

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-23-04

Office of Inspections

October 2022

Inspection of Embassy Ottawa and Constituent Posts, Canada

BUREAU OF WESTERN HEMISPHERE AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-23-04

What OIG Inspected

OIG inspected the executive direction, policy and program implementation, resource management, and information management operations of Embassy Ottawa. The inspection included Consulates General Calgary, Halifax, Montreal, Quebec City, Toronto, and Vancouver, and Consulate Winnipeg.

What OIG Recommends

OIG made 27 recommendations: 26 to Embassy Ottawa and 1 to the Bureau of Information Resource Management.

In its comments on the draft report, the Department concurred with 25 recommendations and disagreed with 2 recommendations. OIG considers 26 recommendations resolved and 1 recommendation unresolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal responses are reprinted in their entirety in Appendix B.

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OFFICE OF INSPECTIONS

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What OIG Found

- Mission Canada's leadership team generally modeled the Department of State's leadership principles, and the Ambassador and Deputy Chief of Mission emphasized diversity and inclusion.
- The mission's Political and Economic Sections collaborated to advance most Integrated Country Strategy and Department priorities, with the exception of countering malign People's Republic of China activities and Arctic issues.
- Mission Canada's Consular Sections continued to meet high demand for U.S. passports and Consular Reports of Birth Abroad within standards and were addressing a backlog in nonimmigrant visa services.
- The mission had consular issues related to space and line of sight, file storage, passport adjudication audits, and fraud prevention.
- Seismic assessments had not been conducted on all Consulate General Vancouver facilities, as required. Additionally, mission wide, the motor vehicle, property management, contracting officer's representative, and housing programs did not fully comply with Department standards.
- The mission had information management issues related to information security practices, standard operating documentation, network cabling, and records management.
- Spotlight on Success: Mission Canada added a floating holiday to advance its diversity, equity, inclusion, and accessibility goal.
- Spotlight on Success: Consulates General Calgary, Halifax, Montreal, Quebec City, Toronto, and Vancouver used contractors for after-hours calls, reducing the burden on duty officers.

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CONTEXT

The United States and Canada have a unique relationship based on shared geography, strong economic ties, similar values, and common interests. The bilateral relationship is close and extensive. The countries share the world's longest international border, and almost 400,000 people and more than \$2 billion worth of goods and services cross the border each day. In 2021, U.S. trade in goods with Canada totaled \$664.8 billion, including \$307.6 billion in exports and \$357.2 billion in imports, making Canada the United States' leading trade partner.

The February 23, 2021, Roadmap for a Renewed U.S.-Canada Partnership (Roadmap) reflects the depth and breadth of the U.S.-Canada relationship.¹ The Roadmap serves as a blueprint for a whole-of-government effort to advance mutual prosperity and a shared commitment to diversity, equity, and justice. It also creates a partnership for combatting the COVID-19 pandemic; promoting free trade and border and international security; bolstering global alliances; cooperating on climate, energy, and transboundary environmental and water issues; securing a supply chain for critical minerals; and education exchanges. Finally, the Roadmap also fosters increasing multilateral cooperation, including international efforts to combat terrorist financing and money laundering.

Mission Canada's top strategic objectives, as outlined in the FY 2022 Integrated Country Strategy (ICS), are to:

- Partner bilaterally, regionally, and multilaterally to advance the climate and environmental goals of decarbonization and good governance through innovation and collaboration.
- Work collaboratively to support small and medium-sized enterprises to ensure economic opportunities for women, youth, underrepresented groups, and indigenous peoples.
- Improve North American competition by supporting resilient and integrated supply chains, reducing regulatory barriers, and cooperating on measures that improve the region's economic security and sustainability.
- Work together to protect the lives and serve the interests of U.S. citizens in Canada and strengthen U.S. border security while facilitating legitimate trade and travel across the shared border.

The U.S. diplomatic mission to Canada consists of Embassy Ottawa; Consulates General Calgary, Halifax, Montreal, Quebec City, Toronto, and Vancouver; and Consulate Winnipeg. At the time of the inspection, Mission Canada had 955 authorized U.S. direct-hire positions. Of these, 199 were Department of State (Department) positions. The remaining 756 positions were filled by other U.S. government agencies represented at the mission, including the Departments of Agriculture, Commerce, Defense, Health and Human Services, Homeland Security, Justice, and

¹ On February 23, 2021, President Biden and Prime Minister Trudeau announced the Roadmap for a Renewed U.S.-Canada Partnership to revitalize and expand the relationship between the two countries.

the Treasury. The mission also had 333 locally employed (LE) staff members and 6 eligible family member employees. Embassy Ottawa and Consulate General Montreal also provide management support to the U.S. Mission to the International Civil Aviation Organization, located in Montreal, Canada.

OIG evaluated Mission Canada's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.² A related classified inspection report discusses the mission's security program, issues affecting the safety of mission personnel and facilities, and Sensitive But Unclassified findings related to the mission's information management program.

EXECUTIVE DIRECTION

OIG assessed Mission Canada's leadership based on interviews, staff questionnaires, reviews of documents, and OIG's observations of meetings and activities during the inspection.

Tone at the Top and Standards of Conduct

The Chief of Mission, a noncareer ambassador, arrived in December 2021, approximately 3½ months before the inspection. Previously, he worked as an executive at a U.S. telecommunications firm. The Deputy Chief of Mission (DCM), a career member of the Senior Foreign Service, arrived in August 2020. She also served as Chargé d'Affaires from November 2020 to May 2021. Her previous assignment was DCM in Abidjan, Cote d'Ivoire. From May 2021 until the arrival of the Ambassador in December 2021, the Department assigned another official to Ottawa to serve as Chargé.

OIG found the Ambassador generally modeled the Department's leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214b,³ particularly to communicate, plan strategically, and value diversity in both his interactions with mission staff and in his outside activities. In his short time at post, the Ambassador had participated in events sponsored by Mission Canada's four Diversity and Inclusion Councils and included the councils' presentations in Country Team meetings to improve diversity, equity, inclusion, and accessibility awareness among the mission's employees. In addition, as discussed below, he approved adding a floating holiday to the mission's list of holidays at the recommendation of the embassy's Diversity and Inclusion Council. This initiative allowed staff to take a day off of their choosing to celebrate a religious holiday or a day of special significance.

