



OIG

Office of Inspector General

U.S. Department of State • Broadcasting Board of Governors

ISP-I-17-17

Office of Inspections

June 2017

Inspection of Embassy Accra, Ghana

BUREAU OF AFRICAN AFFAIRS



OIG HIGHLIGHTS

ISP-I-17-17

What OIG Inspected

OIG inspected Embassy Accra from November 2 to 18, 2016.

What OIG Recommended

This report includes 20 recommendations. OIG made 19 recommendations to Embassy Accra to improve operations and resource oversight. Nine recommendations addressed the need to strengthen internal controls in general services and facilities management operations. OIG also made recommendations regarding grants administration, consular operations, and the recurring use of unauthorized wireless networks on the embassy compound. OIG made one recommendation to the Bureau of African Affairs to improve management and implementation of the Security Governance Initiative.

In their comments on the draft report, Department stakeholders concurred with the 20 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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Bureau of African Affairs

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What OIG Found

- Embassy Accra's inclusive strategic planning process fostered consensus regarding goals, objectives, and the use of resources.
- Although the embassy had taken steps to correct internal control weaknesses identified during investigations into alleged fraud and malfeasance, OIG identified additional vulnerabilities, particularly in general services and facilities management operations.
- The explosive growth of U.S. foreign assistance funding to Ghana over the past 2 years, including the Security Governance Initiative, strained the embassy resources needed to plan, implement, and monitor assistance programs.
- The Consular Section had made progress in correcting deficiencies identified by the Bureau of Consular Affairs, but improvements were still needed in training, managing the appointment system, and reconfiguring consular space to eliminate the presence of non-consular personnel in consular offices.
- Unauthorized wireless networks operated on the embassy compound prior to and during the inspection.
- Spotlight on Success: The Public Affairs Section promoted privately funded study for Ghanaians in the United States through its educational advising (EducationUSA) programs, which contributed to Ghana's status as Africa's second largest source of students to the United States in 2016.

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CONTEXT

Ghana is a West African nation of 27 million people, about the size of Oregon. A former British colony, it gained its independence in 1957. The country experienced a series of coups over the next few decades. Beginning in 2000, Ghana has held elections and peacefully transferred power every 4 years.

Ghana has significant natural resources; its main exports are cocoa, gold, and oil. Prices for these commodities have been falling recently, straining the economy. The economy grew 7.1 percent in 2013, but growth fell to 3.9 percent in 2015. Gross Domestic Product per capita in 2015 was \$1,328. The lack of a consistent electrical supply is a major problem. While the country has managed to add capacity, the energy sector has taken on a massive amount of debt. The private sector suffers from poor infrastructure and a reliance on export of primary commodities.

The country suffers from weak governance systems and a concentration of power in the executive branch. There is a growing narcotics trafficking problem, and corruption is a serious and worsening issue that threatens public trust in the country's institutions. In a recent survey, more than half of Ghanaians reported they believed that all or most government officials were involved in corruption. Government enforcement of anti-corruption laws on the books is uneven and undercut by lack of funding. Strengthening anti-corruption and accountability in Ghana is an important embassy objective. A widely reported instance of corruption occurred in 2016, when an investigation by Ghanaian officials and the Bureau of Diplomatic Security Office of Criminal Investigations led to the arrest of multiple individuals and disrupted an operation that defrauded individuals seeking U.S. visas.¹

Embassy Accra has long worked with the Government of Ghana to promote democracy, human rights, and the rule of law in the region. Ghana is included in more than 30 U.S. Presidential initiatives², 11 of which require Ghana's commitment of significant human or financial resources. The embassy is concerned that Ghana's reduced operating budget for country development³ hampers its ability to achieve the goals of these initiatives. Working through the U.S. Africa Command, the United States and Ghana have a number of bilateral military programs, including participation in the African Contingency Operations Training and Assistance program which is intended to develop peacekeeping capacity among African countries. Ghana also participates in the Bureau of International Narcotics and Law Enforcement Affairs' West Africa Cooperative Security Initiative, a program designed to help West Africa deal with transnational crime and drug trafficking.

Embassy Accra's 2017-2019 Integrated Country Strategy (ICS) has four main goals:

¹ Department cable 16 Accra 1302, "Ghana: Fake U.S. Embassy Closed for Business," July 25, 2016.

² Some of the major Presidential initiatives which include Ghana are the Partnership for Growth, Feed the Future, the President's Emergency Plan for AIDS Relief, the President's Malaria Initiative, Power Africa, the Young African Leaders' Initiative, the Security Governance Initiative, and the African Peacekeeping Rapid Response Partnership, among others.

³ Ghana's FY 2013-2017 Country Development Cooperation Strategy was originally set at \$170 million per year but was reduced to approximately \$146 million per year, straining its implementation.

- Improve governance, strengthen democratic institutions, and promote accountability.
- Promote opportunity and development by investing in people.
- Maintain and bolster peace and security.
- Spur sustained economic growth, trade, and investment.

The embassy is housed in a compound constructed in 2007. At the time of the inspection, the embassy had 150 U.S. direct-hire employees, 21 eligible family members and other locally hired Americans, and 642 locally employed (LE) staff members. Other agencies at the embassy include the Department of Defense, U.S. Commercial Service, Foreign Agricultural Service, Department of Homeland Security, U.S. Agency for International Development (USAID), and Peace Corps. U.S. foreign assistance to Ghana in FY 2016 was approximately \$160.6 million, including funds for development assistance, health initiatives, anti-trafficking initiatives, law enforcement training, and military assistance. In addition, the \$498 million Millennium Challenge Power Compact entered into force in September 2016.⁴

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act. OIG also assessed security, which is covered in a classified report that contains a comprehensive discussion of the conduct of the security program and issues affecting the safety of mission personnel and facilities.

EXECUTIVE DIRECTION

Tone at the Top and Standards of Conduct

OIG evaluated embassy leadership on the basis of 56 on-site interviews and 18 interviews in Washington that included comments on the Ambassador's and the Deputy Chief of Mission's (DCM) performance; 261 questionnaires completed by American and LE staff members; and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

The Ambassador arrived in Ghana nine months before the on-site inspection. He has extensive experience in African issues, including a previous tour as chief of mission in West Africa, and had served as the Principal Deputy Assistant Secretary in the Bureau of African Affairs. The DCM, a few months into her second year in Accra at the time of the inspection, also had served multiple tours in Africa. The DCM focused on internal direction of the embassy, while the Ambassador concentrated on external relations with the host country. Embassy staff and Washington partners consistently regarded the two as knowledgeable, personable, and accessible. OIG observations substantiated interview depictions of the Ambassador as decisive, a supportive and thoughtful mentor in his interactions with staff, and a clear communicator who welcomed discussion and debate, leadership attributes set out in 3 Foreign Affairs Manual (FAM) 1214.

⁴ Millennium Challenge Power Compacts are awarded by the Millennium Challenge Corporation, an independent U.S. foreign assistance agency created by Congress in 2004. Compacts fund country-led programs to achieve sustainable economic growth and poverty reduction.

Employees in the Department and other agencies told OIG the Ambassador was attentive to the views and needs of the whole mission community. Early in his tenure, he distributed a comprehensive morale survey to U.S. direct-hire personnel, and then acted to meet concerns employees raised in their responses. To address requests for more insight into mission activities and goals, for instance, the Ambassador invited all embassy personnel to an expanded country team meeting once a month, where different offices outlined their programs and roles in furthering the Embassy's agenda. Staff members consistently told OIG that these meetings, like the Ambassador's town hall gatherings, contributed to closer teamwork and greater understanding of mission priorities. The Ambassador and the DCM met periodically with the LE staff committee. The Ambassador participated in frequent informal social activities with employees and their families, and traveled outside the capital to meet local officials, business people, and residents as well as to stay in touch with members of the large Peace Corps contingent.

Execution of Foreign Policy Goals and Objectives

The OIG inspection occurred a few weeks before Ghana's contested presidential elections, which observers in Ghana and elsewhere were concerned might generate political unrest.⁵ Officials in the Department and elsewhere in the Washington interagency community told OIG they valued the Ambassador's insights and perspective on this and other issues, and respected him as an influential leader in deliberations to shape U.S. policy.

