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Office of Inspections

May 2017

Inspection of Embassy Freetown, Sierra Leone

BUREAU OF AFRICAN AFFAIRS

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OIG HIGHLIGHTS

ISP-I-17-16

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May 2017
OFFICE OF INSPECTIONS
Bureau of African Affairs

Inspection of Embassy Freetown, Sierra Leone

What OIG Found

- Embassy Freetown was still recovering from the effects of responding to the Ebola crisis. Management programs at the embassy were particularly affected by the crisis.
- Communication between Embassy Freetown and Washington waned following the Ebola crisis, and Washington agencies developed bilateral and multilateral programs for Sierra Leone without consulting the embassy.
- Embassy Freetown identified no significant internal controls issues in its 2016 Statement of Assurance. However, OIG identified 22 internal controls deficiencies.
- Many of Embassy Freetown's buildings had been poorly maintained, the cumulative effect of which risks mission effectiveness.
- The Consular Section was not prepared for a crisis or major disaster.
- Spotlight on Success: Embassy Freetown and the Bureau of Administration's Office of Logistics Management conducted an "Integrated Logistics Management System Tune Up" in August 2016. The 3-week tune up led to improvements in internal controls.

What OIG Inspected

OIG inspected U.S. Embassy Freetown from October 27 to November 16, 2016.

What OIG Recommended

OIG made 18 recommendations: 17 to Embassy Freetown to improve internal controls and emergency preparedness and 1 recommendation to the Bureau of Overseas Buildings Operations and Embassy Freetown to develop and implement an action plan to identify, prioritize, and resolve maintenance deficiencies.

In their comments on the draft report, Department stakeholders concurred with the 18 recommendations. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. OIG considers the recommendations resolved. The Department's formal written responses are reprinted in their entirety in Appendix B.

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CONTEXT

The Republic of Sierra Leone is a small West African country with a population of 6.5 million people. From 1991 to 2002, the country endured a civil war that resulted in tens of thousands of deaths, the displacement of more than two million people (nearly a third of the population), and the presence of a United Nations peacekeeping force to serve as a guarantor of stability. The civil war damaged infrastructure and disrupted the provision of educational, health and other government services. In the years after the war, the country made significant strides in terms of its peace, stability, democratic governance, and economic development. Despite this progress, Sierra Leone remains one of the poorest, least developed countries, ranking 181 of 188 on the 2014 United Nations Human Development Index.

The 2014-2015 Ebola virus outbreak disrupted Sierra Leone's fragile progress towards peace and prosperity. Sierra Leone was one of the three African countries most affected by the outbreak. The Ebola crisis caused a contraction of the economy, including reduced agricultural output and closure of international borders. In the midst of the crisis, the fall of global commodity prices led to closure of two iron ore mines that were the country's two largest export revenue earners. Widespread corruption and weak governance currently impedes economic growth and political reform in Sierra Leone. Sierra Leone held national and local elections in 2007 and 2012, and the next elections are slated for early 2018.

Embassy Freetown shifted from the goals in its 2015-2017 Integrated Country Strategy (ICS), which was prepared before the Ebola outbreak, to new goals for post-Ebola recovery in Sierra Leone. Among these new goals, identified in the embassy's draft ICS and FY 2018 Mission Resource Request, are:

- Improving governance, transparency and accountability by engaging all levels of Sierra Leonean government and civil society;
- Promoting sustainable, equitable economic growth and Sierra Leone's post-Ebola recovery;
- Strengthening Sierra's Leone's regional security role, peacekeeping participation, and capacity to combat transnational crime; and
- Bettering the lives of Sierra Leoneans, especially women and children, through health systems and nutrition improvement.

U.S. foreign assistance to Sierra Leone was \$3.3 million in FY 2016, with a focus on food security and the health care system. U.S. Agency of International Development's Feed the Future program was in its assessment phase in 2016 and targeted commercial food production, nutrition, and food security. In addition, the U.S. provided about \$300 million in supplemental funding for the Ebola emergency response and, in the post-Ebola recovery period, the U.S. will invest an additional \$300 million in health and food security programs. This increase includes a just-launched four-year \$44 million Millennium Challenge Corporation program that will build capacity in the power and water sectors, contributing to the host government's post-Ebola recovery plan.

The Department of State (Department) rated Freetown as a critical threat post for crime. Embassy personnel receive a 35 percent hardship differential,¹ a 25 percent cost of living allowance, and a 15 percent service needs differential. Embassy Freetown comprised a staff of 64 American and 194 locally employed (LE) staff among five agencies.² The Ebola crisis led to the evacuation of non-employed eligible family members and curtailments of several Foreign Service officers.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.³ A separate classified inspection report discusses the embassy's security program and issues affecting the safety of mission personnel and facilities.

EXECUTIVE DIRECTION

Tone at the Top and Standards of Conduct

OIG assessed embassy leadership on the basis of 103 on-site interviews and 66 interviews in Washington, including 52 with comments on front office performance; 93 questionnaires that U.S. and locally employed staff completed; and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection. Interviews consistently described the Ambassador and Deputy Chief of Mission (DCM) as approachable and of high integrity—attributes of leadership in 3 Foreign Affairs Manual (FAM) 1214.

The Ambassador arrived in Freetown in October 2014, during the Ebola virus outbreak. He had three previous assignments in Africa, including as DCM in Uganda, and was an office director in the Department's Bureau of African Affairs (AF) prior to his nomination as ambassador. The DCM arrived in November 2015 with two previous assignments in Africa.

Embassy staff told OIG the Ambassador and DCM functioned effectively as a team, with the DCM serving as the Ambassador's alter ego consistent with her role as outlined in 2 FAM 113.2. The Ambassador and DCM modeled integrity and commitment to ethical values through their words and actions in a country with high levels of corruption. (Sierra Leone ranked 119 of 168 countries in Transparency International's 2015 Index of Perceptions of Corruption.) The Ambassador held a town hall meeting in June 2016 for all embassy employees to stress the importance of integrity and that all employees, American and LE staff, would be treated equally. The embassy posted signs in the chancery offering anonymity and cash rewards to employees who reported malfeasance.

¹ 3 FAM 3261 states that a Service Need Differential may be granted to an employee assigned to a differential post upon a determination that especially adverse environmental conditions warrant additional compensation as a recruitment and retention incentive to fill the employee's position at that post.

² See Appendix C.

³ See Appendix A.

Representatives of other U.S. Government agencies at the embassy told OIG that the Ambassador knew the details of their assistance programs, consistent with his 2 FAM 113 responsibility to direct, coordinate, and supervise all Executive Branch employees and to manage all Executive Branch resources at the embassy. Agency heads and Department section heads told OIG the DCM met regularly with them to review programs and coordinate U.S. activities as outlined in 2 FAM 113.2.

In April 2016, the Ambassador named an Equal Employment Opportunity (EEO) counselor and LE staff liaison, consistent with his responsibility to provide equal opportunity in employment-related decisions in accordance with 3 FAM 1514.2. The embassy held an EEO familiarization meeting for all LE staff in August 2016, and LE staff committee members told OIG they were familiar with the EEO program and reminded each other of EEO principles.

Both the Ambassador and DCM adhered to Department standards on representational events. OIG reviewed vouchers for representational events from January to October 2016 and found no irregularities. However, the embassy did not record gifts in accordance with 2 FAM 960, and OIG advised the embassy to comply with the Department's gift procedures as revised in 2016.⁴

Execution of Foreign Policy Goals and Objectives

During the Ebola crisis, the Ambassador engaged with Washington and with Sierra Leonean officials to manage the influx of U.S. assistance to Sierra Leone to combat the virus. Doing so fulfilled his responsibilities under 18 FAM 005.1-7 (G) and 2 FAM 113.1 to manage foreign assistance and all Executive Branch resources within the embassy. The Ambassador maintained close relations with host government officials and advanced the interests of U.S. Government agencies, consistent with his responsibility under 2 FAM 113.1 (6) and (7). The embassy continued to engage effectively with Sierra Leonean officials after the Ebola crisis passed.⁵

However, the Ambassador and several officials within AF told OIG that communication between Washington and the embassy had waned following the Ebola crisis. In 2016, Washington agencies announced multilateral and bilateral initiatives to assist Sierra Leone, but embassy officials told OIG that they had been unaware of these initiatives beforehand. OIG advised the embassy to increase its communication with Washington to gain greater visibility on proposed U.S. assistance programs.

