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Office of Inspections

April 2021

Inspection of the Bureau of Overseas Buildings Operations' Office of Safety, Health, and Environmental Management

DOMESTIC OPERATIONS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-21-21

What OIG Inspected

OIG inspected the Office of Safety, Health, and Environmental Management, which is located under the Directorate of Operations, in the Bureau of Overseas Buildings Operations.

What OIG Recommends

OIG made 11 recommendations to the Bureau of Overseas Buildings Operations.

In its comments on the draft report, the Bureau of Overseas Buildings Operations concurred with 10 recommendations and neither agreed nor disagreed with 1 recommendation. OIG considers all 11 recommendations resolved. The Bureau of Overseas Buildings Operations' 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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OFFICE OF INSPECTIONS
DOMESTIC OPERATIONS

Inspection of the Bureau of Overseas Buildings Operations' Office of Safety, Health, and Environmental Management

What OIG Found

- The Office of Safety, Health, and Environmental Management made progress in reducing safety risks to Department of State (Department) employees and family members. Fatalities and injuries associated with motor vehicle operations, carbon monoxide, pesticides, and swimming pools have declined since the introduction of special safety programs in these areas.
- Nonetheless, from 2014 to 2020, the Department reported 6,214 mishaps that resulted in 65 fatalities, 442 hospitalizations, 27,983 lost workdays, and \$26.1 million in property damage.
- Ninety-three percent of overseas posts did not fully complete or enter a safety certification for all residences in the Post Occupational Safety and Health Officer Certification Application Database, as required.
- The office improved its database tracking residential safety certifications, but additional corrective actions were needed to resolve other database limitations.
- Database limitations prevented tracking of overseas posts' noncompliance with nonresidential safety standards.
- The office had outdated, inaccurate, and incomplete guidance governing its programs.

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CONTEXT

The Department of State (Department) must establish and maintain an effective and comprehensive occupational safety and health program for its overseas operations in accordance with 29 Code of Federal Regulations § 1960.¹ The Bureau of Overseas Buildings Operations (OBO), Directorate of Operations, Office of Safety, Health, and Environmental Management (SHEM) oversees and directs the Department's safety, health, and environmental program abroad as outlined in 15 Foreign Affairs Manual (FAM) 900. The program aims to promote safe and healthy living and working conditions for Department employees located at overseas posts and residences.² The program also protects all U.S. Government employees, contractors, and visitors under chief of mission authority at overseas posts.

SHEM officials reported that over the last two decades, the office had made progress in reducing safety risks to Department employees and family members. Fatalities and injuries associated with motor vehicle operations, carbon monoxide, pesticides, and swimming pools have declined since the introduction of special safety programs in these areas. However, despite Department safety requirements, SHEM continues to discover hazardous working and living conditions that could lead to mishaps.³ From 2014 to 2020, SHEM reported 6,214 mishaps that resulted in 65 fatalities, 442 hospitalizations, and 27,983 lost workdays. Of this total, motor vehicle mishaps resulted in 31 fatalities, 119 hospitalizations, and \$26.1 million in property damage. Residential mishaps included 7 fatalities, 70 hospitalizations, 255 injuries requiring medical treatment, and 300 injuries requiring first aid.⁴ SHEM noted that overseas posts could have prevented some of these mishaps if they had identified and corrected hazardous behaviors and conditions.

SHEM consists of 24 Civil Service employees,⁵ 6 personal services contractors, and 12 third-party contractors.⁶ The office has three divisions responsible for implementing its safety program: Policies and Special Studies, Technical Operations Support, and Risk Analysis and Management. The Policies and Special Studies Division directs the environmental management program that focuses on clean drinking water and air, ergonomics, and hazardous waste and oversees special emphasis programs, including swimming pools, carbon monoxide, and pest

¹ 29 C.F.R. § 1960.1(a).

² As of FY 2020, the Department had 24,265 Foreign Service and Civil Service employees and 50,424 locally employed staff located at 284 overseas posts.

³ A mishap is any unplanned, unexpected, or undesirable event causing injury, disease or illness, death, material loss of property, or incident causing environmental contamination, including improper pesticide application, and leaking underground or above-ground storage tanks. The term mishap is used instead of accident or occupational illness and includes motor vehicle collisions. 15 FAM 964.1a, "General."

⁴ Information derived from SHEM's Mishap Reporting System.

⁵ At the time of the inspection, SHEM had five vacant Civil Service positions.

⁶ Personal services contractors are individuals who enter into a contract that generally establishes an employer-employee relationship with the Department. Third-party contractors are individuals hired and employed by an independent company that has a contract with the U.S. Government; the relationship is with the independent company and not the employee or employees performing the services.

management. The Technical Operations Support Division conducts workplace and residential site assessments. The Risk Analysis and Management Division manages the motor vehicle safety, mishap investigation, and reporting programs.

OBO's functional bureau strategy for FY 2018 to FY 2022 included three goals:⁷

- Enhance the security, safety, and functionality of facilities and residences for overseas personnel.
- Provide industry leading resilient facilities that represent the nation and support personnel in achieving U.S. foreign policy objectives.
- Promote continuous improvement facilitated by a culture of optimizing people, processes, and supporting technology resources.

EXECUTIVE DIRECTION

The SHEM Office Director has served in his position since 2003. He served as the Division Director of SHEM's Technical Operations Support Division from 1999 to 2003 and as a staff member in the Policies and Special Studies Division from 1992 to 1999. SHEM's Division Directors of Technical Operations Support and Risk Analysis and Management have served in their positions for less than 6 months. The Division Director for Policies and Special Studies has served in her position since 2004.

Overall, the Office Director received positive responses in OIG's survey and staff interviews. Staff complimented the Office Director for his open-door policy, accessibility, and willingness to receive feedback and new ideas. For example, when a small number of SHEM staff reported communication and collaboration among the three divisions could be improved, the Office Director agreed to schedule regular office-wide meetings to improve synergy and the flow of information among the divisions.

OPERATIONAL EFFECTIVENESS AND PROGRAM IMPLEMENTATION

OIG assessed SHEM's operational effectiveness and program implementation by reviewing its policies, programs, and performance. OIG found SHEM generally met Department requirements for operational effectiveness and program implementation, with the exceptions noted below.

Program Overview

Overall, OIG found that SHEM carried out its mission to assist overseas posts in preventing fatalities and injuries. Specifically, over the past two decades, SHEM has implemented special safety programs and other initiatives to reduce fatalities and serious injuries. From 1998 to 2000, SHEM launched special programs emphasizing safety related to swimming pools, pest

⁷ OBO, *Functional Bureau Strategy FY 2018-2022*, 11 (March 28, 2019).

management, and carbon monoxide that reduced or prevented fatalities in these areas. For example, SHEM reported one or two fatalities involving toddler pool drownings annually from 1989 to 1998 (12 total), two fatalities from pesticides from 1988 to 1993, and three fatalities involving carbon monoxide poisoning from 1982 to 1995. However, after the introduction of these special safety programs, SHEM reported no fatalities due to toddler swimming pool drownings, pesticides, or carbon monoxide poisoning. Other initiatives, including the Post Occupational Safety and Health Officer (POSHO) residential certification program, which was launched in 2001, and the DriveCam⁸ motor vehicle program, which was implemented in 2009, also reduced the number of fatalities and serious injuries. DriveCam, at the 25 overseas posts where it was implemented, reduced motor vehicles fatalities by 77 percent, from an average of 6 fatalities to less than 2 annually, from 2000 to 2020. SHEM also introduced database systems that allowed it to conduct risk assessments and track overseas posts' compliance with safety standards. The SHEM Risk Management System, SHEM Management Assessment Results Tracking System (SMARTS), Mishap Reporting System, Project Assessment Tracking System, and the POSHO Certification Application database increased the office's management oversight capabilities.⁹

Office Partially Addressed Staffing Deficiencies

Despite SHEM's success in some areas, insufficient staffing hindered full implementation of its safety programs. SHEM officials told OIG that the office was unable to meet its office performance objective of conducting a site assessment of each overseas post once every 2 to 2½ years because of staffing constraints. Instead, SHEM conducted site assessments once every 4 to 6 years, which resulted in a backlog of more than 134 assessments at the time of OIG's inspection. In addition, because of insufficient staffing, SHEM was unable to meet several other performance objectives: to expand the DriveCam program from 25 to 45 overseas posts, to increase the number of design reviews from 30 to 60 percent of new construction projects, and to perform safety inspections of all major construction projects instead of only new embassy compounds and new consulate compounds.