The Ambassador met regularly with senior Ghanaian officials, as called for in 2 FAM 113c (7). During the period from April 1 to September 30, 2016, he engaged in substantive meetings with the president four times, and had over more than 30 meetings with officials at cabinet rank or above. In the run-up to the elections, he met six times with senior opposition leaders to urge support for a fair and peaceful plebiscite. The Ambassador's calendar also showed frequent engagements with local officials, civil society groups, and representatives of the business and religious communities to promote U.S. interests and activities. In his first 10 months at post, the Ambassador delivered 66 speeches that were covered by the press, and was a regular commentator on radio programs, Ghanaians' major source of information.

Embassy agency and section heads reported that the Ambassador expected them to operate as an integrated team, and they agreed that close interagency cooperation was the norm. Embassy leaders told OIG they were satisfied that a network of thematic interagency working groups buttressed ad hoc, informal contacts to produce unity of purpose and action across the mission. Staff told OIG that a written report outlining the recent activities of each embassy element, distributed by the Front Office in advance of weekly country team meetings, further strengthened mission awareness. Agency representatives described the Ambassador as an informed and effective advocate of their programs. Washington stakeholders agreed with mission staff that the Ambassador's interventions made possible important advances in U.S. programs, such as his successful efforts to persuade the Ghanaian Government to clear the

⁵ The December 7, 2016, elections were orderly. The sitting president conceded to the main opposition leader on December 9, 2016, and the new president was inaugurated on January 7, 2017.

roadblocks to permit the Millennium Challenge Corporation's \$498 million compact to enter into force.

Strategic Planning

Senior embassy officials told OIG that the 2017-2019 ICS was the product of an intensive interagency review of embassy priorities and objectives. At a 2-day off-site meeting designed by the Ambassador, agency and section chiefs debated, assessed, and updated the embassy's top goals. Participants told OIG the offsite discussion and subsequent drafting of the strategy paper produced a broad consensus among the leadership on where and how the embassy should direct its efforts and resources. Following the Washington approval process, the Ambassador planned to ensure the entire staff understood mission goals by presenting the ICS at an expanded country team meeting, and then printing cards listing key objectives and distributing them to all personnel.

Adherence to Internal Controls

Embassy Accra dismissed seven locally employed staff working in the General Services, Facilities Maintenance, and Consular Sections for fraud or malfeasance in 2015. Offenses included theft and alleged bribery and extortion. Investigations by the Regional Security Office into other instances of possible fraud or misconduct were ongoing before and during the inspection.

The Ambassador and the DCM confirmed to OIG they had reviewed the supporting documentation for the FY 2016 Chief of Mission Annual Management Control Statement of Assurance, which the Ambassador signed on August 22, 2016. The statement identified nine potential weaknesses or deficiencies in embassy operations. Seven of these related to control weaknesses in general services and facility management functions, including allegations of fraud in procurement operations.⁶ As described in the Resource Management section below, OIG identified and made recommendations to correct additional internal control deficiencies in these areas. OIG advised the DCM, herself a senior management officer, to provide direction to the new Management Officer and other embassy personnel charged with addressing internal control vulnerabilities.

Country team members told OIG the Ambassador had been clear with embassy leaders that he expected ethical behavior and strict stewardship of embassy resources on the part of all personnel under Chief of Mission authority. OIG encouraged him to convey the same strong general message to the embassy community at large.

Security of the Mission

OIG surveys and interviews showed that the Ambassador and the DCM supported the embassy's security program, as required by the President's Letter of Instruction and 2 FAM 113.1c (5). Both fully participated in all embassy drills, which were up to date. The Emergency Action Committee,

⁶ The two other weaknesses reported were a lack of access controls in the Consular Section, as described in this report; and an issue addressed in the related classified report.

chaired by the DCM, met 16 times between January 2016 and December 2016. Committee members told OIG that this was as often as necessary to adjust the mission's security preparations to changing circumstances.

OIG reviewed Embassy Accra's residential security, physical security, and emergency preparedness. OIG also assessed the technical security program. Security deficiencies that resulted in recommendations are discussed in detail in the related classified report. In addition, OIG identified several minor security deficiencies that the embassy corrected during the inspection.

Developing and Mentoring Future Foreign Service Leadership

During 2016, the Ambassador and the DCM hosted several professional development sessions and social events for the 27 First- and Second-Tour (FAST) Department and USAID employees. Responsible under 3 FAM 2242.4 to mentor and guide FAST personnel, the DCM also sought to broaden their professional experience by assigning them activities such as serving as control officer for visitors. However, some FAST employees told OIG they wanted to be offered more opportunities, while those in the Consular Section said their heavy daily workload prevented them from taking advantage of opportunities that arose. As part of an effort to develop a more structured program, the DCM appointed a Department FAST coordinator to match one already in place for the USAID employees. Employees told OIG that the coordinators brought new energy and ideas to the program. The DCM also recently initiated a matrix assignment and tracking system to ensure that all FAST employees were given equal and full opportunity to learn fundamental career skills. OIG advised the DCM to work closely with the Consular Section chief to maximize opportunities for FAST employees in that section.

POLICY AND PROGRAM IMPLEMENTATION

Political, Economic, and Regional Environmental Sections

The Political, Economic, and Regional Environmental Sections have grown to manage the expanding bilateral relationship. In addition to Ghana, the Regional Environmental Section covers 23 countries in West Africa. The three sections directly administered or supported the Department in managing foreign assistance programs totaling approximately \$21 million for law enforcement, peacekeeping, border and maritime security, anti-trafficking, environmental protection, and economic development. OIG reviewed the sections' reporting, outreach, commercial advocacy, grants administration, and security assistance oversight. The operations complied with Department guidance, regulations and applicable Federal law, with the exceptions noted below.

Political and Economic Sections Met Reporting and Advocacy Responsibilities

Staff in the Political and Economic Sections used a wide range of contacts in government, business, and civil society to advance ICS goals. Department and other agency end-users consistently described advocacy to promote U.S. commercial interests and embassy reporting as

strong, singling out cable reporting on Ghana's presidential campaign as particularly useful. OIG reviewed 165 reporting cables from May 15 through November 15, 2016 and found they were sourced in accordance with Department standards, timely, addressed key issues, and were relevant to ICS goals. OIG discussed with the Political and Economic Section heads ways to increase effectiveness, including the development of section representational plans, use of record emails, and the timely retirement of paper files.

Foreign Assistance

Growth of Security and Law Enforcement Assistance Presented Management Challenges

The inclusion of Ghana in major new U.S. Presidential initiatives, such as the Security Governance Initiative (SGI), as well as large increases in the embassy's foreign assistance budget has strained the resources needed to administer foreign assistance programs. The embassy's security assistance program, managed by the Department of Defense Office of Security Cooperation with oversight and coordination from the Ambassador and the Political Section, grew from approximately \$2.5 million in FY 2015 to an anticipated \$20 million in FY 2017, an increase of 700 percent over 2 years. Law enforcement assistance, managed by the Department's Bureau for International Narcotics and Law Enforcement Affairs with policy oversight and coordination by the Political Section, increased from \$600,000 in 2012 to approximately \$13.8 million in active programming in 2016, a 2,200 percent increase over 4 years. Department cable 2016 State 89990⁷ and Section 622(c) of the Foreign Assistance Act, reaffirm the Department as the lead agency responsible for the policy, supervision, and general management of all U.S. security sector assistance.

While staffing in the Political Section, the Office of Security Cooperation, and other agencies implementing security sector assistance programs has grown, embassy staff were unable to effectively plan, synchronize, and implement this assistance as called for in the April 5, 2013, Presidential Policy Directive 23 on Security Sector Assistance. In addition, the embassy's Political-Military Officer spent 75 percent of his time on law enforcement assistance program management and implementation due to the expansion in law enforcement programs. As a result, the Political Section wrote only 7 reporting cables on security-related issues out of 165 sent in the 6 months prior to the inspection. The Embassy's Maritime Security Working Group met only twice in 2016, and notes from the Embassy's Law Enforcement Working Group meetings showed they largely discussed operational rather than strategic security issues. With an expected \$31 million in anticipated funding for peacekeeping training and equipment in the next few years, the embassy's end-use monitoring responsibilities will also increase.

The Department's effort to modernize U.S. diplomacy to better support development, outlined in 18 FAM 005.1-1d (8), requires strengthening staff, training, and professional incentives to support a more robust and integrated approach to development diplomacy. To address the increased workload, Embassy Accra at the time of the inspection was in the process of hiring a

⁷ Department cable 2016 State 89990, "Message from Secretary Kerry to Chiefs of Mission Regarding Security Assistance Responsibilities," August 12, 2016.