The Ambassador encouraged all mission personnel to focus on embassy ICS goals consistent with the Department's leadership and management principles in 3 FAM 1214. Prior to the inspection, the Ambassador and DCM led an effort in which working groups updated sections of the ICS to reflect the mission's shift to post-Ebola recovery in Sierra Leone. He also reorganized the format of the weekly country team meetings to center on reports from four interagency working groups that corresponded to the embassy's ICS goals. However, mission staff who participated in the country team meetings told OIG that the new format limited discussion on

⁴ Department cable 16 State 97388.

⁵ The World Health Organization declared Sierra Leone free from Ebola on November 7, 2015.

important issues. OIG advised the Ambassador to ensure country team meetings facilitated discussion by all elements of the mission.

Adherence to Internal Controls

The Ebola crisis strained the embassy's internal controls, and OIG found the embassy still trying to recover at the time of the inspection. Employee curtailments during the Ebola crisis led to staffing gaps at the same time the embassy dealt with an influx of hundreds of U.S. Government personnel and hundreds of millions of dollars in U.S. assistance to Sierra Leone to combat Ebola. The embassy had five different Management Officers in a 21-month period.

The embassy moved to strengthen some internal controls during 2016. For example, the DCM chaired quarterly meetings of the Safety, Health, and Environment Committee. Additionally, on August 11, 2016 the embassy issued a management notice designating embassy officials to fulfill specific responsibilities as required by 2 FAM 113.3. The DCM also complied fully with her responsibilities in 9 FAM 403 to review at least 20 percent of non-immigrant visa refusals and at least 10 percent of non-immigrant visa issuances.

During the inspection, OIG identified significant internal controls deficiencies in facilities maintenance and security, which are detailed in both the Resource Management section of this report and the separate classified inspection. The embassy's 2016 Statement of Assurance identified no significant deficiencies in internal controls; however, the embassy could not provide OIG with all of the supporting documentation that led to this conclusion. Department cable 14 State 29422, however, outlines the Chief of Mission's role in assuring strong management controls and oversight of embassy operations. The Government Accountability Office's Standards for Internal Control in the Federal Government also require documentation as part of an effective internal controls system and for management to design controls to respond to risks. The Ambassador's and DCM's review of the draft 2016 Statement of Assurance and documentation did not identify the deficiencies found by OIG, increasing the risk of misuse of embassy resources and of security vulnerabilities.

Recommendation 1: Embassy Freetown should review and correct its process for preparing the annual Statement of Assurance to ensure vulnerabilities are identified and appropriate corrective actions are taken. (Action: Embassy Freetown)

Security of the Mission

The Ambassador and DCM met regularly with the Regional Security Officer (RSO) but were not aware of the physical security deficiencies identified during the inspection. The RSO did not provide adequate oversight of the security program and also was unaware of some of the deficiencies. OIG advised the Ambassador to pay close attention to the security issues, which are discussed in greater detail in OIG's classified inspection report.

The Ambassador and DCM participated in the embassy's security drills. Both also participated in Consular Section events aimed at rebuilding the consular warden system in the broader

American community, which deteriorated during the Ebola outbreak as American citizens departed Sierra Leone.

Developing and Mentoring Future Foreign Service Leadership

The Ambassador and DCM oversaw the embassy's First and Second Tour (FAST) program as required by 3 FAM 2242.4 and provided opportunities for FAST employees to develop new competencies as outlined in Department cable 14 State 19636. The DCM held regularly-scheduled monthly meetings with the FAST group and smaller sessions focused on first-time bidders and other topics. FAST employees told OIG they welcomed suggestions to strengthen the embassy's FAST program. OIG advised the committee to reach out to other FAST groups in the region and to look at Embassy Tashkent's FAST program, which OIG highlighted in a March 2016 inspection.⁶

POLICY AND PROGRAM IMPLEMENTATION

The embassy broadened and deepened its relationships with Sierra Leoneans through its management of the upsurge in U.S. Government assistance in the post-Ebola recovery period. The embassy team collaborated in implementing programs and conducting outreach, but sent few cables to communicate the results to Washington end-users.

Analytical Reporting

Embassy Freetown did not generate analytical reporting on regional or multilateral political and economic affairs, nor on environment, science, and technology issues. Economic and political files were not organized and maintained in accordance with Department standards (see the Information Management section of this report.) OIG reviewed reporting cables from January to August 2016 and found that 55 percent of the cables were responses to demarche instructions or mandated reports. Washington consumers praised two political cables that addressed political-economic issues, but told OIG they would like more original, substantive reporting in advance of the early 2018 elections.

The embassy focused on implementing programs and other activities without adequate attention to reporting on current developments and the impact of U.S. assistance. According to 2 FAM 113.1 c(10) and Department instruction cables on diplomatic reporting, Foreign Service missions are to observe, analyze and report significant political, economic, and societal developments occurring abroad. OIG advised the embassy to increase its output of analytic cables, including cables on domestic politics, regional and multilateral topics, and donor coordination, and environment, science and technology issues. OIG also encouraged the reporting officers to enlist other agencies at post to contribute to reporting, as recommended by the Department, to deepen analysis and help cover staffing gaps.

⁶ OIG, *Inspection of Embassy Tashkent, Uzbekistan* (ISP-I-16-12A, March 2016).

Leahy Vetting Conducted in Accordance with Department Guidance

In 2015, Embassy Freetown vetted 331 individuals and security units for potential gross human right abuses in accordance with applicable laws and Department requirements.⁷ OIG advised the embassy to appoint supervisory backup personnel for the International Vetting Security Tracking software to avoid potential delays in vetting.

Federal Assistance

Department-managed bilateral federal assistance to Sierra Leone in FY 2016 totaled \$3.3 million.⁸ Of this assistance, OIG reviewed \$905,949 in embassy-managed grants—self-help, economic support, and public diplomacy—and found that files, predominantly for the public diplomacy grants managed by the Public Affairs Section, lacked required documentation. OIG also reviewed the Bureau of International Narcotics and Law Enforcement (INL) programs that were managed by the embassy's Political Section and found some deficiencies, as described below.

Although Most Grants Files Complied with Department Standards, Some Lacked Required Documentation

OIG reviewed all 42 FY 2016 self-help and economic support fund grant files (totaling \$671,074). OIG found that nearly all were in compliance with Department standards. OIG also reviewed all 15 public diplomacy grants awarded in FY 2016, which totaled \$234,875. OIG found that all 15 grant files lacked required budget forms, notices of funding opportunity, and evidence of pre-award evaluation criteria, risk assessment, and monitoring plans. Also, while each grant had been assigned to a Grants Officer Representative, only 1 of 15 files contained a Grants Officer Representative designation letter. OIG's findings were consistent with those of a September 24-29, 2016, grants review by the Department's Paris-based Africa Regional Service.

Post officials explained that these deficiencies occurred because the Ebola crisis had increased the workload on Public Affairs Section staff, including through an influx of grants funding, without a commensurate increase in personnel. Public Affairs Section staff told OIG the Africa Regional Service had advised them not to address the deficiencies found in the September review until after the OIG inspection so that all deficiencies could be addressed simultaneously. At the time of the inspection, the LE staff member responsible for managing grants files had just returned from grants training in South Africa.

The Public Affairs Section's grants management procedures and documentation did not meet the requirements of the Department's Federal Assistance Policy Directive, Sections 1.05-C, 1.08,

⁷ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department of State from furnishing assistance to foreign security forces if the Department receives credible information that such forces have committed gross violations of human rights. See 22 USC 2378d.