In OIG interviews, mission staff consistently described the Ambassador as approachable and collaborative. They said the Ambassador set two priorities early in his tenure: implementing the

² See Appendix A.

³ The Department's leadership and management principles outlined in 3 FAM 1214b include (1) model integrity, (2) plan strategically, (3) be decisive and take responsibility, (4) communicate, (5) learn and innovate constantly, (6) be self-aware, (7) collaborate, (8) value and develop people, (9) manage conflict, and (10) foster resilience.

Roadmap and promoting diversity, inclusion, and accessibility, both within the mission and as a bilateral policy priority.

Overall, OIG found the DCM generally acted in accordance with the Department's 3 FAM 1214b leadership principles. Mission staff told OIG they appreciated the DCM's suggestions at a Country Team meeting on ways to help the Ambassador prepare for his meetings with Canadian officials. Specifically, the DCM conveyed the Ambassador's management approach and topics of interest, as well as his goal that the mission meet with a diverse pool of Canadian contacts. The DCM also supported diversity and inclusion efforts. For example, she highlighted the diversity of the mission's staff in an article she wrote in *State Magazine* in March 2022.⁴

OIG determined the Ambassador and the DCM communicated and coordinated with all mission elements through regular meetings. Specifically, the Front Office held weekly Country Team meetings with section heads, principal officers, and agency heads represented at the mission. The Front Office also held weekly senior staff meetings and biweekly individual meetings with section and agency heads.

Spotlight on Success: Mission Canada Added Floating Holiday to Advance Diversity, Equity, Inclusion, and Accessibility Goal

To support the Department's goal of advancing diversity, equity, inclusion, and accessibility, Mission Canada created a paid floating holiday for all employees. The floating holiday permitted each employee, with supervisory approval, to choose one day off to celebrate a cultural, religious, or spiritual holiday, or a day of special significance to the employee, that was not already observed by the mission. Based on feedback from the mission community, Embassy Ottawa's Diversity and Inclusion Council had recommended the idea of the floating holiday to the Ambassador, who supported and approved the council's recommendation. In June 2022, after a review and approval by the Department's Office of Legal Adviser and Bureau of Global Talent Management, the mission added the floating holiday to its list of official holidays.

Execution of Foreign Policy Goals and Objectives

Mission Canada submitted its FY 2022 ICS to the Department for approval in May 2022. Embassy section heads, the heads of the other agencies represented at the mission, and the mission's seven principal officers told OIG that they participated in developing the ICS and understood its goals and objectives.

In addition to the ICS, Mission Canada used the Roadmap, described earlier in this report, for strategic guidance. OIG found mission staff were familiar with the Roadmap goals and used them to structure mission activities. The mission also reported on its progress toward Roadmap

⁴ The article noted 78 of Mission Canada's LE staff members began their careers at one of 40 different U.S. embassies or consulates in their home countries, providing valuable experience to the mission. *State Magazine*, "Professional Cadre: Local Staff From Around the World Enhance Mission Canada," March 2022.

goals and objectives at the 1-year mark in a February 2022 cable.⁵ In the cable, the mission highlighted its actions on climate change, COVID-19 vaccine coordination, joint anti-opioid efforts, expanded small- and medium-sized enterprises outreach, supply chain resiliency cooperation, and critical minerals collaboration.

Mission staff described the Ambassador's leadership of a large interagency team, which included the Departments of Agriculture, Commerce, Defense, Homeland Security, Justice, and the Treasury, as effective and collaborative. During the inspection, OIG observed the Ambassador encouraging the exchange of information and viewpoints from section and other agency heads in Country Team meetings. Additionally, OIG's review of the Ambassador's and the DCM's calendars and other documents showed they had contacts with a wide range of Canadian officials and private citizens, consistent with their 2 FAM 113.1c(1) and (6) responsibilities to maintain close official relations and represent the interests of the United States.

As a result of these relationships, the mission advanced U.S. policy priorities related to security cooperation, strengthening bilateral economic relations, and promoting U.S. exports. For example, the embassy cooperated with the Departments of Defense and Commerce to successfully advocate for Canada's purchase of F-35 fighter aircraft, consistent with the Roadmap's goal of bolstering bilateral trade, security, and defense. In another example, to support the Roadmap's goal of strengthening the bilateral economic relationship, the embassy worked with the Department of Agriculture and with Canadian officials to advocate for the U.S. potato industry to ensure that Canadian food imports met safety standards.

Impact of COVID-19 Pandemic

OIG found the Front Office's response to the COVID-19 pandemic was consistent with 2 FAM 031d and 2 FAM 032.6f guidance on risk management.⁶ By April 2022,⁷ after reviewing local COVID-19 risk factors and convening Emergency Action Committee meetings, Embassy Ottawa and the constituent posts adopted an "all functions" posture,⁸ which allowed a return to onsite

⁵ Cable 22 Ottawa 120, "Canada: The US-Canada Partnership Roadmap at One-Year: Just Getting Started," February 4, 2022.

⁶ According to 2 FAM 031d, a key Department leadership tenet is to lead teams to the best possible assessment of risk, implementation of mitigation measures, and evaluation of the residual risk that still remains, through sound planning and management. The Department expects leaders to judge whether the benefits of an activity outweigh the residual risk potential and to act accordingly. Guidelines in 2 FAM 032.6f also state that chiefs of mission set the risk tolerance level at their mission and communicate it clearly to staff.

⁷ On March 21, 2022, Consulate General Calgary adopted the "all functions" posture. On April 4, 2022, Embassy Ottawa, Consulates General Montreal, Quebec City, Toronto, and Vancouver, and Consulate Winnipeg followed. On April 6, 2022, Consulate General Halifax adopted the posture.

⁸ To inform decision-making on workforce posture and mitigation measures, the Department developed workforce posture levels that aligned with the Centers for Disease Control and Prevention's community level metric measuring the effect of COVID-19 on health and health care systems. The "all functions" posture aligned with low community levels of the disease or a medium level with low hospitalization rates. Under this posture, there are no limitations on the size of in-person gatherings, and other mitigation measures, such as physical distancing and masking, are not required.

work for most staff. Specifically, approximately 80 to 90 percent of Mission Canada's staff resumed working onsite in April 2022. Workplace flexibilities, such as telework, continued for eligible employees. OIG also observed that embassy staff continued practices such as situational telework and voluntary mask wearing and social distancing after staff returned to the office.

