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ISP-I-18-42 Office of Inspections August 2018

Inspection of the Bureau of Consular Affairs' Office of Fraud Prevention Programs

DOMESTIC OPERATIONS AND SPECIAL REPORTS

OIG HIGHLIGHTS

ISP-I-18-42

August 2018
OFFICE OF INSPECTIONS
Domestic Operations and Special Reports

Inspection of the Bureau of Consular Affairs' Office of Fraud Prevention Programs

What OIG Inspected
OIG inspected the Office of Fraud Prevention Programs in the Bureau of Consular Affairs.

What OIG Recommended
OIG made eight recommendations to improve operations in the Office of Fraud Prevention Programs. The report addressed seven recommendations to the Bureau of Consular Affairs, and one recommendation to the Bureau of Human Resources.

In its comments on the draft report, the Department concurred with all eight recommendations. OIG considers the recommendations resolved. The Department's responses can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

What OIG Found

- The Office of Fraud Prevention Programs' leadership and staff were committed to advancing an ambitious 5-year strategy to strengthen border security through data analytics.
- Employees supported leadership's priorities and contributed to the data analytics and training strategic goals.
- The Office of Fraud Prevention Programs evaluated many of its products and programs through an annual stakeholder survey but did not have a similar mechanism in place to assess the value and sustainability of several programs developed primarily for the office's internal use.
- Several divisions of the Office of Fraud Prevention Programs provided relevant and effective fraud prevention and detection training, but the office lacked a centralized system to record training activities, limiting its ability to track and evaluate its overall training efforts.
- The office's standalone data analytics test network and internal case management system lacked adequate security controls.
- The Office of Fraud Prevention Programs did not adequately oversee two labor-hour contracts with a total award value of $8.1 million.
- The Office of Fraud Prevention Programs created expanded training opportunities through innovative learning tools.

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CONTEXT

The Office of Fraud Prevention Programs (CA/FPP) is one of 10 directorates and offices in the Bureau of Consular Affairs (CA). CA's overall mission is to deliver consular services that efficiently and effectively protect U.S. citizens, ensure U.S. security, facilitate the flow of legitimate travelers, and foster economic growth. For its part, CA/FPP contributes to CA's security and protection goals by overseeing and coordinating the integrity of U.S. visa and citizenship processes.

The Department established CA/FPP in June 1986 "to centralize and integrate CA's efforts to combat fraud related to visas, passports, and federal benefits."[1] At its inception, the office's stated priorities included developing consular adjudicator and passport examiner antifraud skills, identifying fraud prevention technologies and best practices, assessing vulnerabilities to malfeasance, analyzing fraud trends and sharing information, and fostering relationships with other Government agencies. CA/FPP continues to play these roles more than 30 years later. The office began with two divisions, which divided responsibilities for overseas posts and the then-14 passport agencies.[2] In July 1996, CA and the Bureau of Diplomatic Security (DS) signed a memorandum of understanding that established a pilot program for Assistant Regional Security Officer for Investigations positions at select U.S. diplomatic posts with high levels of fraud. Despite this increased attention to combatting fraud, CA/FPP had a staff vacancy rate of more than 50 percent immediately prior to the September 11, 2001, terrorist attacks, and CA/FPP's future was unclear.

The events of September 11, 2001, reenergized CA/FPP's mission. Since then, CA/FPP consolidated and standardized fraud prevention operations, increased its role as an interagency and intradepartmental liaison, and applied new technologies to the analysis of visa and passport data available through consular systems. In November 2008, CA and DS partnered to use data analysis techniques to identify trends in a wide range of consular activities in the Consular Integrity Division (CID) in CA/FPP.[3] In January 2009, CA's Office of Passport Services' Passport Integrity Division transferred to CA/FPP, giving it primary responsibility for domestic passport fraud prevention programs. In 2010, CA/FPP reorganized its geographic and functional portfolios into three divisions: the International Division, the National Fraud Division (NFD), and the Analysis, Systems, and Training Division (ATD). In 2011, CA created a Counterfeit Deterrence Laboratory (CDL) under the oversight of the bureau's Principal Deputy Assistant Secretary. In 2016, CA moved the CDL into CA/FPP, resulting in the structure in place at the time of this inspection (see Figure 1).

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[1] Excerpt from Consular Update, "Bureau of Consular Affairs Notes for Professional Use from the Assistant Secretary," January 1987.

[2] As of April 2018, CA had 29 passport agencies and processing centers throughout the United States, not including passport acceptance facilities at post offices and other government offices.

[3] In 2004, CA and DS signed an updated memorandum of understanding that increased their partnership on fraud investigations in consular sections abroad and also created a Vulnerability Assessment Unit. Four years later, in November 2008, that unit was renamed the Consular Integrity Division.

The 9/11 Commission Report listed as one of its fundamental findings the failure of operational entities and intelligence agencies to coordinate their efforts and share information as part of a comprehensive assessment of national security threats.[4] As a result of improvements in information sharing stemming from those recommendations, consular personnel adjudicating entitlement to both visas and passports have access to increased background information before they reach a decision. In turn, CA/FPP's activities incorporated a broader border security focus, with more attention to pre-travel assessments using data analytics and countermeasures.

The bureau's FY 2018-2020 Functional Bureau Strategy includes two CA/FPP specific goals:

- Build the capacity to analyze the range of information available from consular systems and those of interagency partners to inform and equip adjudicators to prevent and deter fraud across the full range of consular services.
- Strengthen and support fraud prevention programs at all visa and passport facilities, providing adjudicators with training, guidance, and analysis to make sound and efficient decisions.

Data Analytics

CA collects and stores biographic, employment, travel, and relationship data from every visa application and biographic information from each passport application. In the past, CA had not maximized the accessibility and utility of this information to predict and mitigate vulnerabilities at the time of adjudication. However, CA/FPP in FY 2015 designed its office strategy, called FPP 2020, around a new focus on data analytics. The strategy, with support from both the Department and the White House, involved synthesizing and analyzing large sets of visa and passport data to develop a risk model to improve future adjudications and to inform policy formulation.

CA/FPP's most widely used data analytics product at the time of the inspection was the visa validation study, designed to identify worldwide traveler misuse of nonimmigrant visas. Recently, automated access to a Department of Homeland Security (DHS) computer system that tracks visa holders' arrival and departure information reduced the time needed to conduct validation studies from weeks or months to days. Follow-on analyses of validation study data enabled consular managers to identify risk factors and adjust adjudication standards accordingly. At the time of the inspection, CA/FPP also was engaged in a pilot study to analyze large data sets at consular posts worldwide to identify and predict risk—before consular officers adjudicate visa applications.

