



OIG

Office of Inspector General

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

ISP-I-18-28

Office of Inspections

June 2018

Inspection of the Bureau of Consular Affairs' Office of Policy Coordination and Public Affairs

DOMESTIC OPERATIONS AND SPECIAL REPORTS



OIG HIGHLIGHTS

ISP-I-18-28

June 2018

OFFICE OF INSPECTIONS

Domestic Operations and Special Reports

Inspection of the Bureau of Consular Affairs' Office of Policy Coordination and Public Affairs

What OIG Found

- The structure of and reporting lines in the Office of Policy Coordination and Public Affairs were inconsistent with Department of State guidance on organizational control.
- Office leadership took steps to improve operations but did not have a strategic plan to implement internal reforms, including those recommended by an external auditor.
- The office led the implementation of an executive communication strategy for the Bureau of Consular Affairs' new Assistant Secretary and the creation of a public affairs strategic communication plan for the entire bureau.
- The dispersal of the office's congressional functions across three separate elements limited internal coordination.
- The Outreach Unit fulfilled its responsibilities and Department stakeholders praised the digital engagement team's crisis communications performance.
- The office did not document or formally monitor contract staff performance.

What OIG Inspected

OIG inspected the Bureau of Consular Affairs' Office of Policy Coordination and Public Affairs' strategic planning, organizational structure, congressional functions, outreach unit, and performance evaluation.

What OIG Recommended

OIG made 5 recommendations to improve strategic planning, organizational structure, congressional engagement, human resource management, and contractor oversight in the Office of Policy Coordination and Public Affairs.

In its comments on the draft report, the Bureau of Consular Affairs concurred with all 5 recommendations. OIG considers all recommendations resolved. The bureau's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The bureau's formal written response is reprinted in its entirety in Appendix B.

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CONTEXT

The Bureau of Consular Affairs (CA) is responsible for protecting U.S. citizens abroad; issuing passports, visas, and other documents to citizens and foreign nationals; and protecting U.S. borders while facilitating legitimate travel to the United States. As the overall coordinator of the bureau's public outreach, the Office of Policy Coordination and Public Affairs (CA/P) develops and implements programs for providing information to Congress, the media, and the public on consular issues. The office's work entails close collaboration with the bureau's directorates, other Department of State (Department) bureaus and offices, and interagency stakeholders. CA/P's main responsibilities, as outlined in 1 Foreign Affairs Manual (FAM) 252.1, include:

