training is required prior to performing as a certifying officer.”

In the sample of trips from 2018, we reviewed the training certificates from the certifying officers, and all five RCs had at least one certifying officer who could not provide documentation verifying completion of the required training.

- At the Africa Center, the one certifying officer approved a single voucher prior to completing required travel training.
- At the Asia–Pacific Center, none of the three certifying officers could provide documentation that they completed the Certifying Officer Legislation training course.
- At the Marshall Center, none of the five certifying officers could provide documentation of travel training, as outlined by the Marshall Center’s specific travel training plan.
- At the Near East–South Asia Center, neither of the two certifying officers could provide documentation of travel training, as outlined by the Near East–South Asia Center’s specific travel training plan.
- At the Perry Center, neither of the two certifying officers could provide documentation of travel training, as outlined by the Perry Center’s specific travel training plan.

Travel Vouchers Did Not Always Include Valid Pre-Audit Justifications

Travel vouchers in our sample from the Marshall Center, the Near East–South Asia Center, and the Asia–Pacific Center did not have valid justifications for pre-audit flags as described in DTS Regulations. Pre-audit flags are notifications

¹⁷ The Joint Travel Regulations, Appendix A: Definitions & Acronyms, “Authorizing/Order Issuing Official (AO),” April 2019.

in the DTS that some aspect of the travel document is not compliant with regulations or exceeds DoD-established cost thresholds. DTS regulations require that the traveler include justifications for pre-audit flags.¹⁸ The routing official reviews the traveler's responses to the pre-audit flags to see if the traveler appropriately addressed the reasons that triggered the pre-audit flag. The certifying officer then validates the justification for items flagged as questionable and, if deemed invalid, returns the document to the traveler for correction.¹⁹

While the majority of the justifications for the pre-audit flags in the sample of travel vouchers we examined were sufficiently justified, some were not. For example:

- Justification for a pre-audit flag on an approved travel voucher from the Marshall Center contained only two periods ("..").
- Justification on a travel voucher from the Asia Pacific Center stated "od," for a claim that was 15 percent greater than the DTS-authorized amount.
- Justification for a pre-audit flag on an approved voucher from the Near East-South Asia Center stated, "I do not understand."

Inappropriate or missing justifications for pre-audit flags demonstrates a lack of compliance on the part of the traveler and weak oversight by routing officials and certifying officers.

The DSCA Did Not Conduct Oversight and the Directors Did Not Ensure Compliance of Regional Centers for Security Studies Travel Programs

The DSCA, as the executive agent for the RCs, did not direct the necessary oversight of the travel programs at the RCs. DoD Directive 5200.41E names the DSCA Director as the DoD Executive Agent for the RCs and assigns him or her the responsibility for "programming, budgeting, and financial management of the resources necessary to support the operation of the Regional Centers, including all operation and maintenance costs..."²⁰

The DSCA Travel Manager stated that the RCs' travel programs, including receipts, training, and approvals, would be part of the overall DSCA Manager's Internal Control Program review in the future. He also stated that the DSCA had undergone a financial improvement and audit readiness review that resulted in the DSCA

¹⁸ Defense Travel System Regulations, section 030408, "Traveler," October 2017.

¹⁹ Defense Travel System Regulations, section 030404, "Routing Official," and section 030401, "Authorizing Official," October 2017.

²⁰ DoD Directive 5200.41E, "DoD Regional Centers for Security Studies," June 30, 2016, page 8.

updating DSCA Travel Directive 7002, last published on March 1, 2010. Finally, he stated that DSCA needs to review more travel documents throughout the agency, including those at the RCs, but staffing prevents such an action.

Furthermore, the RC Directors did not manage their travel programs to ensure compliance. DoD Directive 5200.41E assigns responsibility for direction and management of RC personnel, resources, and programs, under the authority, direction, and control of the USD(P), and in accordance with DSCA guidance, to RC Directors.

Certifying Officers Assumed Liability and Increased the Potential for Improper Payments

Certifying officers at the RCs assumed financial liability for 130 trips without proper authority or training, which increased the risk of improper travel payments. To become a certifying officer, users must complete Certifying Officer Legislation training and be appointed in writing on DD Form 577. The form includes the acknowledgment that “I understand I am strictly liable to the United States for all public funds or payment certification, as appropriate, under my control. I have been counseled on my pecuniary liability applicable to this appointment and have been given written operating instructions.” Without proper authority or training, certifying officers are at increased risk of approving authorizations and vouchers that may not be correct, proper, and legal. The individual certifying officers are assuming personal liability without proper authority or training.²¹ Certifying officers can be held personally accountable, and are individually responsible, for verifying that Government payments under their jurisdiction are legal, proper, and correct.

Management Comments on the Finding and Our Response

The Directors at all five RCs provided comments on Finding B.

Africa Center for Strategic Studies Comments

The Director of the Africa Center agreed with our analysis in Finding B. The Director stated that the Africa Center corrected the identified deficiencies and updated all administrative certifications forms, such as travel trainings and DD Form 577s. Additionally, Africa Center has implemented a mechanism to track Certifying Officer training.

²¹ DoD FMR Volume 5, Chapter 33, defines pecuniary liability as “personal financial liability for fiscal irregularities of disbursing and certifying officers and departmental accountable officials as an incentive to guard against errors and theft by others, and also to protect the government against errors and dishonesty by the officers themselves.”

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments

The Director of the Asia-Pacific Center agreed with our analysis in Finding B. The Director stated that the Asia-Pacific Center continued to comply with travel administrative responsibilities by properly appointing certifying officials and confirming that travel officials have update travel training certificates. As such, to ensure currency, the Center implemented a mechanism to track certifying official training.

George C. Marshall European Center for Security Studies Comments

The Director of the Marshall Center agreed with our analysis in Finding B. The Director stated that the Center updated or corrected certifying official's appointment forms (DD Form 577) and updated their Management Internal Control Program to ensure travelers, authorizing officials, and certifying officials understand and meet DoD travel requirements (such as valid pre-audit justifications). Additionally, the Director stated that the Center continued to improve accountability of travel requirements and established a system to track the compliance of travel training.

Near East-South Asia Center for Strategic Studies Comments

The Director of the Near East-South Asia Center agreed with our analysis in Finding B. The Director stated that the Center updated the appointment orders and required DTS and Joint Travel Regulations training for all certifying officers. The Director also stated that, while we found deficiencies, the Center approved internal travel consistent with the DTS and the Joint Travel Regulations.

William J. Perry Center for Hemispheric Defense Studies Comments

The Director of the Perry Center agreed with our analysis in Finding B. The Director stated that the certifying official appointment orders were current and that the Center would continue to monitor compliance. The Director partially agreed with our analysis regarding their travel training program. While the Director agreed that the Center could not document completion of travel training, the Director said that the Center has a strong commitment to training. Specifically, the Center sends all reviewers and approving officials to DTS school for a week of intensive training.

Our Response

Directors at all five RCs agreed with the Finding. Each of the RCs described completed or ongoing corrective actions and stated that they were prepared to ensure future compliance regarding DoD travel requirements. The Director of the Perry Center partially agreed with our language when describing the training of the Perry Center's routing officials and certifying officers in an earlier version of this report. We considered the Director's comment that the tone and tenor of our analysis gave the impression that the training of routing officials and certifying officers was lacking and deficient and that this put the Government at risk for fraud, waste, and abuse. In response, we updated language in the Finding to reflect that some routing officials could document required travel training. Specifically, we added language stating that the Perry Center, along with the Asia-Pacific Center, provided documentation verifying that all its routing officials completed required travel training for the trips in our sample.

Recommendations, Management Comments, and Our Response

Recommendation B.1

We recommend that the Defense Security Cooperation Agency Director develop and implement a plan to execute its executive agent responsibilities over the Regional Centers' travel program, as required by DoD Directive 5200.41E.

Defense Security Cooperation Agency Comments

The DSCA Director agreed with our recommendation. The DSCA Director proposed a corrective action plan including a data call to verify RC compliance with the appointments and training documents. Furthermore, the DSCA Director said that the DSCA is in the process of updating the DSCA Travel Directive 7002.5. According to the DSCA Director, the updated Directive will correct existing guidance and enumerate the responsibilities of RC Directors and DSCA headquarters' directorates exercising executive agency oversight functions on RC travel.

Our Response

The DSCA Director's comments addressed the recommendation. Therefore, the recommendation is resolved, but will remain open. We will close the recommendation when the DSCA Director provides documentation verifying RC compliance with the appointments and training documents. Additionally, to close the recommendation, we also request that the DSCA Director provide a copy of the approved DSCA Travel Directive 7002.5 updating and correcting existing guidance and responsibilities regarding RC travel.

Recommendation B.2

We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel programs comply with DoD regulations.

Directors of the Regional Centers for Security Studies Comments

The Directors at all five Regional Centers for Security Studies agreed with the recommendation. In addition, the Directors from the Africa Center, Asia-Pacific Center, and the Marshall Center described corrective actions to their travel programs that their respective organizations already completed and additional planned future actions.

