



Office of Inspector General  
United States Department of State

ISP-I-22-03

Office of Inspections

November 2021

# **Review of the Bureau of Consular Affairs’ ConsularOne Modernization Program – Significant Deployment Delays Continue**

DOMESTIC OPERATIONS AND SPECIAL REPORTS

## Summary of Review

OIG reviewed the Bureau of Consular Affairs' ConsularOne modernization program, the bureau's initiative to modernize and consolidate approximately 90 discrete consular legacy systems into a common technology framework. These legacy systems support the bureau's three fundamental responsibilities: the issuance of passports and other documentation to citizens and nationals, the protection of U.S. border security and facilitation of legitimate travel to the United States, and ensuring the welfare and protection of U.S. citizens abroad. CA's Office of Consular Systems and Technology (CST) serves as the business owner for ConsularOne. OIG found that in the 10 years since the ConsularOne modernization program began in 2011, CST had conducted a very limited pilot of just one component—the customer-facing part of the electronic Consular Report of Birth Abroad—and had continued to miss deployment dates for other components under the program. OIG determined that multiple factors caused the delays in the ConsularOne modernization program, including deficiencies in leadership, management of resources, communication, project management, and information security management. OIG made 11 recommendations to address the factors contributing to the delays in the ConsularOne modernization program. In its comments on the draft report, the Bureau of Consular Affairs concurred with 6 recommendations and neither agreed nor disagreed with 5 recommendations. The bureau's response to the recommendations and OIG's reply can be found in the Recommendations Section of this report. OIG considers 8 recommendations resolved and 3 recommendations unresolved. The bureau's formal written response is reprinted in its entirety in Appendix C.

## BACKGROUND

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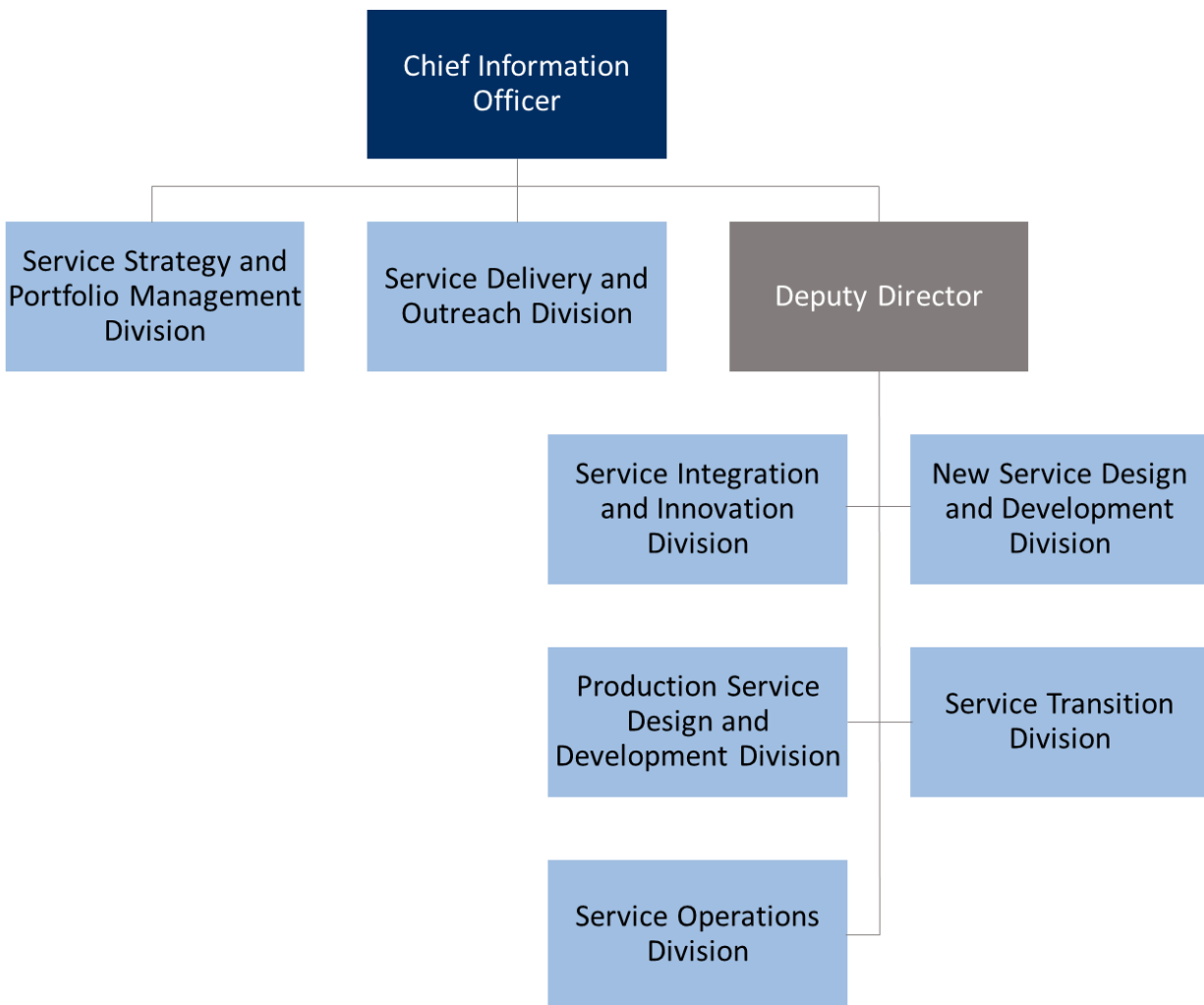
The Bureau of Consular Affairs (CA), recognizing the need to replace its aging information technology systems, began a program to modernize consular systems in 2009. CA initially intended to develop a global visa system to integrate nonimmigrant and immigrant visa processes into one system. It then added a global citizens services system to the modernization effort. However, in 2011, CA canceled both programs and folded them into one enterprise-wide initiative. That initiative, ConsularOne, was intended to modernize and consolidate approximately 90 discrete consular legacy systems supporting visa and passport application services, visa adjudication and issuance services, and other consular functions into a single common technology framework. CA's Office of Consular Systems and Technology (CST) serves as the business owner for ConsularOne.

### Mission and Organizational Structure

CST's mission, as outlined in 1 Foreign Affairs Manual (FAM) 252.3-3, is to support CA's IT efforts through the design, development, deployment, and maintenance of consular IT systems, databases, and infrastructure. In addition, CST is responsible for developing and supporting IT solutions to automate the functions for the Department's visa, passport, and overseas citizens services operations, from concept to product, including research, design, development, testing, and launch.

CST is headed by the bureau's Chief Information Officer, a career member of the Senior Executive Service, who has served as CST's Director since May 2016. He is assisted by a Deputy Director, who has been in the position since November 2016. The office is organized into seven divisions focused on operations and maintenance, security, modernization, enhanced capabilities, and stabilization, as shown in Figure 1, below. All divisions support some aspect of the ConsularOne modernization program. See Appendix B for details on each division's responsibilities.