U.S. citizen contractor to manage law enforcement programs. The Bureau of International Narcotics and Law Enforcement Affairs supported the embassy's request in its FY 2018 Mission Resource Request for a U.S. direct-hire position to serve as the director of security and law enforcement programs.

Security Governance Initiative Lacked Adequate Direction and Support

SGL implementation lacked the rigorous program design, budget planning, management, and monitoring and evaluation from the Bureau of African Affairs necessary to effectively implement programs and measure their progress. A Presidential initiative launched at the July 2014 U.S.-Africa Leaders' Summit, SGI is designed to improve security sector governance and governments' capacity to address threats. Ghana is one of SGI's six partner countries. The United States obligated approximately \$10.4 million for SGI programming in Ghana from October 2015 through June 2017 and signed a Joint Country Action Plan with Ghana in February 2016.

Embassy Accra's SGI coordinator conducted liaison and planning work with other agencies at the mission and with the Ghanaian Government. However, at the time of the inspection (28 months after the initiative was announced), the coordinator did not know the SGI budget for Ghana. Following the inspection, the Bureau of African Affairs told OIG that as of December 2016, the SGI program in Ghana had expended only \$117,000 of the \$10.4 million that had been obligated.

The Joint Country Action Plan for the Ghana SGI program stipulated that a joint monitoring and evaluation framework would be developed and agreed to within 6 months of the plan being approved. Further, 18 FAM 005, 1-7 requires assistance programs to undertake strategic and budget planning to ensure that programs respond to policy objectives; to incorporate best practices in program design and management; to define specific, measurable and time-bound benchmarks and expected outcomes that correspond to development objectives; and to regularly review results. The Ghana SGI program lacked these core management elements because the Bureau of African Affairs did not adequately manage or staff the program. Lacking such elements, the embassy is implementing SGI activities without a framework to collect data and measure progress toward achieving program goals. As a result, program funds may be misspent or used ineffectively. In October 2016, the Bureau of African Affairs began work on a monitoring and evaluation plan for the SGI initiative. Following this inspection, the bureau began developing a detailed program plan and budget.

Recommendation 1: The Bureau of African Affairs should implement a detailed program, budget, and monitoring and evaluation framework for the Security Governance Initiative program in Ghana. (Action: AF)

Embassy Had Not Properly Closed Special Self-Help Grants

Embassy Accra did not close out FY 2015 Special Self-Help grants⁸ administered by the Economic Section in accordance with the Department's Federal Assistance Policy Directive,

⁸ Special Self-Help grants fund small-scale projects that are initiated and administered by the local community.

dated January 14, 2016. Directive section 3.07 requires managers of all Federal assistance awards to complete the closeout process no later than 1 year after receipt of all required final reports. OIG's review of 11 FY 2015 and 15 FY 2016 Special Self-Help grants, totaling \$402,035, found that none of the FY 2015 grant files had the required closeout documents, such as final narrative and financial reports and closeout letters, although the grant funds had been expended. This occurred because the Economic Section's two warranted grants officers and one certified grants officer's representative used an outdated 2013 Special Self-Help manual that did not contain any specific closeout procedures. The section brought all FY 2016 Special Self-Help grants, which were awarded immediately prior to the inspection, into compliance with Department policies. Failure to obtain final reports leaves the embassy unable to evaluate whether the grants achieved the desired outcomes or determine whether U.S. Government funds were spent in accordance with the terms of the grant. OIG advised section employees on current federal assistance policy requirements, including proper closeout of grants, and the section made progress addressing these deficiencies during the inspection.

Recommendation 2: Embassy Accra should close out all FY 2015 grants in accordance with the Department's Federal Assistance Policy Directive. (Action: Embassy Accra)

Leahy Vetting Complied with Department Guidance

Embassy Accra vetted 1,244 individuals in 2015 and 1,806 from January to November 2016 for potential gross human rights abuses in accordance with applicable laws and Department requirements.⁹ The embassy's standard operating procedures for Leahy vetting are current and approved by the Bureau of Democracy, Human Rights and Labor. The Leahy coordinator and back-up have the requisite International Vetting and Security Tracking system training and work closely with other embassy sections and agencies involved in the vetting and training.

Public Diplomacy

Embassy Accra has one of Africa's largest public affairs sections, with 4 American officers (one of whom is a regional Information Resource Officer), 17 LE staff members, and 1 U.S.-citizen contract employee who serves as the Regional Educational Advising Coordinator. The section's FY 2016 a program budget was \$1.14 million. The Public Affairs Section (PAS) enjoys an open and receptive program environment for its activities: 89 percent of Ghanaians have a positive view of the United States, the highest of any African country included in the Pew Research Center's 2015 Global Attitudes Survey. Exchange programs and media engagement especially have prospered under these favorable conditions. OIG reviewed those areas, as well as strategic planning and reporting, grants administration, American Spaces,¹⁰ and educational advising. OIG found public diplomacy operations to be generally aligned with Department priorities and regulations, with specific observations and areas for improvement as noted below.

⁹The 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.

¹⁰ American Spaces are open-access facilities used to engage foreign audiences overseas.

Number of Active Social Media Platforms Exceeded Oversight Capacity

PAS supported active embassy outreach across a full spectrum of media, from traditional outlets like radio—the top news source for Ghanaians—to newer social media platforms. For example, during the three weeks leading up to the November 2016 U.S. elections, PAS leveraged local interest to arrange 16 radio interviews for 9 Embassy staff members. The section’s strong presence on social media was led by an embassy Facebook site with more than 200,000 fans (placing it in the top five for U.S. embassies Africa-wide) and a Twitter account with more than 50,000 followers. PAS’ experimentation with other digital platforms, however, yielded mixed results. Some, such as Flickr, proved useful for specific purposes such as providing photo content to journalists, but others such as Pinterest and Tumblr failed to gain traction with audiences.

The proliferation of active platforms strained PAS’ capacity to maintain oversight and content supervision. For example, at the time of the inspection, one of the embassy’s social media sites had not received fresh content for 5 months, and another still active but unmonitored site had been hacked with unauthorized content. Platform maintenance was challenged by the extended vacancy of the PAS Social Media Coordinator position, left vacant for nine months at the time of the OIG inspection due to the Department’s ongoing grading review and other recruitment processes. At OIG’s suggestion, PAS reduced its number of active social media platforms to better focus oversight, content generation, and engagement efforts on the highest-value platforms such as Facebook and Twitter, as well as ongoing management of the embassy website.

Clearer Strategic Direction Needed for Resource Allocation Decisions and Oversight

PAS did not prepare an FY 2016 Public Diplomacy Implementation Plan, required by Department cable 2015 State 115638¹¹ as a strategic planning tool to link public diplomacy audiences, programs, and activities with ICS goals and objectives. Without such a document, PAS lacked a clear framework for prioritizing resource allocation and for identifying appropriate public diplomacy programs and target audiences. OIG encouraged the Public Affairs Officer to use the preparation of the FY 2017 plan as an opportunity to lead the section through inclusive discussion and agreement on priority public diplomacy goals, clearly linking resources and activities with objectives. During the inspection, the Public Affairs Officer convened senior section staff for an off-site planning session and began drafting the 2017 implementation plan.

Public Diplomacy Grants Lacked Risk Assessments

PAS generally complied with Department guidance on grants administration, with the exception of risk assessments. The section’s two warranted grants officers and five certified grants officer’s representatives administered 40 public diplomacy grants totaling \$485,696 in FY 2015 and 40 grants totaling \$732,892 in FY 2016. OIG reviewed all FY 2015 grants of \$15,000 or greater (six

¹¹ Department cable 2015 State 115638, “Annual Public Diplomacy Implementation Plan (PDIP) Due November 13 [2015],” October 6, 2015.

grants totaling \$327,313 and comprising 67 percent of the FY 2015 grants budget) and all FY 2016 grants of \$10,000 or more (13 grants totaling \$414,034 and comprising 56 percent of FY 2016 grants budget).