To partially address the staff shortages, OBO authorized SHEM to hire 10 third-party contractors in August 2019. For FY 2020, SHEM focused on filling 5 vacant U.S. direct-hire positions and onboarding contractor staff to fill the 10 contractor positions. At the time of OIG's inspection most of the new employees and contractors had been with SHEM for less than 6 months. Therefore, SHEM had not yet determined the full impact of the staffing increase on its programs. However, SHEM officials estimated that the additional contractor staffing would

⁸ DriveCam uses a recording device with a microphone, a forward and backward facing camera, and an accelerometer to record events triggered by abrupt movements, such as hard breaking, rapid acceleration, swerving, impact, or poor road conditions. The intent is to capture risky driving behaviors by embassy drivers of Government-owned vehicles that, if left unchecked, could lead to collisions.

⁹ SHEM uses SMARTS to track compliance with recent assessment visits and the Mishap Reporting System to document and analyze mishap data to identify trends and preventative measures. Additionally, SHEM uses the Project Assessment Tracking System to track inspection findings for all new embassy compounds and new consulate compounds, and the POSHO Certification Application database to track and certify all new or existing residences and nonresidential buildings as safe prior to occupancy.

allow the office to meet more of its performance objectives, including conducting site assessments of each overseas post, expanding its DriveCam program, and increasing the number of design reviews.

Office Engaged in Department COVID-19 Working Group and Response Efforts

In response to the COVID-19 pandemic, SHEM served as a member of OBO's COVID-19 working group and was the Department's principal advisor on the disinfection of overseas facilities. SHEM developed disinfection guidelines for overseas posts in coordination with the Department of Health and Human Services' Centers for Disease Control and Prevention (CDC). Additionally, SHEM developed the OBO mitigation toolkit, which provided overseas posts with the most up-to-date COVID-19 information, in accordance with CDC guidelines. The information included disinfection procedures, best practices for managing the work environment, procedures for responding to a suspected or confirmed case, and safety training.

In addition to developing disinfection guidelines and a mitigation toolkit for overseas posts, SHEM, as part of the construction safety working group, supported OBO's Office of Construction Management's efforts to ensure that construction projects were ready to restart safely after the contractor implemented necessary safety measures. Specifically, SHEM designated a working group that spent 80 percent of its time reviewing contractor COVID-19 pandemic plans. Within the Department, SHEM also coordinated with the Bureau of Administration's Domestic Environmental and Safety Division on the disinfection guidelines and OBO's Office of Facility Management on developing building ventilation guidance.

Residential and Nonresidential Safety Certification Program

SHEM created the POSHO residential certification program in 2001 to reduce injuries and fatalities occurring in embassy residences. OIG found that SHEM achieved some success by adding residential safety standards in the FAM,¹⁰ hiring safety and health professionals, and conducting additional site assessments. From 1987 to 1999, 16 fatalities occurred in residences, with 13 involving children, but only 1 fatality was reported from 2000 to 2013 after SHEM started requiring safety inspections of residences before occupancy. However, according to SHEM officials, four fatalities occurred from 2014 to 2018 because of a lack of overseas posts' adherence to residential safety standards, reduced program oversight, and insufficient SHEM staffing.

In 2014, SHEM created the POSHO Certification Application database¹¹ to improve program oversight and overseas posts' compliance with residential safety standards. In 2017, SHEM began requiring POSHOs to also conduct safety inspections of nonresidential properties and, as

¹⁰ See 15 FAM 971.1, "Residential Property POSHO Certification Requirements."

¹¹ The POSHO Certification Application generates and documents the form used by POSHOs to certify that a residence meets the requirements of 15 FAM 252.5 and 15 FAM 971.1. The form lists the safety requirements that must be certified prior to occupancy, and the application allows relevant documentation to be electronically attached to the form.

with residences, certify that the properties meet Department safety standards.¹² SHEM upgraded its database to its current version in 2020, which improved tracking of overseas posts' compliance with requirements to conduct safety inspections of residential and nonresidential properties and document the certifications in the database. However, as described below, database limitations continue to hinder SHEM's ability to fully monitor overseas posts' compliance with Department safety standards.

Office Made Progress Increasing Overseas Posts' Compliance With Department Residential Safety Certification Standards

The office made progress increasing overseas posts' compliance with Department residential safety certification standards. However, SHEM reported that POSHOs had not conducted residential safety inspections or entered the inspection results into the application for 70 percent of residences worldwide in FY 2019. OIG found that from January 2014 to June 2020, SHEM reported 632 residential mishaps, including 7 fatalities, 70 hospitalizations for serious injuries, 255 requiring medical treatment, and 300 requiring first aid. The conduct of the residential inspections at overseas posts, as required by 15 FAM 971, could have identified the safety hazards that contributed to these mishaps before occupancy of the residences.

Given the consequences of overseas posts not adhering to residential safety standards, SHEM reported the lack of accurate and timely residential safety certifications as a significant deficiency in the annual OBO Functional Bureau Statement of Assurance for FY 2019 and FY 2020. As a result, in FY 2019, SHEM initiated a corrective action plan that included six actions:

- (1) Make POSHO certifications a priority for overseas posts.
- (2) Conduct and document POSHO certifications of residences.
- (3) Increase overseas posts' site support and compliance with POSHO certifications.
- (4) Withhold lease funding for deficient overseas posts.
- (5) Re-educate and remind overseas posts about certification requirements.
- (6) Identify and assess problematic overseas posts.

SHEM reported that, following implementation of its corrective action plan, the percentage of residences lacking certification¹³ had decreased to 61.8 percent (down from 70 percent) as of October 2020.

Additionally, in FY 2020, in a significant step toward improving overseas posts' compliance with residential safety certification standards, SHEM petitioned the Department's Management Control Steering Committee to include the lack of residential safety certifications as a significant

¹² See 15 FAM 971.2, "Nonresidential Property POSHO Certification requirements."

¹³ As of FY 2020, SHEM reported that the Department and other agency U.S. direct-hire employees and their families under Chief of Mission authority occupied 27,758 residences globally that fall under 15 FAM 252.5, 15 FAM 312.6, and 15 FAM 971. These standards stipulate that real property, whether leased or owned, must meet Department safety, health, and environmental management requirements.

deficiency¹⁴ in the Chief of Mission Statement of Assurance process. As a result, chiefs of mission are required to attest that residential safety certifications are electronically documented in the POSHO Certification Application database.¹⁵ Posts that cannot do so are required to (1) report the lack of residential safety certifications as a significant deficiency to their regional bureau in the annual Chief of Mission Statement of Assurance and (2) develop a corrective action plan to address the issue. In addition, SHEM increased its focus on the enforcement of POSHO residential safety certifications by designating it as a priority 1 recommendation in its post site assessments. To reduce risk, a priority 1 recommendation requires overseas posts to immediately resolve or mitigate the condition or hazard. Furthermore, during consultations and in safety training, SHEM reinforced to facility managers the importance of completing and entering residential certifications into the database.

Although SHEM had taken steps to improve overseas posts' compliance with Department residential and nonresidential safety standards, OIG identified three deficiencies that require corrective action as discussed below.

Ninety-Three Percent of Overseas Posts Did Not Fully Complete or Enter Required Safety Certifications for All Residences

OIG reviewed SHEM's POSHO Certification Application database and found 264 of 284 overseas posts (93 percent) had not fully completed or entered safety certifications for all residences into the database, as required. (See Appendix C, Tables 2-7.) Standards in 15 FAM 252.5, 15 FAM 312.6, and 15 FAM 971 require the POSHO to complete and enter a safety certification in the POSHO Certification Application database for all residences before occupancy. Globally, for all overseas posts, as of October 2020, 17,163 of 27,758 residences (61.8 percent) had either an incomplete entry or no entry in the database. The percentage of noncompliance ranged from 45.8 percent to 86.4 percent for the Department's six regional bureaus.¹⁶ As described above, the Department required overseas posts to report the lack of residential safety certifications as a significant deficiency in the annual Chief of Mission Statement of Assurance to their regional bureau. (See Table 1 below.) The database showed that only six overseas posts fully met residential safety standards and 14 posts had no residential properties to certify.