**Figure 1: CST Organization Chart as of June 2021**



**Source:** OIG generated from information obtained from the Bureau of Consular Affairs.

## ConsularOne Modernization Program

As stated earlier, while CA's efforts to modernize its consular systems began in 2009, the ConsularOne modernization program did not formally begin until 2011, when CA decided to modernize and consolidate its consular systems under an enterprise-wide common technology

framework.<sup>1</sup> CA estimated that approaching consular systems modernization through an enterprise-wide approach would significantly shift how consular services would be delivered globally by:

- Promoting a self-service approach for customers through a user-friendly website.
- Facilitating a paperless workflow through an online application process.
- Creating a user-friendly interface with a common look and feel to all functions for customers and users.
- Integrating information needed for users to make confident, well-informed decisions.
- Providing the ability to adjust and scale operations reliably and efficiently.

According to CA, through the Consular One modernization program, the bureau will sunset consular legacy systems by developing new capabilities, including:

- **Electronic Consular Report of Birth Abroad (eCRBA)** includes the development of front-end capabilities allowing customers to complete and pay for a CRBA application online, and back-end capabilities for internal users to upload and adjudicate the application.
- **Online Passport Renewal (OPR)** will allow U.S. citizens to apply to renew a passport online.
- **Customer Account Management (CAM)** is a public facing customer portal that allows global users access to consular services.
- **CA Service Portal (CASP)** will allow CA employees to create and post maintenance and outage information as well as access modernized services from a single web application.
- **Predictive Analytics (PA)** will provide a new framework and platform for CA data scientists to develop and execute CA risk scoring models in an automated fashion.
- **Consular Task Force (CTF)** replaces and modernizes the current Crisis Task Force application and will provide users the ability to disseminate information across multiple communication channels and give task force managers the ability to make decisions related to crisis activities and schedule task force volunteers.
- **Visa Online** will modernize core and specialized services for visa issuance, fulfillment, and allocation processes.

As shown in Figure 2 below, CST spent the first few years (2011 to 2014) of the Consular One modernization program building the logical design and the architecture concept for the program. Systems development of the first component of the program, OPR, began in April 2014 and it originally was scheduled to be deployed in March 2016. However, in April 2016, CA announced a 2-year delay in deploying the OPR component of ConsularOne to allow the bureau to focus on an expected surge in passport applications that was anticipated to start in 2017.<sup>2</sup> At

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<sup>1</sup> Development efforts for the two systems that began in 2009—the global visa system and the global citizens services system—were merged into the ConsularOne modernization program.

<sup>2</sup> The Passport Services Directorate's analysis of renewal application trends showed that passport renewal rates would significantly increase in 2017 due to the Western Hemisphere Travel Initiative. The initiative, part of the Intelligence Reform and Terrorism Prevention Act of 2004, required Americans traveling to or from the Caribbean,

the time of OIG's review, the OPR component, with a cost so far of more than \$18 million, was scheduled to be deployed in December 2021, a delay of 5 years and 9 months beyond the original deployment date.

**Figure 2: Timeline**

2009	2011	2013	2014	2016	2019
<b>May</b> Global Visa System (GVS) and Global Citizen Services (GCS) program contract began	<b>July</b> GVS and GCS merged into the ConsularOne modernization program	<b>November</b> ConsularOne logical design published	<b>February</b> ConsularOne architecture concept published  <b>April</b> First ConsularOne component (OPR) began development	<b>April</b> CA announced a nearly 2-year delay in deploying the OPR component due to expected 2017 surge in passport applications	<b>March</b> First ConsularOne component (eCRBA) pilot deployed at 6 posts <sup>a</sup>

<sup>a</sup> CST launched an Enterprise Payment System, a web service, in July 2017 to enable CA customers to pay application fees online for legacy and ConsularOne applications.

**Source:** OIG generated from information obtained from the Bureau of Consular Affairs.

### ***Past OIG Work on the ConsularOne Modernization Program Identified Delays and Challenges***

OIG has reported about delays and challenges related to the ConsularOne modernization program in the past. For example, in a March 2016 OIG audit of the Department's process to select and approve IT investments, OIG reported that the Department's Chief Information Officer, in May 2015, had "noted that ConsularOne, CA's modernization program for its visa application systems, cost more than \$87 million but had failed to meet performance goals since 2012. Due to the performance failures and delayed delivery to the public, CA had to operate legacy systems for longer than expected, leading to requests for almost \$150 million in additional funding for FYs 2015 and 2016 to maintain the legacy systems."<sup>3</sup> Later in 2016, OIG's inspection of CST found that while CA's plans said "the majority of ConsularOne elements would be rolled out by the end of FY 2017," no ConsularOne components had yet been successfully deployed at the time of the 2016 inspection.<sup>4</sup> In that same report, OIG said that responses to its survey from officers in overseas consular sections and in domestic CA offices expressed doubt about CST's capacity to successfully execute ConsularOne in a timely manner. Finally, OIG's recent inspection of CA's Passport Services Directorate<sup>5</sup> found that CST's delay in modernizing consular systems could potentially leave the bureau unable to perform critical passport operations.

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Mexico, and Canada to obtain a passport or passport card. This requirement, which took effect in January 2009, led to a surge in the demand for passports, most of which are valid for 10 years, beginning in 2007.

<sup>3</sup> OIG, *Audit of the Department of State Process to Select and Approve Information Technology Investments* 40 (AUD-FM-16-31, March 2016).

<sup>4</sup> OIG, *Inspection of the Bureau of Consular Affairs, Office of Consular Systems and Technology* 7-8 (ISP-I-17-04, December 2016).

<sup>5</sup> OIG, *Inspection of the Bureau of Consular Affairs' Passport Services Directorate* (ISP-I-21-17, September 2021).

OIG evaluated CST's implementation of the ConsularOne modernization program, consistent with Section 209 of the Foreign Service Act of 1980.<sup>6</sup> CST's management of its contracts that support the Consular One modernization program was not included in the scope of this review because OIG intends to conduct an audit on this topic in FY 2022.

## CONSULARONE MODERNIZATION PROGRAM CONTINUES TO MISS DEPLOYMENT DATES

OIG found that CST has continued to miss deployment dates for components under the ConsularOne modernization program. In addition to the missed release dates for the OPR deployment, described above in the Background section, CST also missed release dates for eCRBA, CAM, CASP, PA, and CTF, as shown in Figure 3, below. At the time of OIG's review, and in the 10 years since the ConsularOne modernization program began in 2011, the only ConsularOne component CST deployed was the customer-facing portion of eCRBA as a pilot in six overseas consular sections in March 2019.<sup>7</sup> However, CST missed its planned August 2021 release date for a second eCRBA pilot (version 2.0) to the same six overseas consular sections.

**Figure 3: Deployment Schedules for Selected Components Under the ConsularOne Modernization Program**

OPR	eCRBA <sup>a</sup>	CAM/CASP <sup>a</sup>	PA <sup>a</sup>	CTF <sup>a</sup>	Visa Online
<ul style="list-style-type: none"> <li>Missed release dates: March 2016, November 2016, April 2017, November 2020</li> <li>Planned release date: December 2021</li> </ul>	<ul style="list-style-type: none"> <li>Missed release dates: April 2017, May 2017, November 2019 (for 2.0 release), July 2020 (for 2.0 release)</li> <li>Pilot (1.0) released: March 2019</li> <li>Missed release date: August 2021 (for 2.0 release)</li> </ul>	<ul style="list-style-type: none"> <li>Missed release dates: May 2020 (CAM), November 2020 (CASP), March 2021 (CAM and CASP)</li> </ul>	<ul style="list-style-type: none"> <li>Missed release date: May 2021</li> </ul>	<ul style="list-style-type: none"> <li>Missed release date: August 2021</li> </ul>	<ul style="list-style-type: none"> <li>Planned release date: July 2022</li> </ul>

<sup>a</sup> At the time of the inspection, CST did not have a planned release date for eCRBA 2.0, CAM/CASP, PA, or CTF.