All grants reviewed by OIG lacked risk assessments. Federal Assistance Policy Directive 2.03A stipulates that all grants must include a risk assessment as part of the pre-award phase, and a corresponding risk mitigation strategy as part of the grant monitoring plan. PAS staff was aware of the need to consider risk as part of the pre-award review process but not of the requirement to document that assessment and to include a corresponding risk mitigation strategy in each grant's monitoring plan. Effective risk assessment and mitigation reduce the risk of loss or misuse of U.S. Government funds and help ensure that grants meet program objectives. OIG directed PAS staff to the Department's sample templates and guidelines to help them meet these requirements.

Recommendation 3: Embassy Accra should include risk assessment and monitoring plans with risk mitigation strategies as documented elements in all public diplomacy grant files. (Action: Embassy Accra)

Activities Scaled Back to Meet Fast-Growing Exchange Program Demand

PAS promotes mutual understanding between the United States and Ghana through more than 20 U.S. Government-funded exchange programs that send approximately 130 Ghanaians to the United States each year. Ghanaian participation in one program—the Young African Leadership Initiative—doubled over the past 2 years, as did the number of applicants. Almost 4,000 people applied for the 40 available slots in 2017, more than twice as many applicants as in the previous year. To meet this increased workload, which includes engaging program alumni in ongoing public diplomacy programs and activities, PAS redirected staff resources and reduced U.S. speaker and arts programming. The section partially mitigated this trade-off by tapping its annual cohort of approximately 20 U.S. Fulbright grantees as in-country resources for cultural and media programming.

Spotlight on Success: EducationUSA Leveraged Resources to Support Study Abroad

In addition to U.S. Government-funded exchange programs, PAS promotes privately funded study for Ghanaians in the United States through its educational advising (EducationUSA) programs, part of the embassy's overall effort to promote a U.S. education to foreign students. Three staff positions in Accra and a two-person contract advising center in the city of Kumasi together contributed to Ghana's status as Africa's second largest source of students to the United States, with 3,049 Ghanaians enrolled in more than 600 U.S. higher-education institutions during 2016. The mission's EducationUSA offered a positive return on investment as the Kumasi center covered most of its operating expenses through fee-for-services. Services include advising prospective students on educational opportunities and assisting with the application process. The Department estimated that Ghanaian students using EducationUSA services garnered \$8 million to \$10 million per year in scholarships and financial aid from their host U.S. institutions.

Consular Affairs

OIG reviewed the Embassy's consular operations, including visa operations, American citizens services, and consular anti-fraud programs. The Consular Section suffered staffing gaps during much of 2016, contributing to a backlog of immigrant visa cases. Fraud and malfeasance were also a continuing challenge. The embassy fired two LE staff members for malfeasance in the year prior to the inspection. The embassy also dismissed two groups of contractors handling applicant intake over the same period for abusing their positions. Despite these challenges, Consular Section operations were in compliance with rules and regulations, with the exceptions noted below.

Section Implementing Recommendations from Bureau of Consular Affairs Review

The Consular Section developed a backlog of immigrant visa cases and had the Department's longest queue of pending fraud cases. To address these and other concerns, a Bureau of Consular Affairs Consular Management Assistance Team visited Accra in May 2016 and issued a report with 37 formal and informal recommendations. The bureau also reinstated Embassy Accra in the regional consular officer program, which provides regular assistance visits from an experienced consular manager.

OIG concurred with the report's recommendations and determined that the section was making progress in complying with them. For example, the section reduced the immigrant visa backlog from more than 1,500 cases in April 2016 to 134 cases in mid-November 2016. The fraud queue was at levels consistent with other consular sections worldwide, due to assistance from the bureau's Office of Fraud Prevention Programs, better training for interviewing officers about when to refer cases to the fraud unit, and efforts by the fraud prevention manager. However, the section chief had not shared the report's recommendations with consular FAST officers, OIG advised him to do so in order to enlist all consular staff in addressing the outstanding recommendations.

Need to Improve Training for Consular Staff

At the time of the inspection, the Consular Section had not held consular leadership training in 2016 despite such structured training being required on a quarterly basis. Guidance in 7 Foreign Affairs Handbook (FAH)-1 H-645.2 emphasizes the importance of training and lists some requirements such as sessions on malfeasance, consular systems, and consular authorities. Department cable 2009 State 80775¹² outlines the responsibility of consular managers to provide development to FAST officers and to hold regular training. Failure to provide training can lead to errors in adjudication and inefficient operations. The Bureau of Consular Affairs' management assistance report contained a recommendation to develop an active training program, including scheduling conference calls with bureau offices to review policies and procedures.

¹² Department cable 2009 State 80775, "The Consular Manager's Role in Cultivating Leaders," August 4, 2009.

Recommendation 4: Embassy Accra, in coordination with the Bureau of Consular Affairs, should implement a training plan for the embassy's Consular Section. (Embassy Accra, in coordination with CA)

Consular Section Access Controls Do Not Meet Standards

Department of Homeland Security and Millennium Challenge Corporation employees must walk through the consular section to access their offices. This prevents consular managers from limiting access to the section to maintain control over controlled consular items, such as visa foils and seals. Guidance in 7 FAH-1 H-644.1, 7 FAH-1 H-282(9), and 7 FAH-1 H-283 stipulate that access to the consular section should be limited to those persons whose authorities and responsibilities require it or who have known business in the section. This issue has existed for a number of years, but embassy management has yet to find a solution to this vulnerability.

Recommendation 5: Embassy Accra, in coordination with the Bureau of Overseas Buildings Operations, should reconfigure the Consular Section and neighboring office space in accordance with Department standards. (Embassy Accra, in coordination with OBO)

Appointment System Not Managed Effectively

The Consular Section did not manage its appointment system effectively, resulting in long waits for applicants and large crowds. Guidance in 7 FAH-1 H-263.5 states that appointments should be staggered so as to avoid overwhelming security screening and waiting facilities. The section had not attempted to adjust appointment times or inform applicants when they needed to arrive in order to avoid long waits. Visa applicants arrived early in the morning, sometimes well before their interview times, filling up the waiting room. Applicants often waited outside the embassy compound for extended periods, presenting a poor image of the U.S. Government and causing a security issue. The Consular Management Assistance Team noted this issue and called for an overall review of the problem. OIG advised the Consular Section to experiment with different approaches to scheduling.

Outdoor Waiting Area Did Not Meet Department Standards

An outdoor waiting area between the consular compound access control and the entrance to the consular section accommodated applicants waiting to enter the building. However, the waiting area roof did not adequately protect the applicants from rain. The Bureau of Consular Affairs approved funds to rebuild this area, but the embassy had yet to complete the project. OIG advised embassy management that this project should be completed as soon as possible, in compliance with 7 FAH-1 H-282(2), which requires adequate waiting space consistent with the local climate.

RESOURCE MANAGEMENT

Management Operations

OIG reviewed operations and internal control systems for the embassy's Human Resources, General Services, Facility Management, and Financial Management Sections. OIG concluded that human resources operations complied with Department standards and procedures. However, OIG found deficiencies in general services and facility management functions, including a lack of oversight in the embassy's bulk fuel operations, as described below. The embassy was correcting weaknesses in the process for disbursing petty cash at the time of the inspection. With the arrival of the new Management Officer in August 2016, the Management Section was working to implement corrective actions and strengthen controls.

General Services Operations

Lack of Acquisition Planning

Embassy Accra did not have an annual acquisition plan, nor had management sought input from embassy sections to forecast contracting requirements for upcoming fiscal years. The Embassy processed \$10.9 million in procurement orders for goods and services in FY 2015 and FY 2016. Federal Acquisition Regulation 7.102 (a) requires acquisition planning be performed for all purchases. Without an annual acquisition plan, the embassy cannot determine optimal contracting methods, increase competition, or achieve potential cost savings.

Recommendation 6: Embassy Accra should prepare an annual acquisition plan and conduct market research to identify the best contract method for competition and potential cost savings. (Action: Embassy Accra)

Incomplete Contract Files

Contracting officer files were incomplete. OIG reviewed 7 out of 11 active contracts, valued at \$7.1 million, and identified missing documentation, including records of competition, contracting officer representative designations, and notices of award. The Contracting Officer did not conduct reviews to ensure that all files were completed in accordance with Federal procurement regulations. Federal Acquisition Regulation 4.801(a) requires that the head of each contracting office establish files containing records of contractual actions. In FY 2016, three LE staff members were terminated from the procurement section for receiving bribes from vendors. The lack of file documentation and contracting officer reviews increase the risk of fraud, abuse and loss of U.S. Government resources.