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[4] Government Accountability Office, Testimony Before the Committee on Government Reform, House of Representatives; Statement of the Honorable David M. Walker, Comptroller General of the United States, *9/11 COMMISSION REPORT Reorganization, Transformation, and Information Sharing* (GAO-04-1033T, August 2004).

Office Organization

At the time of the inspection, CA/FPP staff included authorized positions for 11 Foreign Service officers and 42 Civil Service employees. CA/FPP had four divisions, each led by a division chief, and one unit led by a supervisory physical scientist.

Figure 1 – Office of Fraud Prevention Programs Organization Chart
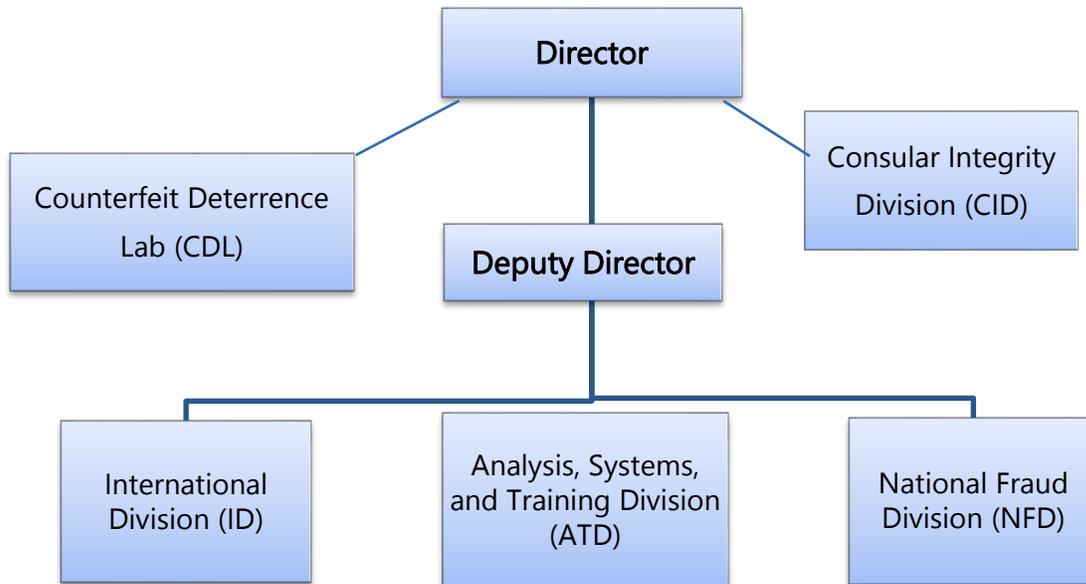
Source: CA/FPP

Analysis, Systems, and Training Division

ATD's staff of 12 analyzes global consular fraud trends, delivers business requirements for fraud prevention technology systems, leads CA/FPP's data analytics program, coordinates fraud prevention training, and prepares online instructional tools for international and domestic fraud managers and adjudicators. ATD also maintains a library of U.S. Government immigration and citizenship documents for use in training consular employees and foreign immigration and law enforcement officials. ATD publishes the *Fraud Digest*, a monthly newsletter on fraud trends and fraud prevention techniques. The publication has nearly 4,000 subscribers, both in the Department and in the interagency community.

Consular Integrity Division

CID, a joint initiative with DS, serves as CA's primary assessor of potential consular-related malfeasance and misfeasance by U.S. Government employees and contractors. CID's 15-person staff reviews and assesses every allegation of potential consular malfeasance received from all sources, including outside agencies, for possible referral to DS' Office of Criminal Fraud

Investigations. CID also inputs all malfeasance allegations into a searchable case management system for cross-referencing. CID provides training to consular professionals on the importance of management controls and ethical behavior and manages the day-to-day operation of the Passport Monitor Program.[5] CID's embedded DS team manages the Procedural Integrity Testing and Training (PITT) program.[6] CID analysts also review global consular information using data analytics software to identify vulnerabilities in consular processing.

Counterfeit Deterrence Laboratory

CDL focuses on research, training, and technical support in counterfeit-resistant document design and detection; it also prepares electronic learning courses on document fraud topics. Staffed with three forensic scientists, CDL trains consular and diplomatic security professionals annually through classroom and online training courses targeting counterfeit detection in security documents. CDL employees also present at conferences and workshops in the United States and internationally and publish research articles on improving document design technologies.

International Division

The International Division is CA/FPP's liaison to more than 200 fraud prevention units in embassies and consulates overseas. The division's 12 officers help fraud prevention staff with complex investigations, share information with interagency partners, perform evaluations of overseas fraud prevention programs, brief consular and DS officers going overseas, coordinate and oversee temporary worker and intracompany transfer visa program budgeting activities, and monitor and coordinate overseas fraud prevention reporting. They work with overseas consular sections to prepare for and analyze the results of validation studies. The International Division is also CA's primary point of contact for DS regarding the Assistant Regional Security Officer for Investigations program, which embeds DS officers in consular operations.

National Fraud Division

NFD's 10 program analysts are the primary points of contact for the prevention of passport fraud at the Department's 29 domestic passport agencies and centers. NFD employees respond to questions from domestic fraud prevention managers and provide training at domestic and international workshops and at the Foreign Service Institute (FSI). NFD also maintains a suspect birth attendants database.[7] It conducts fraud program reviews at domestic passport agencies

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[5] Launched in 2008, the Passport Monitor Program was developed in response to passport record breaches identified by OIG. The program, developed to protect against unauthorized or inappropriate access to personally identifiable information, covers abuse of any personally identifiable information of U.S. persons in consular systems.

[6] CA, in conjunction with DS, created the PITT program in 2009 to identify passport vulnerabilities in the field and improve the passport issuance process.

[7] This database lists the names of birth attendants (health care professionals who provide basic and emergency health care services to women and their newborns during pregnancy, childbirth, and the postpartum period) suspected of filing falsified U.S. birth registrations for births that occurred outside of the United States.

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and centers and, through those reviews, implements revised policies and procedures to strengthen domestic fraud programs. NFD also participates in working groups on new passport forms and data sharing projects and leads the Five Nations Anti-Fraud Working Group[8] that shares best practices with foreign partners.

EXECUTIVE DIRECTION

Office Leadership Advanced Border Security Goal

OIG found that both the Office Director and the Deputy Director were committed to advancing FPP 2020, the office's strategy built around two tools to strengthen border security: data analytics and training. As mentioned earlier, one of CA's FY 2018-2020 Functional Bureau Strategy goals—with CA/FPP as the lead implementer—is strengthening border security through analyzing a range of information available across several consular systems.[9] FPP 2020 focuses on building in-house analytical capacity, which will, in turn, give citizenship and visa adjudicators the information they need to prevent the issuance of travel documentation to unqualified or ill-intentioned applicants.