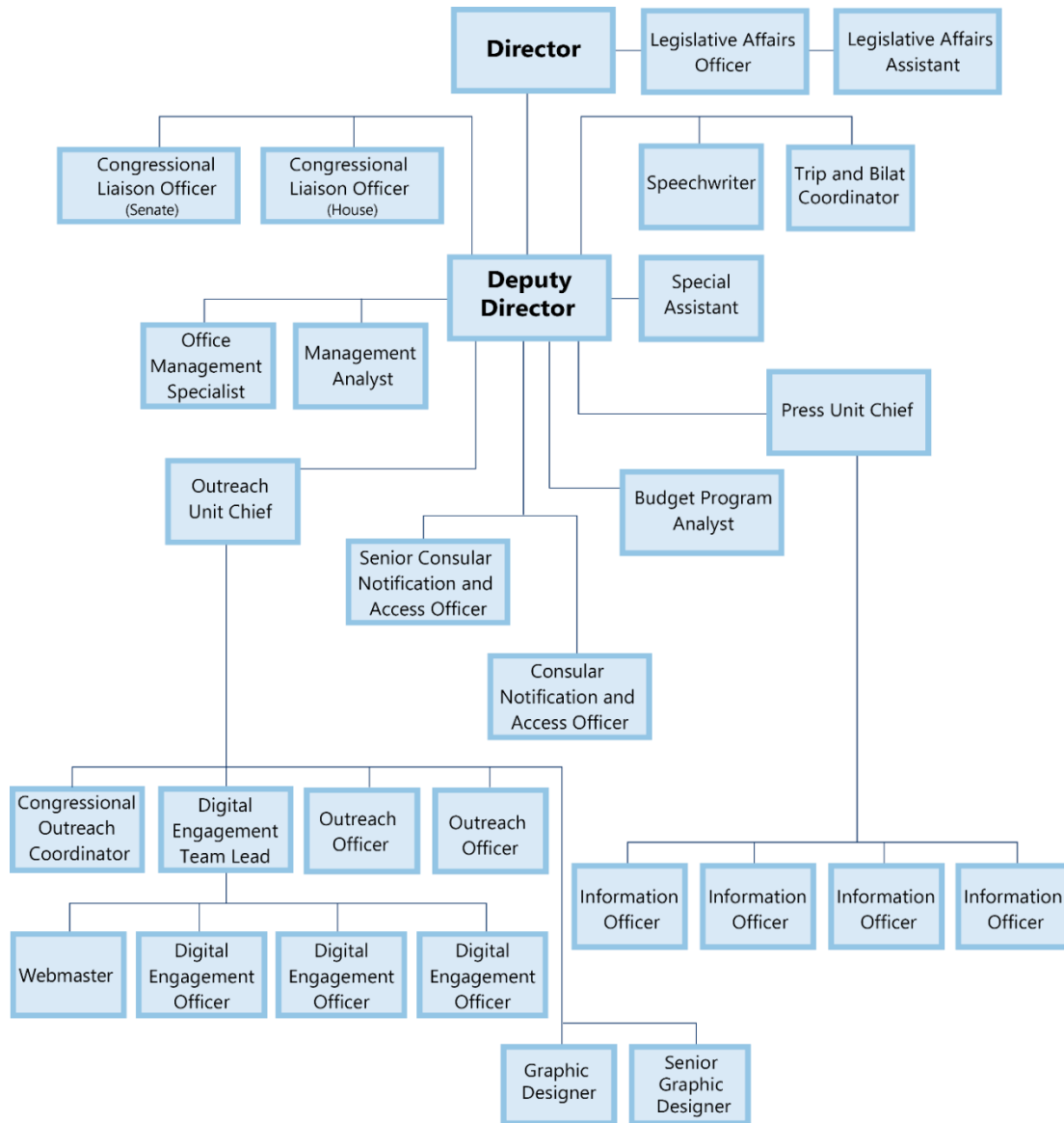
- **Congressional:** Responding to queries from Congress and engaging congressional members and staff, in coordination with the Department's Bureau of Legislative Affairs; coordinating the development of legislative strategies; monitoring the progress of proposed legislation on consular matters; heading the bureau's Legislative Affairs Working Group.
- **Consular Notification and Access:** Providing training and guidance to domestic law enforcement agencies on the consular notification and access obligations of the Vienna Convention on Consular Relations, as well as other bilateral treaties.
- **Executive Communication:** Preparing briefing and trip materials and speeches for the bureau Front Office; coordinating the Assistant Secretary's engagement with partner countries.
- **Outreach:** Organizing events, briefings, and public awareness campaigns directed toward the public, private sector, and Congress; heading the bureau's Public Affairs Working Group.
- **Press:** Providing public affairs guidance for the Department on consular cases and consular-related foreign policy issues and coordinating with the Bureau of Public Affairs.

CA/P's Director and Deputy Director assumed their positions in August 2017 and July 2017, respectively. With an FY 2017 budget of \$1.9 million, CA/P had 11 Civil Service, 13 Foreign Service, and 6 contractor positions at the time of inspection.

OIG's inspection focused on the office's strategic planning, organizational structure, congressional functions, outreach unit, and performance evaluation, consistent with Section 209 of the Foreign Service Act.¹

¹ See Appendix A.

Figure 1: CA/P Organization Chart



Source: Bureau of Consular Affairs

ORGANIZATIONAL STRUCTURE

Office Structure Was Inconsistent with Department Guidance

CA/P’s office structure, which consisted of 10 separate elements designated as teams, units, or functions, did not comply with FAM guidance on organizational control. According to 1 FAM 014.5(a), organizations should be structured so that managers have a span of control necessary to perform the mission. Moreover, 3 FAM 2614(d) requires Department organizations to delegate authority to the lowest appropriate working levels. However, as shown in Figure 1, 14 of the office’s 30 employees were directly supervised by the Director or Deputy Director. The

degree of direct supervisory responsibility borne by the Director and the Deputy Director resulted in several deficiencies, as described later in this report.