Our Response

The Directors' comments addressed the recommendation. Therefore, the recommendation is resolved but will remain open. We will close the recommendation when the Regional Centers for Security Studies provide us with documentation that verifies the development of an inspections process to verify that their travel programs comply with DoD regulations.

Finding C

The Regional Centers for Security Studies Complied with Regulations Governing Vetting, Non-Disclosure Agreements, and Honoraria

We reviewed data from each of the five RCs covering a period of time from 2014 through 2018 and found that, of the five RCs:

- the three RCs that employed foreign nationals followed vetting requirements;
- none of the RCs issued a non-disclosure agreement other than the Standard Form 312, “Classified Information Nondisclosure Agreement;” and
- none of the RCs reported paying an honorarium for any single event above the \$2,000 threshold.

The Regional Centers for Security Studies Complied with Regulations Related to Vetting, Non-Disclosure Agreements, and Honoraria

We reviewed operations at the RCs from January 2014 to November 2018 to determine whether the RCs complied with regulations governing vetting, non-disclosure agreements, and honoraria. For the vetting of foreign faculty, we reviewed RC guidance and procedures for their hiring. For our evaluation of whether non-disclosure agreements included the required language regarding whistleblower rights and whether honoraria over \$2,000 had the required higher-level approval, we analyzed transaction information and other documentation provided by the RCs and conducted interviews with responsible personnel at each RC.

The Regional Centers for Security Studies Followed Vetting Requirements for Foreign Faculty

The three RCs that employed foreign nationals all reported that their foreign faculty had current visas and met additional requirements unique to the individual RC. The Immigration and Nationality Act of 1952, as amended, lays out the vetting requirement for foreign nationals for attaining a visa to work in the United States, which would include foreign faculty at the RCs in the United States.²² The Department of State maintains the “Consular Consolidated Database” that is the consolidated repository of all required information on visa applicants.

²² Title 8, United States Code, Chapter 12, “Immigration and Nationality,” Sections 1101, 1104, and 1181.

The RCs relied on other Government agencies to conduct background checks and investigations necessary for the vetting of foreign faculty.²³ The Department of State checks and reviews input from other Government agencies, such as the Department of Homeland Security and the DoD, for arrests, convictions, and legal information, prior to issuing a work visa.

The Asia-Pacific Center, Africa Center, and Marshall Center employed 10 foreign faculty from 2014 through 2018: the Asia-Pacific Center (four employees), Africa Center (one employee), and Marshall Center (five employees).

- The Asia-Pacific Center forwards information from selected non-U.S. candidates to the Naval Criminal Investigation Service for a law enforcement review and the DSCA for human rights vetting during the hiring process, prior to a job offer. After the selection of a non-U.S. candidate, Washington Headquarters Service vets the prospective employee for trust suitability via the Standard Form 85, "Questionnaire for Non-Sensitive Positions," as non-U.S. candidates at the Asia-Pacific Center do not require a Secret clearance. Officials from the Asia-Pacific Center said that their foreign faculty had current Department of State-issued visas to work in the United States.
- The Africa Center vets non-U.S. citizen faculty per the requirements of the National Defense University Manual 8200.1, in addition to obtaining a visa from the Department of State.²⁴ For employees who accept a job offer, this includes a background investigation for national security positions using the Electronic Questionnaire for Investigations Processing. Officials from the Africa Center said that its hiring process followed the National Defense University's hiring process, and reported that its one foreign faculty member had a current Department of State-issued visa to work in the United States.
- At the Marshall Center, the DSCA vets non-U.S. citizen faculty for human rights violations and U.S. Army Europe vets non-U.S. citizen faculty using the Foreign National Screening Program outlined in Army in Europe Regulations 604-1 and 690-70.²⁵ Additionally, in Germany, prospective employees from non-European Union countries must obtain work and residence permits prior to employment at the Marshall Center, in accordance with the German "Residence Law."²⁶ The German government approves non-U.S. citizen faculty based on investigations and checks by

²³ We did not examine whether the Department of State and the German government properly conducted and completed the investigations on RC faculty.

²⁴ National Defense University Manual 8200.1, "Standard Operating Procedure: Hiring Process," Section 5.2, "Background Investigation," June 12, 2017.

²⁵ Army in Europe Regulation 604-1, "Local National Screening Program in Germany," August 26, 2015; and Army in Europe Regulation 690-70, "Recruitment and Staffing for Local National Employees in Germany," April 5, 2011.

²⁶ "Aufenthaltsgesetz: German Act on the Residence, Economic Activity and Integration of Foreigners in the Federal Territory," February 25, 2008.

various German government agencies and the International Criminal Police Organization. Officials from the Marshall Center stated that all non-U.S. citizen faculty members who worked for the Marshall Center in Germany had approval from the German government authorizing their employment in Germany.

Regional Centers for Security Studies Did Not Issue Non-Disclosure Agreements Other Than Standard Form 312

None of the RCs issued a non-disclosure agreement other than Standard Form 312, “Classified Information Nondisclosure Agreement,” which already contains a version of the language required by the Whistleblower Protection Enhancement Act of 2012.²⁷ The Act prohibits the use of a non-disclosure agreement that does not contain warning language reaffirming employees’ rights under existing statute or Executive Order to communicate with Congress, report complaints to an inspector general, and avail themselves of other whistleblower protections.²⁸ We contacted officials at all five RCs, including Directors, Chiefs of Staff, and legal advisors and all the officials stated that they issued non-disclosure agreements using only the Standard Form 312.

Regional Centers for Security Studies Reported No Honoraria Payments Greater Than \$2,000

None of the RCs reported to us that they paid an honorarium for any single event above the \$2,000 threshold. To avoid excessive payment of honoraria, in accordance with the DoD Financial Management Regulation, the Deputy Secretary of Defense has established a policy that the responsible official in the next higher organizational echelon must approve honoraria amounts greater than \$2,000.²⁹ RC Directors approve honoraria payments that are \$2,000 and below. We reviewed 1,082 honoraria payments based on payment data provided by the individual RCs.

We analyzed honoraria payment data provided by the individual RCs because the RCs did not record honoraria payments uniformly in the Defense Agency Initiative, the RCs financial accounting system. Our examination of data from the Defense Agency Initiative system showed that the RCs did not uniquely identify honoraria payments, making it difficult to use that system to independently corroborate the lists of honoraria payments provided by the RCs. The honoraria data provided by the RCs included the names of the individuals who received payment, their organization, and the dates of the presentations. We sorted this data by honoraria

²⁷ The Whistleblower Protection Enhancement Act of 2012, section 2302, title 5, United States Code, “Prohibited Personnel Practices,” 2012.

²⁸ Section 2302 (b)(13), title 5, United States Code, “Prohibited Personnel Practices,” 2012.

²⁹ DoD 7000.14R, Financial Management Regulation, volume 10, chapter 12, section 1208, “Payments of Fees for Guest Speakers, Lecturers, and Panelists,” July 2010.

amounts paid to determine if the payment for any event was greater than \$2,000.³⁰ Table 1 shows information about honoraria payments by RC. The RCs were following the established criteria for honoraria payments.

Table 1. Total Honoraria Payments and Amounts by RC for 2014 to 2018

Regional Center	No. of Payments	Total Amount
Africa Center for Strategic Studies	17	\$10,000
Daniel K. Inouye Asia-Pacific Center for Security Studies	40	\$27,450
George C. Marshall European Center for Security Studies	328	\$280,250
Near East-South Asia Center for Strategic Studies	632	\$361,761
William J. Perry Center for Hemispheric Defense Studies	65	\$38,750
Total	1,082	\$718,211

Source: DoD OIG analysis of data obtained from the RCs.

The Regional Centers for Security Studies complied with regulations related to vetting, non-disclosure agreements, and honoraria. Therefore, we make no recommendation for this Finding.

Management Comments on the Finding and Our Response

Four of the RCs provided management comments on Finding C.

Director of the Regional Centers for Security Studies Comments

The Directors of the Near East-South Asia Center for Strategic Studies, the George C. Marshall European Center for Security Studies, and the William J. Perry Center for Hemispheric Defense Studies agreed with our finding. The Director of the Daniel K. Inouye Asia-Pacific Center for Security Studies also agreed with the Finding and pointed out the ongoing challenges of hiring foreign nationals, a topic outside the scope of this evaluation.

³⁰ A speaker might be paid multiple honoraria for speaking at different events occurring on the same day. For example, data from the Marshall Center showed that one individual received two honoraria payments of \$800 each in March 2015 for speaking at two separate events on the same day. There are two separate \$800 payments, rather than one \$1,600 honoraria payment.

Our Response

We appreciate the Directors' comments on our finding. As previously stated, we make no recommendation for this finding because we determined that the RCs generally complied with regulations related to vetting, non-disclosure agreements, and honoraria. Because of the comments provided by the Directors of the RCs, we did not make any changes to this section of the report.

Appendix

Scope and Methodology

We conducted this evaluation from September 2018 through June 2020 in accordance with the “Quality Standards for Inspection and Evaluation,” published in January 2012 by the Council of Inspectors General on Integrity and Efficiency. Those standards require that we adequately plan the evaluation to ensure that we met the objectives and that we perform the evaluation to obtain sufficient, competent, and relevant evidence to support the findings, conclusions, and recommendations. We believe that the evidence obtained was sufficient, competent, and relevant to lead a reasonable person to sustain the findings, conclusions, and recommendations.