⁸ This amount excludes military security assistance and USAID-managed Economic Support Funds and may not include regional activities where Sierra Leone is one of several places of performance.

2.03-A, and 3.01-A. The lack of procedures for soliciting, evaluating, monitoring and documenting grant awards risked diverting funds to projects that did not match mission priorities or to grants recipients who lacked the capacity to implement the grant objectives.

Recommendation 2: Embassy Freetown should document procedures and required records for all grant awards in accordance with Department guidance. (Action: Embassy Freetown)

Embassy Did Not Evaluate Police and Judicial Assistance Progress

The Political Section, responsible for oversight of INL programs in Sierra Leone, did not conduct joint evaluation meetings with the Government of Sierra Leone for two programs totaling nearly \$5.3 million in 2014-2016. The programs' letters of agreement between the embassy and Government of Sierra Leone require such joint reviews every 3 or 6 months, with joint reports summarizing results. Embassy staff told OIG that they were unaware of these requirements. Joint reviews of progress facilitate efficient and effective use of funding, minimize waste of resources, and help measure progress against the embassy's ICS and INL's strategic plan. OIG advised the INL program officer and embassy staff to comply with the letters of agreement.

End Use Monitoring Now in Compliance

Embassy Freetown did not prepare a 2015 end use monitoring report for two vehicles and a patrol boat that were provided to the Government of Sierra Leone in 2012. This occurred because the embassy staff had not been trained in end use monitoring. INL's Standard Operating Policy and Procedures for End Use Monitoring, however, specify that all items over \$2,500 must be verified annually. Lack of end use monitoring elevates the risk of loss or misuse of U.S. Government-provided resources. During the inspection, Embassy Freetown and INL were preparing a 2016 report verifying proper use of the vehicles and boat.

Public Diplomacy

OIG found the Public Affairs Section complied with applicable federal and Department regulations and guidelines in the areas of strategic planning and crosscutting working relations, media outreach and analysis, and operations at its Information Resource Center and American Corners. In addition to its embassy-located Information Resource Center, Embassy Freetown supported two American Corner⁹ library partners in Freetown, one in Bo, and four regional library American Shelves partners¹⁰ through a combination of Bureau of International Information Programs and Public Diplomacy discretionary funds.

⁹ American Corners and American Spaces are open-access facilities used to engage foreign audiences overseas.

¹⁰ American Shelves, usually placed in well-known locations in the host country, contain American books and reference materials to help educate interested audiences about the United States by promoting the understanding of American history, culture, and values.

Insufficient Regional Information Resource Officer Oversight

The embassy had not had a regional Information Resource Officer (IRO) visit since December 2013. OIG reviewed 2016 correspondence between the embassy and the Embassy Accra-based Information Resource Officer and found eight emails. Only four of those emails were specific to Sierra Leone, and three of those four addressed OIG's inspection. According to 10 FAM 362.1, ideally, IROs should visit posts in their assigned regions at least twice a year. In addition, Department cable 2012 State 54144 states that IROs should visit each post in their region of responsibility as required to evaluate and advise on the integrity of the American Spaces program. Between visits, IROs should be available for consultation by phone, email and video conferencing.

IROs are responsible for several countries and the Ebola crisis made travel to Sierra Leone difficult. The resultant gap in IRO support limited the embassy's ability to conduct outreach and information services that were cost-effective, of the highest quality, and consonant with the embassy's public diplomacy strategy. OIG advised the embassy to request regular IRO site visits.

Consular Affairs

OIG reviewed consular operations, including immigrant and nonimmigrant visas, American citizens services, and consular anti-fraud programs. The Consular Chief arrived in August 2016 and was working to reduce or eliminate continuing problems caused by the Ebola crisis. These efforts included eliminating immigrant visa genetic testing backlogs, drafting and implementing new standard operating procedures, and cross training LE staff for critical American Citizen Services functions. The Consular Chief was also working to address 35 recommendations the Regional Consular Officer made during a review of consular operations in September 2016. Because the Consular Chief was resolving the issues covered by those recommendations, they are not addressed in this report. OIG also found separate problems with crisis preparedness, as discussed below.

Consular Crisis Preparedness Did Not Comply with Department Standards

The Consular Section did not meet Department standards for crisis preparedness. For example, the section did not have a disaster assistance kit containing the supplies, equipment, and information a consular officer might need to function off-site in an emergency situation. The section had only one partially trained LE staff member as the American Citizens Services backup assistant in the event of an airplane crash or natural disaster. Moreover, the consular section did not have a laptop computer configured for a consular team headed for a disaster site. These deficiencies are inconsistent with the requirements in 7 FAM 1800, which provide guidance to plan for consular crisis management. Staffing shortages and the Ebola crisis deterred the section from adequately maintaining crisis preparedness, but failure to comply with Department standards could put American citizens at risk during a major crisis.

Recommendation 3: Embassy Freetown should comply with Department standards for crisis preparedness. (Action: Embassy Freetown)

RESOURCE MANAGEMENT

Management Operations

OIG reviewed all management operations, including financial management, human resources, general services, and facilities management. As described below, OIG found deficiencies in all of these areas.

Financial Management

Outstanding Travel Advances

As of November 2016, the Department's financial system open advance report showed 75 travel advances totaling \$67,098 for Embassy Freetown. The report showed 27 of 75 travel advances were outstanding for over 90 days. According to 4 FAM 465.1a, upon travel completion, each traveler is required to submit an expense report (voucher/claim) within 5 business days from the travel ending date to account for the travel performed and for the related authorized costs. If travelers do not submit their vouchers on time, the Financial Management Unit is responsible for debt collection as outlined in 4 FAM 490. According to 4 FAM 493.1-3, in no case should a debt delinquent for 90 days remain at post. Embassy management stated that open travel advances occurred because travelers did not submit their vouchers and that the collection of these debts became lax because of other priorities during the Ebola crisis. This issue should be resolved, however, because an outstanding travel advance is an accounts receivable, a loan to travelers, a debt owed to the Department, and a loss of funds to the Department if not collected. Any funds collected by clearing outstanding travel advances could be put to better use.

Recommendation 4: Embassy Freetown should clear outstanding travel advances of \$67,098 in accordance with Department guidelines. (Action: Embassy Freetown)

Unprocessed Financial Transactions

As of November 2016, the embassy had 138 unprocessed financial transactions; 75 transactions were outstanding for over 30 days. Unprocessed transactions included rejected payroll, voucher, and obligation transactions. As stated in 4 FAM 251.7, however, the financial management staff must review all disbursements and related financial reports in a timely manner to ensure all financial transactions are properly recorded. It also states Department staff should ensure unprocessed transactions are resolved expeditiously. The unprocessed transactions occurred because the financial staff did not enter correct fiscal data into the financial system or did not obligate sufficient funds to process the transaction, which caused the financial system to reject the transactions. Unprocessed transactions affect available funding, and expeditious clearing of rejected transactions provides allotment holders with an accurate balance of available funds.

Recommendation 5: Embassy Freetown, in coordination with the Bureau of Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in

accordance with Department guidelines. (Action: Embassy Freetown, in coordination with CGFS)

Alternate Cashiers Did Not Assume Principal Cashier's Duties

The alternate cashier served as the main cashier only during principal cashier absences and not more regularly, as required by the Department's Cashier Users Guide, which states that alternate cashiers should routinely assume all cashier functions and operate the cashier database. Financial management staff stated they were unaware of this requirement. The cashier supervisor should establish a schedule that allows the alternate cashier to work as acting principal cashier at least quarterly. Doing so will help ensure that the alternate cashier maintains the necessary skill to continue cashier operations during the principal cashier's absence. Having an alternate cashier who is unfamiliar with procedures risks errors in cash operations when the principal cashier is away.

Recommendation 6: Embassy Freetown should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Freetown)

Supervisors Did Not Conduct Required Periodic Sub-Cashier Reconciliations

Three of the six sub-cashier supervisors did not perform periodic reconciliations as required by 4 FAH-3 H-397.2-3 (a). Without this internal control, errors and misuse of funds may go undetected.