¹⁴ A significant deficiency is a "deficiency, or combination of deficiencies, that in management's judgment should be communicated because they represent significant weaknesses in the design . . . of internal control that could adversely affect the organization's ability to meet its internal control objectives." 2 FAM 021.3, "Definitions."

¹⁵ The Bureau of Comptroller and Global Financial Services required chiefs of mission to attest that routine safety and health assessments are conducted, identified hazards abated, and certifications are documented electronically in the POSHO Certification Application system. These requirements are included in the instructions in the "Template for Written Assurance to an Assistant Secretary from a Chief of Mission."

¹⁶ The Department's six regional bureaus are charged with advising the Secretary of State and Under Secretary for Political Affairs on matters of the region, as well as dealing with U.S. foreign policy and U.S. relations with countries in that area. The offices of the geographic bureaus direct, coordinate, and supervise U.S. Government activities within the region, including political, economic, consular, public diplomacy, and administrative management issues.

Table 1: Residential Certification and Noncompliance by Regional Bureau

Regional Bureau	Posts	Active Residential Properties	Active Residential Certificates	Inactive Residential Certificates	Percentage of Noncompliance
African Affairs	51	4,135	1,603	2,532	61.2%
East Asian and Pacific Affairs	50	3,774	1,796	1,978	52.4%
European and Eurasian Affairs	83	5,530	2,998	2,532	45.8%
Near Eastern Affairs	26	5,857	1,330	4,527	77.3%
South and Central Asian Affairs	19	4,008	544	3,464	86.4%
Western Hemisphere Affairs	55	4,454	2,324	2,130	47.8%
Total	284	27,758	10,595	17,163	61.8%

Source: Generated by OIG from information provided by SHEM.

SHEM officials told OIG that the reasons for this deficiency included the following:

- Overseas post staffing shortages.
- Lack of management oversight.
- Poor coordination and communication among general services officers and POSHOs.¹⁷
- The time required to correct residential hazards.
- Pressure to place new employees and their families in residences immediately upon arrival.
- Failure to enter hardcopy certifications in the database.
- POSHO Certification Application database limitations.

As noted above, in FY 2019 and FY 2020, SHEM included a corrective action plan as part of the annual OBO Statement of Assurance to address this issue. In addition, in FY 2020, the Department required missions to report lack of residential safety certifications as a significant deficiency in their annual Chief of Mission Statement of Assurance. OIG determined that SHEM, the regional bureaus, and chiefs of missions will need to monitor overseas posts to ensure they comply with the new requirement for missions to report lack of residential safety certifications and to eliminate the backlog of outstanding certifications found during this inspection. The failure to fully complete residential safety inspections exposes U.S. direct-hire employees and their families to unsafe residences and hazards that could lead to injuries and fatalities.

¹⁷ According to 15 FAM 225a, each post must establish a safe and secure housing pool. This requires close coordination between the general services officer who identifies new residences and executes leases, and the POSHO who inspects residences for safety, health, and environmental hazards and ensures the hazards have been effectively controlled or eliminated prior to occupancy.

Recommendation 1: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of African Affairs, East Asian and Pacific Affairs, European and Eurasian Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should require post occupational safety and health officers to complete all outstanding residential safety certifications in the Post Occupational Safety and Health Certification Application database in accordance with Department standards. (Action: OBO, in coordination with AF, EAP, EUR, NEA, SCA, WHA)

Office Made Improvements to Database Tracking Residential Safety Certifications but Additional Corrective Action Needed

Although SHEM made progress in enhancing the POSHO Certification Application database, OIG found that other database limitations hindered SHEM's ability to fully monitor overseas posts' compliance with standards in 15 FAM 971. With the release of the updated POSHO Certification Application in October 2020, SHEM corrected five of nine database limitations, leaving four that still required correction. The five corrected deficiencies were as follows:

- SHEM linked its database with OBO's Real Property Application,¹⁸ which will allow SHEM to validate the accuracy of its database electronically rather than manually.
- The database can archive expired certifications, allowing the office to clear its database of out-of-date records. This will improve record keeping, reporting, and analysis.
- POSHOs can create multiple certifications for residences located in housing complexes that are rented through a single lease, such as apartments. Previously, POSHOs could electronically certify only one residence within the housing complex; others had to be certified manually and maintained in a separate paper file.
- POSHOs must enter a property identification number¹⁹ for residences, which will make it easier to match real property records and determine whether the POSHO certified the residence.
- SHEM and POSHOs can run limited standard compliance reports.

Four limitations with the database continued to hinder SHEM's ability to fully monitor overseas posts' compliance with Department standards. According to 1 FAM 287.6(5), SHEM is responsible for developing and issuing safety, health, and environmental requirements, criteria, standards, and policies for posts, and for ensuring technical and program management support to meet those requirements. Specifically, SHEM staff told OIG that the database:

- Did not have an alert or progressive warning system to notify POSHOs, management officers, deputy chiefs of mission, and regional bureau officials of delinquent safety certifications for residential and nonresidential properties.

¹⁸ The Real Property Application is the Department's single comprehensive database for all Government-leased and -owned real property overseas. It is designed to support local planning, operation, management, and control of U.S. Government-held property abroad and OBO's management and reporting requirements.

¹⁹ The property identification number is the five-digit number assigned by the post to each real property unit or structure.

- Did not automatically alert SHEM and POSHOs about residential units requiring safety recertification.²⁰ Instead, POSHOs manually reviewed and tracked residences to determine when recertifications were due.
- Did not have a dashboard that visually communicated metrics, including the rate of noncompliance, to users to facilitate reviews and conclusions of data.
- Did not have a reporting function to allow SHEM and POSHOs to run custom compliance reports.

As noted previously, SHEM developed the POSHO Certification Application database in 2014 to help overseas posts meet the requirement to submit residential safety certifications to OBO. SHEM officials told OIG they were redeveloping the current database in stages to provide OBO and Department bureaus with reporting that would provide easier monitoring of overseas posts. However, at the time of the inspection, SHEM did not have a timeline for further database enhancements. Failure to address these database limitations could lead to posts placing U.S. direct-hire employees and their families in unsafe residences, leading to potential injuries or fatalities.

Recommendation 2: The Bureau of Overseas Buildings Operations should correct all limitations in the Post Occupational Safety and Health Officer Certification Application database to fully monitor overseas posts' compliance with Department residential safety standards. (Action: OBO)

Database Limitations Prevented Tracking of Overseas Posts' Compliance With Nonresidential Safety Standards

OIG determined that database limitations created inaccurate data, which prevented SHEM from fully monitoring overseas posts' compliance with nonresidential safety standards in 15 FAM 971. OIG found the POSHO Certification Application database incorrectly listed 23,356 nonresidential property units and showed 282 of 284 overseas posts, or 98.2 percent, were noncompliant with Department nonresidential safety standards. SHEM officials confirmed that the total number of nonresidential property units was incorrect. For example, the database listed 6,607 property units requiring certification for 112 chancery buildings worldwide rather than one certification for each chancery. SHEM officials stated that the following limitations caused the inaccuracies in the database for safety certifications of nonresidential properties:

- OBO's Real Property Application, which is used to validate the accuracy of property data in the POSHO Certification Application database, contained multiple nonresidential property units for a single property identification number. For example, in the database, Embassy Santiago showed 390 property units for the chancery building because the database included a property unit for each office located in the chancery building. Therefore, the database incorrectly indicated that the POSHO needed to complete a

²⁰ Department standards in 15 FAM 252.5c require the POSHO to certify lease properties at lease inception, and recertify at each lease renewal, or every 5 years. The standards also require the POSHO to certify Government-owned properties when initially purchased or leased and again every 5 years.

safety certification for 390 offices rather than one certification for the entire chancery building as required in 15 FAM 971.

- OBO's Real Property Application contained categories of nonresidential properties that do not require a safety certification, such as vacant lots and unoccupied nonresidential properties.

