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Office of Inspector General
United States Department of State

ESP-21-01

Office of Evaluations and Special Projects

December 2020

Management Assistance Report: Representational Travel by the Spouse of the Secretary of State

MANAGEMENT ASSISTANCE REPORT

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Summary of Review

In October 2019, the Office of Inspector General received a whistleblower complaint related to travel by the spouse of the Secretary of State that the Department of State (Department) considered official travel. To investigate this complaint, OIG requested and reviewed documentation related to official representational family travel by Susan Pompeo. Generally, Department policy permits such travel by relatives of Department officials for appropriate representational purposes. However, both Department guidance and principles of internal control require documentation of both the official purpose and the approval of the travel. Federal ethics rules prohibit the Secretary from approving the travel himself.¹

The Secretary's spouse took eight trips that were declared official between April 2018 and April 2020. Of the eight trips, OIG found documentation of an authorized purpose for all eight trips, but only found written approval for two of the trips. Of the remaining six trips, the Under Secretary for Management told OIG that he verbally approved four of the trips but did not document his approval. There is no indication of approval for the remaining two trips. OIG recommends that in order to ensure that the Department has appropriate documentation for internal control and recordkeeping purposes, the Office of the Secretary seek and gain written approval for all representational travel, and that the Under Secretary for Management or other authorizing official document in writing the approval for all representational trips by any family members. The Department concurred with these recommendations.

BACKGROUND

In October 2019, OIG received a whistleblower complaint regarding official travel undertaken by Susan Pompeo, the spouse of the Secretary. In order to investigate this complaint, OIG requested and reviewed documents from the Office of the Secretary (S) and its Executive Secretariat (S/ES), as well as from the Office of the Deputy Secretary, the Office of the Under Secretary for Management (M), and the Office of the Legal Adviser (L). OIG also interviewed Department officials with knowledge of these issues.²

In the case of the Secretary of State, he or she flies on military aircraft when traveling for official purposes because such travel is considered a White House Support Mission. Non-official passengers on those flights, such as family members, must reimburse the government for their travel unless their travel is determined to be official.³ For instance, travel for representational purposes— i.e., when a family member accompanies a Department official to an event where he or she will play an active role in representing the Department — is considered official travel. Although the White House provides the means of transportation, the Department is largely

¹ 11 FAM 612.1 (September 3, 2015).

² Both Acting Inspector General Stephen Akard and Acting Inspector General Matthew Klimow recused themselves from this review and delegated final clearance authority to Deputy Inspector General Diana Shaw.

³ For unofficial travel, the amount of reimbursement is calculated by the Department's travel agent and is generally the lowest commercial fare available at that time for the same itinerary.

responsible for the logistics, including determining whether the travel of family is representational in nature. For family travel that is considered representational, not only does the family member not have to reimburse the government for the flight(s), but he or she also receives significant travel support from the Department at no cost, including provision of a control officer⁴ and many hours of support from Department employees.

Between April 2018 and April 2020, Susan Pompeo accompanied the Secretary on eight trips that were determined to be representational in nature (in whole or in part).⁵ For these eight trips, OIG reviewed whether the Department followed relevant guidance in authorizing and approving the trips.

Department Policies Regarding Representational Travel

The Foreign Affairs Manual (FAM) states that “travel for representational purposes may be authorized for one family member.”⁶ Although these FAM provisions appear to be drafted to cover travel by family members of Foreign Service officers, they are useful guidance for other representational travel.⁷ These provisions require that an authorizing officer approve the travel and that this official “is expected to make sparing and judicious use of this authorization,” ensuring that in all cases, there is “a clear advantage to the United States.” The FAM gives some examples of when representational family travel is appropriate, such as when a foreign dignitary is accompanied by a spouse or other members of the household at an event, when spouses of participants in a meeting or conference have also been invited, or when the President sends a delegation abroad accompanied by their spouses.⁸ The FAM requires that the authorizing official provide and sign a justification statement for representational travel and states that “for control and inspection purposes, the authorizing officer should record and file the justification.”⁹

For representational travel for the Secretary’s family, the authorizing official cannot be the Secretary, because Department policies prohibit employees from taking certain official actions

⁴ A control officer serves as the point of contact for coordinating official travel. A control officer facilitates communication between the visitor and post and is typically responsible for setting up meetings, arranging transportation, and making hotel reservations.