From March 2020 to March 2022, Mission Canada operated on a maximum telework posture. During this period, the mission adapted to restrictions on in-person gatherings by using virtual tools such as WebEx and Microsoft Teams. Mission staff told OIG these tools, along with other Department resources to support telework, enabled the mission to continue to advance ICS objectives. For example, the mission used these virtual platforms to meet with Canadian government officials, lawmakers, businesses, and members of civil society. However, the COVID-19 pandemic created operational challenges for the Political, Economic, Consular, and Management Sections, as discussed later in this report. For example, the mission in March 2020 suspended all U.S. citizen and visa services, except for emergency citizen and passport services, for the safety of Consular Section staff and applicants. Consular service levels gradually resumed throughout 2021 as the COVID-19 vaccine became more readily available in Canada and the provinces relaxed their restrictions. Full consular operations resumed in April 2022.

Adherence to Internal Controls

The Front Office prepared the FY 2021 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1) and (5), which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. OIG reviewed the mission's supporting documentation for the Statement of Assurance, which showed that embassy sections and the constituent posts reviewed internal controls as required and identified no significant deficiencies or material weaknesses. However, as discussed later in this report, OIG found internal control issues in political and economic reporting, grants management, consular management, facility management, general services, financial management, and information management.

Security and Emergency Planning

The Front Office's leadership of the security and emergency preparedness programs was consistent with the Department's guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-762a. The Ambassador signed 10 security directives and met with the Regional Security Officer weekly and on an ad hoc basis to review the security program. In addition, the mission updated its emergency action plan on April 1, 2022, and posted links to the plan in its security directive. Responses to OIG's questionnaires showed that most U.S. direct-hire and LE staff members were familiar with the plan, knew where to find it and what to do in case of an emergency, and participated in security drills. The companion classified inspection report contains additional discussion of the security program.

Equal Employment Opportunity

OIG found the embassy's Equal Employment Opportunity (EEO) practices were consistent with 3 FAM 1514 and 21 STATE 60514.⁹ Mission Canada appointed 8 EEO counselors and 11 LE staff EEO liaisons and conducted virtual EEO training for all U.S. direct-hire employees and LE staff. Additionally, Embassy Ottawa and Consulates General Montreal, Toronto, and Vancouver established Diversity and Inclusion Councils. At the time of the inspection, Consulate General Calgary was in the process of reestablishing its Diversity and Inclusion Council following disruptions due to COVID-19 and the departure of previous council members. EEO counselors and council members told OIG the Ambassador and principal officers supported EEO and diversity and inclusion programs and activities. As noted earlier, the Ambassador participated in events sponsored by the councils and implemented one initiative proposed by the embassy's council.

Developing and Mentoring Foreign Service Professionals

Mission Canada Lacked a Formal, Structured First- and Second-Tour Program

OIG found Mission Canada lacked a formal, structured FAST program to provide professional development training and opportunities for the 24 first- and second-tour personnel assigned to Embassy Ottawa and Consulates General Calgary, Montreal, Toronto, and Vancouver. In addition to requirements in 3 FAM 2242.4 and 3 FAM 1214b(8), Department guidance states that structured mentoring programs at overseas posts are essential to providing all employees with professional development opportunities.¹⁰ Furthermore, although missions with constituent posts will likely have one mission-wide FAST committee centered in the embassy, each constituent post should have its own program under the principal officer's guidance.¹¹

FAST personnel told OIG there was no mission-wide FAST program or policy and reported the FAST activities that did occur were informal in nature. Despite the lack of a formal program, FAST personnel said the DCM and principal officers expressed interest in their professional development. They also acknowledged that in-person development opportunities had understandably declined because of the COVID-19 pandemic. OIG determined that, in the 12 months prior to the inspection, some FAST activities had taken place, such as meetings with the Ambassador and the DCM, discussions with other mission personnel, and development opportunities for FAST personnel to serve as control officers for official visitors. However, because the embassy and constituent posts lacked a formal, structured FAST program, these personnel did not always receive regular, structured professional development, mentoring, training, and opportunities, as required by Department standards. The lack of a formal, structured program could lead to some FAST personnel not getting the professional development opportunities needed to prepare them for future assignments.

⁹ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

¹⁰ 3 FAM 2711, "Purpose;" and 3 FAM 2713b, "Foreign Service Programs Components."

¹¹ Cable 15 STATE 23542, "Mentoring for a Stronger Department of State," March 5, 2015.

Recommendation 1: Embassy Ottawa should implement a First- and Second-Tour program that complies with Department standards. (Action: Embassy Ottawa)

Executive Direction at Constituent Posts

The principal officers at each constituent post reported to OIG that the embassy Front Office communicated with them regularly through videoconferencing and conference calls. This included a weekly Country Team meeting, a one-on-one meeting every other week with each of the principal officers, a group meeting with all the principal officers on alternating weeks, and an annual principal officer's workshop held at the embassy. Although the Ambassador had visited Montreal, Quebec City, Toronto, and Vancouver, he had yet to visit the other constituent posts due to COVID-19 travel restrictions. However, at the time of the inspection, as COVID restrictions eased, the Ambassador was making plans to visit each post.

OIG found the principal officers at each of the seven constituent posts embodied the Department's leadership guidelines in 3 FAM 1214b and in 2 FAM 113.9(1).¹² Staff at the constituent posts told OIG the principal officers created a positive leadership climate, modeled openness, and demonstrated concern for their well-being. For example, staff cited the principal officers' support for their professional development, EEO, and diversity and inclusion activities. In addition, in OIG interviews, staff members repeatedly noted the principal officers' support for consular, political-economic, public diplomacy, management, information technology (IT), and security functions at their respective posts. Staff at the constituent posts also told OIG the principal officers were accessible and set clear priorities at their posts.