According to 1 FAM 287.6(5), SHEM is responsible for developing and issuing safety, health, and environmental requirements, criteria, standards, and policies for posts, and for ensuring technical and program management support to meet those requirements. As discussed above, POSHO database limitations hindered SHEM's ability to fully monitor posts' compliance with nonresidential safety standards, which could expose U.S. direct-hire employees, contractors, other staff, and visitors to potential injuries or fatalities.

Recommendation 3: The Bureau of Overseas Buildings Operations should correct all database limitations in its Real Property Application and Post Occupational Safety and Health Officer Certification Application databases to fully monitor overseas posts' compliance with Department nonresidential safety standards. (Action: OBO)

Swimming Pool Safety Program

Four Overseas Posts Did Not Comply With Swimming Pool Safety Standards

According to SHEM officials, swimming pools at the chief of mission residences in Embassies Cairo, Quito, and Madrid and at the consul general residence in Consulate General Hamilton had not complied with Department swimming pool safety standards for several years.²¹ At each residence, the swimming pools did not have self-closing and self-latching hardware for gates or the required height for barriers surrounding the pool. Department standards in 15 FAM 971.2(11) requires swimming pools to be isolated by a permanent barrier that is at least 4 feet high, surrounding the entire pool. Additionally, the gate must open away from the pool, be self-latching, self-closing, and lockable, and the latch must be located at least 4½ feet above the ground. SHEM officials noted these swimming pool deficiencies occurred because of construction project delays, contractor performance issues, and lack of management oversight. Nevertheless, overseas posts' noncompliance with swimming pool safety standards increases the risk of injury or fatality for residents, staff, and guests.

Recommendation 4: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of European and Eurasian Affairs, Near Eastern Affairs, and Western Hemisphere Affairs, should bring principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton into compliance with Department swimming pool safety standards. (Action: OBO, in coordination with EUR, NEA, and WHA)

²¹ SHEM first found the swimming pool in Embassy Cairo to be noncompliant in 2016; Embassy Quito in 2018; Embassy Madrid in 2016; and Consulate General Hamilton in 2018.

Motor Vehicle Safety Program

Office Did Not Mandate Use of the Department's Fleet Management Information System to Track Overseas Posts' Compliance With Motor Vehicle Safety Standards

SHEM did not mandate use of the Department's Fleet Management Information System (FMIS)²² to track overseas posts' compliance with motor vehicle safety standards. In 2020, to increase management oversight, the Bureau of Administration introduced enhancements to FMIS to track chauffeurs and incidental drivers' compliance with requirements to maintain valid driver's licenses, medical examinations, Smith System training,²³ and armored vehicle training. The system compiles the number of expired driver's licenses, medical examinations, and driver training, by region and by overseas post, and summarizes the data in a dashboard. Despite the advantages of FMIS, SHEM officials told OIG they did not plan to mandate use of the system until the Bureau of Administration implemented Phase 2 enhancements, which included programming the system to produce reports and emails to notify employees of due dates for retraining and recertification. However, at the time of the inspection, SHEM did not know of a completion date for the additional enhancements. In the interim, SHEM permitted overseas posts to use FMIS or a manual tracking system such as an Excel spreadsheet. Although OIG found that more than 200 overseas posts were already using FMIS to track compliance with motor vehicle safety standards, it was not clear if those overseas posts were using FMIS to track all the drivers at post. According to 1 FAM 287.6(1), SHEM plans, oversees, directs, and controls the Department's safety, health, and environmental programs to assist posts abroad with meeting Department requirements. Without a mandate for overseas posts to track motor vehicle safety requirement in FMIS, SHEM cannot effectively carry out its oversight duty to monitor overseas posts' compliance with motor vehicle safety standards.

Recommendation 5: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration, should mandate the use of the Fleet Management Information System to track overseas posts' compliance with Department motor vehicle safety standards. (Action: OBO, in coordination with A)

Safety, Health, and Environmental Management Policies and Guidance

Office Had Outdated, Inaccurate, and Incomplete Standards Governing Safety, Health, and Environmental Management Program

OIG determined that SHEM had outdated, incomplete, and, in some cases, conflicting standards governing its safety, health, and environmental management program. Specifically, OIG identified the following discrepancies in 15 FAM 900:

²² Fleet Management Information System is the Department's enterprise system for the management of all fleet operations, a module within the Integrated Logistics Management System, which captures key operational data on vehicle dispatch, maintenance, and fuel. The Bureau of Administration administers the FMIS system.

²³ Smith System training is designed to reduce collision potential by providing drivers with practical methods to maintain adequate space for the vehicle, maintain visibility, and allow sufficient time to make decisions.

- According to 15 FAM 962a-b, one or more qualified safety and occupational health professional(s) must inspect all increased-risk²⁴ work operations at least once a year, and a safety professional assigned to SHEM must conduct or supervise safety assessments. However, SHEM officials reported to OIG that the office had never been able to conduct safety assessments of each overseas post's increased-risk work areas annually because of insufficient U.S. direct-hire staffing. Officials reported that the office was able to conduct safety assessments of each overseas post once every 4 to 6 years. In addition, SHEM did not include in the guidance that overseas posts could hire contractor personnel to complete the semiannual safety assessments.
- Although SHEM established a requirement in 15 FAM 962c for the POSHO to inspect all office work areas annually and increased-risk work areas (i.e., auto and maintenance workshops) and operations twice a year, the office did not require POSHOs to record and document these annual and semiannual inspections in overseas posts' safety records and files.
- Although 15 FAM 962c requires semiannual inspections of increased-risk work areas and operations, safety checklists found on SHEM's SharePoint site gave conflicting guidance by requiring monthly inspections of increased-risk areas.
- In July 2019, SHEM introduced a requirement in 15 FAM 968c for the POSHO to submit a written assessment of post's safety, health, and environmental management program by December 31 each year using SMARTS. The system contained the program evaluation criteria. However, the standards did not identify which program criteria to use to complete the assessment.
- SHEM did not incorporate into 15 FAM 900 its requirement for overseas posts to perform an annual safety self-assessment of operations. According to SHEM officials, the requirement for overseas posts to complete a safety program self-assessment is incorporated into SMARTS. Specifically, overseas posts are required to complete a 300-question safety program self-assessment, 18 months after SHEM conducts a site assessment visit, and annually thereafter, until the next SHEM site assessment.
- SHEM did not incorporate into 15 FAM 900 the Department's requirement for chiefs of mission to attest the following in the annual Statement of Assurance: that the mission had an effective safety, health, and environmental management program; that the post conducted routine safety and health assessments, abated identified hazards, and documented certifications electronically in the POSHO Certification Application database; that the motor vehicle safety management program met Department requirements; and that post reported and investigated all reportable mishaps and took corrective actions.
- OIG observed that the requirements found in 15 FAM 968c could potentially require overseas posts to conduct three safety program evaluations each year: an annual safety assessment, an annual safety inspection 18 months after each SHEM site assessment,

²⁴ According to 15 FAM 962e, an "increased-risk" work area is a workplace or environment with a high potential for mishaps or occupational illnesses, including activities involving machines, electrical or electronic functions, construction, maintenance, and repair.

and a program evaluation and attestation of the overseas post's safety program as part of the annual Chief of Mission Statement of Assurance process.

SHEM officials acknowledged that 15 FAM 900 needs to be reviewed and updated. Officials noted that the office implemented new programs and procedures and that several FAM sections had not been updated since 2016. Officials also agreed that safety assessments linked to requirements set up in SMARTS need to be incorporated into the FAM. Furthermore, officials told OIG that the FAM had not been updated because of competing priorities and insufficient staffing. Nevertheless, SHEM is responsible for developing and issuing safety, health, and environmental requirements, criteria, standards, and policies for posts abroad, and ensuring technical and program management support to meet those requirements, as detailed in 1 FAM 287.6(5). Outdated, inaccurate, and conflicting SHEM standards could increase the risk of overseas posts not adhering to standards designed to prevent injuries and fatalities.

Recommendation 6: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration, should review and update Foreign Affairs Manual standards governing the Department's Safety, Health, and Environmental Management program abroad. (Action: OBO, in coordination with A)

Department Review on a Policy Governing Mishaps Involving Personally Owned Vehicles for Personal Use Was Needed

The Department's policy²⁵ on reporting vehicle mishaps is limited to mishaps involving the use of U.S. Government-owned vehicles (GOVs) and personally owned vehicles (POVs) when used for business purposes. According to SHEM documents, from 2013 to 2020, the number of fatalities involving GOVs was 27. During this same period, however, 21 fatalities involving U.S. direct-hire employees' personal use of POVs were reported, either voluntarily or upon request by SHEM. SHEM officials stated that POV fatalities could eventually exceed GOV fatalities and noted these fatal POV mishaps were often caused by reckless behavior, including drunk driving.