The Government Accountability Office's *Standards for Internal Control in the Federal Government* states that management should develop an organizational structure that assigns responsibilities in an efficient and effective manner that complies with applicable regulations.² In addition, management should establish reporting lines so organizational units can communicate quality information and fulfill their responsibilities, including maintaining relations with external stakeholders. Office staff consistently described to OIG how the office's structure complicated internal coordination and impeded CA/P's ability to effectively convey its mission and capabilities to the bureau's directorates and other Department stakeholders.

Recommendation 1: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should align the organizational structure of the Office of Policy Coordination and Public Affairs in a manner consistent with Department standards. (Action: CA, in coordination with DGHR)

STRATEGIC PLANNING

OIG found that CA/P played a lead role in shaping strategic plans for CA's engagement with Congress, the media, and the public, in accordance with 1 FAM 252.1. Office leadership participated in an October 2017 strategic planning offsite convened by the bureau's Assistant Secretary, who assumed his position in August 2017. CA/P staff subsequently served in lead or supporting roles on nine project teams to implement the Assistant Secretary's priority initiatives. In January 2018, the bureau's Public Affairs Working Group, led by CA/P, finalized CA's Public Affairs Strategic Communication Plan for FY 2018-2021. Through five strategic objectives,³ it seeks to incorporate outreach into a structure that supports CA's Functional Bureau Strategy as well as the Assistant Secretary's focus areas and priority initiatives.⁴ CA/P also authored an Executive Engagement Plan to establish bureau objectives and key messages for the Assistant Secretary's first year. However, OIG found that the office lacked its own strategic plan, as discussed in this report.

² Government Accountability Office, *Standards for Internal Control in the Federal Government* §§ 3.03-3.04 (GAO-14-704G, September 2014).

³ The plan's goals are to establish a unified voice for the bureau; design customer-centric strategies to connect with U.S. and foreign citizens; develop evaluation capability; adopt and deploy digital and innovative tools; and improve understanding of the role of consular work in national security.

⁴ In November 2017, the Assistant Secretary established three focus areas: break down barriers, make data-driven decisions, and raise the profile of consular work. He also established eight priority initiatives: improve coordination within CA; work with interagency partners to inform key issues and achieve more; engage Congress strategically; use data to inform and deliver on policy priorities; modernize IT systems to enhance data collection and use; purposefully collect qualitative and quantitative information to tell a compelling CA story; raise the CA profile by creating a branding and marketing strategy; and improve the executive readiness of consular professionals.

Office Lacked Strategic Plan for Internal Reforms

Although CA/P effectively contributed to CA's executive and bureau-wide strategic planning, the office lacked a strategic plan of its own for internal reforms. In June 2016, an independent auditor completed an evaluation of CA/P's operations that made 31 recommendations to improve its strategic planning, relationships, knowledge management, and data-driven decision making. The auditor facilitated the implementation of some recommendations through June 2017, but OIG interviews with CA/P staff consistently revealed uncertainty over the status of the auditor's recommendations. OIG determined that CA/P lacked a full accounting of its plans to implement these recommendations and the steps it already had taken. In addition, the Director and Deputy Director told OIG that they had been considering other reforms for the office. According to 1 FAM 014.2, managers should set implementation goals and ensure employee ownership and involvement when instituting organizational change. OIG determined that competing priorities as well as the recent change in CA/P's leadership contributed to the lack of a plan to implement internal reforms. As a result, the office had not fully benefitted from the bureau's \$132,000 investment in the auditor's evaluation.

Recommendation 2: The Bureau of Consular Affairs should implement a strategic plan for internal reforms in the Office of Policy Coordination and Public Affairs. (Action: CA)

CONGRESSIONAL FUNCTIONS

OIG reviewed CA/P's congressional functions and found the office generally fulfilled its responsibilities, as described in 1 FAM 252.1. Staff responded to congressional inquiries, provided training to House and Senate employees on consular-related matters, and published a monthly Legislative Digest that tabulated requests for information and tracked legislative issues of interest to the bureau. The staff also organized conferences throughout the United States with stakeholders such as the Department's passport agencies and the Department of Homeland Security's Citizenship and Immigration Service, Customs and Border Protection, and Immigration and Customs Enforcement. These conferences gave the bureau opportunities to explain consular functions to congressional staffers, university audiences, and non-governmental organizations. OIG found deficiencies, however, in internal coordination and human resource management, as described below.