We evaluated the RCs’ administrative processes related to vetting and hiring of faculty, the use of non-disclosure agreements, travel, and payment of fees to guest lecturers (honoraria) to ensure that the RCs were compliant with relevant laws and DoD directives. We also evaluated DoD and RC implementation of actions to develop and use measures of effectiveness. We visited and collected information using data calls and written requests for information from the five RCs and the following DoD organizations responsible for RC operations.

- Assistant Secretary of Defense – Indo-Pacific Security Affairs
- Assistant Secretary of Defense – International Security Affairs
 - Deputy Assistant Secretary of Defense – African Affairs
 - Deputy Assistant Secretary of Defense – Middle East
 - Deputy Assistant Secretary of Defense – Russia, Ukraine & Eurasia
 - Deputy Assistant Secretary of Defense – Western Hemisphere Affairs
- Geographic Combatant Commands:
 - U.S. Africa Command
 - U.S. Central Command
 - U.S. European Command
 - U.S. Indo-Pacific Command
 - U.S. Northern Command
 - U.S. Southern Command

We also conducted site visits to all five RCs, the Office of the Deputy Assistant Secretary of Defense–Security Cooperation, and the DSCA, where we interviewed senior officials and gathered additional documentation.

Vetting and Hiring of Faculty

We reviewed vetting information for foreign faculty from each of the five RCs from January 2014 to November 2018. In our request for information, we asked for data up to September 15, 2018, the day following the distribution of the announcement letter for this project. The Africa Center, the Asia-Pacific Center, and the Marshall Center reported hiring foreign faculty. Data from the three RCs with foreign faculty included the names of the individuals and the type of visa they possess.

The RCs did not conduct investigations or vet foreign faculty themselves but instead relied on other Government agencies to provide background checks and investigations. As a part of the vetting process, the Asia-Pacific Center used the DSCA and the Naval Criminal Investigation Service, while the Africa Center applied National Defense University Manual 8200.1. The Marshall Center used U.S. Army in Europe regulations to screen non-U.S. faculty who also had to obtain work and residence permits from the German government. We reviewed the DoD criteria associated with these vetting procedures. We did not examine the procedures of other U.S. Government agencies or the German government.

Non-Disclosure Agreements

We spoke with RC Directors, Chiefs of Staff, or legal advisors at all five RCs and requested copies of any non-disclosure agreements that they issued from January 2014 to September 2018, excluding Standard Form 312, "Classified Information Nondisclosure Agreement." We determined that Standard Form 312 already contained a version of the language required by the Whistleblower Protection Enhancement Act of 2012. RC officials stated that they did not issue any non-disclosure agreements other than the Standard Form 312 during the review period.

Procedures for Approving Official Travel

We reviewed travel data from each of the five RCs from January 2014 to September 2018. All five RCs provided a list of trips taken, which included, at a minimum, the traveler's name, their office or component, dates of the trip, locations, and travel cost.

To determine the extent to which the faculty and staff travel at the RCs followed selected requirements, we identified requirements in DoD Financial Management Regulation, Joint Travel Regulations, and the DTS regulations. For the purposes of travel, the DoD Financial Management Regulation establishes disbursing requirements, principles, standards, responsibilities, and pecuniary liability standards for certifying officers, among others. The Joint Travel Regulations

govern travel and transportation at Government expense and applies to all DoD travelers. Furthermore, the Defense Travel Regulations state that DTS is the single, online travel system used by the DoD. The DTS enables DoD travelers to generate travel vouchers for payment and receive reimbursement. The DTS regulations also define the responsibilities of DTS users and minimum required training for DTS users.

We selected a random sample of 212 out of the 2,915 trips taken by staff and faculty assigned to all five RCs from January 2014 to September 2018. OIG Quantitative Methods Division randomized the list of trips for each RC. We then applied a control test to the sample, using a 90-percent confidence interval and an error rate in the population of less than 5 percent. This yielded a sample size of 212 trips: Africa Center – 40 trips, Asia-Pacific Center – 44 trips, Marshall Center – 44 trips, Near East-South Asia Center – 41 trips, and Perry Center – 43 trips.

To review each trip in the sample, we examined the voucher in the DTS, verified the appointment of the certifying officer, and checked training documentation of the routing officials and certifying officers. We used the voucher to review pre-audit flag justifications, if any, and to identify the routing officials and certifying officers. We requested copies of the appointment of the certifying officers from the DSCA and RCs to determine whether the RCs had properly appointed certifying officers. To determine whether the routing officials and certifying officers had required training, we requested training certificates from the RCs. As a secondary source, we obtained a list of the training certificates for selected routing officials and certifying officers through the Defense Travel Management Office's Travel Explorer. While not the official database for DoD training, according to an official from Defense Travel Management Office, Travel Explorer offers a centralized source of information, including training information.

Payment of Fees to Guest Lecturers (Honoraria)

We reviewed honoraria data from January 2014 to September 2018 provided by each of the five RCs. We analyzed honoraria payment information provided by the RCs because the RCs did not record honoraria payments in a financial system of record. RCs record honoraria payments, along with all other obligations, in the Defense Agency Initiative system. We reviewed information in the Defense Agency Initiative system, provided by the DSCA, and found it difficult to independently verify that the list of honoraria payments provided was complete from payment information derived from the Defense Agency Initiative system. The Asia-Pacific Center, the Marshall Center, the Near East-South Asia Center, and the Perry Center used the honoraria process as a means of payment to guest lecturers for the entire

period, while the Africa Center stopped using them in 2014. The honoraria data provided by the RCs included the names of the individuals who received payment, their organization, and the dates of the presentations. We sorted all 1,082 reported honoraria payments by amounts paid to determine if the payment for any event was \$2,000 or greater, the threshold that would have required higher echelon approval as stated in the DoD Financial Management Regulation.

Use of Computer-Processed Data

We used computer-processed data from the DTS to obtain travel voucher data to identify pre-audit flag responses and the names of the reviewing and approving officials from each individual trip in our sample of Regional Center travel. In 2013, the Defense Logistics Agency completed a readiness review of DTS controls and on September 25, 2015, the Defense Logistics Agency OIG issued the results of their attestation engagement, providing reasonable assurance of the input, processing, or output of DTS data. On August 14, 2018, the Defense Human Resources Activity issued an audit providing reasonable assurance of the DTS transaction processes. Based on the audits issued by the DLA OIG and DHRA, we concluded that the data obtained from DTS was sufficiently reliable to meet our objectives.

Use of Technical Assistance

During project planning and preparation of this report, the evaluation team met with the OIG Quantitative Methods Division and discussed methods to analyze travel data from the RCs. The Quantitative Methods Division gave input to the team's approach and randomized RC travel data, allowing the team to review a simple random sample of trips.

The evaluation team also received assistance with the analysis of RC travel data from the DoD OIG Audit Component. A senior auditor helped team members obtain read-only access to RC files in the DTS database, gave instruction on how to find the files of interest, and answered questions when required.

Prior Coverage

The GAO issued one oversight report and the RAND Corporation issued one DoD-funded report focused on the operation of the RCs. The GAO report can be accessed at <http://www.gao.gov> and the RAND report can be accessed through <https://www.rand.org/>.

GAO

Report No. GAO-13-606, "Actions Needed to Strengthen DoD Efforts to Assess the Performance of the Regional Centers for Security Studies," June 28, 2013

The GAO evaluated the extent to which the DoD developed and implemented an approach to oversee and assess the RCs progress in achieving DoD priorities, among other areas. The GAO found that the DoD took steps to enhance its oversight of the RCs' plans and activities, but its ability to determine whether the RCs are achieving priorities remains limited because the DoD did not develop an approach for assessing progress.

RAND Corporation

Rand research study report RR388, "Evaluating the Impact of the Department of Defense Regional Centers for Security Studies," 2014

The Office of the Secretary of Defense asked the RAND Corporation to provide recommendations on steps that the RCs and their stakeholders could take to collect relevant data for evaluations, improve evaluations, and better assess the centers' impacts on strategic objectives. RAND stated that officials they interviewed said that the RCs made positive contributions to implementing defense priorities and that the RCs advanced DoD security cooperation in cost-effective ways. However, RAND reported that there were not clear metrics and performance data, which makes it difficult to measure the progress of the RCs through time.