**Source:** OIG generated from information obtained from the Bureau of Consular Affairs.

In an effort to stem delays in the ConsularOne modernization program, in April 2019 CST, with the support of CA's IT Senior Steering Group, recommended to CA's Assistant Secretary that the bureau focus its resources on CA's systems modernization efforts by limiting the number of requests for enhanced capabilities to legacy systems.<sup>8</sup> The CA Assistant Secretary approved the recommendation. However, it is unclear whether this action resulted in any meaningful

<sup>6</sup> See Appendix A.

<sup>7</sup> The six pilot consular sections are located at Embassies Mexico City, Paris, and Tokyo and at Consulates General Frankfurt, Sydney, and Toronto.

<sup>8</sup> The moratorium excluded technology changes and enhancements resulting from statute or executive mandate.

improvement to the deployment schedules as CST continued to miss numerous release dates, as shown in Figure 3 above. Additionally, according to stakeholders in CA directorates and overseas posts interviewed by OIG, the decision to limit further legacy system enhancements negatively affected CA's operations, as many of these systems often do not perform as intended. Furthermore, over time, the multiple missed deadlines resulted in consular personnel, both domestically and overseas, losing confidence in CST's ability to deliver ConsularOne components.

Regarding these many missed deployment dates, OIG found no evidence that CA leadership questioned CST regarding the reasons the office continued to miss set deadlines that were broadly announced to CA stakeholders. In addition, OIG found no evidence of CST leadership holding its U.S. Government and contractor staff accountable for these missed deadlines. Yet, the ConsularOne modernization program is critical to CA's ability to meet its mission in the future. Therefore, CA leadership needs to play a more extensive role than it has to this date in overseeing CST's work. This should include regular reviews of CST's set schedule for ConsularOne deployments to provide enhanced oversight. Per Principle 5.01 in the Government Accountability Office's *Standards for Internal Control in the Federal Government*,<sup>9</sup> management should hold individuals accountable for their internal control responsibilities. Guidance in 5 Foreign Affairs Handbook (FAH)-5 H-213 states that project success depends on identifying end dates. Without management providing sufficient oversight and adequately enforcing deployment schedules for ConsularOne, CST will continue to fail in meeting its program objectives.

**Recommendation 1:** The Bureau of Consular Affairs should review with the Office of Consular Systems and Technology leadership the deployment schedule for ConsularOne components to determine the schedule's viability to achieve bureau requirements.  
(Action: CA)

A successful ConsularOne modernization program is critical for CA's future operations to be successful. As described below, OIG identified multiple factors that contributed to the delays in the program. It is essential that CA address these deficiencies to get the ConsularOne modernization program back on track.

## MULTIPLE FACTORS CONTRIBUTED TO DELAYS IN THE CONSULARONE MODERNIZATION PROGRAM

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OIG found that a number of factors caused the delays in the ConsularOne modernization program. These factors, described in detail below, fall into five broad categories: (1) leadership; (2) management of resources, including both personnel and funding; (3) communication; (4)

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<sup>9</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government* 32 (GAO-14-704G, September 2014).

project management; and (5) information security management.<sup>10</sup> Additionally, because a substantial portion of the ConsularOne modernization program is performed by contractors, OIG determined that CST's management of its contracts is also a likely contributing factor to the program delays. However, because OIG intends to conduct an audit of this topic in FY 2022, CST's management of its ConsularOne contracts was not included in the scope of this review.

## Leadership

### ***Lack of Clarity on What Comprises the ConsularOne Modernization Program Created Confusion***

OIG found that CST leadership was unable to provide a clear, uniform definition of the ConsularOne program, what components it included, and which contracts supported the program, creating confusion for stakeholders. The lack of clarity on what constitutes the ConsularOne modernization program hindered CST management's oversight of the modernization effort and the ability to hold staff accountable for their performance. Furthermore, the lack of clarity resulted in CST staff citing different total program costs for the ConsularOne modernization effort.

During an April 2021 presentation, CST management provided OIG with identical definitions for the ConsularOne modernization program and Consular Systems Modernization (CSM), a term used by the office for its other modernization projects. The description for both was "modernization of all consular services, providing an integrated experience for customers and users, improving business processes, that is supported by a stable and secure technology platform." Furthermore, the CST Director's response to OIG's functional questionnaire<sup>11</sup> stated that CSM and ConsularOne are interchangeable terms, noting that "Consular Systems Modernization (CSM), also referred to as ConsularOne (C1), is CA's comprehensive transformation of consular mission processes and systems." Finally, in CA's May 2017 Federal contract opportunity, which solicited proposals from contractors, CA said, "The main objective of the Consular Systems Modernization contract is to provide the services and technology required to support the ConsularOne program, which will significantly shift how consular services will be delivered globally."<sup>12</sup> During the inspection, OIG asked CST leadership to clarify why it used the identical definition for both programs and to provide a definition related solely to ConsularOne but did not receive an answer.

With respect to what components were involved in ConsularOne, CST staff in interviews with OIG voiced differing views on exactly which systems modernization projects ConsularOne included. According to the April 2021 CST presentation to OIG, the ConsularOne modernization

<sup>10</sup> In its response to the draft report, CA noted that several additional factors also contributed to the delays to the ConsularOne program, including CST's pivot to cloud services, CST's support of its data centers, and CST needing to respond to evolving cybersecurity requirements.

<sup>11</sup> OIG's functional questionnaires focus on the operations of specific sections and offices within the inspected entity.

<sup>12</sup> The 10-year, \$850 million CSM contract was awarded in May 2018.



program comprised different pillars—passport, overseas citizen services, enabler services,<sup>13</sup> and visas—with each pillar having several components underneath it. These include OPR and eCRBA for passports, CTF for overseas citizen services, and CAM, CASP, and PA for enabler services. In interviews, however, CST staff gave differing views on whether ConsularOne also included other components or projects. For example, some CST staff members told OIG that ConsularOne included deploying new passport printers, known as NextGen printers, while others told OIG the printers were not part of ConsularOne.

Finally, with respect to the contracts supporting ConsularOne and the cost of those contracts, CST leadership provided conflicting information to OIG at several different points during the review. For example, in April 2021, CST provided OIG with two separate lists of contracts that support ConsularOne—one with 11 contracts and the other with 40 contracts. These lists contained a total of 45 contracts, since 6 contracts were on both lists. In May 2021, OIG reconfirmed with CST leadership that the 45 contracts were all in support of the ConsularOne modernization program. However, in June 2021, CST responded with a “final list” of just 11 contracts that they said supported ConsularOne, saying that the other contracts supported CSM or other systems modernization efforts. Due to CST’s lack of clarity regarding what comprises ConsularOne and which contracts support it, combined with its lack of information on older contracts,<sup>14</sup> OIG was unable to determine the total cost of the ConsularOne modernization program with any precision. OIG’s best estimate is that, as of mid-June 2021, the cost for ConsularOne ranged between \$200 million (the cost of the 11 contracts CST identified in June 2021<sup>15</sup>) and \$600 million (the cost of the 45 contracts on the April 2021 list provided by CST).