Dispersed Congressional Functions Limited Internal Coordination

CA/P's congressional functions were dispersed across three separate elements. Two Congressional Liaison Officers, who reported to CA/P's Deputy Director, primarily responded to congressional inquiries but also conducted briefings and training for congressional staffers. Two part-time re-employed annuitants, who also reported to the Deputy Director, responded to phone and email constituent inquiries.⁵ A single Legislative Affairs Officer, reporting to CA/P's Director, monitored pending consular-related legislation, chaired the bureau's Legislative Affairs

⁵ At the time of inspection, CA/P had a third officer assigned as a Congressional Liaison on a temporary basis.

Working Group, contributed material to CA/P's Legislative Digest, and acted as liaison with the Department's Bureau of Legislative Affairs.⁶ Finally, a Congressional Outreach Coordinator, who reported to CA/P's Outreach Unit Chief, organized conferences and programs focused on congressional engagement. According to 1 FAM 014.7(e), like functions should be grouped together in an organization.

With their specialized portfolios and separate reporting lines, staff responsible for congressional functions had limited knowledge of the activities of colleagues with related duties. For example, the Legislative Affairs Officer rarely worked with the Congressional Liaison Officers. OIG concluded that CA/P did not consolidate its congressional functions due to competing office priorities and the amount of direct supervisory responsibility borne by CA/P's Director and Deputy Director. The segmentation of the congressional functions increased the risk of limited or missed opportunities for CA/P to effectively promote the bureau's legislative priorities.

Recommendation 3: The Bureau of Consular Affairs should consolidate the Office of Policy Coordination and Public Affairs congressional functions into a single organizational component. (Action: CA)

Congressional Liaison Position Grades Were Not Aligned with Actual Duties

CA/P's congressional liaison function consisted of two upper mid-level Foreign Service positions that had no supervisory responsibility. Typically, officers at this level, if serving in an overseas mission, would be managers in a consular section and supervising staff. However, in CA/P the majority of the incumbents' work related to responding to congressional inquiries. According to 3 FAM 2614(c), positions should be carefully planned and staffed to make the most effective use of human resources at the lowest practical expenditure. In addition, 3 FAM 2637.7(b) states that managers and supervisors should ensure that all position descriptions are commensurate with work actually being performed. Guidance in 3 FAM 2636(b) notes that employee morale and confidence are enhanced when positions are classified in a consistent manner. Assigning officers to positions whose duties are not commensurate with their rank in person is inconsistent with Department efforts to recruit, develop, and retain qualified personnel.

Recommendation 4: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should verify the proper classification of its Congressional Liaison Officer positions. (Action: CA, in coordination with DGHR)

OUTREACH UNIT

OIG reviewed the activities of CA/P's Outreach Unit and found it generally fulfilled its responsibilities as described in 1 FAM 252.1. The unit coordinated CA's public outreach, supported overseas consular outreach, and managed the bureau's digital media platforms.

⁶ In 2011, CA created a full-time position for a Legislative Affairs Assistant, reporting to CA/P's Legislative Affairs Officer. However, it had yet to be filled at the time of the inspection.

Three officers⁷ organized public speaking engagements, small group briefings, visits to consular facilities, and participation in travel shows.⁸ Bureau officials used these opportunities to explain consular services to the general public, private sector, local governments, and Congress. Two graphic designers supported these activities by creating digital and print materials that provided uniform branding for the bureau's communications.

OIG found the unit periodically experienced challenges in coordinating with other CA directorates, which have their own outreach staff and capabilities. CA/P's Director adopted several approaches to strengthen working relationships throughout the bureau, and staff reported recent improvements in the quality and frequency of communication between CA/P and other directorates.

Digital Team Led Bureau-Wide Online Engagement

The Digital Engagement Team fulfilled CA/P's responsibility in 1 FAM 252.1(p) and (q) to oversee the content and design of Travel.State.Gov and CA Web⁹ and to manage the bureau's social media platforms. CA/P staff, bureau personnel, and Department stakeholders praised the team's crisis communications performance and its contributions to CA's goal of protecting U.S. citizens overseas. The team's webmaster used a standard operating procedure that outlined the roles and responsibilities of bureau directorates in producing website content. To ensure uniformity in messaging, the team in April 2017 produced a social media style guide for domestic offices and overseas missions. The team also secured Hootsuite¹⁰ access for social media content contributors in other CA directorates. Moreover, the team enhanced the Department's social media engagement by serving on crisis response task forces.