OIG's review of the principal officers' schedules showed meetings and activities with a wide variety of Canadian governmental and non-governmental officials, consistent with Department guidance in 2 FAM 113.9(2) and (3). OIG found that the principal officers used these contacts to engage on U.S. policy objectives, including border and national security, climate and energy, critical minerals and supply chain management, environmental protection, trade, and diversity and inclusion. For example, the principal officer at Consulate General Vancouver met with industry and provincial leaders to advance clean energy technologies and the renegotiation of the Columbia River Treaty,¹³ an important bilateral agreement between the United States and

¹² Department guidance in 2 FAM 113.9(1) states that, under the supervision and guidance of the chief of mission, principal officers direct, coordinate, and supervise post resources. The seven constituent posts in Canada varied in terms of the Department's U.S. direct-hire staffing. Consulate General Toronto had 25 U.S. direct-hire staff members, including the principal officer; Consulate General Vancouver, 24; Consulate General Montreal, 22; Consulate General Calgary, 10; Consulates General Halifax and Quebec City, 2 each; and Consulate Winnipeg, 1.

¹³ The United States and Canada began negotiations to modernize the 1961 Columbia River Treaty in May 2018. The river's drainage basin is approximately the size of Texas and includes parts of Washington, Oregon, Idaho, Montana, Utah, Wyoming, and British Columbia. The treaty's hydropower operations and management of flood risk provide substantial benefits to millions of people on both sides of the border. The treaty facilitated benefits such as supporting irrigation, municipal water use, industrial use, navigation, and recreation. The Department's key objectives include continued, careful management of flood risk; ensuring a reliable and economical power supply; and improving the ecosystem in a modernized treaty regime.

Canada. In addition, Consulate General Calgary's principal officer met with industry contacts to advance U.S. policy objectives around Canada's oil and gas sector, energy security, and the reduction of emissions, as the United States imports more than 50 percent of its energy from this consular district. Additionally, the principal officers at each constituent post met with civil society leaders in their districts, including those from indigenous and immigrant communities.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Mission Canada's policy and program implementation work performed by the Political and Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions discussed below.

Political and Economic Sections

OIG reviewed Mission Canada's Political and Economic Sections, including the political and economic work performed at the constituent posts.¹⁴ OIG assessed leadership and management, policy engagement and coordination, reporting, Leahy vetting,¹⁵ commercial promotion, and end-use monitoring functions.

OIG determined that the mission's reporting and diplomatic engagement supported ICS, Roadmap, and Department goals. Specifically, OIG reviewed more than 100 mission cables sent between March 2021 and May 2022 and found reporting to be tied to goals, generally timely, and appropriately sourced. Additionally, Department and interagency officials praised the mission's political reporting on Canadian national elections, defense issues, and Canadian support for Ukraine, as well as economic reporting on COVID-19, trade, energy, supply chains, and critical minerals sectors. Department and interagency officials also credited the embassy Economic Section's early engagement with Canadian officials on that country's proposed digital services tax (discussed below), as well as the entire mission's work on the United States-Mexico-Canada Agreement Implementation Act, transboundary issues, and food and energy supply chain resiliency, as successes in advancing important priorities under the Roadmap.

OIG also found the embassy and constituent post political and economic staffs collaborated to advance most ICS and Department priorities, including advocating, coordinating, and reporting on country-wide activities in support of climate change, trade, defense cooperation, and diversity, equity, and inclusion. Mission-wide collaboration included a monthly coordination call

¹⁴ Consulates General Halifax and Quebec City and Consulate Winnipeg did not have either a formal Political or Economic Section. The principal officers performed the political and economic functions.

¹⁵ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the United States from furnishing certain assistance to a unit of a foreign security force if the Department has credible information that the unit has committed a gross violation of human rights. Leahy vetting is the process of determining if the Department has credible information that units or individuals proposed to benefit from certain assistance have committed a gross violation of human rights. See 22 U.S.C. § 2378d and 9 FAM 303.8-5(B). The Department also helps implement a similar law applicable to "amounts made available to the Department of Defense" for assistance to foreign security forces. See 10 U.S.C. § 362.

between the Embassy Ottawa Political and Economic Sections and political-economic constituent post staffs. Additionally, as described below, the embassy's Economic Section led a successful whole-of-mission effort to secure Canadian support for a global minimum tax on multinational corporations. However, despite the mission's generally strong cooperation on political and economic work, OIG determined there were two areas that could benefit from stronger collaboration, as described later in this report.

Embassy's Engagement Resulted in Canadian Support for a U.S.-Backed Global Minimum Tax on Multinational Corporations

OIG found that Embassy Ottawa, due to its proactive engagement with Department and interagency partners, secured support for the U.S.-backed global agreement establishing a minimum tax rate on multinational corporations,¹⁶ consistent with Department guidance in 2 FAM 113.1c(7). The Economic Section first informed Washington policymakers in late 2019 of Canadian legislative developments for a digital services tax that, if enacted, would effectively single out U.S. technology companies and undermine efforts to achieve consensus on the global minimum tax. The embassy continued its reporting on this issue, and in the lead up to Canada's November 2021 national elections, the reporting prompted the U.S. lead negotiator and an interagency team to engage the Canadian government. The Department and U.S. government agencies credited the mission's sustained proactive effort as a significant factor in Canada's agreement to delay adopting the digital services tax legislation. Canada is now among 137 countries that have endorsed the global agreement for a minimum tax.

Working Groups Did Not Collaborate Across the Mission on Countering Malign People's Republic of China Activities and Arctic Issues

OIG found two working groups, the China Working Group and the Arctic Regional Committee, did not collaborate across the mission on key Department and ICS priorities as required.¹⁷ Interagency representatives and mission staff told OIG the two groups met infrequently, did not give representatives from other federal agencies represented in the mission the opportunity to contribute, and lacked the resources to provide strategic coordination on ICS priorities.¹⁸ For example, the Arctic Regional Committee went 18 months without a meeting. Furthermore, OIG found the working groups did not always invite mission staff who were working on either China or Arctic issues to participate in the working groups. For example, despite Consulate General Vancouver's work on Arctic issues, staff from the consulate general were not invited to participate in the working group. In addition, Department of Homeland Security staff told OIG that they were not given an opportunity to contribute to either the Arctic Regional Committee or the China Working Group. Furthermore, Department of Homeland Security and Defense Attaché Office staff reported to OIG that both working groups lacked an overall strategy and did

¹⁶ The Organization for Economic Cooperation and Development agreement would ensure a global minimum tax of 15 percent on multinational corporations.

¹⁷ The China Working Group focused on countering malign People's Republic of China activities, a key Department priority. Arctic issues are an ICS priority.