During the review, CST often used ConsularOne and CSM interchangeably.<sup>16</sup> At other times, the office differentiated between the two. The lack of clarity between ConsularOne and CSM obscured the true costs of the ConsularOne modernization effort and created deficiencies in program management. For example, the differing information about which contracts were part of ConsularOne allowed CST to adjust the program’s total cost based on which contracts were included. When all parties involved have a different understanding of what constitutes the ConsularOne modernization program, CST management cannot adequately provide oversight of the modernization effort and hold staff accountable for their performance. Furthermore, users of consular services who are unclear about what is included in ConsularOne may provide incorrect modernization requirements, leading to products that may not meet their needs.

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<sup>13</sup> Enabler services allow customers to complete CA services such as electronic signatures and appointment scheduling.

<sup>14</sup> CST was unable to provide OIG with contract cost information for any contracts prior to 2014, despite the fact the ConsularOne modernization program began in 2011.

<sup>15</sup> OIG was unable to review details for one of the 11 contracts since it was awarded and paid for by another Federal agency.

<sup>16</sup> In its response to the draft report, CA noted that ConsularOne is the brand name used by CA to represent the modernized suite of capabilities being provided by the Consular Systems Modernization investment. Consular Systems Modernization is the name of the official program approved through the Department’s capital planning and investment control process. Consular Systems Modernization is also the name of the contract awarded to support the execution of the investment.

**Recommendation 2:** The Bureau of Consular Affairs should clearly define the ConsularOne modernization program and Consular Systems Modernization, including its components, projects, supporting contracts, and the associated total cost of those contracts for both efforts. (Action: CA)

***Leaders and Managers Did Not Fully Adhere to Department and Bureau Leadership and Management Standards, Particularly With Respect to Accountability***

CST leaders and managers did not fully adhere to Department or CA leadership and management standards in administering the ConsularOne modernization program. Specifically, OIG found they did not plan strategically, act decisively and take responsibility, collaborate, and objectively measure and review results against expected outcomes.<sup>17</sup> For example, in interviews and personal questionnaires, employees at all levels told OIG that CST leaders and managers failed to develop adequate plans to successfully execute work projects or communicate and collaborate to resolve problems. Staff members noted that planning, communication, and collaboration are critical when, as in CST, development of ConsularOne components require different divisions and teams, all of which have competing demands and priorities, to work together.

Furthermore, CST employees told OIG that while the Director often told staff members in meetings that he would hold employees and contractors accountable for their work, neither he nor other CST managers did so. In fact, CST leaders and managers admitted to OIG that there was a lack of accountability in the office, providing multiple reasons. Some leaders and managers said they did not have sufficient time to carry out their responsibilities. Others stated they did not feel they had the authority to hold personnel in other divisions accountable for their work, despite assurances from the CST Director that they did. CST managers also said that those with supervisory or oversight responsibilities did not have the required skills or experience, and that they were sometimes reluctant to “call out” others. In addition, CA’s senior leaders told OIG that because of vacancies, discussed later in this report, CST did not have enough staff to adequately oversee contractors.

OIG also found that CST leadership’s failure to establish work commitments and complete or document performance reviews in a timely manner contributed to the lack of accountability.<sup>18</sup> For example, four of the seven CST division chiefs told OIG that their work commitments were not established until well after the beginning of the evaluation period, that their interim (mid-year) performance reviews were months late or not held at all, and that their annual evaluations were not completed until months after the end of the rating period. OIG examined

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<sup>17</sup> 3 FAM 1214b(2), (3), and (7); Leadership and Management Tenets for the Bureau of Consular Affairs: Assess Honestly.

<sup>18</sup> 3 FAM 2821.3-6(1), (5), and (9) require rating officials to develop performance plans within 45 days of the first day of the rating cycle, to discuss performance with the employee periodically, and to prepare an appraisal generally within 45 days after the end of the performance cycle. Guidance in 3 FAM 2823.2a and b require the rating official to conduct a documented performance review within 30 days of the mid-point of the appraisal period, while 3 FAM 2821.3-7(2) and (7) require reviewing officials to ensure that rating officials carry out performance management responsibilities.

one division chief's performance records and found that for calendar year 2019, work commitments were finalized 5 months late. Additionally, the division chief's interim progress review, which is supposed to occur at roughly 6 months into the 12-month evaluation period, occurred 6 weeks after the end of the evaluation period with the annual performance evaluation occurring 2 days later. Furthermore, OIG found that a division chief's work commitments for calendar year 2020 were established in 2021—a year late and after the evaluation period had already ended.

Based on conversations with office staff and review of performance documents, OIG concluded that CST leadership did not hold either U.S. Government staff or contractors accountable for the missed ConsularOne deployment dates. In addition, in the 2020 Federal Employee Viewpoint Survey, 41 percent of CST employees who responded said steps were not taken in their work unit to deal with poor performers who could not or would not improve.<sup>19</sup> Finally, CA employees outside CST told OIG that the CA Front Office did not enforce accountability by CST leadership. This lack of accountability is contrary to Principle 5.01 in the *Standards for Internal Control in the Federal Government*,<sup>20</sup> which states management should hold individuals accountable for their internal control responsibilities. As a result of these issues, contractors turned in ConsularOne deliverables that failed testing, resulting in the missed deployment deadlines.

**Recommendation 3:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to hold managers and staff accountable for performance and deliverables for ConsularOne in accordance with Department standards. (Action: CA)

## Management of Resources

### *Significant Personnel Vacancies Contributed to ConsularOne Delays*

OIG found that significant personnel vacancies within CST contributed to the delays in the ConsularOne modernization program. Between December 2014 and April 2021, the vacancy rate of Civil Service positions varied between 28 and 39 percent. According to CA data, the Civil Service vacancy rate in CST increased from 36 to 39 percent in 2017, during the Department-wide hiring freeze.<sup>21</sup> Once hiring resumed, the vacancy rate dropped to 28 percent in 2019, but climbed again to 31 percent in April 2021. At the time of this review, for example, only 3 of the

<sup>19</sup> The Federal Employee Viewpoint Survey is administered annually by the Office of Personnel Management. The survey measures employees' perceptions of whether, and to what extent, conditions characteristic of successful organizations are present in their agencies. The survey serves as a tool for employees to share their perceptions in many critical areas including their work experiences, their agency, and leadership. The results provide agency leaders insight into areas where improvements have been made, as well as areas where improvements are needed.

<sup>20</sup> GAO-14-704G, September 2014, at 32.

<sup>21</sup> The Office of Management and Budget announced a Government-wide hiring freeze on January 23, 2017. While most Department positions were frozen and could not be filled if vacant, the former Secretary approved specific exemptions to the hiring freeze to ensure the Department was able to meet critical needs. The then-Secretary lifted the hiring freeze in May 2018.

Service Strategy and Portfolio Management Division's 13 positions were filled. A high vacancy rate in this division is serious considering its contract management and oversight responsibilities for all of CST.

Both CST managers and staff linked the vacancies to the delays in the ConsularOne modernization program. In responses to OIG's questionnaire, 15 out of 57 employees specifically cited the lack of sufficient staff as a hindrance in implementing ConsularOne. In addition, the CST Director told OIG staffing vacancies "are definitely part of the delay." CST employees cited several potential causes for the significant departure of IT staff, including Federal salaries not being competitive with private sector IT jobs, higher graded positions available in other bureaus, and problematic management styles. In addition, the CST Director told OIG that interviews to fill vacancies draw managers away from other work they need to be doing.