PERFORMANCE EVALUATION

OIG reviewed the work commitments of 9 of CA/P's 11 Civil Service personnel and the work requirements of the office's 13 Foreign Service personnel and found them to be generally accurate and consistent with CA/P's functions as described in 1 FAM 252.1. OIG found, however, a deficiency in how the office monitors the performance of its contract staff.

Office Did Not Document or Formally Monitor Contractor Performance

CA/P did not formally monitor or document the performance of its six contract staff employed through labor-hour contracts. In accordance with 14 Foreign Affairs Handbook (FAH)-2 H-523(b), CA/P is responsible for developing specifications to measure the quality of labor-hour contracts in order to give reasonable assurance that contractors are conducting their duties

⁷ At the time of inspection, CA/P had a fourth officer assigned to the Outreach Unit on a temporary basis.

⁸ Travel shows are events that promote inbound/outbound travel by either U.S. citizens or foreign travelers of interest or value to CA.

⁹ Travel.State.gov is the Department's website for public information on consular services and international travel. CA Web, launched in 2017, is the bureau's internal information portal on the Department's intranet.

¹⁰ Hootsuite is a social media management platform that gives users the ability to create, release, and monitor social media content on multiple accounts, such as Facebook, Twitter, and YouTube.

efficiently and using effective cost controls. These contract staff worked alongside CA/P's Civil Service and Foreign Service employees and provided support for budget preparation, administrative assistance, graphic design, web content, and special projects. CA/P personnel oversaw the day-to-day activities of contract staff and reviewed and verified the contract invoices, which they then sent to the Contracting Officer's Representative in CA's Executive Office for approval. However, OIG did not find documentation of any monitoring and assessment by CA/P of contract staff performance, such as progress or status reports, contractor outputs, or customer feedback on performance, as outlined in 14 FAH-2 H-522. OIG determined that CA/P staff were unfamiliar with methods used to document contractor performance. A lack of documented monitoring of contractor performance increases the risk of fraud, abuse, or loss of Government resources.

Recommendation 5: The Bureau of Consular Affairs should require that the Office of Policy Coordination and Public Affairs monitor and document the performance of its labor-hour contractors and provide feedback to the Contracting Officer's Representative, in accordance with Department guidance. (Action: CA)

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 Consular Affairs. The bureau's complete response can be found in Appendix B.

Recommendation 1: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should align the organizational structure of the Office of Policy Coordination and Public Affairs in a manner consistent with Department standards. (Action: CA, in coordination with DGHR)

Management Response: In its June 4, 2018, response, the Bureau of Consular Affairs concurred with this recommendation. The bureau estimated a target compliance date of December 2018.

OIG's Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Policy Coordination and Public Affairs' organizational structure is aligned in a manner consistent with Department standards.

Recommendation 2: The Bureau of Consular Affairs should implement a strategic plan for internal reforms in the Office of Policy Coordination and Public Affairs. (Action: CA)

Management Response: In its June 4, 2018, response, the Bureau of Consular Affairs concurred with this recommendation. The bureau estimated a target compliance date of August 2018.

OIG's Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a strategic plan for internal reforms in the Office of Policy Coordination and Public Affairs.

Recommendation 3: The Bureau of Consular Affairs should consolidate the Office of Policy Coordination and Public Affairs congressional functions into a single organizational component. (Action: CA)

Management Response: In its June 4, 2018, response, the Bureau of Consular Affairs concurred with this recommendation. The bureau estimated a target compliance date of December 2018.

OIG's Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Policy Coordination and Public Affairs congressional functions were consolidated into a single organizational component.

Recommendation 4: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should verify the proper classification of its Congressional Liaison Officer positions. (Action: CA, in coordination with DGHR)

Management Response: In its June 4, 2018, response, the Bureau of Consular Affairs concurred with this recommendation. The bureau estimated a target compliance date of August 30, 2018.

OIG's Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation verifying that Congressional Liaison Officer positions are properly classified.

Recommendation 5: The Bureau of Consular Affairs should require that the Office of Policy Coordination and Public Affairs monitor and document the performance of its labor-hour contractors and provide feedback to the Contracting Officer's Representative, in accordance with Department guidance. (Action: CA)

Management Response: In its June 4, 2018, response, the Bureau of Consular Affairs concurred with this recommendation. The bureau noted a target compliance date of June 30, 2018.