¹⁸ Despite the inactivity of the China Working Group, Department stakeholders told OIG that the mission's work on China issues generally provided information and analysis useful to them.

not coordinate their work well with their staff. Guidance in 3 FAM 1214b(4) and (7) describes the importance of soliciting feedback from others and of establishing constructive working relationships with all mission elements to further goals. OIG determined that leading these working groups was a collateral duty, and the staff assigned to do so had limited time due to other work responsibilities. Without increased collaboration across the mission, Mission Canada could potentially risk being unable to counter malign People's Republic of China activities in Canada, as well to plan and respond to issues relating to the Arctic.

Recommendation 2: Embassy Ottawa should implement procedures to improve working group relationships and collaboration on Integrated Country Strategy and Department priorities related to the Arctic and countering malign People's Republic of China activities in Canada. (Action: Embassy Ottawa)

Embassy's Economic Section Cited Problems With Coordination and Clearances Due to Lack of Procedures

Despite the mission's generally strong cooperation on political and economic work, Embassy Ottawa's Economic Section cited problems in coordination and clearances that, in some instances, led to constituent posts focusing limited resources on reporting unrelated to ICS priorities. For example, OIG, in its review of the mission's economic cables, found that Consulate Winnipeg reported on local educational reforms, which was not an ICS priority, without clearing or coordinating the reporting with the embassy. In addition, Consulate General Calgary did not clear with the embassy a cable on truck convoys blocking border crossings that gave Washington stakeholders an unbalanced view of border activities, including comments that did not address U.S. objectives such as border security. In interviews with OIG, the embassy's Economic Section confirmed the lack of coordination. Department guidance in 2 FAM 1214.1 states, "Any office that has a substantial interest in a proposed action should be a clearing office."¹⁹ Additionally, the ICS should be connected to the day-to-day work of the mission, consistent with 18 FAM 301.2-4(A)(3). Lastly, 2 FAM 113.1b states the chief of mission has a responsibility for integrating the activities of all posts under their authority. The embassy's Economic Section attributed the problem to a lack of mission-wide policy on clearances. Without a formalized clearance and coordination process, the mission will continue to generate reporting and analysis that may be unrelated to ICS priorities.

Recommendation 3: Embassy Ottawa should implement clearance procedures for reporting on Integrated Country Strategy priorities in accordance with Department standards. (Action: Embassy Ottawa)

Public Diplomacy

OIG reviewed Mission Canada's public diplomacy operations, including educational and cultural programs, grants administration, program implementation, media engagement, reporting,

¹⁹ See also 2 FAM 1216.1, which describes normal Department clearance procedures.

section leadership, and strategic planning at the embassy and seven constituent posts.²⁰ In winter 2021, the mission began implementing the Public Diplomacy Staffing Modernization Initiative²¹ to review and revise the mission’s public diplomacy organizational structure. In spring 2022, section leadership began putting the new organizational structure into place. OIG found public diplomacy staff at the embassy and constituent posts collaborated to conduct programs and support the Ambassador’s media engagement. Overall, OIG determined public diplomacy operations and programs generally complied with Department standards and guidance, except for grants management, as discussed below.

Public Diplomacy Grants Files Lacked Required Documentation

OIG reviewed files for 38 public diplomacy grants from FY 2020 and FY 2021 (including all grants of \$20,000 and greater)²² and found they lacked documentation required by the Federal Assistance Directive.²³ The missing documents included monitoring reports, grants officer or grants officer representative final evaluations during closeout, changes in the grants officer or grants officer representative, and evidence that grants had been awarded through a fair and open process with a merit panel review.²⁴ Despite these file issues, the embassy was able to provide information sufficient for OIG to determine that grant applications were properly evaluated and that the funded work was underway or completed.

OIG determined the grant file issues occurred because Embassy Ottawa’s Public Diplomacy Section assigned primary grants management responsibility—including maintaining all mission-wide FY 2020-2021 public diplomacy grant files—to the section’s resource specialist with backup support from an embassy cultural affairs LE staff member. Both employees had multiple other duties, including budgeting, procurement, and public diplomacy program support.

²⁰ Consulates General Calgary, Halifax and Quebec City and Consulate Winnipeg do not have a formal Public Diplomacy Section. Instead, LE staff and principal officers perform these functions.

²¹ The Public Diplomacy Staffing Modernization Initiative is the Department’s holistic review and realignment of the organizational structure of public diplomacy sections. The Department authorized new framework job descriptions for public diplomacy LE staff in January 2018. At the time of the inspection, global deployment was scheduled to be completed by December 2022.

²² OIG reviewed the files for 38 public diplomacy grants (total value \$1.9 million) out of a universe of 188 grants (total value \$2.38 million) with activity from October 1, 2019, to September 30, 2021.

²³ The Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts administering federal financial assistance. It is updated annually by the Department’s Bureau of Administration, Office of the Procurement Executive. Grants reviewed by OIG were subject to the Federal Assistance Directive, Version 4.0, effective October 1, 2019, through October 20, 2020; the Federal Assistance Directive, Version 5.0, effective October 21, 2020, through October 7, 2021; and Federal Assistance Directive, Version 6.0, which took effect on October 8, 2021.

²⁴ Office of the Procurement Executive, Federal Assistance Directive, October 2021. See Chapter 2, Section F, “Conduct an Open Competition to Select a Recipient;” Chapter 2, Section F.1., “Requirements for Open Competition;” Chapter 2, Section H, “Conduct A Merit Review of Proposals and Recipient Selection;” Chapter 4, Section D, “Monitoring and Reporting;” Chapter 4, Section D.2., “Performance Progress Report;” Chapter 4, Section G, “Changes in Grants Officer or Grants Officer Representative;” and Chapter 5, Section C, “Grants Officer Responsibilities.”

Furthermore, embassy and constituent post LE staff members did not forward grantee correspondence or other monitoring evidence to the embassy for inclusion in the files.

As a result of the Staffing Modernization Initiative, the embassy realigned LE staff responsibilities across the mission to better support grants management, with the goal of having at least one trained grants officer representative at each post. At the time of the inspection, employees had begun training to serve officially as grants officer representatives, in order to more evenly distribute the workload for maintaining grants files across the mission. However, the embassy had yet to address file documentation issues. Without adequate documentation of the entire grants process from pre-award merit review to final evaluation in closeout, the embassy may be unable to determine whether the intended activities, goals, and objectives of each grant are accomplished.