⁵ OIG scoped its review to include trips that occurred between April 2018 and April 2020. Department officials told OIG that at least three additional instances of representational travel have occurred since April 2020.

⁶ 14 FAM 532.1-1 (October 3, 2018).

⁷ Longstanding decisions of the Comptroller General state that federal agencies generally may not pay travel and subsistence expenses for the spouses of employees who accompany them on official travel except when such travel expenses are specifically authorized by law. *See, e.g.,* Government Accountability Office, *Civilian Personnel Manual Title 3*, at 13-14 (March 1979). L officials told OIG that they considered 5 U.S.C. § 5703 to be the specific authorization for Mrs. Pompeo’s travel. Section 5703 states: “An employee serving intermittently in the Government service as an expert or consultant and paid on a daily when-actually-employed basis, or serving without pay or at \$1 a year, may be allowed travel or transportation expenses, under this subchapter, while away from his home or regular place of business and at the place of employment or service.”

⁸ 14 FAM 532.1-1(B) (October 3, 2018).

⁹ 14 FAM 532.1-1(C) (October 3, 2018).

that would affect their personal or imputed financial interest. In this case, Mrs. Pompeo's financial interest, (i.e., what portion of the expenses related to travel would be paid from personal funds or by the government), would be imputed to the Secretary.¹⁰

Officials in S/ES told OIG that they requested and received guidance from L in 2019 that generally followed these guidelines. L officials told them that the Department could determine that the spouse of a Secretary of State may be considered to be performing representational functions if, for example, he or she is traveling to an event with the Secretary where spouses of other high-level dignitaries will be present. L officials emphasized the importance of maintaining appropriate documentation of: (1) a representational purpose or official justification for the travel, and (2) approval of the official travel designation by a Department official other than the Secretary.

FINDINGS

As noted above, between April 2018 and April 2020, all or parts of eight trips taken by Susan Pompeo were declared as representational family travel. OIG requested documentation of both the justification and the approval for each trip. OIG did not assess whether the cited purpose constituted an appropriate justification for representational travel. The table below presents the documentation that was provided by the Department in response to OIG's document requests.

¹⁰ 11 FAM 612.1 (September 3, 2015). An imputed financial interest would include an interest held by the employee's spouse. *See also* 18 U.S.C. § 208.

Table 1: Representational Travel by Susan Pompeo

Travel Dates	Travel Locations	Justification Documentation Provided	Record of Approval Provided
September 2018	New York City	Yes	No
December 2018- January 2019	Brasilia; Cartagena	Yes	No
January 2019	Amman; Baghdad; Erbil; Cairo; Manama; Abu Dhabi; Doha; Riyadh; Muscat	Yes	Yes
March 2019	Kuwait City; Jerusalem Beirut:	Yes	Yes
May-June 2019	Berlin; Bern; Naples; The Hague; London	Yes	No
July-August 2019	Tokyo; Bangkok; Sydney; Pohnpei	Yes	No
September- October 2019	Rome; Podgorica; Lake Ohrid; Athens	Yes	No
February 2020	Munich; Dakar; Luanda; Addis Ababa; Riyadh; Muscat	Yes	No

Source: Generated by OIG from records provided by the Department.

Based on the documentation provided by the Department, OIG identified only two instances in which an authorizing official provided and signed a justification statement documenting the justification for Mrs. Pompeo's travel. Specifically, for the January 2019 trip, a memorandum was drafted for the Deputy Secretary's signature that set forth the representational purpose for the trip and the legal authority for expenses associated with the trip to be paid for by the Department. The memo was cleared through S/ES, L, M, and the relevant regional bureau (the Bureau of Near Eastern Affairs) and signed by then-Deputy Secretary John Sullivan. While no such memorandum was prepared for the March 2019 trip, an official in S/ES prepared a justification statement and emailed it to the then-Acting Under Secretary for Management William Todd, who responded via email that the trip was approved.

For the remaining six trips, officials in S/ES provided OIG with documents that indicated the representational purpose cited for each trip. For example, for the August 2019 trip, S/ES provided an invitation from the Ministry of Foreign Affairs of Thailand to Mrs. Pompeo to attend a spouse program during a meeting of the Association of Southeast Asian Nations. For the September/October 2019 trip, S/ES provided an official agenda noting a luncheon for the Pompeos hosted by the Italian Minister of Foreign Affairs and his partner and a visit with the Prime Minister of Greece and his wife.