Recommendation 7: Embassy Freetown should implement standard operating procedures to require all sub-cashiers' supervisors to conduct unannounced cash verifications and monitor compliance in accordance with Department standards. (Action: Embassy Freetown)

Alternate Cashier Had No Designated Cash Advance

Embassy Freetown's alternate cashier did not have a cash advance. According to the Department's Cashier User Guide, dated May 2013, the alternate cashier should maintain a sufficient advance to sustain cashier operations during brief absences of the principal cashier. Without an advance for the alternate cashier, the embassy risks interruption of cashier operations. Embassy management stated the principal cashier's advance of \$60,000 is insufficient to provide the alternate cashier with a separate cash advance, and, in recent financial assessment reports, financial management regional officers stated the principal cashier cash advance level needed to be increased to \$120,000. At the time of the inspection, the embassy was determining the appropriate cash advance level to request from the Bureau of Comptroller and Global Financial Services during the inspection. OIG advised the embassy to designate a cash advance for the alternate cashier after increasing the principal cashier's cash advance level.

Human Resources

Embassy Directly Paid Official Residence Expenses Salaries

The embassy directly paid official residence expenses staff via cash advance from the Class B cashier. This practice violated 3 FAM 3257 (a), which requires the principal representative or the household manager to pay the official residence staff. OIG issued a Management Assistance Report¹¹ in April 2014 that addressed this improper practice and recommended that the Department issue a directive that prohibits an embassy's direct payment to the official residence expenses staff. The report also recommended that the Department clarify regulations, or periodically remind overseas missions, that ORE staff are the employees of the principal representatives. Although the Management Assistance Report was issued almost 3 years ago, the Department had not implemented OIG's recommendations. At the time of this inspection, OIG was conducting a compliance follow-up review to determine why the Department had not implemented the recommendations in OIG's 2014 report. As a result, OIG did not make a recommendation in this report.

LE Staff Mechanics Performed Auto Repairs on Personally-Owned Vehicles

Embassy Freetown authorized its LE staff mechanics to perform after-hours auto repairs on U.S. direct-hire personally owned vehicles. The embassy also authorized LE staff mechanics to perform these repairs using government-owned facilities, equipment, and tools. According to 28 Code of Federal Regulations Section 45.4 (a) employees may use U.S. Government property only for official business or as authorized by the U.S. Government. Management staff stated they did not know of this prohibition. The practice of LE staff mechanics repairing personally owned vehicles for U.S. direct-hire staff is an inappropriate use of government resources and an unsanctioned employment liability.

Recommendation 8: Embassy Freetown should terminate the practice of allowing locally employed staff to perform after-hour auto repairs, using government-owned facilities and equipment, on personally owned vehicles. (Action: Embassy Freetown)

Local Compensation Plan Did Not Comply With Sierra Leone's Labor Law

In July 2011, the Government of Sierra Leone included a rent allowance and an end of service benefit in its local labor law, which the embassy had not included in its LE staff handbook or local compensation plan. This is inconsistent with Department policy. In particular, guidelines in 3 FAM 7224.1 (a) require Foreign Service national personnel programs to conform as closely as feasible to local law and customs but be based on and administered in accordance with U.S. laws and regulations. In addition, guidelines in 3 FAH-2 H-133.5 B (2)(d) require an explanation of the local compensation plan to new LE staff during orientation. Embassy management stated the lack of a full-time Human Resources Officer and other priorities during the Ebola crisis contributed to the delay in reviewing and implementing the changes. It is important to address

¹¹ OIG, *Management Assistance Report – Direct Payment of Official Residence Expenses Staff Salaries* (ISP-I-14-08, April 3, 2014).

this issue, however, as LE staff may not receive all their entitled compensation and benefits without accurate policies and procedures.

Recommendation 9: Embassy Freetown, in coordination with the Bureau of Human Resources, should update its locally employed staff human resources handbook and local compensation plan to reflect the Government of Sierra Leone's labor law. (Embassy Freetown, in coordination with DGHR)

LE Staff Position Descriptions Were Inaccurate

Embassy managers had not updated some position descriptions since 2006. Six Consular Section LE staff positions did not reflect correct duties and responsibilities. Some Facilities Management positions did not reflect actual duties performed. According to 3 FAH-2 H-441.4 b, American supervisors are responsible for ensuring that position descriptions accurately describe staff positions under their direction. Moreover, pursuant to 3 FAH-2 H-443.1, the Human Resources Officer is responsible for requesting amendments if existing descriptions are inaccurate and for conducting an annual review of all positions to ensure they reflect actual duties. Embassy management stated this procedure became lax because of insufficient regional Human Resources Officer support and other priorities during the Ebola crisis. Inaccurate position descriptions could affect LE staff members' level of compensation.

Recommendation 10: Embassy Freetown should review and update locally employed staff position descriptions in accordance with Department guidelines. (Action: Embassy Freetown)

Overtime Not Authorized in Advance

Some supervisors did not authorize claims for non-emergency overtime in advance in accordance with 4 FAH-3 H-523.2 Failure to approve overtime in advance increases the risk of abuse of premium pay. OIG advised the embassy to require supervisory approval of non-emergency overtime in advance.

General Services Operations

Spotlight on Success – Integrated Logistics Management System Tune Up

Embassy Freetown and the Bureau of Administration's Office of Logistics Management conducted an Integrated Logistics Management System "Tune Up" in August 2016. A team from Washington travelled to Sierra Leone and spent 3-weeks on the project, which led to multiple internal control improvements, including training staff, development of process maps and standard operating procedures, and an action plan to reduce inventory. The tune up team assisted the general services staff in resolving missing and incorrect agency codes for 37 percent of the official vehicles. The tune up team also eliminated 154 inventory locations without active assets and reduced the number of manual entries.

Motor Pool

Chauffeurs and Incidental Drivers Had Not Completed Mandatory Training

Marine Security Guard drivers and the backup chief of mission driver had not taken the mandatory Smith System¹² driver training. According to 14 FAM 432.4, the embassy should provide driver safety training for all chauffeurs and incidental operators upon initial assignment of an official vehicle and at least every 2 years thereafter. Moreover, as stated in 12 FAM 389 b, supervisors of armored vehicle drivers must ensure that any driver assigned to drive regularly an armored vehicle at the embassy has the opportunity to attend the armored vehicles driver training program. Some supervisors overlooked the requirements outlined in 14 FAM 432.4 and 12 FAM 389b. Not ensuring drivers are properly trained increases the risk of motor vehicle accidents.

Recommendation 11: Embassy Freetown should provide its drivers with the Smith System and armored vehicle driver training in accordance with Department guidelines. (Action: Embassy Freetown)

Incidental Drivers Had Not Completed Mandatory Medical Examinations

The embassy had not completed medical exams and certifications for all incidental drivers. According to 14 FAM 432.4, all incidental operators must successfully complete a medical exam and certification before the embassy can grant incidental operators permission to drive an official vehicle. Management staff told OIG the embassy did not follow this requirement because some internal controls became lax during the Ebola crisis. The failure to conduct medical exams and certifications creates an increased risk of vehicle accidents.

Recommendation 12: Embassy Freetown should complete a medical exam and certification for all incidental drivers in accordance with Department guidelines. (Action: Embassy Freetown)

Motor Pool Drivers Regularly Exceeded the 10-hour Daily Duty Maximum

Motor pool drivers regularly exceeded the 10-hour daily duty maximum. In FY 2016, two motor pool drivers worked 14 hour shifts for 3 consecutive days in pay period 21, 10 drivers worked shifts up to 16 hours in pay period 16, and 12 drivers exceeded a 10-hour shift in pay period 14. This is inconsistent with the Department's Motor Vehicle Safety Management Program, 14 FAM 432.4 c (3), and 15 FAM 957.3(4), which limits the daily duty time for drivers of U.S. Government-owned or leased vehicles to 10 hours per day. Embassy staff told OIG that the overtime resulted from assigning designated drivers to visitors. Exceeding maximum duty hours increases the risk of driver fatigue and preventable accidents.