Recommendation 4: Embassy Ottawa should include all required documents in its public diplomacy grants files in accordance with Department standards. (Action: Embassy Ottawa)

Consular Operations

OIG reviewed Mission Canada's consular operations, including U.S. citizen services, crisis preparedness, management controls, visa services and processing, and fraud prevention programs at the embassy and six consulates general.²⁵ Beginning in March 2020, the mission's Consular Sections reduced services due to the pandemic, providing only emergency U.S. citizen services and emergency visa services. At that same time, Mission Canada saw an increased demand for U.S. passports and Consular Reports of Birth Abroad²⁶ due to the closure of the U.S.-Canadian border to non-essential traffic, first by Canada and followed closely by the United States. Citizens with dual Canadian and American nationality who previously used only Canadian documentation to cross the border now required U.S. passports due to regulations barring all but U.S. citizens from entering the United States. Separately, in 2021, Mission Canada's Consular Sections also contributed personnel to the Department's Afghanistan evacuation efforts. Specifically, from August through November 2021, 37 consular staff members served on task forces in Canada and Washington, D.C., and 2 staff members served in Kabul.

Despite these challenges, the mission's Consular Sections addressed backlogs in demand created by the reduction in services that began in March 2020. By February 2022, they brought wait times for U.S. citizen services and some categories of immigrant visas back within Bureau of Consular Affairs standards. At the time of the inspection, Mission Canada's Consular Sections continued to meet high demand for U.S. passports and Consular Reports of Birth Abroad within bureau standards. However, the sections were just beginning to address a backlog in nonimmigrant visa services. Because the Consular Sections had primarily focused on U.S. citizen services during the pandemic, the average wait time for nonimmigrant tourist and business visa

²⁵ Consulate Winnipeg does not provide consular services.

²⁶ From FY 2019 to FY 2022, U.S. passport demand in Canada increased by 42 percent and Consular Reports of Birth Abroad services increased 88 percent.

appointments increased to 415 days.²⁷ Mission Consular Section staff told OIG they were working to eliminate this backlog as expeditiously as possible, consistent with Department guidance.

During the inspection, the mission's Consular Sections corrected three issues identified by OIG:

- Consulate General Toronto co-located the Assistant Regional Security Officer for Investigations²⁸ in the Consular Section's Fraud Prevention Unit, in accordance with guidance in 12 FAH-4 H-722a(1), which "strongly recommend[s]" that the investigator have a physical office in the section for optimal collaboration with consular staff.
- Embassy Ottawa released a management notice on June 1, 2022, outlining mission-wide procedures for the Special Immigrant Visa program²⁹ in compliance with 9 FAM 502.5-3(C)(2). The previous management notice, dated July 2015, contained outdated language that could have led to an incorrect application of eligibility standards.
- Consulate General Halifax installed a new cashier door with a window that permits line of sight into the enclosed cashier booth. Previously, consular managers lacked line of sight into cashier operations required by 7 FAH-1 H-282(2)(i) and 7 FAH-1 H-281e.

OIG concluded that Mission Canada's consular programs generally complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exception of the issues described below.

Consular Spaces in Consulates General Halifax, Quebec City, Vancouver, and Toronto Did Not Comply With Department Standards

OIG found the consular space at four consulates did not comply with Department standards. Specifically:

- Consulate General Toronto's consular managers lacked line of sight into the cashier's booth in its U.S. Citizen Services unit (7 FAH-1 H-282(2)(i) and 7 FAH-1 H-281e).
- Consulate General Quebec City did not have an enclosed booth for the consular cashier (7 FAH-1 H-742a).
- Consulates General Quebec City, Vancouver, and Toronto lacked a window at the appropriate height to accommodate consulate applicants in wheelchairs (7 FAH-1 H-282(1)(m)).
- Consulates General Halifax, Quebec City, and Vancouver did not have privacy booths in which to conduct sensitive consular interviews (7 FAH-1 H-282(1)(k)).

²⁷ March 2020 wait times for tourist and business visas averaged 31 days across Mission Canada.

²⁸ The Assistant Regional Security Officer for Investigations program is a joint venture of the Bureau of Consular Affairs and Diplomatic Security to enhance U.S. border security by establishing investigative positions at selected overseas posts. See 7 FAH-1 H-942.8.

²⁹ The Special Immigrant Visa program allows LE staff members to apply for immigrant visas for themselves and their spouses and children if the LE staff member meets criteria in 9 FAM 502.5-3(C)(2).

- Consulate General Quebec City did not control internal access to the Consular Section (7 FAH-1 H-644.1a).

In most cases, consular managers were aware of these issues but had been unable to procure funding or permission to make necessary improvements. In the case of Consulate General Quebec City, staff informed OIG that the internal door to the Consular Section could not be locked due to the fire code, but they were exploring options for another fire egress point. Additionally, staff told OIG the issues in Consulate General Vancouver would be addressed during an upcoming physical security upgrade. Failure to provide a secure, accessible, and efficient consular workspace could impede productivity and increase the risk of malfeasance.

Recommendation 5: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Mission Improperly Stored Consular Files

OIG found consular paper files improperly stored in key-lock cabinets in Embassy Ottawa and Consulates General Halifax and Calgary. Department standards in 7 FAH-1 H-644.3c(1) and e, and 7 FAH-1 H-942.7c require passport, visa, and fraud files be stored, at a minimum, in bar-lock cabinets. Consular managers told OIG they believed that locking consular documents and files in key-lock cabinets met Department standards. Failure to properly safeguard consular files could lead to the unauthorized disclosure of personally identifiable information.

Recommendation 6: Embassy Ottawa should bring its consular file storage into compliance with Department standards. (Action: Embassy Ottawa)

Minister Counselor for Consular Affairs Did Not Perform Audits of Consular Chiefs' Passport Adjudications

OIG found that the Minister Counselor for Consular Affairs (MCCA) did not perform audits of the passport adjudications³⁰ completed by the mission's consular chiefs as required. Instead, the embassy's special assistant to the MCCA, a non-supervisory position, conducted the audits for the sole consular officers in Consulates General Halifax and Quebec City and the consular chiefs in Embassy Ottawa and Consulates General Montreal, Toronto, and Calgary. According to 8 FAM 1002.1-1, the MCCA or supervisory consular officer must review the passport adjudications of consular chiefs at constituent posts. Department standards allow the MCCA to designate a reviewing officer, but he or she usually should be the adjudicating officer's direct supervisor and must be a senior-level consular supervisor. Staff told OIG that Embassy Ottawa misinterpreted this requirement and delegated the responsibility of auditing passport adjudications to the special assistant in error. Without a systematic, random, and regular

³⁰ Department standards in 8 FAM 1002.1-1(a) require consular supervisors to review as many passport adjudications as is practicable, but no fewer than four percent of passport applications adjudicated at post per month. Systematic, randomized, regular review of adjudicated passport applications is a mandatory management control as well as an instructional tool to maintain the highest professional standards of adjudication.

review of adjudicated passport applications, the supervisory consular officer cannot provide timely feedback on adjudications necessary to ensure uniform and correct application of relevant law and standards.