In FY 2015, the Deputy Director collaborated with the previous Director in the conception and execution of FPP 2020. He and the current Director involved the entire CA/FPP staff in the data analytics program and encouraged all employees to propose projects for consideration on an ad hoc basis. FPP 2020 also established a working group, called the "HIVE," to coordinate this effort. OIG identified shortcomings in HIVE operations, discussed in the Program Implementation section of this report.

CA/FPP's leadership proactively engaged the new Assistant Secretary for Consular Affairs in data analytics as early as spring 2017 as he was preparing for his position.[10] The Director and Deputy Director continued to update him in staff meetings and through memoranda and graphic presentations, and as a result, was invested in the value of data analytics as a border security tool. In January 2018, the Assistant Secretary and the then-Secretary of State briefed the President about the value of data analytics to predict and mitigate risk in visa adjudications. Following that White House briefing and in light of high-level interest in enhanced vetting for both nonimmigrant and immigrant visas, the Secretary approved CA's request to hire additional personnel to accelerate the development of predictive data analytics.[11]

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[8] The Five Nations Anti-Fraud Working Group includes representatives from Australia, Canada, New Zealand, the United Kingdom, and the United States, with Ireland invited as an observer. The working group shares best practices to mitigate risks, reviews analysis of global trends, and collaborates on issues and challenges related to program management.

[9] Those systems are used to adjudicate immigrant and nonimmigrant visas, including for refugees and adopted children, process U.S. passports and reports of U.S. citizen birth abroad, and assist U.S. citizens overseas.

[10] The Assistant Secretary for Consular Affairs was sworn in on August 11, 2017.

[11] CA requested authority to increase both direct hires and contractors in CA/FPP and in the Office of Consular Systems and Technology to support the data analytics initiative.

A second component of CA's border security goal is strengthening and supporting fraud prevention programs at overseas and domestic consular facilities by providing adjudicators with training, guidance, and analyses to enhance decision making. In FY 2017, CA/FPP conducted 152 training sessions for more than 4,000 participants in support of that goal; the Office Director and Deputy Director participated as presenters in approximately 15 of the sessions.

Communication With Bureau Partners Was Effective, but Internal Office Communication Was Not Consistently Clear

OIG interviews with representatives from DHS, DS, and CA's directorates for Visa Services and Passport Services indicated that they had positive and productive relationships with CA/FPP.

CA/FPP's leadership team included a Foreign Service Director and a Civil Service Deputy Director, which provided a useful mix of field experience with a continuity of operations perspective. Their division of labor at the time of the inspection generally was effective, with the Director focusing on the relationship with the CA Front Office and other agencies and the Deputy Director managing the paper flow process and overseeing most internal operations, including management of the office's two contracts. To encourage productive relationships at all levels, the Director often included both the Deputy Director and the division chiefs in high-level meetings, especially the regular exchanges with other CA directorates. Visa and Passport Services representatives told OIG that they appreciated CA/FPP leadership's commitment to communication and coordination. However, employees in both directorates cited instances where CA/FPP initiated analytical projects or sent guidance to the field without coordinating with the visa and passport offices that had primary responsibility for policy implementation. As a result, those offices lost the opportunity to shape a project or to ensure that guidance to the field was consistent. OIG advised the Director and the Deputy Director to emphasize coordination and communication to all CA/FPP employees so that the bureau maximizes its resources and speaks with one voice on policy issues.

Leadership's communication with its own staff was not always proactive and strategic, as required by 3 Foreign Affairs Manual (FAM) 1214b.(2) and (4). Twenty-eight CA/FPP employees participated in one of five FPP 2020 focus groups,[12] but representatives from all focus groups commented that office leadership never or rarely attended their meetings. As a result, some focus group members reported they were unclear about their group's direction, effectiveness, or sustainability.

CA/FPP employees reported confusion about internal management issues such as telework policy, temporary duty assignments, and training priorities. For example, employees told OIG

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[12] FPP 2020 identified five themes as essential elements of its strategy: policy; health check dashboards; analytics; training; and stakeholders. CA/FPP established formal focus groups to develop and implement agendas for the policy, analytics, and stakeholders groups. The health check dashboard was developed for use by CA's management analysts, while the two ADT training coordinators managed efforts for the training theme.

that CA/FPP had no written policy on temporary duty assignments despite requests to the Deputy Director to ensure consistency through formal guidance. In addition, in the absence of a clearly articulated office telework policy, some division chiefs hesitated to authorize telework in their divisions, even though one division had implemented it productively. In some cases, employees stated that they were frustrated by the decision-making process because they did not understand what appeared to be the inequitable application of internal policies.

OIG suggested that CA/FPP leadership attend division meetings periodically to monitor workload, take note of employee concerns, and transmit relevant information from their outreach efforts. OIG also suggested that the Director or Deputy Director participate regularly in focus groups and dedicate time at selected expanded staff meetings to seek input and convey guidance on telework, temporary duty assignments, training for career development, and other management issues. In response, CA/FPP leadership told OIG they were committed to communicating more effectively and directly with employees at all levels.

Despite the noted deficiencies in communication, OIG found leadership attuned to team building and providing positive feedback. For example, at the end of each week, leadership participated in an informal and often humorous "shout-out" email recognizing and thanking colleagues for their individual efforts. Office leadership also participated in regular Friday afternoon "briefings" with light refreshments that facilitated informal reviews of the week's accomplishments and camaraderie.

Adherence to Management Controls

CA/FPP generally complied with 2 FAM 022.12 and 2 FAM 024d., Bureau of the Comptroller and Global Financial Services,[13] and CA Office of the Comptroller guidance.[14] These guidelines require managers to assess risks and management controls within their purview, report deficiencies, and take corrective action on identified deficiencies. For example, CA/FPP representatives participated in a CA-wide risk assessment process, identified operational risks, and took action to mitigate those risks.[15] CA/FPP also reviewed the effectiveness of a number of its programs and products using stakeholder surveys and took corrective action based on the survey results (see the Program Implementation section). Finally, CA/FPP conducted one internal management control review in support of its 2017 Statement of Assurance of Management Controls input to CA's Assistant Secretary. As a result of the review, CA/FPP developed a standard operating procedure for accessing and securing personally identifiable information.

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[13] Bureau of the Comptroller and Global Financial Services June 2017 Memorandum, "Management Controls Checklist Fiscal Year 2017" and August 16, 2017, Memorandum for Assistant Secretaries and Bureau Directors, "Guidance for the Fiscal Year (FY) 2017 Reporting Requirements for the Federal Managers' Financial Integrity Act (FMFIA).