However, the Department was unable to provide a signed justification statement or other documentation evidencing approval of these six trips by an authorizing official. For two of the six trips — the September 2018 trip and the December 2018/January 2019 trip listed in Table 1 — OIG could not determine either through its document review or interviews whether an appropriate Department official approved the trips.

For the remaining four trips (the last four trips listed on Table 1¹¹), Under Secretary for Management Brian Bulatao told OIG that he had verbally approved the trips.¹² He explained that once he took office in May 2019, he became the authorizing official for representational travel by Mrs. Pompeo.¹³ He told OIG that he approved these four trips after meeting with S/ES officials who explained the representational purpose of each trip. However, he could not provide any documentation evidencing that he had done so. In an August 2020 interview, the Under Secretary told OIG that he was never provided any guidance that he was required to document his approval or sign a justification statement.¹⁴ Similarly, there was no documentation that the Office of the Legal Adviser or the relevant regional bureau were consulted about these trips.

Department policy generally requires documentation provided and signed by the authorizing official for representational travel.¹⁵ This policy notes that documentation is important for control and inspection purposes. Likewise, such documentation should also be kept to comply with Federal Records Act requirements that require agencies to make and preserve records containing adequate and proper documentation of the decisions and transactions of the agency.¹⁶ The decision to approve representational travel authorizes the expenditure of Department funds and the use of the official time of its employees, which adds even greater weight to the necessity of proper documentation.

¹¹ These trips were the May-June 2019, July-August 2019, September-October 2019, and February 2020 trips.

¹² In May 2020, when OIG initially asked Under Secretary Bulatao's office for information regarding the Under Secretary's involvement in approving Susan Pompeo's representational travel, the Office of the Under Secretary for Management stated that it played no role in approving such travel. In July 2020, the Office of the Deputy Secretary told OIG that Under Secretary Bulatao was involved in approving Ms. Pompeo's travel. In August 2020, OIG interviewed Under Secretary Bulatao, and he confirmed that he had served as the authorizing official for four such trips. Under Secretary Bulatao acknowledged that his office initially gave an inaccurate response and informed OIG that he had tasked his staff to correct it at the time, but they did not do so.

¹³ Under Secretary Bulatao told OIG that he did not recall why he served as the authorizing official rather than the Deputy Secretary.

¹⁴ In November 2020, Under Secretary Bulatao clarified that in July 2020, L provided written guidance that recommended documenting his approval for each trip, but prior to receiving that document, he believed that verbal approval was consistent with existing guidance and policy.

¹⁵ 14 FAM 532.1-1(C) (October 3, 2018). As noted above, this provision appears primarily geared toward representational travel by family members of Foreign Service officers but is useful guidance for other representational travel.

¹⁶ 44 U.S.C. § 3101.

CONCLUSION

A signed statement, documenting both the justification and approval of representational travel, is essential to ensure compliance with Department guidance, as well as for recordkeeping and internal control purposes. Although the Department had documentation that purportedly demonstrated justification for all eight trips taken by the spouse of the Secretary, the Department could provide appropriate documentation of approval by an authorized official for only two of them.

RECOMMENDATIONS

In order to ensure that representational travel complies with Department guidance and to ensure that the Department has appropriate documentation for internal control and recordkeeping purposes, OIG makes one recommendation to the Office of the Secretary, Executive Secretariat, and one recommendation to the Under Secretary for Management.

The Department submitted its official response (Response) to OIG's draft report on November 9, 2020, which is reprinted in full in the appendix. The Department also provided technical comments, which OIG incorporated as appropriate. The Department concurred with OIG's two recommendations.

In the Response, the Department reads into OIG's report a conclusion that OIG does not make – namely, that the Department's use of funds on the trips reviewed by OIG did not violate any law, regulation, or FAM provision. The report, however, does not reach this conclusion. The scope of OIG's review was to determine whether the trips were authorized in accordance with the policies and principles applicable to such travel – i.e., whether the Department properly documented (1) an official purpose for each trip and (2) approval of the trips by someone other than the Secretary. The Department provided documentation supporting the purpose of each trip but could not provide documentation demonstrating approval of each trip, bringing into question whether the trips were, in fact, authorized.

Given our findings, OIG made two recommendations aimed at ensuring that both the Executive Secretariat and the authorizing official – in this case the Under Secretary for Management – understand that approvals should be documented. OIG is pleased the Department has acknowledged the prudence of documenting the official nature of representational travel, as well as approval of such trips, by concurring with our recommendations.