Recommendation 7: Embassy Ottawa should conduct audits of passport adjudications in accordance with Department standards. (Action: Embassy Ottawa)

Consulate General Montreal Lacked a Fraud Prevention Strategy

Consulate General Montreal did not have a fraud prevention strategy but relied instead on a mission-wide strategy created in 2019. Department standards in 7 FAH-1 H-941a(1) and 7 FAH-1 H-941.1c require each consular section to define its fraud prevention program in a written strategy, which includes specific responsibilities, goals, and priorities for the year. Montreal's Fraud Prevention Unit staff told OIG that they did not have time to focus on the fraud strategy because they were working with staff at other Mission Canada Fraud Prevention Units who needed training and help developing fraud prevention procedures.³¹ The absence of a fraud prevention strategy increases the risk that fraud cases and trends at Consulate General Montreal will not be identified, and that time and effort devoted to fraud prevention will be allocated improperly.

Recommendation 8: Embassy Ottawa should create a fraud prevention strategy for Consulate General Montreal in accordance with Department standards. (Action: Embassy Ottawa)

Spotlight on Success: Consulates General Used Contractors for After-Hours Calls, Reducing the Burden on Duty Officers

Because the safety and security of U.S. citizens overseas is a top Department priority, all diplomatic missions have duty officer programs with U.S. direct-hire personnel serving on a rotational basis to assist Americans after normal operating hours. Consulates General Calgary, Halifax, Montreal, Quebec City, Toronto, and Vancouver built on this model by contracting with call centers to respond to non-emergency inquiries and to relay emergency calls—generally defined as life-or-death circumstances, U.S. citizen minors in distress, and detention or arrest—to the duty officer. The consulates general each developed and provided detailed scripts to the contractors to assist with screening and to ensure the call centers could relay accurate information in routine, non-emergency cases, such as requests for information on how to apply for a U.S. passport or visa. As a result, the consulates general saw a decrease in the number of calls to the duty officer, reducing the after-hours burden for U.S. direct-hire personnel. In Toronto, for example, only approximately 17 percent of all calls were relayed to the duty officer as potential emergencies. This program allowed duty officers to focus on assisting U.S. citizens facing emergencies, while eliminating their need to handle routine calls.

³¹ Consulate General Montreal's Fraud Prevention Manager also serves as the country fraud prevention coordinator with oversight for Mission Canada's fraud program.

RESOURCE MANAGEMENT

OIG reviewed Mission Canada's internal control systems in facility management, general services, financial management, and human resources management. During the inspection, the mission corrected three issues identified by OIG. Specifically:

- Embassy Ottawa reviewed and de-obligated approximately \$444,000 of invalid unliquidated obligations, in accordance with 4 FAM 225d.
- Consulate General Toronto inventoried its confined spaces and established entry permit requirements, as required by the Department's Confined Space Program Procedures.³²
- The mission reviewed its local compensation plan and requested authorization from the Department to implement changes, as required in 3 FAM 7525.1.

Overall, OIG found the mission's Management Sections at the embassy and seven constituent posts generally implemented required processes and procedures in accordance with applicable laws and Department standards, with the exceptions noted below. Mission staff attributed internal control issues described below to a lack of awareness of Department standards; COVID-19 restrictions, including social distancing and restrictions on in-office presence; a lack of management oversight; and a management platform with insufficient U.S. direct-hire staff. For example, Embassy Ottawa had just three U.S. direct-hire employees to oversee human resources, financial management, and facilities management operations for the embassy, seven constituent posts, and the U.S. Mission to the International Civil Aviation Organization. Additionally, mission staff told OIG that U.S. direct hire employees at the constituent posts served in several capacities. For example, the Management Officer at Consulate General Quebec City also served as the Post Security Officer and the sole Consular Officer.

Facility Management

Consulate General Vancouver Did Not Conduct Seismic Evaluations for All Facilities

OIG found Consulate General Vancouver did not conduct seismic safety evaluations for the leased consulate general building, U.S. government-owned consul general residence, and 145 residential units leased under the living quarters allowance³³ program. When OIG was unable to locate documentation regarding seismic evaluations, Consulate General and Bureau of Overseas Buildings Operations (OBO) staff confirmed they did not conduct the evaluations. According to 15 FAM 252.6f, overseas posts in high-risk seismic areas, such as Vancouver, must evaluate the seismic safety of residential units.³⁴ Additionally, 15 FAM 971.2(6) states that if a

³² Office of Safety, Health, and Environmental Management, Confined Space Program Procedures, 2002.

³³ According to 15 FAM 121, the living quarters allowance is intended to cover the average cost of rent and utilities incurred by U.S. government employees living overseas where residences are not provided.

³⁴ As noted in 15 FAM 252.6f, overseas posts may choose from one of the following methods to evaluate the seismic safety of residential units: (1) engaging the services of a local structural engineer; (2) requesting municipality assistance in obtaining design and construction documents to determine seismic safety; and (3) requesting the services of OBO's in-house engineering staff.

nonresidential facility is in a seismic zone, the overseas post must contact the program manager in OBO's Office of Design and Engineering for guidance. OBO told OIG that it prioritized conducting seismic evaluations at overseas posts with U.S. government-owned and -leased residences, rather than posts with residences leased under the living quarters allowance system. Failure to conduct seismic safety evaluations and mitigate identified issues risks the life and safety of occupants.