According to 1 FAM 287.6(9), SHEM oversees and directs special studies to investigate, evaluate, and resolve safety issues affecting Department activities at overseas posts or to establish information for developing and issuing policies and procedures. Additionally, 1 FAM 287.6(5) states SHEM develops and issues safety, health, and environmental requirements, criteria, standards, and policies for posts abroad, and ensures technical and program management support to meet those requirements. SHEM officials told OIG that they were unclear whether U.S. direct-hire staff could be required to report mishaps involving the personal use of their POVs. Accordingly, OIG determined that a review was needed on this issue to determine the obligation for overseas posts to report such mishaps.

Recommendation 7: The Bureau of Overseas Buildings Operations, in coordination with the Office of the Legal Adviser, should evaluate whether reporting mishaps involving personal

²⁵ Standards in 15 FAM 964 detail the Department's requirements for reporting mishaps, including motor vehicle mishaps.

use of personally owned vehicles of U.S. direct-hire staff should be required. (Action: OBO, in coordination with L)

Office Did Not Establish a Standardized Training Program for Overseas Employees

Although SHEM provided training programs for POSHOs and for employees working in high-risk areas such as operating motor vehicles, it did not establish a training program for new employees and supervisors, or employees working in other areas at overseas posts in accordance with 15 FAM 965 a-b and d.²⁶

OIG found no training materials or training objectives in its review of SHEM's SharePoint site that related to the requirements in 15 FAM 965. Although SHEM officials voiced concerns about the level of overseas staff participation and the lack of engagement of overseas management officials, supervisors, and employees in safety programs, the office had not developed a standardized training program. SHEM staff told OIG the office had not established standardized content or training objectives and materials because of competing priorities. According to 1 FAM 287.6(5), SHEM develops and issues safety, health, and environmental requirements, criteria, standards, and policies for overseas posts, and ensures technical and program management support to meet those requirements. Training and education are elements of a strong safety program. Absent a standardized training program, POSHOs cannot ensure they are meeting their training obligations and employees are meeting their safety responsibilities.

Recommendation 8: The Bureau of Overseas Buildings Operations should develop and implement a training program incorporating training objectives and materials for safety orientations and safety training for all employees at overseas posts. (Action: OBO)

RESOURCE MANAGEMENT

OIG reviewed management controls related to SHEM's operations in financial management, procurement and contracting, and information management. OIG found that SHEM generally implemented the required processes and procedures in accordance with applicable laws and Department guidance, with the three exceptions described below.

Office SharePoint Site Contained Outdated Information

OIG found that SHEM's SharePoint site contained outdated information and did not comply with Department standards. For example, SHEM last revised its safety program sample management policy template for overseas posts in May 2006. The template had incorrect procedures for mishap reporting and a reference to 6 FAM 600 that was no longer used by the

²⁶ Guidance in 15 FAM 965a defines the orientation, learning experiences, and types of training POSHOs should provide to management officials to enable them to meet their safety and occupational health responsibilities. Guidance in 15 FAM 965b defines what occupational safety and health training should be provided to supervisors to enable them to provide and maintain safe working conditions for employees, and 15 FAM 965d defines what information should be provided to all employees to ensure they can perform their jobs in a safe manner or the type of safety and occupational health orientation that should be provided to all new employees.

Department. OIG also found the site had broken hyperlinks, outdated contacts, and incorrect references in some documents. According to 5 FAM 776.2b(2), content managers should ensure that information published on websites is current, relevant, and accurate. SHEM staff told OIG that the office assigned content managers; however, because of competing priorities, they were unable to conduct regular reviews of the content of the site. Nevertheless, SHEM's SharePoint site serves as a repository for guidance, standard operating procedures, and checklists and training materials for overseas posts to use in conducting their safety programs. Absent regular content reviews and updates, SHEM cannot guarantee viewers are accessing accurate and relevant information.

Recommendation 9: The Bureau of Overseas Buildings Operations should develop and implement procedures to regularly update the content of the Office of Safety, Health, and Environmental Management SharePoint site. (Action: OBO)

Office Did Not Have Records and Information Life Cycle Management Standard Operating Procedures

SHEM did not have standard operating procedures for records and information life cycle management as required by Department standards. OIG found that SHEM's network shared drive and its internal SharePoint site lacked organization and version control and files had inconsistent naming conventions. Additionally, OIG did not find any guidance or procedures to instruct staff on the creation, maintenance and use, and disposition of records, or standards and procedures for classifying, indexing, and filing records. According to 5 FAM 414.4a, Department bureaus and offices are responsible for implementing and administering the records policies, standards, systems, and procedures issued by the Department's records officer. According to SHEM staff, the office had not created a records and information life cycle management program because of competing priorities. However, without office records and information life cycle management standard operating procedures, SHEM cannot determine its compliance with Federal information access laws and regulations; properly classify, protect, and declassify sensitive national security information; and meet the Department domestic and internal copyright and other intellectual property obligations.

Recommendation 10: The Bureau of Overseas Building Operations should develop and implement records and information life cycle management standard operating procedures for the Office of Safety, Health, and Environmental Management in accordance with Department standards. (Action: OBO)

Office Did Not Obtain an Authorization to Operate for the DriveCam System

SHEM did not obtain an authorization to operate (ATO)²⁷ for the DriveCam system when the system was deployed in 2009 and it has operated without an ATO ever since. An ATO ensures

²⁷ An authorization to operate is the official management decision given by a senior organization official to authorize operation of an information system and to explicitly accept the risk to an organization's operations, assets, and individuals, as well as other organizations and the nation, based on the implementation of an agreed-

that adequate security controls are in place for an information system based on the risk associated with its use. Department standards²⁸ state that an information system must be reauthorized at least every 3 years or whenever changes are made that affect the potential risk level of operating the system. As part of the system's authorization process, system owners also must define the security level of the information contained in the system and establish appropriate security controls to protect the information. In addition, as part of the authorization process, system owners must provide current copies of their system contingency plan and system security plans.

In October 2013, OBO's Information Systems Security Officer initiated the ATO process, requesting that the Bureau of Information Resource Management (IRM) conduct an initial assessment of the system. IRM's initial assessment began in October 2014 and was completed in February 2015, resulting in 39 findings, which OBO addressed. However, IRM did not finalize the assessment because of competing priorities. Without a valid ATO, OBO management cannot confirm that risks to the DriveCam system have been adequately identified and mitigated and necessary security controls are in place.

Recommendation 11: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Information Resource Management and the Bureau of Diplomatic Security, should obtain an authorization to operate the DriveCam system, in accordance with Department standards. (Action: OBO, in coordination with IRM and DS)

upon set of security controls. National Institute of Standards and Technology, SP 800-53, rev. 4, "Security and Privacy Controls for Federal Information Systems and Organizations" B-2 (April 2013).

²⁸ 12 FAH-10 H-312.4, "Security Authorization Management Responsibilities;" 5 FAM 1066.1-3, "Systems Authorization;" and 5 FAM 1066.1-5, "Systems Security Documentation."

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 Overseas Buildings Operations. The Bureau of Overseas Buildings Operations' complete response can be found in Appendix B.¹

Recommendation 1: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of African Affairs, East Asian and Pacific Affairs, European and Eurasian Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should require post occupational safety and health officers to complete all outstanding residential safety certifications in the Post Occupational Safety and Health Certification Application database in accordance with Department standards. (Action: OBO, in coordination with AF, EAP, EUR, NEA, SCA, WHA)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of December 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations required post occupational safety and health officers to complete all outstanding residential safety certifications in the Post Occupational Safety and Health Certification Application database in accordance with Department standards.

Recommendation 2: The Bureau of Overseas Buildings Operations should correct all limitations in the Post Occupational Safety and Health Officer Certification Application database to fully monitor overseas posts' compliance with Department residential safety standards. (Action: OBO)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of June 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations corrected all limitations in the Post Occupational Safety and Health Officer Certification Application database to fully monitor overseas posts' compliance with Department residential safety standards.