¹² The Smith System of Training is a program that was developed by Harold Smith in 1948 and established as a company, The Smith System Driver Improvement Institute was established in 1952. They provide training to companies with vehicle fleets, driving schools and government agencies. There are five key concepts to the Smith System designed to see and avoid driving hazards.

Recommendation 13: Embassy Freetown should implement procedures to limit all drivers' duty time to the 10-hour maximum. (Action: Embassy Freetown)

Other Authorized Use Motor Vehicle Policy Did Not Meet Department Guidelines

The embassy's motor vehicle policy did not include provisions to charge users for other-authorized use of official vehicles, as required. For example, the embassy did not charge for home-to-office transportation of U.S. direct-hire staff while they waited for their personal vehicles to arrive at post, nor did it charge for non-official use of motor-pool by TDY staff. Although guidance in 14 FAM 433.3-4 defines "other authorized use" to include home-to-office transportation for employees in these situations for a limited time, there is no exception to the requirement to charge for the service. Failure to charge leads to loss of collections by the U.S. Government and increases the risk of excessive use of motor pool services. The embassy updated its motor vehicle policy during the inspection and, therefore, OIG did not issue a recommendation.

Procurement

No Annual Acquisition Plan

The General Services Office did not establish an acquisition plan for FY 2016 or FY 2017 even though 14 FAM 221.1 requires it to do so for acquisitions over \$100,000. Embassy staff told OIG they were not familiar with the function and potential value of such a plan. The lack of procurement planning decreases competition and the potential to identify cost savings; it may also increase the risk that embassy staff procure unnecessary goods and services. OIG advised the embassy to conduct acquisition planning at the beginning of each fiscal year.

Contracting Officer's Representatives Served Without Proper Designation and Training

LE staff served as contracting officer's representatives without proper designation or training on three of six contracts valued at \$1.3 million. This is inconsistent with Department policy. Guidelines in 14 FAH-2 H-143.2 require the program office to nominate in writing a technically qualified, responsible, and certified contracting officer's representative to the contracting officer. According to 14 FAH-2 H-141 b. (4) and 14 FAH-2 H-143, the contracting officer must designate in writing a contracting officer's representative. As stated in 14 FAH-2 H-143.1, all contracting officer's representatives must be certified and maintain their certification. Management staff did not enforce these requirements and did not understand the importance of these internal controls. Failure to follow Department guidance could increase the risk of billing and contractual errors and result in incomplete contracting officer's representative files.

Recommendation 14: Embassy Freetown should request, appoint, and train contracting officer's representatives in accordance with Department standards. (Action: Embassy Freetown)

Personal Property Management

Inadequate Oversight of Bulk Fuel Operations

The General Services Office did not perform oversight of its bulk fuel operations (\$1.5 million was spent on fuel in a 10-month period in 2016.) OIG found inadequate locks on residential generators, no documented spot checks of fuel deliveries, and no calibration of fuel pumps or tanks. The embassy did not perform an annual review of the fuel acquisition plan to verify whether purchases of gasoline and diesel fuel matched requirements. As stated in 14 FAM 411.2-2, however, the Accountable Property Officer is responsible for the custody, care, and safekeeping of all property under control of the embassy. Guidelines in 14 FAH-1 H-815.4 detail the requirements for staff to inspect, calibrate, and secure pumps and tanks. Embassy management was unaware of the calibration requirements and, more generally, the staff had focused on other priorities during the Ebola crisis. To help address these deficiencies, the embassy ordered fuel tank automated measuring devices and flow meters. Lack of a comprehensive monitoring program increases the risk of fuel theft and inaccurate fuel deliveries.

Recommendation 15: Embassy Freetown should conduct oversight of bulk fuel operations in accordance with Department guidelines. (Action: Embassy Freetown)

Facilities Management

U.S. Government-owned properties in Freetown included the chancery, warehouse, recreation center, utility building, and workshops. OIG found significant maintenance gaps in the chancery.

The Chancery Had Multiple Long Standing Maintenance Deficiencies

Embassy staff and OIG identified numerous facility maintenance deficiencies that required corrective action (also see the classified inspection report). For example: the safe haven bathroom was inoperable; the chancery roof and some windows leaked; and multiple fire alarm panels were not fully functional. The work order system had a backlog of 206 work orders, 102 of which were outstanding more than 30 days. The embassy's Facilities Management work plan identified over \$10.8 million of unfunded and unresolved maintenance items. Facilities Management did not contract out maintenance services that they were unable to perform in-house. The unit also reported in OIG's facilities management functional questionnaire the lack of oversight of elevators, storage tanks, swimming pools, emergency fire preparedness, generators and safety training. Further, the unit had not corrected all safety and fire deficiencies identified in Bureau of Overseas Building Operations inspection reports.¹³

These practices are inconsistent with multiple Department policies. According to 15 FAM 613 a., all posts must adequately and properly maintain all facilities abroad. Guidelines in 15 FAM 613 b, state each mission must establish and implement a comprehensive preventive, routine, and special maintenance program covering all facilities and major support systems using the 15

¹³ Technical Support Visit, Embassy Freetown, dated August 15-19, 2011; Fire and Life Inspection Report, dated October 22, 2015.

FAH-1, Facilities Maintenance Handbook. The handbook provides standard procedures that posts must follow to establish maintenance programs and for the continuous evaluation of maintenance needs. According to 15 FAM 613c., posts must survey and inspect each building and its support systems annually and must document and maintain the findings on file for review. Each post also must prepare an Annual Inspection Summary following the procedures in 15 FAH-1, Facilities Maintenance Handbook, and use that summary to substantiate budget requests for routine maintenance funding. The interruption of local services during the 22-month Ebola crisis made it difficult for the unit to resolve maintenance deficiencies on a timely basis. Even after the crisis, the embassy's failure to organize and prioritize maintenance issues, train LE staff, and secure Department resources caused these maintenance deficiencies to remain uncorrected. The failure to identify and correct deficiencies could result in the shutdown of key building systems and close the chancery.

Recommendation 16: The Bureau of Overseas Buildings Operations, in coordination with Embassy Freetown, should develop and implement an action plan to identify, prioritize and resolve maintenance deficiencies at the chancery. (Action: OBO, in coordination with Embassy Freetown)

Information Management

The Information Management Section delivered computer services to over 300 computer users. The section also provided telephone, emergency radio, and pouch and mail services. During the on-site inspection, OIG reviewed the security controls used to prevent unauthorized access to the computer systems along with emergency communications planning, IT equipment inventories, telephone systems, and the pouch and mail programs. Embassy Information Management programs and services largely complied with Department directive 5 FAM 120 except for the Information Systems Security Officer (ISSO) and Records Management programs. The Information Management Section corrected deficiencies identified by OIG during the on-site inspection. Staff placed a safe and the emergency action plan in the alternate command center, created a spreadsheet to manage annual laptop security controls, updated and tested the IT contingency plan, and inspected expired fire extinguishers in multiple section spaces.

Information Systems Security Officer Requirements Not Completed

The ISSOs did not record information system audits or complete the Department's ISSO checklist, including weekly vulnerability scanning, monthly random email reviews, and monthly random user data reviews. These practices are inconsistent with several Department policies. In particular, directive 12 FAM 623.2 requires the Department to create, protect and retain information system audit records. Guidance in 12 FAH-10 H-112.9-2 requires the ISSO to conduct monthly reviews of randomly selected user accounts to protect information and equipment from unauthorized software and hardware and ensure users are not processing information above the authorized classification level for the computer system. Department directive 12 FAH-10 H-332.3-3 requires that system vulnerabilities be remediated as soon as possible.

ISSOs did not prioritize their workloads to include the tasks required by Department directives and the ISSO checklist. The Information Management Section maintained an average iPost¹⁴ grade of "A" during recent months. However, without frequent reinforcement through formal oversight, computer users can become inattentive toward intrusion attempts such as spear phishing. Failure to complete required ISSO program tasks can put sensitive Department information and equipment at risk for loss or damage.