In December 2020, CST brought on a senior advisor, who is an experienced human resources specialist, as a detailee from CA's Executive Office to assist with recruitment. The specialist, working with the bureau's Executive Office, began implementing innovative hiring procedures with promising results. Nonetheless, since many of the potential employees lack the required security clearance, it will take time before they begin work.

The vacancies will continue to hinder the ConsularOne modernization program until CST's positions are filled. OIG recognizes that filling the vacant positions in CST will take time, but recent efforts appear to be yielding favorable results.

### ***Office Funding Not a Significant Contributing Factor to ConsularOne Delays***

Although CST leadership told OIG that budget constraints were a contributing factor to ConsularOne delays,<sup>22</sup> OIG generally did not find that to be the case. Specifically, OIG found that, in most years, CST received more funding than requested in the President's budget. In addition, between FY 2015 and FY 2020, CST's expenditures<sup>23</sup> rose by almost 48 percent, from \$315 million to \$466 million. Although CST's funding dropped by 13 percent to \$401 million in FY 2021 due to COVID-19, which reduced the demand for visas, this funding reduction post-dated the ConsularOne delays described in this report.<sup>24</sup> Accordingly, OIG concluded that funding was not a significant contributing factor to the delays that have already occurred, though the reduction in funding for FY 2021 likely will have an impact on future release dates for ConsularOne components.

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<sup>22</sup> In its response to the draft report, CA cited several factors that constrained available resources for ConsularOne, including the costs of switching to cloud development, increases in fixed hardware and software costs, and costs of other operations and security activities.

<sup>23</sup> The amount of the authorized budget spent by CST, including for contracts, travel, equipment, and training. It does not include direct-hire personnel costs.

<sup>24</sup> According to CA's website, the bureau is almost entirely funded through revenue generated by consular fees.

## Communication

### ***Office Lacked Adequate Internal Communication and Collaboration***

OIG found CST lacked effective internal communication and collaboration at all levels between office divisions and branches. OIG also found this issue in the 2016 inspection of CST.<sup>25</sup> The Department's leadership and management principles in 3 FAM 1214b(4) and (7) call for communication to be clear and effective and to establish constructive working relationships with all mission elements to further goals. In addition, the *Standards for Internal Control in the Federal Government*,<sup>26</sup> Principle 14, states that organizations should have adequate internal communication and collaboration to support the office in fulfilling its objectives.

CST staff told OIG that communication and collaboration within their respective division or branch worked reasonably well, although some employees noted that filtering of information at the division or branch chief levels led to miscommunication and a focus on non-priority projects. However, in OIG's survey of CST mid-level managers, 73 percent said that communication and collaboration among staff was inadequate to support the office's objectives. In addition, 53 percent of mid-level managers who responded to the survey said they spent more than 40 percent or more of their time in group meetings, with 80 percent saying that these meetings were ineffective or only somewhat effective, resulting in the need for additional meetings to reach decisions. CST leadership recognized this issue during OIG's review and told managers that meetings must be outcome driven to improve collaboration and better fulfill CST objectives.

OIG found these ineffective patterns of communication and coordination between divisions and branches led to misunderstandings among staff and contractors as to the office's priorities, eroded trust between divisions, and reduced CST's operational effectiveness, affecting the pace of the ConsularOne modernization program. As staff noted in OIG surveys and interviews, given the complexities and interdependencies of CST work, better communication and coordination was needed throughout the office, particularly at the division and branch chief levels.

CST managers told OIG they recognized the need for improved communication and coordination between and within CST divisions and branches. During OIG's review, CST drafted a plan to improve communication and collaboration within the office and said it planned to work with CA's Office of 1CA<sup>27</sup> to review and provide an outside perspective on the communication plan. Until that plan is implemented, ineffective communication and collaboration may continue to result in divisions and branches working in silos, coordinating poorly, and failing to fulfill commitments made to other teams.

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<sup>25</sup> ISP-I-17-04, December 2016.

<sup>26</sup> GAO-14-704G, September 2014, at 60.

<sup>27</sup> The Office of 1CA assists CA offices to use a shared approach to management across the bureau.

**Recommendation 4:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement an internal communication and collaboration plan. (Action: CA)

***Office Did Not Communicate and Collaborate Effectively With Overseas Stakeholders on ConsularOne Modernization***

OIG found that although CST communicated frequently and collaborated adequately with CA domestic stakeholders on the ConsularOne modernization program, overseas stakeholders cited inadequate communication and collaboration with CST. OIG also found this issue in the 2016 inspection of CST.<sup>28</sup> OIG's survey of the six eCRBA pilot posts and six other consular sections<sup>29</sup> showed that these overseas stakeholders were unaware of CST's plans for ConsularOne modernization or its timeline and roadmap for implementation. Furthermore, the six eCRBA pilot posts told OIG they received little substantive communication from CST on whether their feedback on eCRBA would be incorporated in the program's next version, eCRBA 2.0, scheduled to be deployed in August 2021.

Although CA leadership stated that the bureau had regular communication with overseas missions, OIG found that these missions lacked information directly from CST on schedules and modernization program changes. In interviews, overseas staff told OIG they found the lack of communication and collaboration from CST with its overseas stakeholders negatively affected the level of confidence overseas missions had in ConsularOne's ability to meet their needs. In addition, surveyed overseas consular managers reported to OIG that the lack of communication and collaboration affected CST's understanding of the overseas operational environment and constraints with current consular systems. Moreover, overseas stakeholders reported frustration with CST's lack of responsiveness in considering minor enhancements to modernize consular systems that would improve operational efficiencies.

In contrast, OIG found that CST met frequently with domestic stakeholders to discuss ConsularOne. For example, domestic stakeholders cited CST's productive and collaborative exercise to gather ConsularOne business requirements. In addition, collaboration occurred domestically at the senior level through the Senior Steering Group, at the office level through quarterly meetings with CA directorates, and at the working level with CA's Business User System Liaisons.<sup>30</sup> Domestic stakeholders reported that these meetings generally were effective in fostering communication and collaboration.

The Department's leadership and management principles in 3 FAM 1214b(4) and (7) call for communication to be clear and effective and to establish constructive working relationships

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<sup>28</sup> ISP-I-17-04, December 2016, at 9.

<sup>29</sup> OIG randomly selected 6 additional overseas posts to survey as part of the review.

<sup>30</sup> Each CA directorate has at least one position designated as a Business Unit Systems Liaison. These liaisons are a critical link between CA's policy directorates and CST. They work with CST and the affected directorates to verify business requirements and make sure that changes and enhancements to consular systems serve users and customers.



with all mission elements to further goals. According to the *Standards for Internal Control in the Federal Government*,<sup>31</sup> Principle 15, organizations should have adequate external communication to achieve its objectives. OIG interviews and reviews of documentation showed the primary cause for the imbalanced communication and collaboration was CST management's emphasis on communication with domestic stakeholders. In fact, CST staff reported that management told them to prioritize communication with domestic stakeholders in order to highlight their accomplishments with Department officials.