Recommendation 7: Embassy Accra should implement standard operating procedures for maintaining contract files as required by Federal regulations. (Action: Embassy Accra)

Contracting Officer's Representatives Did Not Adequately Administer Contracts

Contracting officer's representatives did not properly administer their assigned contracts. Guidelines in 14 FAH-2 H-142 outline their responsibilities, which include monitoring the contractor's technical progress and the expenditures of resources relating to the contract. OIG reviewed the contracting officer's representative files for the seven contracts discussed above and found that five contracting officer's representatives did not perform their duties or maintain files properly. A sixth contracting officer's representative lacked the training required to administer the contract. Only one of the seven contracting officer's representative kept a file and performed duties in accordance with standards. The contracting officer's representatives stated that they could not perform their duties due to competing priorities. Inadequate oversight of contracts can result in excessive costs, misuse of U.S. Government resources, and substandard contractor performance.

Recommendation 8: Embassy Accra should require all contracting officer's representatives to administer contracts in accordance with Department standards. (Action: Embassy Accra)

No Ratification of Unauthorized Commitments

Embassy Accra had three unauthorized commitments in FY 2016 that had not been ratified at the time of the inspection. These involved 3 invoices totaling \$8,118 from one vendor for services that were not procured or approved by the former contracting officer. The General Services Office did not seek Department ratification of these unauthorized commitments because it could not identify the person who committed the funds, although the embassy received these services. Guidance in 14 FAH-2 H-132.2 (f) requires that the contracting officer submit all unauthorized commitments exceeding \$1,000 to the Bureau of Administration's Office of the Procurement Executive for ratification. Failure to report and ratify unauthorized commitments risks potential violations of the Anti-Deficiency Act.

Recommendation 9: Embassy Accra should complete the ratification process for its three unauthorized commitments. (Action: Embassy Accra)

No Access Control at Off-Site Warehouse

The Embassy's offsite warehouse, used to store excess property, lacked access controls. Guidance in 14 FAM 413.7 (a) outlines the need for secure or controlled areas for storing equipment and supplies, and require segregation of other agencies' property and access restrictions. OIG observed that the warehouse lacked secure or controlled areas, and that property belonging to other agencies was not segregated from Department property. General services staff were inattentive to this weakness. Lack of access control increases the risk of theft and loss of U.S. Government resources.

Recommendation 10: Embassy Accra should institute access controls at its off-site warehouse in accordance with Department standards. (Action: Embassy Accra)

No Spare Parts Inventory

Embassy Accra did not have property management procedures in place to track the purchase and inventory of maintenance spare parts, as required by 14 FAM 414.4. For example, the embassy purchased \$77,567 in spare parts for maintenance and repair of the Embassy access control gates. However, none of the parts were accounted for in the inventory, and the embassy could not verify that all were received. OIG reviewed four purchase orders, but could locate only one receiving report. During the course of the inspection, the facility manager began the process of locating the parts.

Recommendation 11: Embassy Accra should conduct an inventory of all spare parts and report any missing property in accordance with Department standards. (Action: Embassy Accra)

Ineffective Control of Fuel for Official Vehicles

The embassy did not have an effective system to monitor fuel consumption for official vehicles. Embassy motor pool employees had access to the fuel pump for refueling vehicles but there was no system to control the keys to the pump. The embassy relied on a gas attendant to keep records and track fuel usage. An automated metering system installed when the new embassy compound was built in 2007 had not worked for at least 5 years. According to 14 FAH-1 H-815.1b, control is to be maintained over pumps used in bulk-fuel operations to prevent theft. Access to pumps must be restricted to authorized personnel and keys to fuel system locks must be secured. The lack of internal controls increases the risk for theft, fraud, and misuse of U.S. Government property.

Recommendation 12: Embassy Accra should enforce controls on fuel consumption in accordance with Department standards. (Action: Embassy Accra)

Facility Management

No Oversight of Generator Fuel Deliveries

The embassy did not have a system to track generator fuel deliveries to residences. The accountable property officer did not designate a receiving clerk to oversee fuel deliveries. Guidance in 14 FAH-1 H-815.2 (d) requires that copies of fuel delivery orders be forwarded to the receiving clerk and kept in a pending file until delivery. In addition, acquisition documents are to be compared with the vendor delivery tickets to ensure that the correct quantity and type of fuel is delivered. OIG found no records showing that a receiving clerk checked the residential deliveries against the orders. Lack of oversight contributes to the likelihood of fuel theft or inaccurate fuel deliveries.

Recommendation 13: Embassy Accra should implement controls over residential and chancery fuel deliveries that include oversight and spot checks. (Action: Embassy Accra)

No Calibration of Fuel Tanks

The fuel tanks located on the Embassy compound were not calibrated to ensure accurate meter reading, as required by 14 FAH-1 H-815.4(C)(1). OIG found no records showing that the fuel tanks had been calibrated since the compound was first occupied in 2007. The embassy used a dip stick to measure fuel levels because the tank meters did not work. The Facility Management Section had not requested guidance or assistance from the Bureau of Overseas Building Operations to repair the meters. Lack of fuel tank maintenance, including fuel tank calibration, increases the risk of inaccuracies in fuel inventory and leaves the embassy's fuel system vulnerable to theft and fraud.

Recommendation 14: Embassy Accra should implement standard operating procedures to ensure that tanks are calibrated in accordance with Department guidelines. (Action: Embassy Accra)

Financial Management

Implementing Controls over Petty Cash Transactions

Embassy officials identified irregularities in petty cash transactions made by Facility Management Section LE employees in 2014. The embassy's Regional Security Officer, in coordination with the general services and financial management officers, discovered an estimated \$27,000 in fraudulent petty cash transactions in 2013 and 2014. As a result, nine LE staff members were investigated and four were terminated. Embassy management and Regional Security Office staff identified and investigated additional irregularities

This issue was reported in the Ambassador's 2016 Statement of Assurance of Management Controls. In 2015 and 2016, Embassy officials drafted new controls over petty cash disbursements, including requiring approvals by U.S. direct-hire supervisors. OIG reviewed the updated procedures, but was unable to determine their effectiveness as they had yet to be fully implemented. OIG advised management officials to closely monitor petty cash transactions.

Health Unit

Pharmacy Access Controls Were Inadequate

Access to the embassy's health unit pharmacy, where medical supplies, prescription drugs, and controlled substances are stored, was inadequate. OIG found that the pharmacy door was open during business hours, allowing unauthorized access. In addition, health unit staff members had unsupervised access to the pharmacy's controlled narcotics lockbox key. In accordance with 16 FAM 741d, the Foreign Service medical practitioner is responsible for ensuring that an internal control system is in place to limit access to controlled items and to prevent any one individual from being responsible for the receipt, storage, and disposition of medical supplies, including controlled substances and prescription drugs. Failure to adequately protect supplies and medications can result in theft of Government resources and pose a life-threatening health risk.

Recommendation 15: Embassy Accra should establish internal control procedures regarding access to medical supplies, controlled substances, and prescription drugs in accordance with Department standards. (Action: Embassy Accra)

Employee Association

Excessive School Bus Profits Subsidized Other Association Cost Centers

Profits from the school bus service provided to embassy families by the American Embassy Association were excessive in 2013 through 2015. During that 3-year period, the bus service operated at annual profit margins between 31.2 percent and 38.4 percent, and generated profits totaling \$287,232. The association, in coordination with the Bureau of Administration Office of Allowances, established the annual bus fees, which are funded by U.S. Government agencies. The Department's Office of Commissary and Recreation Affairs has oversight responsibility for association activities. Guidance in 6 FAM 531.4 states that profits from employee associations "must not be excessive,"¹³ and that associations must operate using sound business practices while providing goods and services at a fair price. Excessive bus service profits deprive the funding agencies of resources that could be used for other programs.

Recommendation 16: Embassy Accra should establish association bus fees that do not generate excessive profits. (Action: Embassy Accra)

The profits from the school bus service provided by the American Embassy Association subsidized unprofitable association cost centers. Since 2013, the association's revenue from commissary sales had decreased due to the availability of imported consumer goods and access to online sources. The bus service profits of \$287,232 from 2013 through 2015 subsidized losses of \$193,669 in other association cost centers. In accordance with 6 FAM 531.5, employee associations operating more than one activity must ensure that each revenue-generating cost center is financially self-sustaining to ensure that the profits of one cost center are not unduly subsidizing another cost center. Furthermore, 6 FAM 531.4 states that associations must operate using sound business practices while providing goods and services to its members at a fair price. Its failure to address the commissary losses threatens the association's financial viability.