¹ OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

Recommendation 3: The Bureau of Overseas Buildings Operations should correct all database limitations in its Real Property Application and Post Occupational Safety and Health Officer Certification Application databases to fully monitor overseas posts' compliance with Department nonresidential safety standards. (Action: OBO)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of June 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations corrected all database limitations in its Real Property Application and Post Occupational Safety and Health Officer Certification Application databases to fully monitor overseas posts' compliance with Department nonresidential safety standards.

Recommendation 4: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of European and Eurasian Affairs, Near Eastern Affairs, and Western Hemisphere Affairs, should bring principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton into compliance with Department swimming pool safety standards. (Action: OBO, in coordination with EUR, NEA, and WHA)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations neither agreed nor disagreed with this recommendation. However, the bureau noted it is working to address the principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations brought principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton into compliance with Department swimming pool safety standards.

Recommendation 5: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration, should mandate the use of the Fleet Management Information System to track overseas posts' compliance with Department motor vehicle safety standards. (Action: OBO, in coordination with A)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of December 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations mandated the use of the Fleet Management Information System to track overseas posts' compliance with Department motor vehicle safety standards.

Recommendation 6: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration, should review and update Foreign Affairs Manual standards governing the Department's Safety, Health, and Environmental Management program abroad. (Action: OBO, in coordination with A)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of September 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations reviewed and updated Foreign Affairs Manual standards governing the Department's Safety, Health, and Environmental Management program abroad.

Recommendation 7: The Bureau of Overseas Buildings Operations, in coordination with the Office of the Legal Adviser, should evaluate whether reporting mishaps involving personal use of personally owned vehicles of U.S. direct-hire staff should be required. (Action: OBO, in coordination with L)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of December 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations evaluated whether reporting mishaps involving personal use of personally owned vehicles of U.S. direct-hire staff should be required.

Recommendation 8: The Bureau of Overseas Buildings Operations should develop and implement a training program incorporating training objectives and materials for safety orientations and safety training for all employees at overseas posts. (Action: OBO)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of December 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations developed and implemented a training program incorporating training objectives and materials for safety orientations and safety training for all employees at overseas posts.

Recommendation 9: The Bureau of Overseas Buildings Operations should develop and implement procedures to regularly update the content of the Office of Safety, Health, and Environmental Management SharePoint site. (Action: OBO)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion in early 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations developed and implemented procedures to regularly update the content of the Office of Safety, Health, and Environmental Management SharePoint site.

Recommendation 10: The Bureau of Overseas Building Operations should develop and implement records and information life cycle management standard operating procedures for the Office of Safety, Health, and Environmental Management in accordance with Department standards. (Action: OBO)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau estimated completion by the end of December 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations developed and implemented records and information life cycle management standard operating procedures for the Office of Safety, Health, and Environmental Management in accordance with Department standards.

Recommendation 11: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Information Resource Management and the Bureau of Diplomatic Security, should obtain an authorization to operate the DriveCam system, in accordance with Department standards. (Action: OBO, in coordination with IRM and DS)

Management Response: In its April 2, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations obtained an authorization to operate the DriveCam system, in accordance with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Office Director		
Office of Safety, Health, and Environmental Management Office Director	David Needham	6/2003
Division Directors		
Policies and Special Studies Division	Claris Huson	5/2004
Risk Analysis and Management Division	Mary Profitt	6/2020
Technical Operations and Support Division	Terry Carraway	8/2020

Source: Generated by OIG from data provided by the Office of Safety, Health, and Environmental Management.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from August 31, 2020, to November 25, 2020, 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 Inspections Handbook, as issued by OIG for the Department and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. 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, 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; and whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

OIG's specific objectives for this inspection were to determine if the Bureau of Overseas Buildings Operations' Office of Safety, Health, and Environmental Management (SHEM):

- Had taken steps to address its staffing shortages, to include the possible use of third-party and personal services contractors.
- Mitigated potential safety issues that could arise from its inability to conduct site assessments, design reviews, and provide technical support.
- Used its corrective action plan as an effective mechanism to correct significant deficiencies and compel overseas posts' compliance with Department standards in 15 Foreign Affairs Manual (FAM) 971 requiring that overseas posts conduct safety certifications and enter the results in the Post Occupational Safety and Health Officer (POSHO) Certification Application system.
- Updated the POSHO Certification Application database to correct all deficiencies introduced in previous versions of the database so SHEM can fully monitor overseas posts' compliance with 15 FAM 971.
- Improved safety program participation and compliance with Department safety standards at overseas posts.

Methodology

OIG used a risk-based approach to prepare for this inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted the inspection remotely and relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. OIG also reviewed pertinent records and circulated surveys, including two supplemental office questionnaires to gain an understanding of SHER's safety program, and compiled the results of the surveys and questionnaires. OIG reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED
MEMORANDUM

April 2, 2021

TO: OIG/ISP – Sandy Lewis

FROM: OBO – James Kent Stiegler, Acting Director (JKS)

SUBJECT: **Draft Report - OIG Inspection of the OBO Office of Safety, Health, Environmental Management (OBO/OPS/SHEM)**

OBO has reviewed the draft report and provides the following responses to the recommendations.

Recommendation 1: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of African Affairs, East Asian and Pacific Affairs, European and Eurasian Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs, should require post occupational safety and health officers (POSHO) to complete all outstanding residential safety certifications in the Post Occupational Safety and Health Certification Application database in accordance with Department standards. (Action: OBO, in coordination with AF, EAP, EUR, NEA, SCA, WHA)

OBO response: OBO concurs with this recommendation. OBO issued ALDAC 21 STATE 1222, POSHO Certification of Residences in 2021 requiring posts to complete inspection of residential properties and record POSHO certifications in the certification system. SHEM is currently working with the regional bureaus and OBO's Office of Area Management to monitor and update post compliance weekly. In turn, the regional bureaus and Area Management are working with posts to improve compliance, especially at posts where POSHO certifications fall below 70 percent. OBO anticipates that post occupational safety and health officers will complete outstanding residential safety certifications in the Post Occupational Safety and Health Certification Application database by the end of December 2021.

Recommendation 2: The Bureau of Overseas Buildings Operations should correct all limitations in the Post Occupational Safety and Health Officer Certification Application database to fully monitor overseas posts' compliance with Department residential safety standards. (Action: OBO)

OBO Response: OBO concurs with this recommendation. SHEM is working with OBO/EX/IRM to address the four system limitations noted in the report. OBO estimates these four additional features will be integrated into the application by the end of June 2021.

Recommendation 3: The Bureau of Overseas Buildings Operations should correct all database limitations in its Real Property Application and Post Occupational Safety and Health Officer Certification Application databases to fully monitor overseas posts' compliance with Department nonresidential safety standards. (Action: OBO)

OBO Response: OBO concurs with this recommendation. SHEM is coordinating with OBO/EX/IRM to modify the POSHO Certification Application to ensure that non-residential properties that do not require certification are not included. SHEM is also working with the Real Property Application (RPA) developers and subject matter experts to ensure that RPA will require only one POSHO certification for each residence or office building. OBO estimates this will be completed by the end of June 2021.

Recommendation 4: The Bureau of Overseas Buildings Operations, in coordination with the Bureaus of European and Eurasian Affairs, Near Eastern Affairs, and Western Hemisphere Affairs, should bring principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton into compliance with Department swimming pool safety standards. (Action: OBO, in coordination with EUR, NEA, and WHA)

OBO response: OBO is working to address the principal officer residential swimming pools at Embassies Cairo, Madrid, and Quito, and Consulate General Hamilton.

- The courtyard pool at the Chief of Mission Residence in Cairo does not have space to install a barrier without a major renovation encroaching on living space or removing the pool entirely. However, given that the pool is located on a second floor, thus limiting access, and the doors can further restrict access, SHEM determined that these mitigating factors provide some barriers to pool access.
- The barrier at the Madrid pool will be permanent once the DS-required security upgrades to install fixed FEBR windows is complete. In the interim, keeping the French doors locked achieves an effective barrier.
- The Quito Chief of Mission Residence is unoccupied during renovations, including the pool area. The pool is currently covered. Post and SHEM are working together to ensure that a compliant barrier is installed prior to re-occupancy.
- The Hamilton barrier is scheduled to be installed imminently.