During the review, CST began taking steps to improve communication with overseas stakeholders through updates to its ConsularOne SharePoint site and blog. In addition, during the review, CST created a draft communication plan to improve communication and collaboration with external stakeholders, with plans to work with CA's Office of 1CA to review and provide an outside perspective on the communication plan. However, overseas CA stakeholders will continue to have concerns about the ability for ConsularOne to meet their operational needs until the communication plan is implemented and effective communication and collaboration occur regularly.

**Recommendation 5:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement a plan for communication and collaboration with its stakeholders that would promote feedback, as well as promote the understanding of the stages, timeline, and content for the ConsularOne modernization effort. (Action: CA)

## Project Management

### ***Office Lacked Documented Management Approvals and Central Retention of Project Documentation for ConsularOne Systems Development***

CST lacked documented management approvals showing review and approval by CST leadership throughout the systems development process. It also lacked a central location for maintaining documentation for the various projects under the ConsularOne modernization program. In its review of four ConsularOne information system project files, OIG was unable to locate current project plans detailing tasks, start and end dates, budget information, and deliverables for each project, or documented management approvals for those project plans. According to 5 FAH-5 H-213c, a project cannot succeed without a valid project plan. Additionally, CST was unable to locate user requirements reviews, system concepts, acquisition plans, or source selection approvals for the same four projects. CST staff also told OIG that they did not include "controls gates"<sup>32</sup> as part of the Agile system development lifecycle process,

<sup>31</sup> GAO-14-704G, September 2014, at 62.

<sup>32</sup> According to 5 FAM 613, control gates are a management review process in the project cycle designed to examine and evaluate project status (milestones) and to determine if the project will proceed to the next management event.

which they began using in 2012,<sup>33</sup> despite requirements in 5 FAH-5 H-210 and Bureau of Information Resource Management guidance to do so.<sup>34</sup>

In addition, OIG found that CST lacked a central location for staff to maintain project documents, contrary to 5 FAH-4 H-215.1-1, which requires offices to issue procedures that explain to all personnel how the central file is to be used for file content and management. Because CST did not have such procedures, OIG found CST divisions stored files in multiple locations, including shared drives, SharePoint sites, the Microsoft Teams application, and two other project collaboration systems. As a result, CST staff members were unable to locate some projects' documentation or determine which project documents were final. Staff told OIG this occurred due to a lack of guidance by CST management on the use of a central location.

Without documented management approvals and a central location for project documentation, CA leadership will be unable to adequately evaluate ConsularOne systems development to ensure alignment with CST's objectives and goals, which will further delay ConsularOne modernization progress.

**Recommendation 6:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to maintain documented management approvals for all information systems throughout the systems development lifecycle process in accordance with Department standards. (Action: CA)

**Recommendation 7:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement standard operating procedures for its systems development lifecycle process that includes details on the central location to be used to maintain project documentation. (Action: CA)

## Information Security Management

### *Security Assessment Service Did Not Meet Independence Standards*

OIG found that CST did not use an independent entity to perform security assessment services for its systems, including those supporting ConsularOne, contrary to industry standards. CST contracted security assessment services for its information systems from the same vendor that provided security development, deployment, and maintenance services, rather than having assessments performed by an independent entity such as the Bureaus of Diplomatic Security or Information Resource Management. An independent assessment of an information system is a key security control component.

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<sup>33</sup> Agile methodology is focused on iterative and incremental development while employing frequent inspection and adaptation procedures. Agile requires greater collaboration between all functions within an organization toward accelerating time-to-deploy performance while remaining focused on product quality.

<sup>34</sup> According to the Bureau of Information Resource Management, an Agile methodology provides the same transparency as the traditional methodology (also known as Managing State Projects IT Framework) and includes the same control gates, governance, and artifacts. Agile methodology for systems development includes 2-6 weeks for design, develop and test phases, and provides additional control gates after each iteration for review.



National Institute of Standards and Technology (NIST) Special Publication 800-53, Revision 5,<sup>35</sup> states that to achieve impartiality, assessors should not create a mutual or conflicting interest with the organizations where the assessments are being conducted, assess their own work, or act as management or employees of the organizations they are serving. The Government Accountability Office's *Government Auditing Standards*<sup>36</sup> identifies threats to independence as including financial interest, reviewing one's own work, and being located within the same organization level. OIG determined that a change in CST's contract structure that consolidated the office's information security contracts resulted in the lack of impartiality in CST's assessment service. Without an independent assessment of information systems, CST cannot ensure that security assessments objectively identify deficiencies that might compromise CST's legacy and modernized systems and the information contained within them.

**Recommendation 8:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to conduct independent information system security assessments. (Action: CA)

### ***Information System Operating With Expired Authorization to Operate***

OIG found that one of CST's systems being modernized under ConsularOne was operating with an expired authorization to operate (ATO),<sup>37</sup> contrary to Department standards. Guidance in 5 FAM 619c states that Department system owners must ensure that an authorization is performed on all Department systems reportable under the Federal Information Security Modernization Act of 2014.<sup>38</sup> The system was categorized as having moderate security impact under Federal Information Processing Standard 199,<sup>39</sup> which means that the loss of confidentiality, integrity, or availability of the system and its data could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.

OIG found that the components being developed as part of the ConsularOne modernization program will share data with other CST systems, including those with valid ATOs, potentially putting data located in the other systems at risk. CST staff told OIG that they were unable to

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<sup>35</sup> NIST Special Publication 800-53, Revision 5, *Security and Privacy Controls for Information Systems and Organizations*, Security Control CA-2(1), Independent Assessors 85 (updated December 2020).

<sup>36</sup> Government Accountability Office, *Government Auditing Standards*, 2018 Revision, Technical Update April 2021 32-33 (GAO-21-368G, April 2021).

<sup>37</sup> An authorization to operate is the official management decision given by a senior Federal official or officials to authorize operation of an information system and to explicitly accept the risk to agency operations (including mission, functions, image, or reputation), agency assets, individuals, other organizations, and the nation based on the implementation of an agreed-upon set of security and privacy controls. Authorization also applies to common controls inherited by agency information systems.

<sup>38</sup> The 2014 Federal Information Security Management Act (FISMA) provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets.

<sup>39</sup> NIST, Federal Information Processing Standards Publication 199, *Standards for Security Categorization of Federal Information and Information Systems 2* (FIPS PUB 199, February 2004).

meet the security requirements needed to extend the ATO due to competing priorities but that they were in the process of meeting those requirements during OIG's review.

The ATO process is particularly important for systems with a moderate security impact categorization because moderate systems require a stringent level of security controls to maintain the confidentiality, integrity, and availability of the systems. The ATO process validates that the required security controls are properly implemented. Systems operating with expired ATOs are at an increased risk of the confidentiality, integrity, and availability being compromised due to inadequate security controls.

**Recommendation 9:** The Bureau of Consular Affairs should implement a process to conduct system authorizations for the Office of Consular Systems and Technology's information systems prior to expiration of the systems' authorizations to operate. (Action: CA)

**Recommendation 10:** The Bureau of Consular Affairs, in coordination with the Bureau of Information Resource Management, should complete the assessment and authorization process for the Office of Consular Systems and Technology's information systems with expired authorizations to operate. (Action: CA, in coordination with IRM)

***Office Did Not Perform Security Controls Assessments as Required***

CST staff did not perform ongoing security controls assessments for its information systems in accordance with Department standards. Guidance in 5 FAM 1066.1-1(A)c states the system owner must perform an annual security control self-assessment. OIG found that all of CST's systems, including the ConsularOne systems, had overdue security controls assessments, in some cases by more than 3 years. CST staff acknowledged that the security controls assessments were overdue and stated competing priorities as the reason they had not been completed. Failure to regularly assess security controls increases the potential risk that CST's information systems could be compromised, which could negatively affect the ConsularOne modernization program.