[14] CA Office of the Comptroller May 2017, "CA Management Controls Program and the Statement of Assurance Process."

[15] For example, CA/FPP identified its ability to obtain timely and accurate data from consular systems as an operational risk to its data analytics program and formally requested that the bureau's Office of Consular and Systems Technology take action to mitigate that risk.

Although CA/FPP generally complied with management control requirements, OIG identified procedural issues in contract oversight and position description accuracy, as discussed in the Support Functions section below. OIG also found that CA/FPP's managers and staff did not fully understand the Department's broader management control programs or how the bureau's Office of the Comptroller risk assessment process contributed to that program. OIG suggested that CA/FPP, in coordination with CA's Office of the Comptroller, communicate the Department's broader management control requirements to all CA/FPP staff and reiterate how the risk assessment process contributes to those requirements.

PROGRAM IMPLEMENTATION

OIG reviewed a range of CA/FPP's programs and processes, including validation studies, fraud program reviews, suspect birth attendants database, partnership with DS on malfeasance and integrity issues, publications such as the *Fraud Digest*, trade-based money laundering, and workload rationalization. OIG found that employees understood CA/FPP's priorities, provided appropriate guidance to fraud prevention managers and adjudicators in the field, and supported the office's focus on data analytics and training. OIG also found that CA/FPP had mechanisms in place to evaluate programs developed to reach external stakeholders. As a result, OIG made no recommendations to address most of CA/FPP's programs or processes. However, OIG determined that CA/FPP had initiated or supported a number of other programs developed primarily for internal use without establishing a clear mechanism to evaluate their scope and sustainability as required in 18 FAM 301.4-3 and 18 FAM 301.4-4(D). In addition, while CA/FPP delivered relevant and effective training, it had no centralized repository to document the range of training that its employees delivered. OIG's findings and recommendations are detailed below.

External Stakeholder Working Group Achieved Stated Goals

The stakeholder working group, established to gauge satisfaction with CA/FPP products and services, achieved the goals set for it in FPP 2020, the office's 5-year strategy. Stakeholders included overseas consular staff, domestic passport employees, and counterparts at DHS and other U.S. Government agencies. OIG found that the group's efforts aligned with the program design, monitoring, evaluation, and data analysis standards in 18 FAM 301.4-4. The working group included members from all CA/FPP divisions. It met bimonthly and intended to operate indefinitely.

In 2016, the working group sent its first survey to 1,027 stakeholders. The survey measured familiarity with services such as fraud alerts and the usefulness and effectiveness of products such as validation studies and the *Fraud Digest* forum. In late 2016, the working group analyzed the survey results and reported to stakeholders through a *Fraud Digest* article that detailed its plan to improve products and services in response to their feedback.

CA/FPP engaged stakeholders in a second survey in 2017 to measure progress made in the prior 12 months. The survey results confirmed improvements. For example, stakeholders noted

improvement in validation study response time and acknowledged a more integrated and transparent fraud program review process for passport agencies. The 2017 survey results also showed a 45 percent increase in domestic stakeholders who rated CA/FPP's post liaison officers' service as valuable.

OIG noted that the 2016 and 2017 surveys were a "one size fits all" exercise that polled all stakeholders about the entire range of CA/FPP products and services. OIG suggested to CA/FPP that in 2018 the working group create separate surveys focused on evaluating the products and services actually used by each stakeholder. This approach would be more in line with its 2018 priority for better and more targeted outreach to the office's diverse stakeholders.

Office Lacked Procedures to Evaluate Some Internal Programs and Products

Although the stakeholders working group evaluated those CA/FPP products and services that were designed to share information with external users, OIG found the office was less effective in assessing the value and sustainability of products and programs it developed for internal use, as required by 18 FAM 301.2 and 18 FAM 301.4-4. As a result, CA/FPP devoted significant time and personnel to several programs without systematically evaluating whether they met the intended goals or warranted the same level of the office's finite resources. In this respect, OIG reviewed three programs that were time and resource intensive: the PITT program,[16] Global Analysis Reports (GAR),[17] and the data analytics working group, known as the HIVE.[18]

Procedural Integrity Testing and Training Program

Created in 2009 in collaboration with DS, the PITT program's overall objective was to identify passport vulnerabilities in the field and improve the passport issuance process. In 2012, CA/FPP and CA/PPT conducted a joint, initial evaluation of the program's goals and methods, which resulted in a proposal to make the program's test case scenarios more realistic and consequently more useful in identifying passport processing vulnerabilities. Former passport adjudication managers and former passport fraud prevention managers were to produce 12 new scenarios annually in response to the initial evaluation's findings. However, CA/FPP never implemented the proposed changes to the test case scenarios, and it did not develop any new scenarios. In addition, CA/FPP did not perform any follow-on evaluation of the PITT program, which might have highlighted this fact.

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[16] DS personnel embedded in CID, in collaboration with the Passport Services' Office of Passport Integrity and Internal Controls, oversee this CA-funded program, which provides internal testing for vulnerabilities in the passport issuance process. Launched as a pilot in June 2009, the program became permanent in May 2010.

[17] GARs draw on global consular data to analyze consular processes and determine whether they create vulnerabilities that could lead to consular misfeasance and/or malfeasance.

[18] CA/FPP created the HIVE in 2016 to add full-time U.S. Government employees to its data analytics program instead of relying exclusively on contactors. HIVE members included a representative and back-up member from each of CA/FPP's divisions. They met monthly to discuss new and ongoing projects and were authorized to work up to 50 percent of their time on HIVE-related data analytics projects, pursuant to the HIVE's standard operating procedure.

Just before the inspection, Passport Services submitted the first new batch of test case scenarios to CA/FPP. However, the full-time DS position responsible for the PITT program had been vacant for 9 months, and DS told OIG it could not commit to a date when the position would be filled with a permanent PITT program manager. At the time of the inspection, other DS employees managed the program as a collateral duty. OIG confirmed during interviews that, even with the new scenarios, the program may not achieve its intended goals given the lack of prospective candidates to manage the program and an increased difficulty recruiting volunteers to run the scenarios.

Global Analysis Reports

OIG found that CID had not evaluated the GARs' effectiveness or their added value for CA or the Department. Each CID analyst's work plan included the completion of one GAR per year. The average GAR requires significant time and effort to complete, but OIG found they generally remained internal CID products with limited coordination with other parts of CA during development, clearance, or distribution. In addition, CID did not regularly seek input from other CA/FPP divisions or bureau directorates on proposed GAR topics to improve the final product and avoid duplication. During the inspection, CID developed two visa-related GAR proposals that it vetted with Visa Services before undertaking a more in-depth analysis. Nevertheless, failure to coordinate and vet GAR proposals routinely with the relevant CA offices limited the program's overall effectiveness.