Despite its ultimate concurrence, the Department questioned why OIG “wasted its time” completing this review once it determined that the recommendations would be directed at “purely administrative matters” and suggested that OIG should have approached Department leadership and discussed the findings rather than draft a public report. This suggestion fundamentally misunderstands the independent role of OIG and our statutory oversight responsibilities. First, the Inspector General Act requires OIG to post any document making a recommendation for corrective action on OIG's website not later than three days after the recommendation is submitted in final form to the Department.¹ This is not only a legal requirement, but integral to ensuring transparency. Second, while the Department may view internal controls as mere “administrative matters,” they are mandated by law and are a “key factor in improving accountability in achieving an entity's mission.”²

¹ 5 U.S.C. App. 3, § 3(e)(1)(C).

² GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014), at 1.

We believe that implementation of OIG's recommendations will improve the Department's accountability and we look forward to working with the Department through the compliance process.

Recommendation 1: The Office of the Secretary, Executive Secretariat, should seek and gain written approval from an appropriate authorizing official for all representational travel by any family member of the Secretary of State.

Management Response: In its November 9, 2020 response, the Department concurred with this recommendation.

OIG Reply: This recommendation can be closed when the Department provides documentation that it will seek and gain written approval for future trips.

Recommendation 2: The Under Secretary for Management, or other authorizing official, should document in writing the approval for all representational trips by any family member of the Secretary of State.

Management Response: In its November 9, 2020 response, the Department concurred with this recommendation.

OIG Reply: This recommendation can be closed when the Department provides documentation that it will document the approval for future trips.


APPENDIX: DEPARTMENT RESPONSE



United States Department of State

Washington, D.C. 20520

November 9, 2020

FROM: Counselor Brechbühl 
TO: Deputy Inspector General Diana Shaw
SUBJECT: Response to the Draft Management Assistance Report of the Inspector General: Representational Travel by the Spouse of the Secretary of State (undated)

The Department is in receipt of the undated draft of the Office of Inspector General (“OIG”) Management Assistance Report: Representational Travel by the Spouse of the Secretary of State (“Draft Report”). That Draft Report alleges that the “OIG received a whistleblower complaint related to official representational family travel by Susan Pompeo.”

A thorough reading and review of the Draft Report reveals three key conclusions regarding the expenditure of funds in connection with the Secretary of State’s Spouse’s Representational Travel:

1. There was no violation of any law or statute.
2. There was no violation of any regulation.
3. There was no violation of any Foreign Affairs Manual (“FAM”) provision.

Why did the OIG, led by Assistant Inspector General (AIG) Jeff McDermott, not state that clearly and upfront in its summary of review? The Department has repeatedly pointed that out. One can only surmise that the OIG/AIG McDermott refused to do that as that would have 1) made it clear to readers that there were no violations; and 2) prevented partisan actors from trying to torture, twist and contort the report to imply that the Secretary and Department somehow did something improper. That was not the case and an impartial and professional OIG would have stated so right up front.

The Draft Report acknowledges, and no one disputes that, as a matter of law, the Department has the authority to pay for the official travel of the spouse of the

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Secretary of State (“Secretary”). It is assumed that the whistleblower complaint alleged either that (a) the Department did not have the authority to pay for the travel of the Secretary’s spouse or, (b) that the travel of the Secretary’s spouse was somehow not in compliance with the law. The Draft Report finds no shortcomings with respect to either (a) or (b). That is, the Draft Report does not claim that the Department did not have the authority to pay for the travel of the Secretary’s spouse nor that the travel of the Secretary’s spouse was not in compliance with the law. That, it seems obvious, should have been the end of the investigation by the OIG. Alas, no.

Instead, for reasons one can only surmise, the OIG must have decided to interpret and modify the whistleblower complaint to have been that the Department had not fully-complied with administrative directives or “guidance and principles of internal control” related to family member representational travel. The OIG then decided to use that “made-up” complaint to initiate an investigation of its choosing.

Facts Asserted By OIG

According to the summary section of the draft report, the OIG found that the Secretary’s spouse took eight official trips between April 2018 and April 2020. Furthermore the “OIG found documentation of an authorized purpose for all eight trips, but only found written approval for two of the trips,” apparently a violation, in the eyes of the OIG – not of any statute, regulation or FAM provision – but rather of “principles of internal control”.