Recommendation 5: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration should mandate the use of the Fleet Management Information System to track overseas posts' compliance with Department motor vehicle safety standards. (Action: OBO, in coordination with A)

OBO Response: OBO concurs with this recommendation. OBO has submitted edits to the Office of Logistics Management (A/LM) to incorporate into 14 FAM requiring the use of the Fleet Management Information System (FMIS) to enter all required safety information related to motor vehicle operation. OBO estimates this will be completed by the end of December 2021.

Recommendation 6: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Administration, should review and update Foreign Affairs Manual standards governing the Department's Safety, Health, and Environmental Management program abroad. (Action: OBO, in coordination with A)

OBO Response: OBO concurs with this recommendation. OBO has edited 15 FAM 960 to specifically address the conflicts and discrepancies identified by the OIG in 15 FAM 900 and will route for internal OBO clearance before submitting to A Bureau. OBO expects this will be completed by the end of September 2021.

Recommendation 7: The Bureau of Overseas Buildings Operations, in coordination with the Office of the Legal Adviser, should evaluate whether reporting mishaps involving personal use of personally owned vehicles of U.S. direct-hire staff should be required. (Action: OBO, in coordination with L)

OBO Response: OBO concurs with this recommendation. SHEM has sent a position paper on the tragic history of personally owned vehicle mishaps (POVs), their impact on host country relations, and possible corrective measures to reduce these mishaps to the Office of the Legal Adviser for their evaluation. OBO estimates this be completed by the end of December 2021.

Recommendation 8: The Bureau of Overseas Buildings Operations should develop and implement a training program incorporating training objectives and materials for safety orientations and safety training for all employees at overseas posts. (Action: OBO)

OBO Response: OBO concurs with this recommendation. OBO currently is reviewing and editing 15 FAM 965 to clarify training requirements for new hires, POSHOs, POSHO Assistants, management officials (DCMs, MOs, GSOs). SHEM is also reviewing the training requirements and programs on its SharePoint site to ensure consistency with the drafted FAM. OBO estimates this be completed by the end of December 2021.

Recommendation 9: The Bureau of Overseas Buildings Operations should develop and implement procedures to regularly update the content of the Office of Safety, Health, and Environmental Management SharePoint site. (Action: OBO)

OBO Response: OBO concurs with this recommendation. The SHEM SharePoint site is massive - currently there are 491 webpages and 4,000 documents on the site. SHEM is developing a tracking system to review each page and document. This system will assign responsibility to an individual for every page and document and, in the future, allow the website content manager to identify components that have not been updated within the past year. OBO estimates this be completed in early 2022.

Recommendation 10: The Bureau of Overseas Building Operations should develop and implement records and information life cycle management standard operating procedures for the Office of Safety, Health, and Environmental Management in accordance with Department standards. (Action: OBO)

OBO Response: OBO concurs with this recommendation. OBO is developing a standard operating procedure (SOP) that will also consider the review of the SharePoint site, shared directories and other information repositories discussed. OBO estimates that it will develop a draft SOP by the end of September 2021 and finalize it by the end of December 2021.

Recommendation 11: The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Information Resource Management and the Bureau of Diplomatic Security, should obtain an authorization to operate the DriveCam system, in accordance with Department standards. (Action: OBO, in coordination with IRM and DS)

OBO Response: OBO concurs with this recommendation. IRM has initiated an Interagency Agreement with the Federal Aviation Administration (FAA) to use that agency's shared services to conduct the assessment of the DriveCam system. The assessment is scheduled to kick off in July 2021 with the Security Assessment Report (SAR) delivered by FAA in October 2021. The issuance of the Authority to Operate (ATO) will be dependent upon the number of findings, how long remediation may take, and whether DriveCam is within the overall risk tolerance of the Department.

APPENDIX C: RESIDENTIAL CERTIFICATION TABLES

Table 2: Noncompliance Rate at Bureau of African Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Luanda	41	26	63.4%
Cotonou	31	15	48.4%
Gaborone	104	72	69.2%
Ouagadougou	43	3	7.0%
Bujumbura	46	34	73.9%
Praia	11	2	18.2%
Douala	1	1	100.0%
Yaoundé	61	25	41.0%
Bangui	30	10	33.3%
N'Djamena	69	58	84.1%
Brazzaville	16	4	25.0%
Kinshasa	130	115	88.5%
Abidjan	83	42	50.6%
Djibouti	48	25	52.1%
Malabo	11	4	36.4%
Asmara	11	2	18.2%
Mbabane	94	84	89.4%
Addis Ababa	167	63	37.7%
Libreville	36	28	77.8%
Banjul	16	16	100.0%
Accra	185	133	71.9%
Conakry	59	29	49.2%
Bissau	0	0	-
Nairobi	314	50	15.9%
Maseru	38	25	65.8%
Monrovia	102	33	32.4%
Antananarivo	48	42	87.5%
Lilongwe	231	195	84.4%
Bamako	83	31	37.3%
Nouakchott	36	6	16.7%
Port Louis	42	42	100.0%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Maputo	103	68	66.0%
Windhoek	50	22	44.0%
Niamey	62	46	74.2%
Abuja	170	159	93.5%
Lagos	91	90	98.9%
Kigali	66	14	21.2%
Dakar	156	119	76.3%
Freetown	35	35	100.0%
Mogadishu	0	0	-
Cape Town	37	23	62.2%
Durban	17	12	70.6%
Johannesburg	50	7	14.0%
Pretoria	262	66	25.2%
Juba	65	1	1.5%
Khartoum	62	61	98.4%
Dar es Salaam	120	100	83.3%
Lomé	26	9	34.6%
Kampala	129	111	86.0%
Lusaka	180	158	87.8%
Harare	267	216	80.9%
Total	4,135	2,532	61.2%

Source: Generated by OIG from information provided by Office of Safety, Health, and Environmental Management (SHEM).

Table 3: Noncompliance Rate at Bureau of East Asian and Pacific Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Canberra	156	15	9.6%
Melbourne	11	6	54.5%
Perth	8	5	62.5%
Sydney	33	3	9.1%
Bandar Seri Begawan	10	1	10.0%
Nay Pyi Taw	3	3	100.0%
Rangoon	168	94	56.0%
Phnom Penh	95	43	45.3%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Beijing	401	192	47.9%
Chengdu	29	12	41.4%
Guangzhou	118	23	19.5%
Shanghai	101	45	44.6%
Shenyang	36	5	13.9%
Wuhan	15	11	73.3%
Suva	33	18	54.5%
Hong Kong	140	69	49.3%
Jakarta	205	167	81.5%
Medan	2	2	100.0%
Surabaya	15	10	66.7%
Fukuoka	4	4	100.0%
Nagoya	3	3	100.0%
Naha	5	3	60.0%
Osaka-Kobe	15	15	100.0%
Sapporo	3	2	66.7%
Tokyo	227	185	81.5%
Yokohama - RLS	19	19	100.0%
Busan	3	0	0.0%
Seoul	248	168	67.7%
Vientiane	44	13	29.5%
Kuala Lumpur	109	23	21.1%
Majuro	5	5	100.0%
Kolonia	12	9	75.0%
Ulaanbaatar	44	11	25.0%
Auckland	10	9	90.0%
Wellington	44	3	6.8%
Koror	2	2	100.0%
Port Moresby	24	24	100.0%
Cebu	0	0	-
Manila	308	269	87.3%
Apia	1	1	100.0%
Singapore	124	59	47.6%
Honiara	0	0	-
AIT Kaohsiung	7	0	0.0%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
AIT Taipei	139	89	64.0%
Bangkok	579	261	45.1%
Chiang Mai	21	1	4.8%
Udon	2	2	100.0%
Dili	23	11	47.8%
Hanoi	121	46	38.0%
Ho Chi Minh City	49	17	34.7%
Total	3,774	1,978	52.4%

Source: Generated by OIG from information provided by SHEM.