**Recommendation 11:** The Bureau of Consular Affairs should perform annual security controls assessments for the Office of Consular Systems and Technology's information systems in accordance with Department standards. (Action: CA)

## RECOMMENDATIONS

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OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to the Bureau of Consular Affairs. The bureau's complete responses can be found in Appendix C.<sup>1</sup> The bureau also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** The Bureau of Consular Affairs should review with the Office of Consular Systems and Technology leadership the deployment schedule for ConsularOne components to determine the schedule's viability to achieve bureau requirements. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs reviewed with the Office of Consular Systems and Technology (CST) leadership the deployment schedule for ConsularOne components to determine the schedule's viability to achieve bureau requirements.

**Recommendation 2:** The Bureau of Consular Affairs should clearly define the ConsularOne modernization program and Consular Systems Modernization, including its components, projects, supporting contracts, and the associated total cost of those contracts for both efforts. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs clearly defined the ConsularOne modernization program and Consular Systems Modernization, including its components, projects, supporting contracts, and the associated total cost of those contracts for both efforts.

**Recommendation 3:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to hold managers and staff accountable for performance and deliverables for ConsularOne in accordance with Department standards. (Action: CA)

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<sup>1</sup> 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.

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs neither agreed nor disagreed with the recommendation but concurred that staff should be held accountable for performance and deliverables for ConsularOne. The bureau asserted that CST employs the bureau's leadership and management tenets.

**OIG Reply:** OIG considers the recommendation resolved. OIG revised the recommendation to emphasize the need for enhanced staff and management accountability. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs required CST to hold managers and staff accountable for performance and deliverables for ConsularOne in accordance with Department standards.

**Recommendation 4:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement an internal communication and collaboration plan. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs required CST to implement an internal communication and collaboration plan.

**Recommendation 5:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement a plan for communication and collaboration with its stakeholders that would promote feedback, as well as promote the understanding of the stages, timeline, and content for the ConsularOne modernization effort. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs neither agreed nor disagreed with this recommendation but concurred with the intent of the recommendation. Furthermore, the bureau requested a revision to the recommendation and noted the effort will require engagement by all levels of bureau leadership and both domestic and overseas end users.

**OIG Reply:** OIG considers the recommendation resolved. OIG revised the recommendation to acknowledge the effort will require engagement with all stakeholders. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs required CST to implement a plan for communication and collaboration with its stakeholders that would promote feedback, as well as promote the understanding of the stages, timeline, and content for the ConsularOne modernization effort.

**Recommendation 6:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to maintain documented management approvals for all information systems throughout the systems development lifecycle process in accordance with Department standards. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs neither agreed nor disagreed with this recommendation but concurred with the intent of the recommendation. The bureau noted it employs the Scaled Agile Framework methodology, which includes documented management approvals.

**OIG Reply:** OIG considers the recommendation unresolved. Although CA noted its use of the Scaled Agile Framework, the bureau was not able to provide OIG with evidence of its use of this methodology or any other methodologies during the inspection. Specifically, CA was unable to provide OIG the current project plans detailing tasks, start and end dates, budget information, and deliverables for each project, or documented management approvals for those project plans. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs required CST to maintain documented management approvals for all information systems throughout the systems development lifecycle process in accordance with Department standards.

**Recommendation 7:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement standard operating procedures for its systems development lifecycle process that includes details on the central location to be used to maintain project documentation. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs neither agreed nor disagreed with this recommendation and requested a revision to the recommendation to focus on enforcing the consistent use of existing standard operating procedures.

**OIG Reply:** OIG considers the recommendation unresolved. The standard operating procedures that CST provided to OIG at the time of the inspection did not describe a central location to maintain project documentation. Also, as noted in the report, OIG found CST divisions stored files in multiple locations, including shared drives, SharePoint sites, the Microsoft Teams application, and two other project collaboration systems. As a result, CST staff members were unable to locate some projects' documentation or determine which project documents were final. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs required CST to implement standard operating procedures for its systems development lifecycle process that includes details on the central location to be used to maintain project documentation.

**Recommendation 8:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to conduct independent information system assessments. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs neither agreed nor disagreed with this recommendation but concurred with the intent of the recommendation. The bureau noted that CST executes independent information system assessments as required by the Foreign Affairs Manual.

**OIG Reply:** OIG considers the recommendation unresolved. As noted in the report, OIG determined that a change in CST's contract structure, which consolidated the office's information security contracts, resulted in the vendor conducting CST's security assessments not being independent, contrary to industry standards in National Institute of Standards and Technology Special Publication 800-53, Revision 5. This publication states that to achieve impartiality, assessors should not create a mutual or conflicting interest with the organizations where the assessments are being conducted, assess their own work, or act as management or employees of the organizations they are serving. As stated in the report, CST contracted with the same vendor to both develop and assess security plans. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs required CST to conduct independent information system assessments.

**Recommendation 9:** The Bureau of Consular Affairs should implement a process to conduct system authorizations for the Office of Consular Systems and Technology's information systems prior to expiration of the systems' authorizations to operate. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs implemented a process to conduct system authorizations for CST's information systems prior to expiration of the systems' authorizations to operate.

**Recommendation 10:** The Bureau of Consular Affairs, in coordination with the Bureau of Information Resource Management, should complete the assessment and authorization process for the Office of Consular Systems and Technology's information systems with expired authorizations to operate. (Action: CA, in coordination with IRM)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs completed the assessment and authorization process for CST's information systems with expired authorizations to operate.

**Recommendation 11:** The Bureau of Consular Affairs should perform annual security controls assessments for the Office of Consular Systems and Technology's information systems in accordance with Department standards. (Action: CA)

**Management Response:** In its October 25, 2021, response, the Bureau of Consular Affairs 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 Consular Affairs performed annual security controls assessments for CST's information systems in accordance with Department standards.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This review was conducted from March 15 to July 28, 2021, 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 the Office of Inspector General (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. Consistent with Section 209 of the Foreign Service Act of 1980, OIG's objectives for this review of the Bureau of Consular Affairs' ConsularOne modernization program were to determine whether:

- The Office of Consular Systems and Technology (CST) was successfully meeting deployment schedules for launching components under the ConsularOne modernization program.
- CST leadership adhered to leadership principles and tenets within CST and with Bureau of Consular Affairs (CA) stakeholders.
- CST and its stakeholders communicated and collaborated with respect to strategic planning per the Department's leadership and management principles.
- CST leadership and staff had adequate internal communication and collaboration to support the office in fulfilling its objectives.
- Staff vacancies affected CST's timeline in achieving ConsularOne modernization effort objectives.
- CST recruited, developed, and retained personnel to achieve the office's objectives.
- Budget cuts affected CST's timeline in achieving ConsularOne modernization effort objectives.
- CST adhered to project management methodology for its modernization efforts, including required documented management reviews, proper documentation creation and retention, and necessary user and stakeholder involvement throughout the processes.
- Information Systems Security Officer duties were adequately performed.
- The assessment and authorization process complied with Department and Federal standards for completed and active authorization to operate for their information systems.
- The security controls, such as configuration management, data management, access management, and cybersecurity controls, complied with Department and Federal requirements.