OIG's Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Office of Policy Coordination and Public Affairs monitors and documents labor-hour contractors' performance and provides necessary feedback to the Contracting Officer's Representative.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted between January 3 and March 30, 2018, 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 in 2017 by OIG for the Department of State and the Broadcasting Board of Governors.

Objectives 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.

The specific objectives for this inspection were to determine whether:

- The Office of Policy Coordination and Public Affairs (CA/P) has clear and current strategies to carry out its mission and to implement planned organizational reform.
- CA/P is fulfilling its congressional functions and internal processes in this area of responsibility are defined and documented.
- CA/P's Outreach Unit is fulfilling its responsibilities and internal processes in this area of responsibility are defined and documented.
- Work commitments in employee performance plans are aligned with CA/P's mission and activities.

Methodology

OIG uses a risk-based approach to prepare for each inspection; reviews, circulates, and compiles the results of survey instruments, as appropriate; conducts interviews with Department and on-site personnel; observes daily operations; and reviews the substance of the report and its

findings and recommendations with offices, individuals, and organizations affected by the review. OIG uses 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 55 interviews and reviewed 29 questionnaires. OIG focused on the use of strategic planning to achieve organizational goals; the implementation of organizational reform; the alignment of employee responsibilities with organizational goals; and the activities of CA/P's congressional staff and Outreach Unit. OIG did not evaluate CA/P's Press Unit, Executive Communication Unit, or Consular Notification and Access function.

APPENDIX B: MANAGEMENT RESPONSE



United States Department of State

*Office of Policy Coordination and
Public Affairs for Consular Affairs*

Washington, D.C. 20520

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June 4, 2018

THROUGH: Bureau of Consular Affairs – Karen L. Christensen, Acting

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

FROM: CA/P – Karin M. Lang, Director

SUBJECT: Response to Draft OIG Report – Inspection of CA/P

Consular Affairs provides the following comments in response to the OIG's recommendations:

OIG Recommendation 1: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should align the organizational structure of the Office of Policy Coordination and Public Affairs in a manner consistent with Department standards. (Action: CA, in coordination with DGHR)

Management Response: CA agrees with the recommendation and is reviewing CA/P's organizational structure with CA/EX. Once CA has completed its initial review, it will consult with DGHR on the appropriate next steps. CA estimates the timeline for a full analysis and implementation of Recommendation 1 is six months.

OIG Recommendation 2: The Bureau of Consular Affairs should implement a strategic plan for internal reforms in the Office of Policy Coordination and Public Affairs. (Action: CA)

Management Response: CA agrees with the recommendation. CA/P is formulating a strategic plan and will implement it as the general reorganization project moves forward. The timeline for implementation is approximately two months.

OIG Recommendation 3: The Bureau of Consular Affairs should consolidate the Office of Policy Coordination and Public Affairs congressional functions into a single organizational component. (Action: CA)

Management Response: CA agrees with the recommendation. CA/P leadership is working with CA/EX on this action, which it views as a component of Recommendation 1. The new unit will consist of the four staff who currently engage in legislative affairs. The timeline for implementation is six months.

OIG Recommendation 4: The Bureau of Consular Affairs, in coordination with the Bureau of Human Resources, should verify the proper classification of its Congressional Liaison Officer positions. (Action: CA, in coordination with DGHR)

Management Response: CA agrees with the recommendation. CA/P leadership has begun consultations with CA/EX to review the position descriptions of the Congressional Liaison Officer positions. The timeline for completing the review of the classifications is approximately two months.

OIG Recommendation 5: The Bureau of Consular Affairs should require that the Office of Policy Coordination and Public Affairs monitor and document the performance of its labor-hour contractors and provide feedback to the Contracting Officer's Representative, in accordance with Department guidance. (Action: CA)

Management Response: CA agrees with the recommendation. CA/EX is currently drafting a Best Practices Guide for supervising contracts and contracted staff that will be distributed across the bureau and integrated into each office's management. After discussing this recommendation with the authors of the Best Practices Guide, CA/P leadership anticipates the office will be in full compliance by the end of June.

The point of contact for this memorandum is Michael Katula.

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CA Tracking Number: T1250-18

ABBREVIATIONS

CA	Bureau of Consular Affairs
CA/P	Office of Policy Coordination and Public Affairs
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual

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