Recommendation 17: Embassy Freetown should complete and record Information Systems Security Officer tasks as required by Department directives. (Action: Embassy Freetown)

Embassy Records Management Program Did Not Comply with Department Standards

Embassy staff did not fulfill records management responsibilities. OIG observed safes containing classified documents from departed employees that were not retired, archived, or disposed. OIG also observed that not all employees conformed to Department guidance for the use of personal email for work. The embassy had not trained the designated Post Records Coordinator. These practices do not comply with Department policy. Department directive 5 FAM 414.5 requires the principal officer at each embassy to implement and administer records policies, standards, systems, and procedures issued by the Department's Records Officer. Department directive 5 FAM 414.8 requires that all Department employees preserve documentary materials meeting the definition of a record under the Federal Records Act. The embassy nonetheless had no formal policy on record email, nor had it provided employee training. Moreover, embassy managers did not provide guidance and procedures to assure records management conformed with records management directives. The lack of an effective records management program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

Recommendation 18: Embassy Freetown should establish a records management program in accordance with Department guidelines. (Action: Embassy Freetown)

Information Management Position Not Programmed To International Cooperative Administrative Support Services

The Information Management Section had two Department funded positions—an Information Management Officer and an Information Management Specialist—costing an average of \$268,419 annually per position. Despite being funded by the Department, these U.S. direct-hire officers also delivered some information management (IM) support services to other agencies at the mission. Unlike other U.S. direct-hire management positions that deliver support services such as human resources and financial management, the cost of these IM officer positions was

¹⁴ According to the Department, Enterprise Network Management, "iPost is a tool from Enterprise Network Management (ENM) that allows authorized users to access enterprise network and system monitoring data." <https://ipost.state.sbu>.

not captured in the International Cooperative Administrative Support Services (ICASS)¹⁵ system to ensure the costs were distributed among the agencies who used their services. When ICASS began 20 years ago, IM positions primarily supported and handled communications for core Department offices. But according to Department officials and documentation, IM functions evolved significantly and U.S. direct-hire IM staff now deliver more support to other agencies.

To ensure the cost of IM services are equitably shared, in June 2010, the Office of Management Policy, Rightsizing, and Innovation advised some embassies, including Embassy Freetown, to convert one of their U.S. direct-hire IM positions to ICASS as soon as budgetary provisions could be made to do so. At the time of the inspection, this conversion had not occurred. OIG is preparing a Management Assistance Report that will recommend the conversion of one U.S. direct-hire IM position to ICASS in many embassies, including Freetown. As a result, OIG did not make a recommendation in this report.

¹⁵ The International Cooperative Administrative Support Services (ICASS) system, established in 1997, is the principal means by which U.S. Government agencies share the cost of common administrative support services at more than 250 diplomatic and consular posts overseas. Through ICASS, which operates a working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions, in accordance with 6 FAM 911 and 6 FAH-5 H-013.2.

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Freetown and the Bureau of Overseas Buildings Operations. Their complete responses can be found in Appendix B.

Recommendation 1: Embassy Freetown should review and correct its process for preparing the annual Statement of Assurance to ensure vulnerabilities are identified and appropriate corrective actions are taken. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted its commitment to a thorough review of the effectiveness of its internal controls and the oversight of its operations, with a focus on facilities maintenance and security.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation correcting its process for preparing the annual Statement of Assurance.

Recommendation 2: Embassy Freetown should document procedures and required records for all grant awards in accordance with Department guidance. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that, as of March 29, 2017, it had conducted the actions needed to document procedures and required records for all grant awards in accordance with Department guidance.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the grants award process.

Recommendation 3: Embassy Freetown should comply with Department standards for crisis preparedness. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it was procuring disaster assistance kits and a laptop for use in emergency situations, and these should be ready for use by July 2017. The embassy also noted that the local American Citizen Services (ACS) Assistant had received the required training to collect consular fees and to act as cashier in the event of an ACS emergency.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of compliance with Department standards for crisis preparedness.

Recommendation 4: Embassy Freetown should clear outstanding travel advances of \$67,098 in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it is educating its traveling staff to close vouchers expeditiously. The embassy is following up with travelers with outstanding balances to remind them of their obligations and the potential for disciplinary actions for non-compliance. From November 2016 to April 2017, the embassy had reduced total advances from \$67,098 to \$42,640.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all 75 travel advances totaling \$67,098 have been cleared.

Recommendation 5: Embassy Freetown, in coordination with the Bureau of Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in accordance with Department guidelines. (Action: Embassy Freetown, in coordination with CGFS)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it had reduced the number of unprocessed and rejected financial transactions from 138 in November 2016 to 14 remaining. CGFS planned to conduct a site visit in June 2017 to provide additional training to embassy staff.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all 138 unprocessed and rejected financial transactions are cleared.

Recommendation 6: Embassy Freetown should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it established and implemented a schedule for the alternate cashier to work as the principal cashier. The alternate cashier started quarterly rotations as of December 2016.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the change in the alternate cashier's work schedule.

Recommendation 7: Embassy Freetown should implement standard operating procedures to require all sub-cashiers' supervisors to conduct unannounced cash verifications and monitor compliance in accordance with Department standards. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it implemented a standard procedure to require all sub-cashiers' supervisors to conduct unannounced cash verifications and will continue to monitor compliance to further ensure strong internal controls.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the sub-cashiers' supervisors conducted unannounced cash verifications.

Recommendation 8: Embassy Freetown should terminate the practice of allowing locally employed staff to perform after-hour auto repairs, using government-owned facilities and equipment, on personally owned vehicles. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it amended its Motor Pool Vehicle Policy to end this practice and ensure compliance.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the amended policy.

Recommendation 9: Embassy Freetown, in coordination with the Bureau of Human Resources, should update its locally employed staff human resources handbook and local compensation plan to reflect the Government of Sierra Leone's labor law. (Embassy Freetown, in coordination with DGHR)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it updated the Locally Employed Staff Handbook to include a rent allowance and an end-of-service benefit, as reflected in the Government of Sierra Leone's labor law. The embassy requested assistance from the Bureau of Human Resources to update its local compensation plan.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated handbook and the local compensation plan to reflect the Government of Sierra Leone's labor law.

Recommendation 10: Embassy Freetown should review and update locally employed staff position descriptions in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it conducted a comprehensive review of locally employed staff position descriptions. As a result, several reclassification requests, particularly in the Facilities Management and Consular sections, were pending finalization. The embassy plans to have all sections and agencies review and update position descriptions by June 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated locally employed staff position descriptions in accordance with Department guidelines.

Recommendation 11: Embassy Freetown should provide its drivers with the Smith System and armored vehicle driver training in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that a motor pool dispatcher received Smith System Certification in March 2017. The embassy now has two Smith System Instructors who can certify other drivers. The embassy anticipated all 40 drivers, who need certification, will be trained by May 31, 2017. Additionally, the Regional Security Officer requested a Mobile Training Team provide armored vehicle training to the drivers.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the drivers required training.

Recommendation 12: Embassy Freetown should complete a medical exam and certification for all incidental drivers in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that the General Services Office was coordinating with the health unit to have all medical exams and certification completed by July 30, 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the medical certification for the drivers.

Recommendation 13: Embassy Freetown should implement procedures to limit all drivers' duty time to the 10-hour maximum. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it updated the Motor Vehicle Policy policy November 14, 2016 to reflect this procedure.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated policy.

Recommendation 14: Embassy Freetown should request, appoint, and train contracting officer's representatives in accordance with Department standards. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy anticipated all contracting officer's representative training would be complete by April 30, 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of appointed and trained contracting officer's representatives.

Recommendation 15: Embassy Freetown should conduct oversight of bulk fuel operations in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that the Regional Security Office, General Services Office, and Management Section are implementing oversight plans for the bulk fuel operations.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the oversight plans.