The HIVE

CA/FPP did not evaluate the HIVE program after its first year of operation in July 2017, nor did it develop a stakeholders' survey, as called for in the HIVE's original standard operating procedure. In fact, CA/FPP omitted the evaluation requirement from the draft standard operating procedure. Moreover, the majority of HIVE members that OIG interviewed could not identify a common purpose for the HIVE working group independent of the individual projects HIVE members worked on within their respective CA/FPP divisions. Two months before the OIG inspection, CA/FPP assigned a permanent HIVE coordinator from ATD, instead of a rotational chairperson, which should improve operation oversight, including the development of new standard operating procedures.

In conclusion, OIG's review found that none of the three programs—PITT, GARs, and the HIVE—had mechanisms to ensure they were sustainable in the long term or to create value for the Department. As the inspection concluded, CA/FPP was organizing an office-wide review of its FPP 2020 strategy in preparation for its next 5-year plan. As part of that review, the office intended to evaluate the progress of its focus groups and adjust other priorities as needed. However, CA/FPP had no plan in place to systematically evaluate its programs, products, and processes. Without these periodic, systematic reviews, CA/FPP risks retaining programs that no longer meet their original objectives or draw on resources that could be put to better use elsewhere.

Recommendation 1: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement procedures to evaluate internal programs and products. (Action: CA)

Fraud Prevention and Detection Training Was Relevant and Effective

As stated earlier, CA/FPP identified adjudicator training as one of its two primary objectives in support of CA's overall border security goal. OIG found that CA/FPP generally fulfilled its core mission to provide relevant and effective fraud prevention and detection training, both in quantity and quality.

CA/FPP in FY 2017 trained more than 4,000 participants in 152 sessions. ATD's two training coordinators developed course content, identified and trained CA/FPP employees as presenters, and coordinated logistics as appropriate. FSI hosted the majority of ADT's classroom and on-line courses as well as its U.S.-based and regional workshops and conferences. FSI's Consular Training Division told OIG that students routinely rated CA/FPP training "high" for both content and presenter skills. The course managers specifically noted that CA/FPP presenters were not merely briefing but were rather training using adult learning methods.[19] CDL's presentation on recognizing fraudulent documents was among the highest-rated modules in the 6-week Basic Consular Course.[20] OIG questionnaires sent to fraud prevention personnel in the field confirmed FSI's appraisal of CA/FPP's fraud training. Seventy-nine percent of the 56 respondents who evaluated CA/FPP-coordinated FSI courses and 84 percent of 31 respondents who evaluated workshops rated them as "very useful"—the highest rating possible.

Office Lacked a Centralized Repository to Record Training Activities

Despite providing quality training, CA/FPP had no centralized repository to document the range of training its employees delivered. OIG found that FSI maintained records for ATD-organized training, but ATD did not keep any records itself. In addition, CID and CDL trained numerous adjudicators and other target groups and NFD held training as part of its outreach to passport agencies and centers, as did the International Division for diplomatic posts, but CA/FPP did not consolidate this information in an office-wide matrix. This lack of a centralized repository made it difficult for CA/FPP management to use their resources effectively; in particular, management was not consistently able to seek economies of scale, avoid duplication of effort, ensure that opportunities to present training were offered equitably throughout the office, rationalize the training budget, and determine if training objectives needed to be refocused over time. The creation of a centralized training repository would be a first step in facilitating evaluation of the overall training program.

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[19] Adult learning methods take advantage of the life experience and knowledge adults bring to the training environment. FSI incorporates the concepts developed in *The Adult Learner: A Neglected Species* by Malcom Knowles.

[20] The Basic Consular Course is required for employees assuming consular adjudication positions abroad. This course offers intensive training in immigration and nationality law and regulations and in consular policies, responsibilities, and procedures.

Recommendation 2: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement a centralized repository to record all training activities. (Action: CA)

Training Opportunities Expanded Through Innovative Learning Tools

Acknowledging that formal training was unavailable to everyone all the time, CA/FPP developed an array of learning tools for use in the field. The new products included webinars, voice over Power Point slide decks, and 5-minute videos called "video snacks." CA/FPP's most recent training tool was a Fraud Book Club, which bundled reading materials and study guides that fraud prevention managers can use to stimulate discussion in the workplace. CA/FPP included these learning tools in a Community at State webpage designed to consolidate all available online fraud learning resources. As a result, fraud prevention managers in the field had access to training materials whenever needed.

SUPPORT FUNCTIONS

Twenty-Two Percent of the Office's Position Descriptions Were Either Missing or Out of Date

OIG's review of 19 of CA/FPP's 45 filled position descriptions found that 10—representing 22 percent of the total number of filled positions—either were missing or out of date, contrary to 3 FAM 2633 requirements.[21] Position descriptions for three Foreign Service officer positions, including one branch chief position, were missing, while those for another five Foreign Service officer positions were last updated in 1987 and included duties that were neither performed nor authorized at the time of the inspection. Position descriptions for an additional two positions, including the Deputy Office Director position, were out of date. In fact, the Deputy Office Director's position description was last updated in 2006 and referred to the incumbent as the "division chief" of CA/FPP's "Inter-American and East Asia/Pacific Division."[22]

CA/FPP leadership told OIG they relied on the bureau's Office of the Executive Director to ensure the accuracy of position descriptions. However, 3 FAM 2637.7 states that managers and supervisors should initiate re-description of duties when warranted. Office of the Executive Director management responsible for overseeing CA's position classification activities under 3 FAM 2637.5 told OIG they did not know why the position descriptions were out of date.

According to 3 FAM 2638.2, each bureau's position descriptions shall undergo formal maintenance reviews periodically to ensure accuracy and proper position classification. The Bureau of Human Resources is responsible for classifying CA's position descriptions and

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[21] The reviewed position descriptions included those for CA/FPP's leadership, five last updated in 1987, and nine additional positions selected at random.

[22] The position description also credited the incumbent with supervising nine positions, although the incumbent supervised only four positions at the time of the inspection.

periodically reviewing their accuracy, as outlined in 3 FAM 2637.3d. and the October 2014 service level agreement between the Bureau of Human Resources' Shared Services and CA. Out-of-date position descriptions could affect the appropriateness of position classifications, which are used to determine employees' compensation levels.