Conclusion of the OIG

The OIG made one **legal** conclusion:

“A signed statement, documenting the justification and approval of representational travel, is essential to ensure compliance with Department guidance, as well as for recordkeeping and internal control purposes.”

The OIG made one **factual** conclusion:

“Although the Department had documentation that purportedly demonstrated justification for eight trips taken by the spouse of the Secretary, the Department could provide appropriate documentation of approval by an authorized official for only two of them.”

Both legal conclusion and the factual conclusion are unfounded, wrong and use language that is intended to mislead the reader of the Draft Report.

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1. The “Legal” Conclusion is Wrong

The OIG has incorrectly proffered a “legal” conclusion that there was inadequate documentation in connection with the travel. However, the OIG acknowledges that: the governing statute authorizing such travel does not require this type of documentation (see Draft Report, footnote 7); there is no regulation requiring this type of documentation; and there is no governing FAM provision requiring this type of documentation (see Draft Report, footnote 15).¹

Therefore, the Draft Report’s purported “legal” conclusion is wrong for a series of reasons:

- a. As a legal matter, the statutory underpinning of 14 FAM 532.1-1(C) applies only to Foreign Service family members on assignments overseas and not the Secretary or his spouse. As such, the requirement in the FAM to provide both written justification of the official nature and written approval of the actual travel for the Spouse of the Secretary of State does not exist and therefore, the Department cannot be in violation of it. This is fully dispositive as to whether the Department complied with the FAM – it did.
- b. Moreover, the actual language of 14 FAM 532.1-1(C), while not applicable as shown above and as the OIG acknowledges, would not have been violated even had it been applicable. The OIG noted in the Draft Report in Table 1 that justification documentation was provided. The OIG, wrongly, asserts that an “authorizing” officer must “record and file the justification.” Yet the FAM only says that such filing “should” be made – thus is permissive, not mandated.
- c. The report inaccurately states that “Department guidance and principles of internal control *require* (emphasis added) documentation of both this justification and the approval by an authorizing official.” Again, there is no FAM provision or other legal requirement that mandates a written authorization.
- d. Multiple references are made to “appropriate Department official” approval of the trips. Yet, the FAM provisions simply do not address that there must

¹ As the OIG concedes, 14 FAM 532.1-1(C) “appears primarily geared toward representational travel by family members of *Foreign Service officers*” (emphasis added) stationed overseas, not to the spouse of the Secretary. It is worth recalling that material contained in the FAM is simply a policy guidance – not a legal or statutory compilation. The FAM can be, and frequently is, changed by the Secretary at his sole discretion.

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be a separate “authorizing” official. The FAM provisions talk about “Chiefs of Mission” or other “principal officer” approving representational travel. Yet, as noted in item 1b above, in each of the eight cases, there was a clear justification. Indeed, for the two first trips reviewed, the justification was obvious as the precise examples of justified family representation travel contained in 14 FAM 532.1-1(B) (2) (a trip to United Nations events in which spouses were invited) and (3) (Presidential delegation) were exactly what took place. Why would there need to be an authorizing official, or for that matter a justification, given that the FAM (even if it had applied) expressly authorizes travel of precisely this nature.

2. The Factual Conclusion is Wrong

The OIG makes the factual assertion that “[a]lthough the Department had documentation that purportedly demonstrated justification for all eight trips taken by the spouse of the Secretary, the Department could provide appropriate documentation of approval by an authorized official for only two of them.” That is incorrect. For the eight trips reviewed, the OIG confirms that a justification was provided. Thus, the Department, contrary to the factual assertion by the OIG, did provide written “justification documentation” as the basis for each trip reviewed, consistent with applicable requirements. In any event, as the OIG itself acknowledges throughout the report, there is no requirement for this documentation in any statute, regulation, or FAM provision in connection with the dual representational travel by the Secretary’s spouse.

As both the legal and factual conclusions upon which the Draft Report depends are incorrect, the appropriate action by the OIG would be to close out the review and issue no report.

Other Relevant Facts For the Sake of Completeness

From the beginning of the Secretary’s time in office in April 2018 (and frankly for many years and Secretaries before that) it has been unclear what administrative rules governed representational travel by family members of domestically assigned employees not covered by the Foreign Service Act. The current Executive Secretary has been extremely diligent ensuring the appropriate use of public funds and has repeatedly sought guidance from the Department’s Office of the Legal Advisor (L).