Management Comments

Africa Center for Strategic Studies Comments



AFRICA CENTER
FOR STRATEGIC STUDIES

CENTRE D'ÉTUDES
STRATÉGIQUES DE L'AFRIQUE

CENTRO DE ESTUDOS
ESTRATÉGICOS DE ÁFRICA

April 2, 2020

MEMORANDUM FOR Department of Defense, Office of Inspector General (DoD IG)

SUBJECT: Africa Center for Strategic Studies (ACSS) response to the Inspector General "Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. D2018-D00SPO-0141.000, dated March 2, 2020

RESPONSE:

FINDING A (Measures of Effectiveness (MOE)): The Regional Centers for Security Studies did not have Measures of Effectiveness

- **FINDING A1: The five RCs for Security Studies did not have MOEs.**
 - o **NON-CONCUR with Finding A1:** The Africa Center does establish measures of effectiveness to assess outputs, outcomes and impacts. The IG evaluation report "determined that, although each RC developed goals, objectives, or strategic outcomes linked to DoD strategic policy and guidance, none of the RCs had a comprehensive program of measures of effectiveness that measured progress in achieving those expected strategic results." The Africa Center does not concur with the part of this statement that concludes we do not measure progress. The Africa Center measures progress in achieving our expected strategic results through program evaluations, monitoring research and communications metrics, assessing impact indicators and maintaining impact narratives to capture long-term impact over time. Qualitative feedback from alumni and key stakeholders is routinely solicited and received, including frequent requests for additional programmatic engagements beyond the current capacity of the Africa Center. We assess progress quarterly and evaluate and adapt annually during the development of our annual strategic plan.
- **FINDING A2: USD(P) & DSCA did not provide the RCs for Security Studies with assistance.**

National Defense University
300 5th Avenue, Building 20 • Washington, DC 20319-5066
+1 202-685-7300 • africacenter.org

Africa Center for Strategic Studies Comments (cont'd)

- **NON-CONCUR with Finding A2:** USD (P) and DSCA do provide the Africa Center with assistance. While it is correct that the Africa Center requires updated formal/written guidance and revised priorities from USD (P), informal and routine communications provide current strategic guidance and priorities in accordance the National Defense Strategy and DoD's Africa Strategy. DSCA does offer technical assistance and/or subject matter expertise as requested by the Africa Center in accordance with the DSCA role as the RC's executive agent. The Africa Center has regular telephonic, email and in-person discussions with USD(P)/ASD-ISA, USD(P)/DASD-AF and DSCA on program guidance and accomplishments.
- **FINDING A3: RCs for Security Studies could not demonstrate their value to the DoD & GCCs.**
 - **NON-CONCUR with Finding A3:** The Africa Center consistently articulates and demonstrates its value to DoD and USAFRICOM most principally through our annual program plan, which identifies goals, objectives, and strategic outcomes in keeping with the National Defense Strategy, DoD's Africa Strategy, and the USAFRICOM Campaign Plan; and through our quarterly reviews which assess progress in achieving those goals, objectives, and strategic outcomes. Moreover, the Africa Center engages in routine interaction, coordination and collaboration with DASD-AF and USAFRICOM to ensure Africa Center activities remain aligned with the National Defense Strategy and complement the USAFRICOM Campaign Plan lines of effort. The Africa Center Annual Plan is submitted to ASD-ISA, DASD-AF, USAFRICOM Commander and DSCA to gain formal endorsements, and the annual plan is ultimately approved for execution by the USD(P). As well, the Africa Center responds to frequent requests from OSD and USAFRICOM throughout the year to provide insight and analysis on emerging issues, such as Great Power Competition, and to facilitate engagements with key experts and senior African stakeholders on topics of immediate concern to DoD in Africa. The Africa Center's research products are widely used and circulated by DoD colleagues focused on Africa. The Center's network of distinguished alumni, e.g., National Security Advisers, Ministers, and CHoDs across the continent, enable the Center to serve as a bridge between DoD and African counterparts, directly supporting the NDS' key objective to strengthen alliances and partnerships. Africa Center leadership is frequently requested to moderate and facilitate DoD senior leader engagements with African counterparts.

Africa Center for Strategic Studies Comments (cont'd)

- **DOD IG RECOMMENDATION A:** We (DOD IG) recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise indicated by DoD instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise, "to develop and implement measures of effectiveness that track progress on achieving program outcomes.
 - o **NON-CONCUR with Recommendation for Finding A:** USD-P and DSCA currently provide technical assistance and subject matter expertise as required. DSCA includes the Africa Center in the coordination of the Initiative Design Documents (IDD) development process for USAFRICOM security cooperation activities. The AM&E framework developed by the Africa Center complements the security cooperation initiatives led by USAFRICOM and articulated as specific lines of effort in the ACP (in accordance with the DoD instruction 5132.14). The mandate of the Africa Center to serve as a forum for research, communication and exchange of ideas requires a unique AM&E framework. AM&E for security cooperation activities inherently focused on education are different than that of traditional security cooperation programs. The DODI specifies that "DoD will maintain a hybrid approach to management of AM&E efforts, whereby, in general, assessment and monitoring will be a decentralized effort."

FINDING B (Travel): The Regional Centers for Security Studies did not follow regulations for travel program management.

- **FINDING B1:** Certifying Officers (COs) at Four of the Five Regional Centers were not properly appointed required by DoD FMRs and DTS regulations.
 - o **CONCUR with Finding B1:** ACSS has corrected the identified deficiencies. All ACSS CO's have completed the necessary training and all have an approved DD Form 577s on file.
- **FINDING B2:** Routing Officials and Certifying Officials Could Not Document that they had completed Required DTS Training.
 - o **CONCUR WITH COMMENT to Finding B2:** ACSS has documentation from 2018 showing completed training, but at the time of the IG inspection, they had expired (due to an administrative

Africa Center for Strategic Studies Comments (cont'd)

oversight which has been corrected). ACSS COs are trained and have all current certifications on file. To ensure currency, ACSS has implemented a mechanism to track CO training. To become a certifying officer, users must complete Certifying Officer training (required every two years) and appointed in writing on DD Form 577.

- **FINDING B3: Travel Vouchers did not always include Valid Pre-Audit Justifications**
 - o **CONCUR with Finding B3:** Although ACSS was not singled out for a specific deficiency, ACSS acknowledges that a CO did not have current documentation on file to confirm the training necessary to properly review and correctly annotate justifications to flagged vouchers. ACSS has taken corrective action and all Cos are currently trained and current certifications are on file.

DOD IG RECOMMENDATION B:

- **B.1: We recommend that the DSCA Director develop & implement a plan to execute its executive agent responsibilities over the RC's travel programs, as required by Directive 5200.41E.**
 - o **CONCUR with Recommendation for B1:** ACSS stands ready to assist DSCA with the implementation of travel program staff assistance visit program and inspection process.
- **B.2: We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel programs comply with DoD regulations.**
 - o **CONCUR with Recommendation for B2:** ACSS will execute its Management Internal Control Program to include our travel office's prescribed checklists and internal inspection program IAW DoD Directive 5200.41E, (Oversight, Management, Function and Operations, and support of the DoD Regional Centers for Security Studies) and DTS Travel Regulations.

If there are any questions, the point of contact for this action is my Chief of Staff, [REDACTED]

KNOPF.KATHERINE
NE.J [REDACTED]
Katherine Almquist Knopf
Director

Digitally signed by
KNOPF.KATHERINE
Date: 2020.04.02 13:19:34 -0400'

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments



ASIA-PACIFIC CENTER FOR SECURITY STUDIES

2058 MALUHIA ROAD

HONOLULU, HAWAII 96815-1949

2 Apr 20

MEMORANDUM

From: Director, Daniel K. Inouye Asia-Pacific Center for Security Studies (DKI APCSS)

Subj: DKI APCSS Response to DoD IG Evaluation Report

1. After an additional review of the DoD IG's evaluation of the Regional Centers, we have updated our initial response with details regarding Finding A of the IG evaluation. These details include how our Center demonstrates its value to INDOPACOM, DSCA, and OSD. Although DKI APCSS may not agree with every aspect of the DoD IG's assessment, please know that we remain committed to continued process and program improvement as we continue to provide unique capabilities to the INDOPACOM AOR.

2. My POC is [REDACTED]

//SIGNED, PAG, 2 Apr 20//
PETER A. GUMATAOTAO
Rear Admiral (Retired)
U.S. Navy
Director

Attachment:

DKI APCSS formal response to DoD IG Evaluation report

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments (cont'd)

DOD IG REPORT **DKI APCSS RESPONSE**

FINDING A (Measures of Effectiveness (MOE)): The Regional Centers for Security Studies did not have Measures of Effectiveness

- **FINDING A1:** The five RCs for Security Studies did not have MOEs.
 - o **DKI APCSS RESPONSE (FINDING A1): PARTIALLY CONCUR; DKI APCSS MOE development is in progress.** DKI APCSS published its 10-15 year strategic plan in the fall of 2019, which outlines a future state and four strategic goals and conditions which DKI APCSS strives to create in the Indo-Pacific Region. DKI APCSS has distributed this strategic plan to its stakeholders and is now working to develop measurements, indicators, and collection methods to monitor these goals for progress. As part of this effort, DKI APCSS is currently developing short-/mid-/long-term MOEs in addition to those prescribed in the DoD Regional Center FY16-17 Policy Priorities memorandum (3 June 2015) that it intends to coordinate with both DSCA and USINDOPACOM; completion date is TBD. DKI APCSS is in consultation with USD(P) and DSCA in formulating written guidance, to include mission prioritization, that supplants the previous memorandum in order to effectively develop its MOEs. DKI APCSS also contributes to various Lines Of Effort (LOEs), Measures Of Performance (MOPs), and MOEs in USINDOPACOM's Theater Campaign Plan.
- **FINDING A2:** USD(P) & DSCA did not provide the RCs for Security Studies with assistance.
 - o **DKI APCSS RESPONSE (FINDING A2): PARTIALLY CONCUR; DKI APCSS requires updated formal guidance, including revised prioritization, from USD(P) and DSCA.** DKI APCSS stands ready to coordinate with and receive any assistance provided by USD(P), USINDOPACOM and DSCA for the continued development and implementation of MOEs. DKI APCSS has regular telephonic and in-person discussions with USD(P)/IPSA, USINDOPACOM and DSCA on program guidance and accomplishments. These discussions are invaluable and ensure that this center's actions and activities support higher level goals and objectives. Program accomplishments are documented in executive summaries which are sent to these higher officials and their staffs to confirm attainment of intended outcomes.
- **FINDING A3:** RCs for Security Studies could not demonstrate their value to the DoD & GCCs.