> **Recommendation 3:** The Bureau of Human Resources, in coordination with the Bureau of Consular Affairs, should conduct a maintenance review of the Office of Fraud Prevention Programs' position descriptions. (Action: DGHR, in coordination with CA)

Contracts Were Not Administered Per Department Standards

CA/FPP did not administer its two labor-hour contracts, with a total award value of $8.1 million, in accordance with 14 Foreign Affairs Handbook (FAH)-2 H-142b. requirements. One contract provides administrative and advisory assistance, and the second supports CA/FPP's data analytics program. CA/FPP's Government Technical Monitor (GTM) was responsible for the data analytics contract and for three of the four contractors working in CA/FPP under the administrative and advisory assistance contract.[23] The fourth contractor is under the purview of the Analysis Branch Chief of CID, due to CID's compartmentalized location and mission.

According to the GTM designation letter and 14 FAH-2 H-142b.(8)-(10), a GTM is responsible for monitoring and inspecting the contractor's progress and performance. The CA/FPP GTM oversaw the contractor's day-to-day activities and received Task Order Performance Reports.[24] However, the GTM did not maintain records reflecting contract quality assurance actions and decisions as required by Federal Acquisition Regulation 46.104(c)(1) and (2). In addition, the GTM was responsible for reviewing, validating costs against supporting documentation, and approving the contractor's invoices. However, OIG did not find evidence that the GTM validated hours worked by contractors in accordance with 14 FAH-2 H-522.9b. Inadequate contract administration increases the risk of fraud, abuse, and misuse of Government funds and resources.

> **Recommendation 4:** The Bureau of Consular Affairs should require that the Office of Fraud Prevention Programs administer contracts in accordance with Department standards. (Action: CA)

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[23] The administrative and advisory contract did not require a GTM, per applicable FAM requirements.

[24] Task Order Performance Reports are a deliverable from the contractor outlining work performed during the reporting period of the invoice (accomplishments, problems/issues, and recommendations for corrections), work to be accomplished during the next reporting period, updates on the status of task order deliverables, actions required of the Government, ad hoc information on project status, and cost reporting, including monthly and cumulative costs and remaining task order balances.

Information Management

OIG reviewed more than 20 agreements between CA/FPP and other federal agencies[25] that outlined the parties' data sharing responsibilities. Although most were current, a few new agreements were still being drafted. OIG also reviewed the IT security access controls for systems and applications, including account access procedures and permissions, as well as audit and accountability protections for systems and applications. As described below, OIG identified deficiencies in access controls, as well as in information security oversight for the office's standalone data analytics test network and its case management system.

Data Analytics Test Network Lacked Access Controls and Security Oversight

CA/FPP's standalone data analytics test network lacked adequate access controls and proper information security oversight, as required by the FAM.[26] CA/FPP established the network in FY 2016 to analyze data extracted from the DHS Arrival and Departure Information System[27] and CA's Office of Consular Systems and Technology (CA/CST) SAP HANA database.[28] CA/FPP employees manually loaded data files from both systems onto portable media and then saved them on the standalone network, reconciled any discrepancies in data, and produced reports for CA and DHS end users.

OIG found that CA/FPP and CA/CST had not established policies and procedures regarding user access for the standalone data analytics test network. OIG found deficiencies that included shared passwords and lack of access control lists or visitor logs. In addition, CA/CST's information systems security officer did not perform regular patch management or anti-virus scanning on the network or regular audit and accountability reviews to identify data loss or potential intruder activities. Guidance in 12 FAM 623 and 12 FAM 643, however, requires management to provide access controls to secure any information system. Further, management must create, protect, and retain information system audit records to enable the monitoring and reporting of unlawful, unauthorized, or inappropriate information system. Without adequate access controls and information security oversight, data residing on the standalone network is at risk of compromise.

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[25] The agencies include the Departments of Homeland Security, Commerce, Defense, Energy, and Justice.

[26] 12 FAM 623 and 12 FAM 624.

[27] DHS' Arrival and Departure Information System is a system for the storage and use of biographic, biometric indicator, and encounter data on aliens who have applied for entry, entered, or departed the United States. It consolidates information from various systems to provide a repository of DHS-held data for pre-entry, entry, status management, and exit tracking of immigrants and nonimmigrants.

[28] SAP HANA is a database management system that performs advanced analytics such as predictive analytics, spatial data processing, text analytics, text search, streaming analytics, and graph data processing.

> **Recommendation 5:** The Bureau of Consular Affairs should implement access controls and information security oversight procedures for the Office of Fraud Prevention Programs' standalone data analytics test network as required by Department standards. (Action: CA)

Case Management System Lacked Adequate Security Controls

CA/FPP's case management system did not have adequate security controls to protect information residing on it, as required by the Federal Information Processing Standards Publication 199.[29] CA/FPP developed the case management system in 2008 as a SharePoint site to maintain records involving possible consular malfeasance. However, neither CA/FPP nor CA/CST assessed the system to determine the sensitivity of its information, the commensurate security controls required to protect that information, or the appropriate security categorization. Federal Information Processing Standards Publication 199 provides a standard for categorizing information and information systems according to an agency's level of concern for confidentiality, integrity, and availability and the potential impact on agency assets and operations should the information be compromised.

CA/FPP and CA/CST management were unaware that the system had never undergone an assessment to determine whether it contained information that exceeded SharePoint's security categorization. An evaluation of the case management system would enable CA/FPP and CA/CST to determine whether the current SharePoint platform or a different application would provide the most appropriate protection for the information. Without applying appropriate controls, the case management system and its information are vulnerable to unauthorized access or compromise.

> **Recommendation 6:** The Bureau of Consular Affairs should perform an assessment to determine the security categorization of the Office of Fraud Prevention Programs' case management system and implement required security controls in accordance with Federal standards. (Action: CA)

Records Management and Website Content Management

Office Had No Records Management Program

CA/FPP did not have a records management program to ensure the uniform creation, maintenance, and disposition of files and records in accordance with 5 FAM 413, 5 FAM 414.4, 5 FAH-4 H-212, and 5 FAH-4 H-215.1-1. Department policy requires offices to implement and administer record policies, standards, and procedures in a defined records management program that includes effective management controls. Further, Department offices are required to assign a trained, responsible employee to manage office files, ensure the integrity of records, and assist in filing and disposition.

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[29] National Institute of Standards and Technology, Federal Information Processing Standards Publication, *Standards for Security Categorization of Federal Information and Information Systems* (FIPS PUB 199, February 2004).

OIG, however, found no documented standard operating procedures or designated staff to manage CA/FPP's records. Instead, personnel maintained files and records inconsistently, with employees storing most documents on CA/FPP's network shared drive. OIG found the shared drive lacked organization and version control, and files had inconsistent naming conventions. OIG also found documents dating from 2008, and no evidence that CA/FPP had archived appropriate files. In addition, staff seldom used CA/FPP's SharePoint site except to track document drafts for clearance. Although one working group created a potentially useful SharePoint folder, most content pages were empty.