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In response to those requests, L provided formal guidance to the Executive Secretary and, each time, that guidance has been complied with in full. First, L suggested a practice that an appropriate official at the Department, typically the Undersecretary for Management as Federal Ethics rules prohibit the Secretary from approving such travel himself, make decisions approving representational travel by family members of domestically-assigned employees not covered by the Foreign Service Act. In further guidance received in mid-2020, again provided at the request of the Executive Secretary, L advised that “while there is no legal requirement as to form, L recommends that such determinations be reflected in writing (for example in an email exchange) and clearly identify the nature of the event, include any relevant invitations, the date on which M made the decision and summarize the reasons that support that determination.” The Department has diligently followed all guidance it has received from L.

The Eight Trips Reviewed – Justifications Provided for All Eight!

The first two trips taken by Mrs. Pompeo are shown to have justifications submitted, although not “authorizations”. As previously explained, no such authorizations in writing are required either in law or in the FAM. It is important, however, to note the following:

Trip 1

September 2018 to New York City for the United Nations General Assembly (UNGA). This trip fits squarely into the types of trips expressly approved by the FAM as cited by the OIG (“when spouses of participants [in a meeting or conference] have also been invited”). It is plain, therefore that no justification should even be necessary as that trip was expressly approved within the FAM itself.

Trip 2

December 2018/January 2019 Presidential Delegation to Brasilia and Cartagena for President Bolsonaro’s Inauguration. Similarly, the FAM expressly authorizes family travel when the President sends a delegation abroad (the Presidential Delegation to Brasilia).

Trips 3 and 4

OIG finds both a written justification and a written approval and thus does not find any administrative shortcoming.

Trips 5, 6, 7 and 8

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There were neither governing regulations nor updated guidance from L at the time of the final four trips reviewed, Under Secretary Bulatao's oral approval provided to S/ES officials was more than sufficient to document approval and ensure proper use of Department funds for all four trips taken by Mrs. Pompeo since he became Under Secretary in May 2019.

Thus, despite there being no statutory, regulatory, or FAM provision requiring the written approvals for the Secretary's travel with his spouse, it is further clear that all official travel taken by Mrs. Pompeo has appropriate justification and was properly documented or approved based on the regulations and guidance in place at the time.

Regarding the Recommendations of the OIG

The OIG made two recommendations at the end of its report:

Recommendation 1: The Office of the Secretary, Executive Secretariat, should seek and gain written approval from an appropriate authorizing official for all representational travel by any family member of the Secretary of State.

Recommendation 2: The Under Secretary for Management, or other authorizing official, should document in writing the approval for all representational trips by any family member of the Secretary of State.

As part of its updated guidance provided to the Department leadership earlier in 2020, L made clear that, while noting that the FAM provision is not applicable to this travel, L recommended memorializing the official nature of such travel as well as its approval in writing in the future. In essence, L made the same recommendations as the OIG, only several months earlier. We agree with the L guidance and OIG recommendations and will continue to follow the L guidance and the OIG recommendations for any subsequent family member travel of the Secretary.

One Last Observation:

The OIG found that all eight trips that Mrs. Pompeo took in an official capacity had the proper justification documentation. The only concern expressed by the OIG was the form of documentation of approval -- a position that the OIG has acknowledged is not a requirement under any statute, regulation, or FAM provision.

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Given this work resulted only in a set of recommendations on purely administrative matters, Department leadership wonders why the OIG wasted both time (its, as well as that of many Department officials) and resources writing a report. Would it not have been better to have simply approached Department leadership in a collaborative manner and discussed these concerns? Perhaps, Department leadership would have refused to accept the recommendations. If so, the OIG could write a report to reflect its recommendations and the Department's declination to accept them. But as is now clear, the Department leadership had already sought and implemented guidance from L by the time the OIG formulated its recommendations. Had the OIG presented these concerns to the Department leaders it would have learned this was the case and could have stopped work, thereby saving considerable time, money and effort. The OIG's mission, after all, is to work with the Department's leadership to root out fraud, waste and abuse and to improve the Department's efficiency and operations to better serve the American taxpayer. Its mission is not to play hide the ball in an effort to accuse and prosecute.

Department leadership under Secretary Pompeo stands ready to work with the OIG to help it accomplish its rightful mission at all times.

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