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments (cont'd)

- **DKI RESPONSE (FINDING A3): NON-CONCUR; DKI APCSS consistently articulates and demonstrates its value to DoD and USINDOPACOM by executing its annual program.** USD(P)/IPSA and USINDOPACOM do recognize DKI APCSS' unique value in the expansion of the competitive space with China, the strengthening of alliances, and the Center's unique ability in attracting new partners. Our Center has been recognized by USINDOPACOM Senior Leadership as being instrumental in extending its theater-shaping capabilities throughout the AOR, including locations where there is limited military engagement (e.g. Myanmar, Oceania). Ultimately, the Assistant Secretary of Defense for Indo-Pacific Security Affairs leadership, CDR USINDOPACOM, and Director DSCA regularly validate that DKI APCSS has the ability work by, with, and through U.S. allies and partners in order to secure national interests and counteract coercion by revisionist powers through our Center's focus and ability to connect, educate, and empower the security practitioner community throughout the USINDOPACOM AOR.

DKI APCSS' core values of producing educated, connected, and empowered security practitioners is what drives our Center's ability to execute its program by ensuring the completion of its resident courses, tailored workshops, support of dialogues and partnerships, a robust visitor's program, and maintaining its extensive alumni program. Specifically, our Center takes a comprehensive (whole of society) view in order to gain shared understanding of complex issues. We are able to do this by providing a safe haven for dialogue and cooperation which is built on a foundation of non-attribution and guided by our proven principles of transparency, mutual respect, and inclusion. DKI APCSS is centered on critical thinking by employing an applied, Fellows-focused approach to adult learning which enables the building of networks of enduring relationships through our Center's program that offers broad access to regional perspectives. Ultimately, DKI APCSS promotes effective and accountable security sector governance (e.g. rule of law; international norms and standards) that strengthens the security sector through the inclusion of all security practitioners regardless of gender, race, religion, etc.

DKI APCSS' program and operations are annually presented to USINDOPACOM, DSCA, DASD, and other DoD agencies to gain formal endorsements; the annual plan is ultimately approved for execution by the USD(P). DKI APCSS' annual program plan aligns with National Security Strategy Pillar 3: Preserving Peace through Strength, and Pillar 4: Advance American Influence; National Defense Strategy Objective to Strengthen Alliances and Attract new Partners; DoD Indo-Pacific Strategy LOE 2: Partnerships, and LOE 3: Promoting a Networked Region; and supports various LOEs, MOPs, and MOEs in USINDOPACOM's Theater Campaign Plan. DKI APCSS consistently provides USINDOPACOM, DSCA, and OSD with post-event executive summaries and activity reports that provide insights into the Indo-Pacific Region's security environment.

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments (cont'd)

DOD IG RECOMMENDATION A: We (DOD IG) recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise indicated by DoD instruction 5132.14, "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise, "to develop and implement measures of effectiveness that track progress on achieving program outcomes.

- **DKI APCSS RESPONSE (RECOMMENDATION A): CONCUR; DKI APCSS recommends that both USD(P) and DSCA provide updated formal guidance to all Regional Centers, including revised prioritization.** DKI APCSS will further develop its MOEs in coordination with USINDOPACOM, USD(P), and DSCA to ensure that they meet expected program outcomes.

FINDING B (Travel): The Regional Centers for Security Studies did not follow regulations for travel program management.

- **FINDING B1:** Certifying Officers (COs) at Four of the Five Regional Centers lacked proper appointments.
 - **DKI APCSS RESPONSE (FINDING B1): CONCUR; DKI APCSS was not identified as being a part of this finding, but the Center continues to ensure that new COs have the required certifications.** All DKI APCSS employees who certified trips for APCSS had signed DD Forms 577 and were properly appointed as certifying officials.
- **FINDING B2:** Routing Officials and Certifying Officials Could Not Document Required Travel Training.
 - **DKI APCSS RESPONSE (FINDING B2): CONCUR; DKI APCSS COs have been trained and are now current. To ensure currency, DKI APCSS has implemented a mechanism to track CO training.** To become a certifying officer, users must complete Certifying Officer Legislation training (required every two years) and be appointed in writing on DD Form 577. DKI APCSS had documentation from 2016 showing completed training, but at the time of the IG inspection, they were expired (due to an administrative oversight which has been corrected).

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments (cont'd)

DOD IG RECOMMENDATIONS:

B.1: We recommend that the DSCA Director develop & implement a plan to execute its executive agent responsibilities over the RC's travel programs, as required by Directive 5200.41E.

- **DKI APCSS RESPONSE (RECOMMENDATION B.1):**
CONCUR; DKI APCSS stands ready to assist DSCA.

B.2: We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel programs comply with DoD regulations.

- **DKI APCSS RESPONSE (RECOMMENDATION B.2):**
CONCUR; DKI APCSS will execute its Management Internal Control Program to include our travel office's prescribed checklists and process evaluation. This will also include our alignment with DOD/DSCA guidance and DKI APCSS' Strategic Implementation efforts.

- **FINDING B3: Travel Vouchers Did Not Always Include Valid Pre-Audit Justifications** **DKI APCSS Specific Finding: *Justification on a travel voucher from the Asia Pacific Center stated "od," for a claim that was 15 percent greater than the DTS-authorized amount.***

- **DKI APCSS RESPONSE (FINDING B3):** **CONCUR; DKI APCSS TRAVEL STAFF HAS BEEN TRAINED TO STOP THIS PRACTICE AND INPUT ACTUAL JUSTIFICATION.** At the time of the inspection, DKI APCSS was not fully in compliance with documenting accurate audit justifications for some records based on DTS (at times) causing records to default back to CTO Ticketing after the trip, which deleted justification statements and caused the Center to rebuild/reenter statements. This has been addressed to the DTS Service Desk. As an internal remedy, the audit justification block was annotated with 'od' or 'k'. Since then, we have rebuilt/reentered the audit justification block with an accurate statement, as applicable.

Daniel K. Inouye Asia-Pacific Center for Security Studies Comments (cont'd)

FINDING C (Vetting, NDAs & Honoraria): The Regional Centers for Security Studies complied with Regulations Governing Vetting, Non-Disclosure Agreements (NDAs), and Honoraria.

- **FINDING C1:** The Regional Centers for Security Studies Followed Vetting Requirements for Foreign Faculty.
 - o **DKI APCSS RESPONSE (FINDING C1): CRITICAL COMMENT: DKI APCSS discussed with the IG Inspection team the lack of progress in RC's ability to hire foreign faculty.** OPM will not complete a background investigation if the potential foreign citizen has not lived in the United States for three of the past five years. DKI APCSS and DSCA have been unable to ascertain the regulatory source that specifies this "three of five years" requirement despite multiple efforts. DKI APCSS attempted to hire best qualified individuals who lived in the United States for three years (which is required by HSPD-12), but not three of the last five without success. DOD IG inspection team indicated they would conduct research into this issue, but no further clarification has been provided.
- **FINDING C2:** Regional Centers for Security Studies did not issue NDAs other than standard Form 312.
 - o **DKI APCSS RESPONSE (FINDING C2): ACTION: NONE REQUIRED FROM DKI APCSS.**
- **FINDING C3:** Regional Centers for Security Studies reported no Honoraria payments greater than \$2,000.
 - o **DKI APCSS RESPONSE (FINDING C3): CONCUR; DKI APCSS continues to follow procedures related to Honoraria payment limitations.** These current monetary limits do not limit DKI APCSS mission accomplishment.

Defense Security Cooperation Agency Comments



DEFENSE SECURITY COOPERATION AGENCY
201 12TH STREET SOUTH, SUITE 101
ARLINGTON, VA 22202-5408

MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL

SUBJECT: Response to the Department of Defense Inspector General (DoDIG) Evaluation of the Department of Defense Regional Centers for Security Studies Draft Report (Project No. D2018-D00SPO-0141.000)

I have reviewed and concur with Recommendation B.1, addressed to DSCA. In response to the DoDIG's request for a description of the actions taken and actions planned in order to accomplish this recommendation, please see DSCA's proposed corrective action plan attached.

I appreciate the thorough and comprehensive work that went into this report. DSCA has drafted an updated travel directive that will more clearly delineate the responsibility of Regional Center Directors and those DSCA directorates exercising executive agency oversight functions for Regional Center travel programs. I have also directed my staff to monitor the implementation of the other recommendations in this report.