Moreover, CA did not have an assigned bureau records coordinator. As a result, CA/FPP will have to define its own internal records management process and consult the Bureau of Administration for any needed assistance. Without an established and enforced records management process, CA/FPP cannot provide a complete record of official actions or maintain and dispose of files and records in accordance with Department policy.

> **Recommendation 7:** The Bureau of Consular Affairs should implement a records management program for the Office of Fraud Prevention Programs that complies with Department standards. (Action: CA)

Office Lacked a Content Management Process for its Intranet Website

CA/FPP did not have a website content management process or dedicated staff to update content on its intranet website, in accordance with 5 FAM 776.2, 5 FAM 776.3a., and 5 FAH-8 H-115. Department policy requires offices to establish a process for identifying information to post to its websites and to designate staff focused on website content, graphic design, and technology. Content managers are responsible for ensuring that website content is current, relevant, and accurate.

OIG found that CA/FPP lacked a policy for reviewing, uploading, and clearing website content; OIG also found that each division used a different approach. Two divisions assigned employees to monitor and update content related to their respective portfolios, a third division told OIG it did not update any content, and the fourth division had content handled by the division chief as needed. CA/FPP leadership had not designated a team to maintain website content, although they assigned one individual to review website content as a collateral duty. In addition, division chiefs had not designated any individuals responsible for monitoring the accuracy of the division's content or requesting updated content from other division members.

According to 7 FAH-1 H-146, CA websites are a rich resource of information and tools and consular officers and staff should consult them regularly for new information. OIG found, however, that some CA/FPP content on its website was more than 3 years old, including checklists for fraud prevention coordinators, training materials, and validation study procedures. Without current, relevant, and accurate content, the CA/FPP section of CA's website is not a reliable resource for consular staff.

Recommendation 8: The Bureau of Consular Affairs should implement a website content management process for the Office of Fraud Prevention Programs that includes a dedicated team responsible for the regular updating of website content. (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 and to the Bureau of Human Resources. The Department's complete responses can be found in Appendix B. The Department also provided technical comments that were incorporated into the report as appropriate.

Recommendation 1: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement procedures to evaluate internal programs and products. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted an estimated compliance date of December 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the procedures used to evaluate internal programs and products.

Recommendation 2: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement a centralized repository to record all training activities. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted an estimated compliance date of October 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a centralized repository to record all training activities.

Recommendation 3: The Bureau of Human Resources, in coordination with the Bureau of Consular Affairs, should conduct a maintenance review of the Office of Fraud Prevention Programs' position descriptions. (Action: DGHR, in coordination with CA)

Management Response: In its August 13, 2018, response, the Bureau of Human Resources concurred with the recommendation. The bureau noted a target compliance date of March 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the maintenance review of the Office of Fraud Prevention Programs' position descriptions.

Recommendation 4: The Bureau of Consular Affairs should require that the Office of Fraud Prevention Programs administer contracts in accordance with Department standards. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted a target compliance date of October 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Office of Fraud Prevention Programs' administration of contracts in accordance with Department standards.

Recommendation 5: The Bureau of Consular Affairs should implement access controls and information security oversight procedures for the Office of Fraud Prevention Programs' standalone data analytics test network as required by Department standards. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted a target compliance date of November 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Office of Fraud Prevention Programs' access controls and information security oversight procedures.

Recommendation 6: The Bureau of Consular Affairs should perform an assessment to determine the security categorization of the Office of Fraud Prevention Programs' case management system and implement required security controls in accordance with Federal standards. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted an estimated compliance date of February 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the assessment of the security categorization of the Office of Fraud Prevention Programs' case management system and implementation of the required security controls.

Recommendation 7: The Bureau of Consular Affairs should implement a records management program for the Office of Fraud Prevention Programs that complies with Department standards. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted an estimated compliance date of December 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a records management program for the Office of Fraud Prevention Programs that complies with Department standards.

Recommendation 8: The Bureau of Consular Affairs should implement a website content management process for the Office of Fraud Prevention Programs that includes a dedicated team responsible for the regular updating of website content. (Action: CA)

Management Response: In its August 13, 2018, response, the Bureau of Consular Affairs concurred with the recommendation. The bureau noted an estimated compliance date of October 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a website content management process for the Office of Fraud Prevention Programs that includes a dedicated team responsible for the regular updating of website content.

PRINCIPAL OFFICIALS

Title	Name	Start Date
Director		
	Brett Pomainville	07/2016
Deputy Director		
	Stephen Ashby	12/2016
Division Chiefs		
Analysis, Systems, and Training Division	Matthew Horner	08/2016
Consular Integrity Division	Matt Cottrell	08/2016
Counterfeit Deterrence Laboratory	Joel Zlotnick	07/2014
International Division	Karen Hsiao	08/2016
National Fraud Division	Anthony Graves (Acting)	05/2017

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted between March 2 and June 12, 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 by OIG for the Department and the Broadcasting Board of Governors.

Objectives and Scope

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

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

The specific objectives for this inspection that led to findings were to determine whether:
- Performance of the Office of Fraud Prevention Program's (CA/FPP) Director and Deputy Director complied with applicable leadership standards articulated in 1 FAM 112, specifically in adjusting priorities, communicating effectively, and developing and implementing policy.
- Office leadership had effective processes in place to support the other Bureau of Consular Affairs (CA) divisions, to ensure effective and appropriate internal and external communication, and to mentor and develop employees in accordance with 3 FAM 1214.
- Leadership maintained up-to-date standard operating procedures for its relationships with the Bureau of Diplomatic Security (DS) and other law enforcement entities and fostered intra- and inter-agency cooperation on a range of border security issues in accordance with 1 FAM 252.2-1g.
- CA/FPP's leadership vetted and verified the input from its five units to the Management Controls Statement of Assurance process in accordance with 2 FAM 020.