Recommendation 17: Embassy Accra should adjust the American Embassy Association's business model to comply with Department standards. (Action: Embassy Accra)

Information Management

OIG validated that most information management programs and services met customer needs and complied with procedures outlined in 5 FAM 120. OIG identified deficiencies in IT contingency planning and wireless network operations, as described below. OIG also advised the Information Management Officer on potential recruitment options for additional staff, cross-

¹³ While "excessive" is not defined in 6 FAM 531.4, the Office of Commissary and Recreation Affairs told OIG that they consider a profit up to 15 percent to be reasonable.

training, helpdesk management, and emergency preparedness. OIG also provided advice on standard operating procedures for the telephone network operations, emergency radio networks and communication security duties. The related classified report addresses other information security issues.

OIG reviewed the Information Management section's physical, environmental, and technical security of classified and sensitive computer networks and dedicated internet networks. OIG also reviewed the radio and telephone systems, diplomatic post office and mail, classified and unclassified pouch, mobile computing, communications security, records management, equipment inventories, and emergency operations.

Incomplete and Untested Information Technology Contingency Plan

Embassy Accra had not completed and tested an IT contingency plan for the unclassified computer network. The Bureau of Diplomatic Security computer security assessments of January 2015 and November 2012 also identified this deficiency. Standards in 5 FAM 851 state that every information system must have a contingency plan that is documented and tested annually. Incomplete and untested IT contingency plans increase the risk of ineffective responses to or loss of critical communication during an emergency or crisis event.

Recommendation 18: Embassy Accra should complete and test an information technology contingency plan for the unclassified information system in accordance with Department standards. (Action: Embassy Accra)

Wireless Network Missing Formal Approval

Embassy Accra has operated a wireless dedicated internet network since 2014 that has two access points located outside the chancery building. OIG determined that the wireless dedicated internet network met all Department requirements, except for the required formal approval by the Mission's Counter Intelligence Working Group, as required by 12 FAH-10 H-152.1 (d). Without formal approval and the appropriate management oversight, wireless networks can potentially threaten the security of Department networks.

Recommendation 19: Embassy Accra should document formal approval from the Counter Intelligence Working Group for the Embassy's wireless dedicated internet network in accordance with Department standards. (Action: Embassy Accra)

Unauthorized Wireless Networks

Unauthorized wireless networks operated on the Embassy compound without formal approvals prior to and during the inspection. In January 2016, the information systems staff identified and disabled an unauthorized wireless network operating from the USAID office building adjacent to the chancery. During the inspection, OIG identified an additional unauthorized wireless network operating from the same building without the knowledge of the Information Systems Security Officer, who subsequently disabled the network. Guidance in 12 FAH-10 H-152.3(2) requires that

information systems security officers ensure that users do not physically connect non-Department-owned wireless equipment to Department-owned equipment. Without standard operating procedures for regularly scanning to detect unauthorized wireless network activity, the Department's networks are vulnerable to potential compromise.

Recommendation 20: Embassy Accra should implement procedures for regularly scanning for unauthorized wireless network activity on the mission compound. (Action: Embassy Accra)

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 the Bureau of African Affairs and Embassy Accra. The Department's complete responses can be found in Appendix B. The Department also provided technical comments that were incorporated into the report.

Recommendation 1: The Bureau of African Affairs (AF) should implement a detailed program, budget, and monitoring and evaluation framework for the Security Governance Initiative (SGI) program in Ghana. (Action: AF)

Management Response: In its May 26, 2017, response AF concurred with this recommendation. The bureau noted the SGI program management is decentralized and the process for managing programs and budgets is the responsibility of the operating unit.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of plan for the Security Governance Initiative program in Ghana.

Recommendation 2: Embassy Accra should close out all FY 2015 grants in accordance with the Department's Federal Assistance Policy Directive. (Action: Embassy Accra)

Management Response: In its May 18, 2017, response, Embassy Accra concurred with this recommendation. The embassy noted that its Grants Officers and Grants Officers Representatives were working with the Financial Management Center to review all outstanding FY 2015 grants. The embassy anticipates full compliance by September 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of all closed FY 2015 grants.

Recommendation 3: Embassy Accra should include risk assessment and monitoring plans with risk mitigation strategies as documented elements in all public diplomacy grant files. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted that the Grants Officers and Grants Officers Representatives have updated grants standard operating procedures to ensure that risk assessment and monitoring plans with risk mitigation strategies are included in all grant files.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts the updated standard operating procedures.

Recommendation 4: Embassy Accra, in coordination with the Bureau of Consular Affairs, should implement a training plan for the embassy's Consular Section. (Embassy Accra, in coordination with CA.)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy, in coordination with the Bureau of Consular Affairs created a new robust training plan that is constantly evolving. The Bureau of Consular Affairs has sent staff over to provide extensive training to the embassy's consular staff.

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

Recommendation 5: Embassy Accra, in coordination with the Bureau of Overseas Buildings Operations, should reconfigure the Consular Section and neighboring office space in accordance with Department standards. (Embassy Accra, in coordination with OBO)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy has designed a reconfiguration plan and is waiting for approval and funding from the Bureau of Overseas Buildings Operations.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts the approved and funded reconfiguration plan.

Recommendation 6: Embassy Accra should prepare an annual acquisition plan and conduct market research to identify the best contract method for competition and potential cost savings. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted that it is preparing a consolidated acquisition plan and the estimated completion date is August 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts the completed acquisition plan.

Recommendation 7: Embassy Accra should implement standard operating procedures for maintaining contract files as required by Federal regulations. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it had reviewed its standard operating procedures for maintaining contract files. Additionally, all six embassy procurement personnel will receive formal training by the end of FY 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts the updated standard operating procedures.

Recommendation 8: Embassy Accra should require all contracting officer's representatives to administer contracts in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted that all the necessary contracting officer's representatives would be trained by August 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the contracting officer's representatives administering contracts in accordance with Department standards.

Recommendation 9: Embassy Accra should complete the ratification process for its three unauthorized commitments (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it has ratified all three unauthorized commitments.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the three ratified unauthorized commitments.

Recommendation 10: Embassy Accra should institute access controls at its off-site warehouse in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it instituted access controls at the warehouse, consisting of a list of authorized employees and a log book to record dates and times of employee access.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the access controls for the off-site warehouse.

Recommendation 11: Embassy Accra should conduct an inventory of all spare parts and report any missing property in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted the inventory was completed during the course of their regular annual inventory.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the inventory of all spare parts and reporting of any missing property.

Recommendation 12: Embassy Accra should enforce controls on fuel consumption in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it implemented management controls on access to embassy fuel pumps in November 2016. Additionally, deliveries are scheduled in advance and a U.S. direct-hire is present at every vendor delivery.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the implemented management controls.

Recommendation 13: Embassy Accra should implement controls over residential and chancery fuel deliveries that include oversight and spot checks. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it implemented controls for fuel deliveries to residences and the chancery.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the implemented fuel delivery controls.

Recommendation 14: Embassy Accra should implement standard operating procedures to ensure that tanks are calibrated in accordance with Department guidelines. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it received funding from the Bureau of Overseas Buildings Operations to recalibrate the fuel tanks and was waiting for the contractor and the parts to be delivered.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the standard operating procedures.

Recommendation 15: Embassy Accra should establish internal control procedures regarding access to medical supplies, controlled substances, and prescription drugs in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted its internal control procedures for medical supplies, controlled substances, and prescription drugs were in accordance with Department standards.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the internal control procedures.

Recommendation 16: Embassy Accra should establish association bus fees that do not generate excessive profits. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it was working with the new association board to agree on bus fees that are in line with accepted business practices and did not subsidize other association cost centers. The embassy estimated this would be completed by the end of FY 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the new association bus fees.

Recommendation 17: Embassy Accra should adjust the American Embassy Association's business model to comply with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted the American Embassy Association management was working to ensure all cost centers were self-sustaining in accordance with Department standards. The embassy estimated this to be completed by end of FY 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the adjusted American Embassy Association business model complying with Department standards.