Please direct any questions or comments regarding this response to my primary action officers for this matter: [REDACTED]

[REDACTED]


Charles W. Hooper
Lieutenant General, USA
Director

Attachments:
As stated

Defense Security Cooperation Agency Comments (cont'd)

	
Corrective Action Plan (CAP) for “Evaluation of the Department of Defense Regional Centers for Security Studies” March 2, 2020 (DODIG Project No D2018-D00SPO-0141.000) DEFENSE SECURITY COOPERATION AGENCY (DSCA)	
<p>Recommendation B.1: We recommend that the Defense Security Cooperation Agency Director develop and implement a plan to execute its executive agent responsibilities over the Regional Centers’ travel program, as required by Directive 5200.41E.</p> <p>DoD Position: Concur.</p> <p>Estimated Completion Date: 9/30/2020</p> <p>Status/Comments: (1) An immediate data call will ensure compliance in the areas of appointments and training documentation. (2) DSCA has drafted an update to DSCA Travel Directive 7002.5, last amended in 2010. This revised draft, which is in pre-coordination, will correct existing guidance that is no longer accurate since the 2016 realignment of Regional Centers (RC) under the Office of the Under Secretary of Defense for Policy and enumerate the responsibilities of RC Directors and DSCA headquarters directorates exercising executive agency oversight functions for RC travel.</p>	<p>Recommendation Follow-up POC: [REDACTED]</p> <p>Budget Implication: N</p> <p>Budget Implication Explanation: NA</p> <p>Potential Monetary Benefit: N</p> <p>Potential Monetary Benefit Amount: NA</p> <p>Potential Monetary Benefit Methodology: NA.</p>
<p>WHS AMD GAO CAP Template 8/15/2019 1</p>	

Defense Security Cooperation Agency Comments (cont'd)

				
Key Corrective Actions	Estimated Completion Dates	Actual Completion Date	Measure(s) Capturing Demonstrated Results	Clarifying Comments
1. DSCA's Building Partner Capacity (BPC) Directorate will task all Regional Centers (RC) to provide (a) current appointments, in the form of a DD Form 577, for all certifying officers; and (b) current training documentation for all authorizing and certifying officers and routing officials.	4/30/2020		DD Form 577s & training completion documentation	
2. DSCA will update DSCA Travel Directive 7002.5 to enumerate the responsibilities of RC Directors and DSCA offices exercising executive agency oversight functions with respect to RC travel programs.	9/30/2020		Updated DSCA Travel Directive 7002.5 showing enumeration of responsibilities	

George C. Marshall European Center for Security Studies Comments



GEORGE C. MARSHALL
EUROPEAN CENTER FOR SECURITY STUDIES

UNIT 24502, APO AE 09053

GCMC-D

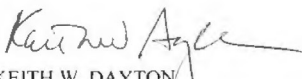
3 April 2020

MEMORANDUM FOR Department of Defense Inspector General (DoD IG)

SUBJECT: George C. Marshall European Center for Security Studies Response to DoD IG Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. D2018-D00SPO-0141.00, dated March 2, 2020.

1. The George C. Marshall European Center for Security Studies (GCMC) appreciates the opportunity to review and provide comments to the subject report. Our response to the findings and recommendations is in the attached document.
2. It is important to note that the GCMC is a bi-national regional center and receives guidance and funding from both the United States and the Federal Republic of Germany. In close coordination with DoD, the German Federal Ministry of Defence (FMoD), and Combatant Commands, we have developed a multi-year program planning effort based on Lines of Effort (LOE) that are based on US and German guidance and feedback; and these LOEs are modified annually accordingly. As a result, GCMC does not concur with the report's comments on Measures of Effectiveness and our value to stakeholders.
3. GCMC is committed to continuous improvement of our processes and programs and we have corrected, or are in the process of correcting, all travel-related findings. We continue to support DSCA, OSD(P), the German FMoD, EUCOM, and other combatant commands through our regional and global programs. Our programmatic activities are the result of US and German guidance, and extensive feedback from our stakeholders and participants. This is an ongoing and interactive process.
4. The POC for this memorandum is [REDACTED]

Encl
GCMC Response
to DoD IG Report


KEITH W. DAYTON
Lieutenant General (Ret), USA
Director

A GERMAN-AMERICAN PARTNERSHIP

George C. Marshall European Center for Security Studies Comments (cont'd)

GEORGE C. MARSHALL CENTER RESPONSE to DOD IG REPORT (Project D2018-D00SPO-141.000)

FINDING A (Measures of Effectiveness (MOE)): The Regional Centers for Security Studies did not have Measures of Effectiveness

- **FINDING A1:** The five RCs for Security Studies did not have MOEs.
 - o **GCMC RESPONSE (FINDING A1): NON-CONCUR.** GCMC programs are assessed and measured in both qualitative and quantitative terms based on the Kirkpatrick Model for evaluating training and learning through indicators of success. GCMC programs measure effectiveness – the degree to which GCMC events provide return on investment and accomplish stakeholder priorities. They also measure efficiency – resources expended per participant. GCMC uses Lines of Effort (LOEs) which reflect consolidated OSD(P) and German Federal Ministry of Defense (FMoD) priorities. These LOEs are designed to focus events and activities toward achieving shared strategic national objectives, and support building partner capacity, networking and gaining and maintaining access. Each GCMC LOE has assigned short-, mid-, and long- range indicators of success. GCMC is in its second year of multi-year, line of effort planning, and is developing a 5-10 year strategic plan. We will continue to support national strategic objectives and stakeholder guidance through this multi-year planning based on progress and achievement over time.
- **FINDING A2:** USD(P) & DSCA did not provide the RCs with (technical and subject matter expertise to assist with the development, use, and reporting of MoE) assistance.

GCMC RESPONSE (FINDING A2): NON-CONCUR. USD(P), DSCA, and other stakeholders facilitate, enhance, and support the GCMC mission and associated activities. GCMC frequently engages with persons in various offices in the OUSD(P), DSCA, and combatant commands (CCMDs). All stakeholders provide input and concur with the GCMC FY Program Plan. Furthermore, the GCMC continually seeks feedback in order to improve our programs; we receive guidance and feedback on our programmatic activities from stakeholders via multiple mediums and various strategies, such as the DOD Cyber Strategy, or DASD SOCT guidance to the RCs. The GCMC, nonetheless, welcomes assistance, and stands ready to coordinate with others on the Assessment, Monitor, and Evaluation (AM&E) process.
- **FINDING A3:** RCs for Security Studies could not demonstrate their value to the DOD & GCCs.
 - o **GCMC RESPONSE (FINDING A3): NON-CONCUR.** As the only DOD bi-lateral RC, the GCMC routinely demonstrates our value to not only the DOD,

George C. Marshall European Center for Security Studies Comments (cont'd)

CCMDs, and DSCA, but also to the German FMoD. Due to our unique U.S.-German partnership, the GCMC is extremely valuable in strengthening transatlantic relations by focusing on topics of significant shared value that are heavily influenced by stakeholder interests from the US and Germany. Through the GCMC, the CCMDs and DOD are able to collaborate with the DEU FMoD to facilitate the efforts and sharing of programs and concepts related to areas such as NATO-EU cooperation, addressing great power competition, and other more technical aspects such as cyber. The German Minister of Defense has described the GCMC as a strategic instrument of transatlantic cooperation and a way to synchronize German and American strategic interests. The GCMC also maintains a fully empowered German Deputy Director to ensure FMoD interests are integrated into broader GCMC goals and objectives outlined in US guidance.

The GCMC demonstrates value by supporting Combatant Command Campaign plans (primarily USEUCOM and USAFRICOM); routinely involving CCMD participants (GCC as well as functional combatant commands such as CYBERCOM) in our programmatic activities – to include at the GO/FO level; effectively executing our programmatic activities to build partner capacity; maintaining an extensive alumni network to assure CCMD access; and maintaining a strong partnership with our European allies. In line with our program plan and programmatic activities, our AARs are routinely shared with various stakeholders to showcase our value and demonstrate the DOD return on investment. The GCMC presents our annual program plan to USEUCOM, other CCMDs, several Deputy Assistant Secretaries of Defense, DSCA, and other DOD agencies, as well as the German FMoD to gain formal endorsements. USD(P) assigns ultimate approval authority for annual program plan execution to the Regional Center Oversight and Advocacy Board, which is chaired by USD(P) or, in his/her absence, ASD(SPC).

DOD IG RECOMMENDATION A: We (DOD IG) recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise indicated by DOD instruction 5132.14, “Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise,” to develop and implement measures of effectiveness that track progress on achieving program outcomes.

- **GCMC RESPONSE (RECOMMENDATION A): NON-CONCUR.** USD(P) and DSCA currently provide technical assistance and subject matter expertise as required. The GCMC will continue to develop our strategic vision and multi-year planning approach with appropriate assessment processes to ensure we continue to meet both USG and DEU expectations and results. Our approach will be within the intent and fully support DOD instruction 5132.14, “Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise,” to develop and implement measures that track progress on achieving program outcomes.