- CA/FPP performed appropriate assessment and/or evaluation of its key programs and products to determine relevance and effectiveness for its stakeholders and end-users and adjusted its programs and products accordingly per 18 FAM 301.4.
- CA/FPP provided guidance to overseas consular offices and domestic passport agencies based on its evaluation of programs and products per 18 FAM 301.4.
- Training modules and courses for the range of visa and passport adjudicators and fraud prevention personnel were sufficient to meet goals as described in 7 FAH-1 H-932.
- CA/FPP had a training curriculum to ensure its own staff had appropriate skills, per 13 FAM 022.4 and 13 FAM 022.5.
- CA/FPP managed and adjusted CA/FPP 2020 to meet the strategy's stated goals and timelines while ensuring that it also focused on the office's priorities outlined in 1 FAM 252.2-5 and 7 FAH-1 H-932.4.
- CA/FPP coordinated data analytics requirements with other CA offices in accordance with 1 FAM 252.2 and Principle 15 in the Standards for Internal Control in the Federal Government.
- The support CA's executive office provided CA/FPP complied with 3 FAM 2360 and 3 FAM 4810 requirements.
- The scopes of work written in both contracts managed by CA/FPP articulated the work to be performed by the contractors in accordance with 14 FAH-2 H-522 and 14 FAH-2 H-523.
- CA/FPP monitored contractor performance and hours worked consistent with requirements in 14 FAH-2 H-522 and 14 FAH-2 H-523.
- CA/FPP, in coordination with CA's Executive and Comptroller's Offices, conducted quarterly reviews as previously reported to OIG.
- Adequate information security controls protected the data on the office's standalone server and a defined process was in place for routine oversight in accordance with 12 FAM 620.
- CA/FPP completed the required assessment and authorization process for the case management system in accordance with 5 FAM 1060.
- Memoranda of understanding were in place between CA/FPP and other Federal agencies and, if so, that they included the required security controls for data sharing in accordance with 12 FAM 623 and 12 FAH-10 H-312.2.
- CA/FPP managed records and documentation in accordance with 5 FAM 410 and 5 FAH-4.

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 178 documented interviews and reviewed responses to personal questionnaires from 54 employees and contractors. OIG also reviewed responses to questionnaires received from 224 consular officer personnel in the field. OIG did not review CA's Executive Office as part of the inspection.

APPENDIX B: MANAGEMENT RESPONSES

United States Department of State

Bureau of Consular Affairs

Washington, D.C. 20520

August 13, 2018

THROUGH: Bureau of Consular Affairs – Carl C. Risch, Assistant Secretary

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

FROM: CA/FPP – Brett Pomainville, Director

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

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

OIG Recommendation 1: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement procedures to evaluate internal programs and products. (Action: CA)

Management Response: CA agrees with the recommendation. CA/FPP will expand its monitoring and evaluation program to include additional internal FPP programs [Procedural Integrity Testing and Training (PITT), Global Analysis Report (GAR), and HIVE (CA/FPP's analytic group)]. CA/FPP is examining the Bureau of Consular Affair's Management Controls Toolkit (http://snip.state.gov/ghm) and the Department's Program Design and Performance Management Toolkit (http://cas.state.gov/managingforresults/pdpmresources/) to establish monitoring and evaluation activities. The timeline for implementation is approximately four months.

OIG Recommendation 2: The Bureau of Consular Affairs should require the Office of Fraud Prevention Programs to implement a centralized repository to record all training activities. (Action: CA)

Management Response: CA agrees with the recommendation. CA/FPP created an internal database to record training activities of all FPP divisions and is developing a policy to maintain this database. The timeline for implementation is approximately two months.

OIG Recommendation 3: The Bureau of Human Resources, in coordination with the Bureau of Consular Affairs, should conduct a maintenance review of the Office of Fraud Prevention Programs' position descriptions. (Action: DGHR, in coordination with CA)

Management Response: CA agrees with the recommendation. CA is working with DGHR to review and update all relevant position descriptions for CA/FPP as required by the OIG.

OIG Recommendation 4: The Bureau of Consular Affairs should require that the Office of Fraud Prevention Programs administer contracts in accordance with Department standards. (Action: CA)

Management Response: CA concurs with the recommendation. CA will issue updated guidance to the bureau to address the identified deficiencies. CA estimates the timeline for full compliance with the recommendation is the end of October 2018.

OIG Recommendation 5: The Bureau of Consular Affairs should implement access controls and information security oversight procedures for the Office of Fraud Prevention Programs' standalone data analytics test network as required by Department standards. (Action: CA)

Management Response: CA agrees with the recommendation. CA/FPP will work with CA/CST to ensure proper access controls and security oversight procedures are established and maintained. CA/CST estimates it will be able to complete the assessment by November 2018.

OIG Recommendation 6: The Bureau of Consular Affairs should perform an assessment to determine the security categorization of the Office of Fraud Prevention Programs' case management system and implement required security controls in accordance with Federal standards. (Action: CA)

Management Response: CA agrees with the recommendation. CA/FPP will work with CA/CST to perform this assessment. CA/CST estimates six months for the assessment.

OIG Recommendation 7: The Bureau of Consular Affairs should implement a records management program for the Office of Fraud Prevention Programs that complies with Department standards. (Action: CA)

Management Response: CA agrees with the recommendation. In consultation with the Bureau of Administration, CA/FPP is formulating a plan for internal records management that complies with Department policy. Timeline for implementation is four months.

OIG Recommendation 8: The Bureau of Consular Affairs should implement a website content management process for the Office of Fraud Prevention Programs that includes a dedicated team responsible for the regular updating of website content. (Action: CA)

Management Response: CA agrees with the recommendation. CA/FPP is developing an office-wide website content management process that clearly identifies team members' responsibilities for regular updating of website content. Timeline for implementation is two months.

The point of contact for this memorandum is Stephen Ashby.

United States Department of State

Washington, D.C. 20520

AUG 1 3 2018

UNCLASSIFIED

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

FROM: DGHR – William E. Todd, Acting

SUBJECT: Response to Draft OIG Report – Inspection of the Bureau of Consular Affairs' Office of Fraud Prevention Programs (CA/FPP)

The Bureau of Human Resources has reviewed the draft OIG Inspection report. We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 3: The Bureau of Human Resources, in coordination with the Bureau of Consular Affairs, should conduct a maintenance review of the Office of Fraud Prevention Programs' position descriptions. (Action: DGHR, in coordination with CA)

Management Response: HR agrees with the recommendation. In coordination with CA, HR will obtain, review, and update as necessary all relevant position descriptions for CA/FPP as required by the OIG. HR estimates the timeline for the completion of this task will be March 2019.

ABBREVIATIONS

ATD	Analysis, Systems, and Training Division
CA	Bureau of Consular Affairs
CA/CST	Office of Consular Systems and Technology
CA/FPP	Office of Fraud Prevention Programs
CDL	Counterfeit Deterrence Laboratory
CID	Consular Integrity Division
DHS	Department of Homeland Security
DS	Bureau of Diplomatic Security
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FSI	Foreign Service Institute
GAR	Global Analysis Reports
GTM	Government Technical Monitor
NFD	National Fraud Division
PITT	Procedural Integrity Testing and Training

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