Recommendation 18: Embassy Accra should complete and test an information technology contingency plan for the unclassified information system in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it had an updated draft information technology contingency plan that would be reviewed during an upcoming Regional Information Systems Security Officer audit.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the completed and tested information technology contingency plan.

Recommendation 19: Embassy Accra should document formal approval from the Counter Intelligence Working Group for the embassy's wireless dedicated internet network in accordance with Department standards. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted the Counter Intelligence Working Group approved the embassy's dedicated internet network on May 17, 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the formal approval from the working group.

Recommendation 20: Embassy Accra should implement procedures for regularly scanning for unauthorized wireless network activity on the mission compound. (Action: Embassy Accra)

Management Response: In its May 18, 2017, Embassy Accra concurred with this recommendation. The embassy noted it had implemented periodic scanning for Bluetooth and 802.11 wireless networks, but it noted additional training was needed to increase the number of personnel able to perform the scans. The embassy estimates the training to be completed by July 2017.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the scans for unauthorized wireless network activity.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Robert P. Jackson	1/16
Deputy Chief of Mission	Melinda Tabler-Stone	7/15
Chiefs of Section:		
Management	Michelle Wollam	8/16
Consular	Philip Franz Seitz	7/14
Political	Thomas Lyons	8/16
Economic	Jimmy Mauldin	7/15
Public Affairs	Daniel Fennell	9/14
Regional Security	Kevin Whitson	
Other Agencies:		
Department of Defense	Col. Jano Carlson	9/15
USAID-Ghana	Andrew Karas	1/13
USAID-West Africa Regional Office	Alexander Deprez	8/13
Foreign Agricultural Service	David Wolf	8/16
U.S Commercial Service	Tyrena Holley	8/16
Centers for Disease Control and Prevention	Dr. Dan Baden	8/16
Department of Homeland Security	Aster Zeleke	12/12
Department of Justice-DEA	Anthony McCrorey	4/15
Department of Justice – FBI/Legal Attache	J.D. Shamwell	3/15
Millennium Challenge Corporation	Diedre Fair-James	1/15
Peace Corps	Carla Ellis	12/14

Source: Embassy Accra

APPENDIX A: OBJECTIVE, 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 OIG for the Department and the Broadcasting Board of Governors.

Objective and Scope

The Office of Inspections provides the Secretary of State, the Chairman of the Broadcasting Board of Governors, and Congress with systematic and independent evaluations of the operations of the Department and the Broadcasting Board of Governors. 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. OIG used professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

For this inspection, OIG conducted 166 documented interviews in Washington and overseas and reviewed 718 documents. OIG reviewed responses to personal questionnaires from 64 American employees at Embassy Accra and from 197 locally employed staff members.

APPENDIX B: MANAGEMENT RESPONSES

UNCLASSIFIED



*Embassy of the United States of America
Accra, Ghana*

May 18, 2017

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TO: OIG - Sandra Lewis, Assistant Inspector General for Inspections
THROUGH: AF Bureau Senior Official - Peter Barlerin
FROM: Ambassador Robert P. Jackson, Embassy Accra *RPJ*
SUBJECT: Response to Draft OIG Report - Inspection of Accra, Ghana

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

I. Responses to Recommendations:

OIG Recommendation 1: The Bureau for African Affairs should implement a detailed program, budget, and monitoring and evaluation framework for the Security Governance Initiative program in Ghana. (Action: AF)

Management Response: This recommendation is for the Bureau of African Affairs.

OIG Recommendation 2: Embassy Accra should include risk assessment and monitoring plans with risk mitigation strategies as documented elements in all public diplomacy grant files. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. In progress. Grants Officers and Grants Officers Representatives (GORs) are working with FMC to review all outstanding FY 2015 grants to determine a current status, soliciting finalized reporting documents from grantees, and issuing close-out letters. Post has now met compliance for nearly all outstanding FY 2015 grants, and anticipates full compliance by September 2017.

OIG Recommendation 3: Embassy Accra should include risk assessment and monitoring plans with risk mitigation strategies as documented elements in all public diplomacy grant files. (Action: Embassy Accra)

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Management Response: Embassy Accra accepts the recommendation. Completed. Grants Officers and Grants Officers Representatives (GORs) have updated grants SOPs to ensure that risk assessment and monitoring plans with risk mitigation strategies are included in all grants. Post requests the recommendation be closed.

OIG Recommendation 4: Embassy Accra, in coordination with the Bureau of Consular Affairs, should implement a training plan for the embassy's Consular Section. (Embassy Accra, in coordination with CA.)

Management Response: Embassy Accra accepts the recommendation. There is a new, robust training plan which is constantly evolving through interaction with the Bureau of Consular Affairs, especially through interaction with the Regional Consular Officer. Monthly training sessions cover high priority subjects every month. Other topics are included based on new directives or urgent issues. Moreover, the Supervisory RCO, an officer from CA/VO/L/A, and an officer from CA/FPP visited the consular section for a week in February. They held several training sessions during this time, and collaborated with the consular section chief, ACS chief, and fraud prevention manager to devise specific training plans for the coming months. In April and May of 2017, a TDY officer from CA/EX came and brought with her substantial expertise on consular process improvements. She did extensive one-on-one and one-on-many trainings with the officers and FSNs. Post requests that the recommendation be closed.

OIG Recommendation 5: Embassy Accra, in coordination with the Bureau of Overseas Buildings Operations, should reconfigure the Consular Section and neighboring office space in accordance with Department standards. (Embassy Accra, in coordination with OBO)

Management Response: Embassy Accra accepts the recommendation. Post facilities manager has designed a reconfiguration, which has been approved at post by the affected offices (Consular, DHS and MCC). Post has submitted the proposal to OBO for approval and funding. Estimated completion date will be determined by OBO action and availability of funding.

OIG Recommendation 6: Embassy Accra should prepare an annual acquisition plan and conduct market research to identify the best contract method for competition and potential cost savings. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. In progress. Post FMO and GSO are collecting acquisition needs and preparing a consolidated acquisition plan. Estimated completion in August 2017.

OIG Recommendation 7: Embassy Accra should implement standard operating procedures for maintaining contract files as required by Federal regulations. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Post has reviewed its standard operating procedures for maintaining contract files. Three of six

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procurement personnel have attended formal training. Post has identified formal training for the remaining three employees, and we expect all of them to be trained by the end of FY17. We are using the ILMS-recommended SOPs and General Guidance in addition to A/OPE's Procurement Information Bulletin (PIB) requirements for contract files maintenance. Post requests the recommendation be closed.

OIG Recommendation 8: Embassy Accra should require all contracting officer's representatives to administer contracts in accordance with Department standards. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. In progress. Post has trained the CORs for facilities, shipping and the LES health insurance contracts. We have created folders and inserted checklists for how contract files are to be maintained. The certificate for the IT services COR has expired and he is working on renewing it. Estimated completion by August 2017.

OIG Recommendation 9: Embassy Accra should complete the ratification process for its three unauthorized commitments. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Post has ratified all three unauthorized commitments. Post requests the recommendation be closed.

OIG Recommendation 10: Embassy Accra should institute access controls at its off-site warehouse in accordance with Department standards. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Post has instituted access controls at the off-site warehouse, consisting of a list of authorized employees and a log book to record dates and times of employee access. GSO and RSO Security Coordinator have to approve access requests for staff not on the authorized list. Post requests the recommendation be closed.

OIG Recommendation 11: Embassy Accra should conduct an inventory of all spare parts and report any missing property in accordance with Department regulations. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed in the course of the regular annual inventory. Post requests the recommendation be closed.

OIG Recommendation 12: Embassy Accra should enforce controls on fuel consumption in accordance with Department regulations. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Post implemented management controls on access to Embassy fuel pumps in November

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2016. Deliveries are now scheduled in advance and a USDH is present at every vendor delivery. Post requests the recommendation be closed.

OIG Recommendation 13: Embassy Accra should implement controls over residential and chancery fuel deliveries that include oversight and spot checks. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Facilities Management's process for managing the fuel we receive is controlled by measuring the amount in the underground tanks and our trucks before and after deliveries and distribution. Deliveries to our residences are tracked and amounts disbursed are tabulated on a spreadsheet comparing the amount in the day and supplemental tanks and running hours of the generators. Data collected provides detail accounting of facilities fuel consumption. Post requests the recommendation be closed.