Recommendation 16: The Bureau of Overseas Buildings Operations, in coordination with Embassy Freetown, should develop and implement an action plan to identify, prioritize and resolve maintenance deficiencies at the chancery. (Action: OBO, in coordination with Embassy Freetown)

Management Response: In its April 23, 2017 response, the Bureau of Overseas Buildings Operations (OBO) concurred with this recommendation. OBO has already developed a detailed action plan to address all known deficiencies at the embassy. Embassy Freetown was identified as an OBO Priority Needs Post (PNP) thereby moving the embassy's needs to the top of the list for funding and implementation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of OBO's action plan.

Recommendation 17: Embassy Freetown should complete and record Information Systems Security Officer tasks as required by Department directives. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted that it implemented Information Systems Security Officer audits and checklist schedule. Non-sensitive auditing tasks are performed by the Information Service Center local staff for greater coverage.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the completed Information Systems Security Officer tasks.

Recommendation 18: Embassy Freetown should establish a records management program in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: In its April 24, 2017 response, Embassy Freetown concurred with this recommendation. The embassy noted it is providing training and guidance to ensure compliance with records management directives.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the embassy's records management program.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	John Hoover	10/2014
Deputy Chief of Mission	Laurie Meininger	11/2015
Chiefs of Sections:		
Management	Evangeline Gohoure	9/2016
Consular	Dawn Roberts	8/2016
Political	Gregory Maggio	7/2015
Economic	Scott Risner	8/2015
Public Affairs	Hollyn Green	7/2014
Regional Security	Sean Nedd	11/2015
Other Agencies:		
Department of Defense	Kimberly Lee	7/2015
Peace Corps	Lonnie Born	1/2016
U.S. Agency for International Development	Khadijat Mojidi	6/2016
Centers for Disease Control & Prevention	Sara Hersey	4/2015

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General (OIG) for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chairman of BBG, and Congress with systematic and independent evaluations of the operations of the Department and BBG. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; whether U.S. interests are being accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

Methodology

In conducting inspections, OIG uses a risk-based approach to prepare for each inspection; reviews pertinent records; reviews, circulates, and compiles the results of survey instruments, as appropriate; conducts interviews; and reviews the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by the review.

For this inspection, OIG reviewed 33 personal questionnaires from U.S. direct-hires and 60 questionnaires from LE staff members. In Washington, the inspectors conducted 66 interviews with the Department and other U.S. Government officials engaged in work in Sierra Leone. In Freetown, OIG conducted 103 interviews. OIG carried out a physical inspection of three U.S. Government facilities that comprised the mission, along with the residences of the Ambassador, the DCM, Marine Security Guards, and five staff members.

APPENDIX B: MANAGEMENT RESPONSES



United States Department of State

Washington, D.C. 20520

APR 23 2017

UNCLASSIFIED
MEMORANDUM

TO: OIG/ISP – Ms. Sandy Lewis, Assistant Inspector General for Inspections

FROM: OBO/RM – Jürg E. Hochuli 

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Freetown

OBO has reviewed the draft OIG Inspection report. We provide the following comments in response to the recommendation provided by OIG:

OIG Recommendation 16: The Bureau of Overseas Buildings Operations, in coordination with Embassy Freetown, should develop and implement an action plan to identify, prioritize and resolve maintenance deficiencies at the chancery. (Action: OBO, in coordination with Embassy Freetown).

OBO Response: OBO accepts this recommendation. OBO has already developed a detailed action plan to address all known deficiencies at post. Critical tasks including major repairs to the façade and the establishment of Building Maintenance Contracts for systems lacking required maintenance have been identified and are being tracked in the plan. OBO will closely manage the plan to ensure all the deficiencies are resolved in a timely manner to bring the facility back to an acceptable condition, and to ensure scheduled maintenance is documented and performed as required. Embassy Freetown was identified as an OBO “Priority Needs Post” (PNP) thereby moving its needs to the top of the list for funding and implementation.

OBO is also aware of the issues with the fire alarm system. The International Maintenance Assistance Program (IMAP) fire systems team has already shipped needed parts to post, and OBO coordinated with the facilities manager in March 2017 to conduct an inventory of the shipment. OBO will be sending a technician to post by the end of May 2017 to make needed repairs to the system.

With regards to fire safety deficiency concerns, OBO/OPS/FIR conducted a biennial fire/life safety visit in October 2015, and post submitted a compliance report in January 2017. OBO/OPS/FIR will be visiting post again to conduct a fire and life safety evaluation by mid-September 2017.

The point of contact for this memorandum is Amy Gertsch.


UNCLASSIFIED



United States Department of State
Bureau of African Affairs
Washington, DC 20520-6258

April 24, 2017

UNCLASSIFIED

THRU: AF – Peter Barlerin, Deputy Assistant Secretary
 TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections
 FROM: Embassy Freetown – John Hoover, Ambassador 
 SUBJECT: Response to Draft OIG Report – Inspection of Embassy Freetown

Embassy Freetown has reviewed the draft OIG Inspection report. We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: Embassy Freetown should review and correct its process for preparing the annual Statement of Assurance to ensure vulnerabilities are identified and appropriate corrective actions are taken. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. We commit to a thorough review of the effectiveness of our internal controls and the oversight of Embassy operations, with a particular focus on facilities maintenance and security. We have identified additional actions in those two areas and generally across Embassy operations to document and support all further internal assessments including our annual Statements of Assurance.

OIG Recommendation 2: Embassy Freetown should document procedures and required records for all grant awards in accordance with Department guidance. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation and completed the needed actions as of March 29, 2017 to document procedures and required records for all grant awards in accordance with Department guidance. Self-help and economic support grant files were rechecked and verified for compliance. In our Public Affairs Section (PAS), the Grants Officer (GO) and Grants Officer Representative (GOR) created a checklist of documents required for all grants, according to Department guidelines. Following that checklist, the PAS grant management team completed a review of 100% of the public diplomacy grant files since 2015 and corrected

any deficiencies, including the missing documents as outlined by the OIG. With regard to Notice of Funding Opportunities (NOFO), the PAS grant team is preparing thematic annual NOFOs in accordance with established Embassy Freetown Integrated Country Strategy goals. In addition, a second locally employed (LE) staff member is completing the online GOR course which will be supplemented by regional training. The GO will identify two more LE staff members to acquire GOR training in FY 2018. These actions ensure that Freetown has proper and continued oversight and documentation of grants.

OIG Recommendation 3: Embassy Freetown should comply with Department standards for crisis preparedness. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our Consular Section (CA) team is procuring disaster assistance kits and a laptop for use in emergency situations. These should arrive and be ready for use by July 2017. CA's dedicated local American Citizen Services (ACS) Assistant has completed the course PC419: Collecting Consular Fees and is fully trained to act as cashier in the event of an ACS emergency. The CA team updated the list of American Citizen Liaisons and will extend that network as Americans return to post-Ebola Sierra Leone.

OIG Recommendation 4: Embassy Freetown should clear outstanding travel advances of \$67,098 in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our Management team is making progress by steadily reducing the number of outstanding travel advances, particularly those outstanding over 90 days. In November 2016, the OIG team noted the Embassy had 75 travel advances totaling \$67,098. As of April 2017 we have reduced our totals to 49 travel advances totaling \$42,640. Of particular note is we currently have two travel advances outstanding over 90 days, compared to 27 in November 2016. We are educating our traveling staff to close vouchers expeditiously after travel and offering guidance if there are any difficulties or questions. In addition, we are rigorously following up with travelers with outstanding balances to remind them of their obligations and the potential for disciplinary actions for non-compliance.

OIG Recommendation 5: Embassy Freetown, in coordination with the Bureau of Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in accordance with Department guidelines. (Action: Embassy Freetown, in coordination with CGFS)

Management Response: Embassy Freetown accepts the recommendation. Our Management team has made significant progress in reducing the number of unprocessed and rejected financial transactions. As of April 2017 we have 14 remaining, compared to 138 in November 2016. We continue to work closely with Bureau of Comptroller and Global Financial Services (CGFS) staff and have confirmation of a CGFS team site visit to Freetown in June 2017 to further coordinate our efforts and provide additional training for our staff so that we avoid errors in the first place.