Table 4: Noncompliance Rate at Bureau of European and Eurasian Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Tirana	47	8	17.0%
Yerevan	52	17	32.7%
Vienna	249	75	30.1%
Baku	70	30	42.9%
Minsk	19	4	21.1%
Brussels	264	114	43.2%
Hamilton	20	11	55.0%
Banja Luka	2	2	100.0%
Mostar	0	0	-
Sarajevo	84	37	44.0%
Sofia	71	9	12.7%
Zagreb	46	13	28.3%
Nicosia	58	11	19.0%
Prague	74	64	86.5%
Copenhagen	80	52	65.0%
Tallinn	44	26	59.1%
Helsinki	51	11	21.6%
Bordeaux	1	1	100.0%
Lyon	2	2	100.0%
Marseille	4	2	50.0%
Paris	257	128	49.8%
Paris - OECD	2	2	100.0%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Strasbourg	2	2	100.0%
US UNESCO (PARIS)	1	1	100.0%
Tbilisi	127	9	7.1%
Berlin	158	47	29.7%
Bonn	0	0	-
Dusseldorf	3	3	100.0%
Frankfurt	508	441	86.8%
Hamburg	7	1	14.3%
Leipzig	3	0	0.0%
Munich	34	26	76.5%
Athens	114	41	36.0%
Thessaloniki	2	0	0.0%
Budapest	96	34	35.4%
Reykjavik	16	3	18.8%
Dublin	96	44	45.8%
Florence	8	8	100.0%
Milan	38	10	26.3%
Naples	11	1	9.1%
Palermo	0	0	-
Rome	197	74	37.6%
USUN Rome	12	7	58.3%
Pristina	85	19	22.4%
Riga	45	13	28.9%
Vilnius	40	10	25.0%
Luxembourg	16	16	100.0%
Valletta	24	6	25.0%
Chisinau	60	32	53.3%
Podgorica	29	2	6.9%
Amsterdam	13	1	7.7%
Hague, the	140	53	37.9%
Skopje	50	18	36.0%
Oslo	61	21	34.4%
Krakow	11	4	36.4%
Poznan	0	0	-
Warsaw	129	75	58.1%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Lisbon	56	8	14.3%
Ponta Delgada	1	0	0.0%
Bucharest	108	18	16.7%
Moscow	396	394	99.5%
St. Petersburg	4	4	100.0%
Vladivostok	7	0	0.0%
Yekaterinburg	7	1	14.3%
Belgrade	101	51	50.5%
Bratislava	28	11	39.3%
Ljubljana	30	5	16.7%
Barcelona	8	3	37.5%
Madrid	117	68	58.1%
Palma De Mallorca	0	0	-
Seville	0	0	-
Valencia	0	0	-
Stockholm	54	11	20.4%
Bern	36	13	36.1%
USUN Geneva	136	22	16.2%
Adana	31	3	9.7%
Ankara	200	127	63.5%
Istanbul	80	12	15.0%
Kyiv	195	71	36.4%
Belfast	5	3	60.0%
Edinburgh	1	1	100.0%
London	291	61	21.0%
Vatican City	5	4	80.0%
Total	5,530	2,532	45.8%

Source: Generated by OIG from information provided by SHEM.

Table 5: Noncompliance Rate at Bureau of Near Eastern Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Algiers	67	48	71.6%
Manama	75	35	46.7%
Alexandria	0	0	-

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Cairo	253	176	69.6%
Baghdad	1,499	1,494	99.7%
Basrah	1,358	1,358	100.0%
Erbil	336	316	94.0%
Jerusalem, Embassy	119	64	53.8%
Tel Aviv, EBO	237	64	27.0%
Amman	319	165	51.7%
Kuwait	182	118	64.8%
Beirut	122	109	89.3%
Tripoli	74	74	100.0%
Casablanca	32	18	56.3%
Rabat	105	38	36.2%
Tangier	0	0	-
Muscat	90	41	45.6%
Doha	81	25	30.9%
Dhahran	30	8	26.7%
Jeddah	66	65	98.5%
Riyadh	258	41	15.9%
Damascus	6	6	100.0%
Tunis	146	92	63.0%
Abu Dhabi	273	89	32.6%
Dubai	122	76	62.3%
Sanaa	7	7	100.0%
Total	5,857	4,527	77.3%

Source: Generated by OIG from information provided by SHEM.

Table 6: Noncompliance Rate at Bureau of South and Central Asian Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Kabul	2,412	2,412	100.0%
Dhaka	112	27	24.1%
Chennai	60	36	60.0%
Hyderabad	33	25	75.8%
Kolkata	19	13	68.4%
Mumbai	64	9	14.1%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
New Delhi	291	284	97.6%
Almaty	50	8	16.0%
Nur-Sultan	66	13	19.7%
Bishkek	55	40	72.7%
Kathmandu	88	24	27.3%
Islamabad	343	291	84.8%
Karachi	91	87	95.6%
Lahore	17	17	100.0%
Peshawar	33	3	9.1%
Colombo	84	46	54.8%
Dushanbe	52	9	17.3%
Ashgabat	64	64	100.0%
Tashkent	74	56	75.7%
Total	4,008	3,464	86.4%

Source: Generated by OIG from information provided by SHEM.

Table 7: Noncompliance Rate at Bureau of Western Hemisphere Affairs Posts

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Buenos Aires	118	113	95.8%
Nassau	118	103	87.3%
Bridgetown	66	17	25.8%
Belmopan	35	8	22.9%
La Paz	52	31	59.6%
Belo Horizonte	1	1	100.0%
Brasilia	170	82	48.2%
Porto Alegre	16	3	18.8%
Recife	19	4	21.1%
Rio De Janeiro	79	30	38.0%
Sao Paulo	89	22	24.7%
Calgary	58	15	25.9%
Halifax	16	15	93.8%
Montreal	58	52	89.7%
Ottawa	150	20	13.3%
Quebec	1	1	100.0%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Toronto	152	109	71.7%
Vancouver	121	7	5.8%
Winnipeg	13	12	92.3%
Santiago	83	28	33.7%
Barranquilla	0	0	-
Bogota	390	54	13.8%
Cartagena	38	12	31.6%
San Jose	82	17	20.7%
Havana	72	72	100.0%
Curacao	34	34	100.0%
Santo Domingo	159	49	30.8%
Guayaquil	54	51	94.4%
Quito	84	27	32.1%
San Salvador	145	24	16.6%
St. George's	1	1	100.0%
Guatemala City	160	145	90.6%
Georgetown	32	26	81.3%
Port au Prince	139	27	19.4%
Tegucigalpa	118	64	54.2%
Kingston	88	49	55.7%
Ciudad Juarez	85	69	81.2%
Guadalajara	56	29	51.8%
Hermosillo	31	16	51.6%
Matamoros	29	2	6.9%
Mazatlán	6	6	100.0%
Merida	19	7	36.8%
Mexico City	436	172	39.4%
Monterrey	66	22	33.3%
Nogales	16	5	31.3%
Nuevo Laredo	24	6	25.0%
Tijuana	52	29	55.8%
Managua	72	44	61.1%
Panama City	142	110	77.5%
Asuncion	49	36	73.5%
Lima	190	165	86.8%

Post	Active Residential Properties	Inactive Residential Certificates	Percentage of Noncompliance
Paramaribo	29	25	86.2%
Port of Spain	41	16	39.0%
Montevideo	57	15	26.3%
Caracas	43	31	72.1%
Total	4,454	2,130	47.8%

Source: Generated by OIG from information provided by SHEM.

ABBREVIATIONS

ATO	Authorization to Operate
CDC	Centers for Disease Control and Prevention
FAM	Foreign Affairs Manual
FMIS	Fleet Management Information System
GOVs	U.S. Government-Owned Vehicles
IRM	Bureau of Information Resource Management
OBO	Bureau of Overseas Buildings Operations
POSHO	Post Occupational Safety and Health Officer
POVs	Personally Owned Vehicles
SHEM	Office of Safety, Health, and Environmental Management
SMARTS	SHEM Management Assessment Results Tracking System

OIG INSPECTION TEAM MEMBERS

Timothy Wildy, Team Leader/Co-Team Manager

Sergio Lagares, Co-Team Manager

Wilma Bodden-Raffucci

Chelsea Cowan

Daniel Pak

Henry Weiss

Other Contributors

Joy Atkins

Cindy Cobham

Rebecca Sawyer



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WPEAOmbuds@stateoig.gov