OIG Recommendation 14: Embassy Accra should implement standard operating procedures to ensure that tanks are calibrated in accordance with Department guidelines. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. In progress. Post has received funding from OBO to recalibrate the fuel tanks and has selected a contractor. We are awaiting parts delivery and contractor visit. Post also uses the manual dip stick method to confirm delivery amounts. Estimated completion date is end of FY17.

OIG Recommendation 15: Embassy Accra should establish internal control procedures regarding access to medical supplies, controlled substances, and prescription drugs in accordance with Department standards. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Post procedures are in accordance with Department standards. All controlled medications are in a double-locked lockbox and after hours are located behind three locked doors. These controlled medications are kept in small quantities and are logged monthly, verifying quantity and noting to whom they have been dispensed. All immunizations, prescription medications and injectable medications are stored in our pharmacy. The pharmacy has a separate lock on the door which is always locked after hours. There is no access to our pharmacy other than for employees that work in the Health Unit. Medical supplies are stored in patient rooms and the pharmacy. These are boxed and labeled as medical supplies. Post requests the recommendation be closed.

OIG Recommendation 16: Embassy Accra should establish association bus fees that do not generate excessive profits. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. In progress. Post Financial Management is working with the new association board and association

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management to agree on bus fees that are in line with accepted business practices and do not subsidize other Association cost centers. Estimated completion is end of FY17.

OIG Recommendation 17: Embassy Accra should adjust the American Embassy Association's business model to comply with Department regulations. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. The board of the American Embassy Association is working with association management to ensure that all cost centers are self-sustaining in accordance with regulations. Estimated completion is end of FY17.

OIG Recommendation 18: Embassy Accra should complete and test an information technology contingency plan for the unclassified information system in accordance with Department standards. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. An updated IT Contingency Plan is in draft. Post will review the plan during an upcoming Regional Information Systems Security Officer (RISSO) audit. Estimated completion date is August 2017.

OIG Recommendation 19: Embassy Accra should document formal approval from the Counter Intelligence Working Group for the Embassy's wireless dedicated internet network in accordance with Department standards. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Completed. Post's Counter Intelligence Working Group approved on May 17, 2017. Post requests the recommendation be closed.

OIG Recommendation 20: Embassy Accra should implement procedures for regularly scanning for unauthorized wireless network activity on the mission compound. (Action: Embassy Accra)

Management Response: Embassy Accra accepts the recommendation. Post has implemented periodic scanning for Bluetooth and 802.11 wireless networks. Familiarization training is needed to expand the cadre of personnel completing these scans. Estimated completion is July 2017.

II. Suggested Changes to Draft Text:

Post suggests the following clarifications to the text on the Public Affairs Section's management of social media platforms strategic planning. The text can be found on page 9. Post's suggested edits are in blue as follows:

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“The proliferation of active platforms strained PAS’ capacity to maintain oversight and content supervision. For example, at the time of the inspection, one of the embassy’s social media sites had not received fresh content for 5 months, and another still-active but unmonitored site had been hacked with unauthorized content. Platform maintenance was challenged by the extended vacancy of the PAS Social Media Coordinator position, left vacant for nine months at the time of the OIG visit due to the Department’s on-going grading review and other recruitment processes. At OIG’s suggestion, PAS reduced its number of active social media platforms to better focus oversight, content generation, and engagement efforts on the highest-value platforms such as Facebook and Twitter, as well as ongoing management of the embassy website.”

“Clearer Strategic Direction Needed for Resource Allocation Decisions and Oversight

Due to a technical glitch, Post was among 17 AF bureau embassies that did not have access to the new mandatory online Public Diplomacy Implementation Plan (PDIP) software introduced for the FY 2016 programming year. As a result, PAS did not prepare an FY 2016 PDIP Public Diplomacy Implementation Plan, required by Department cable 2015 State 11563811 as a strategic planning tool to link public diplomacy audiences, programs, and activities with ICS goals and objectives. Without such a document, PAS lacked a clear framework for prioritizing resource allocation and for identifying appropriate public diplomacy programs and target audiences. OIG encouraged the Public Affairs Officer to use the preparation of the FY 2017 plan as an opportunity to lead the section through inclusive discussion and agreement on priority public diplomacy goals, clearly linking resources and activities with objectives. During the inspection, the Public Affairs Officer convened senior section staff for an off-site planning session and began drafting the 2017 implementation plan.”

The point of contact for this memorandum is DCM Melinda Tabler-Stone, tabler-stonemc@state.gov.

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United States Department of State

Washington, D.C. 20520

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MEMORANDUM

May 26, 2017

TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections

THROUGH: AF/FO – Peter Barlerin, Senior Africa Bureau Official

FROM: AF/EX – Eric Stromayer, Director

SUBJECT: Response to Draft Unclassified OIG Inspection of Embassy Accra

The AF Bureau reviewed the draft Unclassified OIG Inspection Report of Embassy Accra and provides the following response:

OIG Recommendation 1: The Bureau of African Affairs should implement a detailed program, budget, and monitoring and evaluation framework for the Security Governance Initiative program in Ghana. (Action: AF)

Management Response: AF concurs with the recommendation. SGI program management is decentralized and the process for managing programs and budgets is the responsibility of the operating unit. The Africa Bureau's SGI office works with each of the operating units throughout State and USAID to ensure that proposed programs meet SGI/JCAP objectives, and identifies resource requirements from a central source of funding set aside by F for SGI. Once the funds are received by requesting bureaus/agencies, the majority of the SGI budget is not controlled by the Africa Bureau. One way to improve the SGI Office's oversight would be the creation of a broader funding authority that allows the Africa Bureau's SGI office to manage foreign assistance to a wider range of partners, permitting a more centralized program management.

AF has no further comment on the report.

Approved: AF: Stephanie Sullivan

Drafted: AF/SA: MBittrick
AF/EX: IOnyeagbakoMofunanya

Cleared: AF/EX: EStromayer
AF/EX: JHinden
AF/FO: Amanda Jacobsen
AF/FO: Robert Scott

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 ^{a14}	Funding (\$)
Department of State					
Diplomatic and Consular Programs	27	0	16	43	2,955,600
International Cooperative Administrative Support Services	11	21	324	356	13,716,700
Public Diplomacy	4	0	17	21	1,158,383
Diplomatic Security	7	0	11	18	1,091,423
Consular Affairs	11	0	20	31	1,181,629
Marine Security	8	0	3	11	62,013
Representation	0	0	0	0	31,900
Overseas Buildings Operations	0	0	0	0	2,720,140
Subtotal	68	21	391	480	22,917,788
Broadcasting Board of Governors					
	1		2	3	1,068,155
Department of Agriculture					
Foreign Agriculture Service	2	0	3	5	412,234
Department of Commerce					
U.S. Commercial Service	1	0	4	5	290,629
Department of Defense					
Defense Attaché Office	11	0	1	12	593,670
Defense Security Cooperation Agency	2	0	2	4	*
Army–U.S. Africa Command	2	0	1	3	*
Naval Health Research Center- President's Emergency Plan for AIDS Relief	0	0	1	1	56,630
Medical Research Unit	2	0	5	7	*
Force Protection Detachment	2	0	1	3	128,500
Subtotal	19	0	11	30	778,880
Department of Justice					
Drug Enforcement Administration	5	0	1	6	422,767
Legal Attaché Office	2	0	0	2	*
Subtotal	7	0	1	8	422,767

¹⁴ Authorized positions.

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Agency	U.S. Direct-hire Staff	U.S. Locally Employed Staff	Foreign National Staff	Total Staff ^{a14}	Funding (\$)
Department of Homeland Security	2	0	3	5	297,982
Department of the Treasury					
Office of Technical Assistance	1	0	0	1	*
Other					
USAID (including regional programs)	40	0	172	212	155,000,000
President's Emergency Plan for AIDS Relief (PEPFAR)	1.5	0	4.5	6	220,000
Centers for Disease Control and Prevention	1.5	0	0.5	2	505,330
Peace Corps	4	0	47	51	*
Millennium Challenge Corporation	2	0	3	5	273,120
Total	150	21	642	813	182,186,805

* Agency not serviced by the Department of State

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

ABBREVIATIONS

DCM	Deputy Chief of Mission
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
LE	Locally Employed
PAS	Public Affairs Section
SIG	Security Governance Initiative
USAID	U.S. Agency for International Development

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