George C. Marshall European Center for Security Studies Comments (cont'd)

GCMC stands ready to coordinate with others in the continued development, use and reporting of MoEs. However, we should be careful with a blanket MoE approach. There is a reason educational institutions use the Kirkpatrick model and indicators of success versus broader DOD MoEs and MoPs for evaluation. We agree the assessment process can be improved and we need valid assessments, but using a military MoE/MoP approach will fall short when “measuring” academic value, changes in participant knowledge and skill-sets, and alumni networking.

FINDING B (Travel): The Regional Centers for Security Studies did not follow regulations for travel program management.

- **FINDING B1:** Certifying Officers (COs) at four of the five Regional Centers lacked proper appointments.
 - o **GCMC RESPONSE (FINDING B1): CONCUR.** Appointment/Termination Record-Authorized Signature, DD Form 577's, have been corrected and are now maintained in a Resource Management (RM) Shared portal.
- **FINDING B2:** Routing Officials and Certifying Officials Could Not Document Required Travel Training.
 - o **GCMC RESPONSE (FINDING B2): CONCUR.** GCMC Certifying Officials (CO) are trained and received current certificates. To maintain auditability, the GCMC has implemented a report to track CO training. COs must complete Certifying Officer Legislation (COL) Refresher training every two years along with an approved DD Form 577 to maintain CO authority. At the time of this IG inspection, the GCMC did not have all of the training certificates on file to substantiate DD Form 577 appointment. We are continuing to improve our accountability and have required documentation on file.
- **FINDING B3:** Travel Vouchers Did Not Always Include Valid Pre-Audit Justifications, as required by DTS Regulations. *GCMC Specific Finding Justification for a pre-audit flag on an approved travel voucher from the Marshall Center contained only two periods (“..”).*
 - o **GCMC RESPONSE (FINDING B3): CONCUR.** The GCMC to conduct refresher Joint Travel Regulation (JTR) training for all DTS users. GCMC approving officials and travel personnel did not properly scrutinize travel vouchers to ensure traveler provided valid pre-audit justifications. The GCMC is coordinating refresher travel training and including proper pre-audit travel justification are included in its Management Internal Control Program worksheets.

George C. Marshall European Center for Security Studies Comments (cont'd)

DOD IG RECOMMENDATIONS B:

B.1: We recommend that the DSCA Director develop & implement a plan to execute its executive agent responsibilities over the RC's travel programs, as required by Directive 5200.41E.

- **GCMC RESPONSE (RECOMMENDATION B.1): CONCUR.** GCMC is prepared to assist in the development of an RC travel program plan.

B.2: We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel programs comply with DoD regulations.

- **GCMC RESPONSE (RECOMMENDATION B.2): CONCUR.** The GCMC is currently developing a Management Internal Control Program policy with worksheets and timelines in order to ensure the travel program complies with all applicable regulations, instructions and policies.

FINDING C (Vetting, NDAs & Honoraria): The Regional Centers for Security Studies complied with Regulations Governing Vetting, Non-Disclosure Agreements (NDAs), and Honoraria.

- **FINDING C1:** The Regional Centers for Security Studies Followed Vetting Requirements for Foreign Faculty.
 - **GCMC RESPONSE (FINDING C1): CONCUR.**
- **FINDING C2:** Regional Centers for Security Studies did not issue NDAs other than standard Form 312.
 - **GCMC RESPONSE (FINDING C2): CONCUR.**
- **FINDING C3:** Regional Centers for Security Studies reported no Honoraria payments greater than \$2,000.
 - **GCMC RESPONSE (FINDING C3): CONCUR.**
The GCMC continues to ensure compliance with DoD FMR regulatory guidance.

Near East-South Asia Center for Strategic Studies Comments



NATIONAL DEFENSE UNIVERSITY
NEAR EAST SOUTH ASIA CENTER FOR STRATEGIC STUDIES
WASHINGTON, D.C. 20319-5066



3 April 2020

Office of the Director

MEMORANDUM for Department of Defense, Office of Inspector General, 4800 Mark Center Drive, Alexandria, VA 22350-1500

Director, Defense Security Cooperation Agency (DSCA), 201 12th Street South, Suite 203, Arlington, VA 22202-4508

SUBJECT: Near East South Asia Center for Strategic Studies (NESA) Response to the Inspector General "Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. D2018-D00SPO-0141.000, dated March 2, 2020

1. References:

- a. Department of Defense, Inspector General, "Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. D2018-D00SPO-0141.00, dated March 2, 2020.
- b. Near East South Asia Center Input to "Evaluation of DOD Regional Centers of Security Studies (Project No. D2018-D00SPO-0141.000), dated November 26, 2018.

2. **Purpose:** To provide the Department of Defense, Inspector General response comments to the Department of Defense, Inspector General, "Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. D2018-D00SPO-0141.00, dated March 2, 2020. The Near East South Asia Center appreciates the recommendations of the of the Inspector General team. The Center immediately corrected all findings in the Travel Management program. NESA personnel are appointed and conducted training IAW DoD 7000.14R, DoD Financial Management Regulation, November 2017 and Defense Travel System Regulations, October 2017.

3. **Findings:** The NESA Center does not concur with several of the DOD Inspector General findings and recommendations specifically:

Finding A. The Regional Centers of Security Studies Did Not Have Measures of Effectiveness, USD(P) and DSCA Did Not Provide the Regional Centers for Security Studies with Assistance, and Regional Centers for Security Studies Could Not Demonstrate Their Value to the DoD and Geographic Commands.

Response: The Near East South Asia Center does not concur with this finding.

The NESA Center demonstrated to the DoD IG Team in a separate briefing that we have developed and continue to improve measures of effectiveness and provide value for our stakeholders. After this brief the DoD IG Team provided extremely positive comments on how the Center measured its effectiveness and demonstrated value to both the USG, the DoD and the Geographic Commands that NESA supports. NESA's programing over the over last decade flow from and is directly tied to the Department's, and Geographic Commander's strategy,

Near East-South Asia Center for Strategic Studies Comments (cont'd)

guidance, and input. Our annual Program Plan development and approval process receives adequate guidance and assistance from the Department, Geographic Commands, the Defense Security Cooperation Agency and our regional stakeholders and meet the DoD Instruction 5132.14 "Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise." Based on this input we pursue opportunities to enhance the strategic impact of COCOM Theater Engagement Plans (TEP) through direct programming, and with key regional partners by integrating our efforts through strategic-level education. We continually garner feedback from stakeholders and assess the areas that we find can provide the most impact for the DoD and COCOM investment. Therefore our effectiveness and value is not only measured qualitatively but quantitatively as well.

As a result of this analysis and programmatic investment, the Center's professional military (PME) and civilian strategic education initiatives and programs constitute our main effort and create long-term relationships that directly impacted USG goals and objectives in the region and directly enhance the capacity of our regional partners. For the past five years NESA, has been the academic partner for the strategically important UAE National Defense College FMS Case. Initiated in 2013, the initial FMS case (LOA1, 2013-15) totaled \$15M and was so successful the UAE has approved (LOA2, 2016-20) totaling \$34M. Since its inception the UAE NDC has provided this key coalition partner with 160 MEL1, JPME graduates that greatly enhanced the military capability of this key regional partner.

In January 2020 the Kingdom of Saudi Arabia signed a \$26M FMS Case to enhance training and education. Nearly half of this amount is dedicated to a NESA effort to create an internationally accredited National Defense University in the KSA. NESA is currently manning a Strategic Initiative Office in the Kingdom with 32 military and civilian academic professionals with the goal of enhancing the strategic and operational WARFIGHTING capacity of this key strategic partner.

NESA will continue to meet its goals and objectives in 2020-21 with \$8.80M in O&M funding and a projected \$2.217M from Geographic Commands (CENTCOM / AFRICOM). Direct investment in NESA programs by our stakeholders is a major indicator of effective programming. Additionally, the Center is financially sustainable in the out-years. Total civilian and contract personnel costs average \$4.670M (38%) leaving \$7.565M (62%) for programs. Our program strategy provides a clear means for the Department to sustain its long-term efforts in the region while providing the opportunity to directly support a "new generation across the Middle East and North Africa demanding universal rights, political, and economic reforms, and deepening our partnerships to ensure regional security."

Finding B. The Regional Centers of Security Studies Did Not Follow Regulations for Travel Program Management.

Response. Concur with comment.

The NESA has updated the appointment orders and DTS and JTR training for all travel certifying officers. However, the Center operated internal travel consistent with DTS and with the Joint Travel Regulation (JTR) for approvals. Of the 260 DTS actions provided to the DoD Inspectors, none of the travel actions examined were found to be illegal, improper or incorrect. Every NESA certifying official is aware that they are liable to the United States for all public funds or payments and

Near East-South Asia Center for Strategic Studies Comments (cont'd)

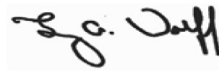
that they are pecuniary liable for any errors. The current system of oversight under DoD Directive 5200.41E and other DoD regulations are more than adequate oversight for the NESA Center.

Finding C. The Regional Centers for Security Studies Complied with Regulations Governing Vetting, Non-Disclosure Agreements, and Honoraria.