## **Methodology**

OIG used a risk-based approach to prepare for this review. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted the review 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; circulated questionnaires and compiled the results; and 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.

Team Leader Vandana Patel, Robin Busse, Daniel King, Kevin Milas, Lisa Piascik, and Paul Sanders conducted this review. Other report contributors included Caroline Mangelsdorf and Diana McCormick.

## APPENDIX B: OFFICE OF CONSULAR SYSTEMS AND TECHNOLOGY DIVISIONS

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As stated in 1 Foreign Affairs Manual (FAM) 252.3-3(A)-(G), the Office of Consular Systems and Technology (CST) is comprised of seven divisions:

- (1) **Service Strategy and Portfolio Management (SSPM)** is responsible for IT governance, enterprise requirements management, project/program management, acquisitions, contract management, budget planning, and internal management oversight. SSPM develops project management standards, governance processes, and internal controls to facilitate program/project delivery and operational efficiency.
- (2) **Service Integration & Innovation (SII)** is responsible for crosscutting initiatives aimed at standardizing and improving CST. SII identifies new technologies to support the Bureau of Consular Affairs (CA) mission, ensures alignment of systems to business goals through enterprise architecture modernization, and identifies ways to improve CST processes to ensure optimal delivery of services.
- (3) **New Service Design & Development (NSDD)** is responsible for selecting, designing, and implementing new technology services that support CA and clearly align to business needs. It also functions as the software developer for ConsularOne.
- (4) **Production Service Design & Development (PSDD)** is responsible for developing and maintaining production application software, business intelligence and reporting tools, and web content that supports CA's mission.
- (5) **Service Transition (ST)** manages, supports, and facilitates the transition of IT services from inception to production, ensuring that business requirements are met and are sustainable by Service Operations.
- (6) **Service Operations (SO)** provides enterprise network and application support. SO provides backup, recovery, and storage services for CA systems, and provides tier 1 and 2 support for its systems.
- (7) **Service Delivery and Outreach (SDO)** is responsible for hardware acquisition and warehouse management and deploys hardware and software to all domestic and overseas consular locations. SDO also provides training on consular applications to all domestic and overseas consular operations, including passport agencies and visa centers.

## APPENDIX C: MANAGEMENT RESPONSE

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United States Department of State

Washington, D.C. 20520

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October 25, 2021

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

**FROM:** Bureau of Consular Affairs – Rena Bitter, Assistant Secretary

**SUBJECT:** Response to Draft OIG Report – Review of the Bureau of Consular Affairs' ConsularOne Modernization Program - Significant Deployment Delays Continue

The Bureau of Consular Affairs (CA) has reviewed the draft OIG inspection report. CA will provide feedback with respect to the factual and editorial aspects of the report under separate cover. We submit the responses below in answer to the recommendations provided by the OIG.

**OIG Recommendation 1:** The Bureau of Consular Affairs should review with the Office of Consular Systems and Technology leadership the deployment schedule for ConsularOne components to determine the schedule's viability to achieve bureau requirements. (Action: CA)

**Management Response:** CA concurs with this recommendation.

**OIG Recommendation 2:** The Bureau of Consular Affairs should clearly define the ConsularOne modernization program and Consular Systems Modernization, including its components, projects, supporting contracts, and the associated total cost of those contracts for both efforts. (Action: CA)

**Management Response:** CA concurs with this recommendation. For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 3:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement leadership and management tenets and use mechanisms in place to hold staff accountable for performance and deliverables for ConsularOne in accordance with Department standards. (Action: CA)

**Management Response:** CA concurs with the OIG recommendation that staff be held accountable for performance and deliverables for ConsularOne but asserts that the Office of Consular Systems and Technology does employ the Bureau's leadership and management tenets.

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**OIG Recommendation 4:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement an internal communication and collaboration plan. (Action: CA)

**Management Response:** CA concurs with this recommendation. For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 5:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement a plan for communication and collaboration with its overseas stakeholders that would promote feedback from stakeholders, as well as promote the understanding of the stages, timeline, and content for the ConsularOne modernization effort. (Action: CA)

**Management Response:** CA concurs with the intent of this recommendation. CST currently communicates with its overseas stakeholders when collecting requirements and through various user experience activities. The Bureau, through the Senior Steering Group, made a decision to leverage existing channels such as the Business Unit System Liaison (BUSL) working group to communicate with business stakeholders (CA-wide) on behalf of CST. This allows the Business Units to provide leadership with the necessary factors to prioritize the work done by CST. However, given the complexity of CA's systems modernization effort and changes to the timelines for implementation, CA concurs with the need to expand communication channels related to requirements gathering, leadership and end user feedback, and timeline and content for modernization.

As this effort will require robust, ongoing engagement by all levels of CA leadership and end users both domestically and overseas, CA recommends rewording Recommendation 5 to state:

The Bureau of Consular Affairs should develop and implement a comprehensive plan for communication and collaboration with its overseas and domestic stakeholders that would promote feedback from stakeholders, as well as promote the understanding of the stages, timeline, and content for the ConsularOne modernization effort. (Action: CA)

For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 6:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to maintain documented management approvals for all information systems throughout the systems development lifecycle process in accordance with Department standards. (Action: CA)

**Management Response:** CA concurs with the intent of this recommendation. CST already employs the SAFE Agile methodology, which includes documented management approvals. Since this recommendation is already being implemented by the Department, we respectfully request that OIG remove it from their report when the final version is published. For

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additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 7:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement standard operating procedures for its systems development lifecycle process that includes details on the central location to be used to maintain project documentation. (Action: CA)

**Management Response:** CA recommends changing this recommendation from implementing SOPs and central storage locations to enforcing the consistent use of existing SOPs governing the use of central storage locations. For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 8:** The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to conduct independent information system assessments. (Action: CA)

**Management Response:** CA concurs with the intent of this recommendation and notes that CA/CST already executes independent information system assessments as required by the FAM. Since this recommendation is already being implemented by the Department, we respectfully request that OIG remove it from their report when the final version is published. For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

**OIG Recommendation 9:** The Bureau of Consular Affairs should implement a process to conduct system authorizations for the Office of Consular Systems and Technology's information systems prior to expiration of the systems' authorizations to operate. (Action: CA)

**Management Response:** CA concurs with this recommendation.

**OIG Recommendation 10:** The Bureau of Consular Affairs, in coordination with the Bureau of Information Resource Management, should complete the assessment and authorization process for the Office of Consular Systems and Technology's information systems with expired authorizations to operate. (Action: CA, in coordination with IRM)

**Management Response:** CA concurs with this recommendation. However, CA understands the scope of this inspection is the ConsularOne Modernization Program and believes the priority for this recommendation should be the four ConsularOne boundaries.

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**OIG Recommendation 11:** The Bureau of Consular Affairs should perform annual security controls assessments for the Office of Consular Systems and Technology's information systems in accordance with Department standards. (Action: CA)

**Management Response:** CA concurs with this recommendation. For additional commentary, please see factual and editorial feedback sent to [ispclearances@stateoig.gov](mailto:ispclearances@stateoig.gov).

The point of contact for this memorandum is James W. Smith, Division Chief, CA/CST/SSPM.

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