OIG Recommendation 6: Embassy Freetown should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Freetown)

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Management Response: Embassy Freetown accepts the recommendation and completed the action on November 30, 2016 by establishing and implementing a schedule for the alternate cashier to work as the principal cashier. The alternate cashier started her quarterly rotations as of December 5, 2016.

OIG Recommendation 7: Embassy Freetown should implement standard operating procedures to require all sub-cashiers' supervisors to conduct unannounced cash verifications and monitor compliance in accordance with Department standards. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. We implemented a standard procedure to require all sub-cashiers' supervisors to conduct unannounced cash verifications. We continue to monitor compliance to further ensure strong internal controls.

OIG Recommendation 8: Embassy Freetown should terminate the practice of allowing locally employed staff to perform after-hour auto repairs, using government-owned facilities and equipment, on personally owned vehicles. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our Management Section team has amended its Motor Pool Vehicle Policy to end this practice and ensure compliance.

OIG Recommendation 9: Embassy Freetown, in coordination with the Bureau of Human Resources, should update its locally employed staff human resources handbook and local compensation plan to reflect the Government of Sierra Leone's labor law. (Embassy Freetown, in coordination with DGHR)

Management Response: Embassy Freetown accepts the recommendation. We have updated all content in the Embassy's LE Staff Handbook except for the inclusion of a rent allowance and an end-of-service benefit, which are cited in a July 2011 revision to Government of Sierra Leone labor law. In August 2016 Post reached out to the Bureau of Human Resources via front channel cable requesting assistance to bring the LCP into compliance and has followed up on a regular basis since. We will continue to follow up with HR/OE.

OIG Recommendation 10: Embassy Freetown should review and update locally employed staff position descriptions in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Post has undertaken a comprehensive review of locally employed staff position descriptions with the assistance of an LE Executive Corps TDYer. As a result, several reclassification requests, particularly in Facilities Management and Consular, are pending finalization. We continue to move through all sections and agencies to review and update position descriptions by June 30, 2017, and have begun to educate supervisors on their responsibilities to ensure that position descriptions accurately describe staff positions under their direction.

OIG Recommendation 11: Embassy Freetown should provide its drivers with the Smith System and armored vehicle driver training in accordance with Department guidelines. (Action: Embassy Freetown)

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Management Response: Embassy Freetown accepts the recommendation. We have 40 drivers and incidental drivers who need to certify or recertify in Smith System driver training. We sent a Motor pool dispatcher to receive Smith System Certification in late March 2017, therefore we now have two Smith System Instructors who can certify other drivers and are moving ahead with that plan to ensure drivers are properly trained. We plan to have this completed by May 31, 2017. Freetown's Regional Security Officer has requested a Mobile Training Team to visit Freetown to provide Armored Vehicle training for drivers and is coordinating with Diplomatic Security.

OIG Recommendation 12: Embassy Freetown should complete a medical exam and certification for all incidental drivers in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. We have 64 drivers and incidental drivers who are in need of a medical physical. There are 61 drivers and incidental drivers who require an additional medical screening test. Freetown's General Services Office (GSO) team is coordinating with our Health Unit to schedule dedicated days for Motor Pool drivers to have physicals and testing completed by July 30, 2017.

OIG Recommendation 13: Embassy Freetown should implement procedures to limit all drivers' duty time to the 10-hour maximum. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation and completed the action as of November 14, 2016 when our Motor Vehicle Policy was updated. The policy now requires that no driver of a USG vehicle shall be scheduled for duty longer than 10 hours per day, including heads of agencies and COM chauffers, and must have a minimum of eight hours of rest in between shifts. The Management team continues to closely monitor driver duty schedules and hours worked.

OIG Recommendation 14: Embassy Freetown should request, appoint, and train contracting officer's representatives in accordance with Department standards. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. We have certified Contracting Officer Representatives (CORs) for our Emergency Medical Services and Trash Removal contracts. CORs for the Cellphone, Internet and LE Staff Health Insurance contracts are instructed to complete COR training and certification; training will be completed by April 30, 2017.

OIG Recommendation 15: Embassy Freetown should conduct oversight of bulk fuel operations in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our Regional Security Office team ordered adequate locks for residential fuel tanks and we are awaiting receipt. Our GSO team developed a system of monthly spot checks for both residential and Chancery fuel deliveries. Post is at the Technical Evaluation Panel stage of a contract for fuel services that will include the calibration of fuel pumps semi-annually. Post Management completed a FY2017 acquisition plan in November 2017 that included a review of requirements for the purchase of diesel and gasoline.

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OIG Recommendation 16: The Bureau of Overseas Buildings Operations, in coordination with Embassy Freetown, should develop and implement an action plan to identify, prioritize and resolve maintenance deficiencies at the chancery. (Action: OBO, in coordination with Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. The Bureau of Overseas Buildings and Operations (OBO) established a Priority Post Program in January 2017 that includes 20 posts world-wide targeted to receive prioritized attention directed from OBO and the Frankfurt Regional Office. Embassy Freetown has been earmarked as one of the top priority posts. Under the program, Post and OBO will be partnering on a large-scale effort to upgrade facility systems and equipment, establish regional Building Maintenance Expense (BME) contracts, and correct the many deficiencies identified. Planning is underway. While the timeline for compliance is expected to be a multi-year process, evaluation of the buildings' envelope design and corrective recommendations – step one – has already begun and is expected to be completed in 2017. The actual repair work is expected to continue into 2019.

OIG Recommendation 17: Embassy Freetown should complete and record Information Systems Security Officer tasks as required by Department directives. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our Information Management Officer (IMO) along with the Information Management Specialist (IMS) have implemented Information System Security Officer (ISSO) audits and a checklist schedule. We have the latest ISSO checklist along with the necessary auditing tools. Per guidance from the visiting OIG inspector, some of the non-sensitive auditing tasks (server events) have been tasked out to the the Information Service Center local staff for greater coverage.

OIG Recommendation 18: Embassy Freetown should establish a records management program in accordance with Department guidelines. (Action: Embassy Freetown)

Management Response: Embassy Freetown accepts the recommendation. Our IMO has begun reviewing the records management guidance and is updating the Freetown's SharePoint website with guidance and links on records management. He has prepared brown bag sessions on records management as well as informational messages to provide training and guidance, and ensure compliance with records management directives.

The point of contact for this memorandum is Deputy Chief of Mission, Laurie Meininger.

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APPENDIX C: FY 2015 STAFFING AND FUNDING BY AGENCY

Agency	U.S. Direct-hire Staff	U.S. Locally Employed Staff	Foreign National Staff	Total Staff ^a	Funding (\$)
Department of State					
Diplomatic & Consular Programs	12	3	12	27	1,097,885
Consular	2	2	6	10	323,955
ICASS	3	7	116	126	7,750,385
Public Diplomacy	1	0	8	9	376,900
Diplomatic Security	3	3	10	16	368,930
Marine Security	7	0	4	11	122,500
Representation	0	0	0	0	23,991
Overseas Buildings Operations	1	1	3	5	2,701,338
Subtotal	29	16	159	204	12,765,884
Department of Defense					
Defense Attaché Office	4	0	3		784,999
Office of Security Cooperation	1	0	2	3	162,777
Subtotal					947,776
USAID	1	4	5	10	67,500,000
Millennium Challenge Corporation	1	0	1	2	2,957,040
Peace Corps	4	1	0	0	1,486,900
Centers for Disease Control	3	0	24	27	11,974,851
					97,632,451

Source: Generated by OIG from Department of State data.

ABBREVIATIONS

DCM	Deputy Chief of Mission
Department	Department of State
EEO	Equal Employment Opportunity
FAM	Foreign Affairs Manual
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
IM	Information Management
INL	International Narcotics and Law Enforcement
IRO	Information Resource Officer
ISSOs	Information Systems Security Officers

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