Response. Concur with comment.

While the NESA Center complied with all regulations, we appreciate the efforts made by the Washington Headquarters Service, particularly, Mr. Richard Gutter and Ms. Constance House, is providing a consistent, stable platform in the Defense Agency Initiative System (DAI) and the internal link in US Bank to provide Oversight on Demand (IOD) for all Government Purchase Card (GPC) transactions which include honoraria payment transactions. All NESA personnel in the GPC process are properly trained and appointed in the Procurement Integrated Enterprise Environment (PIEE) / Wide Area Work Flow (WAWF). This system has increased our GPC productivity, reduced financial risk, promoted collaboration, and enhanced visibility of the GPC process.

4. Again, I wish to express my appreciation to the DoD IG team and their efforts which have enhanced the effectiveness and performance of the Near East South Asia Center. My point of contact for this action is [REDACTED]
- 5.



Terry A. Wolff
LTG, USA (Ret.)
Director, NESA Center

William J. Perry Center for Hemispheric Defense Studies Comments



NATIONAL DEFENSE UNIVERSITY
WILLIAM J. PERRY
CENTER FOR HEMISPHERIC DEFENSE STUDIES
WASHINGTON D.C. 20319-5066

3 Apr 20

MEMORANDUM FOR DOD Inspector General

Subj: Perry Center Response to Report DoD IG Evaluation of the Department of Defense Regional Centers of Security Studies," Project No. 02018-DOOSPO-O 141.00, dated March 2, 2020.

Thank you for your thorough review of the Regional Center enterprise and affording us the opportunity to review and provide an initial response to the subject report. I and my staff have reviewed the IG team's assessment and attached is our initial response to the findings and recommendations. I welcome the opportunity to work with your office as well as OSD and DSCA as we look forward to making changes to ensure we are providing demonstrated value to all Department stakeholders.

2. My POC is my Chief of Staff, [REDACTED]

Frederick S. Rudesheim
FREDERICK S. RUDESHEIM
LTG, USA (Ret)
Director

Attachment: as

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William J. Perry Center for Hemispheric Defense Studies Comments (cont'd)

DOD IG REPORT (Project D2018-D00SPO-141.000) WJPC RESPONSE

FINDING A (Measures of Effectiveness (MOE)): The Regional Centers for Security Studies did not have Measures of Effectiveness

- **FINDING A1: The five RCs for Security Studies did not have MOEs.**
- WJPC RESPONSE (FINDING A1): PARTIAL CONCUR; The wording of this finding headline seems to indicate that that Regional Centers are responsible for establishing their own MOEs. However, DoD Directive 5200.41E, establishes the requirement for the Assistant Secretaries of Defense (ASDs) to: "Set indicators of success for each of the Regional Centers, continually monitor their progress toward achieving those indicators, and annually evaluate the extent to which they have achieved them, in close coordination with the GCCs." Further responsibility is placed on OSD in DoDI 5132.14 to provide "DoD-wide guidance, tools, and templates on all aspects of AM&E." The report correctly notes that each RC "developed goals, objectives, or strategic outcomes linked to DoD strategic policy and guidance, none of the RCs had a comprehensive program of measures of effectiveness that measured progress toward this outcome." Given the findings in the report, it is clear that, collectively, more work is needed in this area. OSD with the assistance of DSCA should provide not only technical assistance and subject expert expertise, however your recommendation again places responsibility on the RCs to meet requirements placed in OSD by DoDI 5200.41E.
- RECOMMENDATION: Change the wording in the finding headline to reflect that OSD did not provide required indicators of success to the RCs nor did they provide guidance or assistance to the RCs to develop a meaningful AM&E program.
- **FINDING A2: USD(P) & DSCA did not provide the RCs for Security Studies with assistance.**
- WJPC RESPONSE (FINDING A2): PARTIAL CONCUR; The wording in this finding headline is too broadly stated. The Perry Center receives significant and regular guidance, support and assistance from USD(P) as well as DSCA. WJPC, like other RCs, has not received specific guidance and assistance on the development of an AM&E program.
- RECOMMENDATION: Change the wording in the finding headline to be more specific, reflecting that OSD did not provide the required guidance or assistance to the RCs to develop a meaningful AM&E program.

William J. Perry Center for Hemispheric Defense Studies Comments (cont'd)

- **FINDING A3: RCs for Security Studies could not demonstrate their value to the DoD & GCCs.**
- WJPC RESPONSE (FINDING A3): NON-CONCUR; WJPC demonstrates its value to OSD and the COCOMs on a regular basis. We do so by execution of our annual Program Plan consisting of academic classes, workshops, key leader engagements (KLEs), and seminars in the U.S. and in the region. We also do this by hosting a significant number of visits annually by U.S. and foreign academic programs and distinguished visitors. These visits provide the opportunity to provide information, articulate U.S. policy and reinforce relationships with key leaders. Additionally, the leadership and faculty of the Center provides routine advice and assistance to senior leaders, in OSD, the Combatant Commands and foreign leaders. The execution of the Program Plan is foundation upon which longstanding relationships are established with current and future leaders in the security and defense sector. The alumni of the Perry Center not only utilize the knowledge gained as a result of our programs, but the relationships they established at the Center – relationships with U.S. government officials and their peers. As has been well documented in several studies, it is extremely difficult to quantify the value of relationships and yet everyone acknowledges the obvious, relationships matter. Thus, the broad statement that the RCs could not demonstrate value is not correct and suggest a more nuanced finding.
- RECOMMENDATION: Change the wording in the finding headline to be more nuanced, such as: RCs for Security Studies have difficulty quantifying their value to the DoD & GCCs.

DOD IG RECOMMENDATION A: We (DOD IG) recommend that the Under Secretary of Defense for Policy, in coordination with the Defense Security Cooperation Agency Director, provide the Regional Centers with the technical assistance and subject matter expertise indicated by DoD instruction 5132.14, “Assessment, Monitoring, and Evaluation Policy for the Security Cooperation Enterprise, “to develop and implement measures of effectiveness that track progress on achieving program outcomes.

- WJPC RESPONSE (RECOMMENDATION A): CONCUR

FINDING B (Travel): The Regional Centers for Security Studies did not follow regulations for travel program management.

- **FINDING B1: Certifying Officers (COs) at Four of the Five Regional Centers lacked proper appointments.**
- WJPC RESPONSE (FINDING B1): CONCUR; WJPC had a short lapse in effective dates on DD577. This issue has been corrected and will be monitored to ensure proper compliance.
- **FINDING B2: Routing Officials and Certifying Officials Could Not Document Required Travel Training.**

William J. Perry Center for Hemispheric Defense Studies Comments (cont'd)

- WJPC RESPONSE (FINDING B2): PARTIAL CONCUR; As stated, the finding summary is correct, WJPC could not document completion of training. However, this summary headline is not correct in tone or tenor. WJPC has a strong commitment to travel training. We invest in our people. We send all reviewers and approving officials to DTS school for a week of intensive training, rather than just relying on online modules. Yet, this finding headline gives one the impression that the training is lacking or deficient and that this puts the government at risk for fraud, waste and abuse. This is a patently false proposition and is not reflective of our travel administration and oversight.

DOD IG RECOMMENDATIONS:

B.1: We recommend that the DSCA Director develop & implement a plan to execute its executive agent responsibilities over the RC's travel programs, as required by Directive 5200.41E.

- WJPC RESPONSE (RECOMMENDATION B.1): CONCUR; We look forward to working with DSCA to develop an oversight program appropriately tailored to meet each RC unique circumstance.

B.2: We recommend that the Directors of the Regional Centers for Security Studies develop an inspections process to verify that their travel programs comply with DoD regulations.

- WJPC RESPONSE (RECOMMENDATION B.2): CONCUR; WJPC will execute yearly review/inspection of documentation to ensure compliance with applicable directives.
- **FINDING B3: Travel Vouchers Did Not Always Include Valid Pre-Audit Justifications**
- WJPC RESPONSE (FINDING B3): CONCUR; WJPC travel reviewers are conducting sustainment training of all personnel to ensure continued compliance with procedures.

FINDING C (Vetting, NDAs & Honoraria): The Regional Centers for Security Studies complied with Regulations Governing Vetting, Non-Disclosure Agreements (NDAs), and Honoraria.

- **FINDING C1: The Regional Centers for Security Studies Followed Vetting Requirements for Foreign Faculty.**
- WJPC RESPONSE (FINDING C1): CONCUR.
- **FINDING C2: Regional Centers for Security Studies did not issue NDAs other than standard Form 312.**
- WJPC RESPONSE (FINDING C2): CONCUR

William J. Perry Center for Hemispheric Defense Studies Comments (cont'd)

- **FINDING C3: Regional Centers for Security Studies reported no Honoraria payments greater than \$2,000.**
- WJPC RESPONSE (FINDING C3): CONCUR

Acronyms and Abbreviations

DSCA	Defense Security Cooperation Agency
DTS	Defense Travel System
GAO	Government Accountability Office
OIG	Office of Inspector General
RCs	Regional Centers for Security Studies
OUSDP(P)	Office of the Under Secretary of Defense for Policy



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