Recommendation 9: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of residential and nonresidential properties at Consulate General Vancouver, in accordance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

General Services Operations

Mission Did Not Fully Comply With Department's Motor Vehicle Safety Standards

Mission Canada did not fully comply with the Department's Motor Vehicle Safety Management Program standards. Specifically, OIG found at least 253 incidental (self-drive) drivers³⁵ did not receive safety training or retraining, as required in 14 FAM 433.5a-b. In addition, at least 155 incidental drivers did not receive medical clearances or held expired medical clearances, contrary to 14 FAM 433.4a. OIG also found the mission did not track all incidental drivers' compliance with driver safety training and medical clearance requirements using the Department's Fleet Management Information System,³⁶ as required by 14 FAM 433.5e and 14 FAM 433.4e. The issues related to driver safety training and medical clearances occurred due to mission staff's unfamiliarity with Department standards and pandemic-related restrictions that limited in-person training and medical examinations. The lack of complete records in the Fleet Management Information System resulted from insufficient management oversight. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, and the public, as well as damage to U.S. government property.

Recommendation 10: Embassy Ottawa should comply with all Department Motor Vehicle Safety Management Program standards for incidental drivers under chief of mission authority. (Action: Embassy Ottawa)

³⁵ The embassy did not know the mission's total number of incidental drivers because other U.S. government agencies, such as Customs and Border Protection, also had incidental drivers.

³⁶ The Fleet Management Information System is the Department's enterprise system for managing all fleet operations.

Mission Canada Did Not Account for All Expendable Property as Required

OIG found the mission did not account for all expendable property³⁷ in the Integrated Logistics Management System's (ILMS)³⁸ Expendable Management System as required. Additionally, none of the constituent posts accounted for any of their expendable property in ILMS. According to 14 FAM 414.2-1a(2), the ILMS Expendable Management System is the Department's approved system of record for materials and supplies, such as those used for facility management, in storage at a warehouse or storeroom. Mission staff told OIG this occurred because of insufficient staffing, limitations on physical presence in mission facilities during the COVID-19 pandemic, and unfamiliarity with requirements. Failure to account for expendable property in the Department's approved system of record increases the risk of mismanagement and theft of embassy property.

Recommendation 11: Embassy Ottawa should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Ottawa)

Mission Contracting Officer's Representative Program Did Not Comply With Department Standards

The mission's contracting officer's representative (COR) program did not comply with Department standards. Specifically, OIG found:

- CORs did not maintain their files in the ILMS COR eFiling module, as required by 14 FAH-2 H-142b(16)(b). Instead, CORs maintained paper and local electronic files.
- Neither the COR nor the contracting officer at Consulate General Toronto completed a mandatory performance review in the Contractor Performance Assessment Reporting System for one contract valued at \$773,000, out of a total of 10 contracts valued at \$1.87 million, as required by 14 FAH-2 H-572d³⁹ and 48 Code of Federal Regulations 42.1502(a).

Despite these issues, OIG's discussions with mission staff and review of other documentation showed the mission monitored the contracts, received the goods and services for which it had contracted, and addressed contractor performance when issues arose. Mission staff told OIG this issue occurred because of a lack of familiarity with Department standards. A non-compliant COR program increases the risk of contract mismanagement.

³⁷ Expendable property is property which, when put in use, is consumed, loses its identity, or becomes an integral part of another item of property. Examples are office supplies, automobile tires, and machine parts.

³⁸ ILMS is an integrated web-based system that encompasses all Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

³⁹ The contracting officer is responsible for ensuring the evaluation takes place, but the COR may be tasked with evaluating contractor performance. See 14 FAH-2 H-572e, "Final Evaluation."

Recommendation 12: Embassy Ottawa should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Ottawa)

Mission Did Not Approve Living Quarters Allowance Leases Prior to Employee Signing

OIG found Mission Canada's Interagency Housing Board did not approve 438 of 599 living quarters allowance residential leases prior to lease signing, as required by Department standards. Instead, the mission referred only those employees seeking to lease a residence above size standards⁴⁰ to the board. Standards in 15 FAM 263a require all employees to obtain approval from the Interagency Housing Board prior to signing living quarters allowance leases. Management staff told OIG they were unfamiliar with this requirement. Failure to secure approval for all leases affects the mission's ability to apply housing standards equitably.

Recommendation 13: Embassy Ottawa should bring its living quarters allowance leasing program into compliance with Department standards. (Action: Embassy Ottawa)

Mission Canada Foreign Per Diem Rates Were Out of Date

OIG found per diem rates for six locations in Canada were out of date. According to Office of Allowances' documentation, Embassy Ottawa and Consulates General Halifax, Montreal, and Quebec City had not submitted a hotel and restaurant report since 2017, and Consulates General Toronto and Vancouver had not submitted the same report since 2019. Department of State Standardized Regulation 074.2 states that parties having responsibility to prepare and submit reports must provide complete, accurate, and supportable information in their biennial hotel and restaurant reports. Mission staff told OIG they were unaware the reports were overdue. Failure to submit reports on a timely basis could result in overpayment or underpayment of travel expenses to U.S. government personnel.

Recommendation 14: Embassy Ottawa should submit its hotel and restaurant reports to the Bureau of Administration's Office of Allowances, in accordance with Department standards. (Action: Embassy Ottawa)

⁴⁰ Guidance in 15 FAM 237a states an employee's position, rank, and family size at the time of arrival at post determines the maximum residential space authorization for the employee.

Financial Management

Only Two of Twelve Information Management Positions Programmed to International Cooperative Administrative Support Services

OIG found that International Cooperative Administrative Support Services (ICASS)⁴¹ funded only 2 of the mission's 12 Information Management (IM) U.S. direct-hire positions⁴² although the sections provided support to other agencies. The Department paid for the remaining 10 positions through its Diplomatic Engagement funding, even though the mission estimated that some of these employees allocated more than 50 percent of their time to ICASS services. According to 6 FAH-5 H-013.2, agencies must pay their share of post administrative costs based on usage. Additionally, 6 FAH-5 H-341.9⁴³ states that ICASS costs should include salaries and benefits of all U.S. direct-hire and LE staff who deliver services to other agencies, overhead associated with those staff members, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at overseas posts with multiple U.S. direct-hire IM officers and specialists, the Department pays for the first position, while the second one is always paid through ICASS. Where there are more than two such employees, the post should determine an appropriate mix of program and ICASS-funded positions. Thus, Mission Canada's failure to determine whether the additional IM positions should be reprogrammed to ICASS means the Department would continue to subsidize most of the costs for information management services to other agencies. OIG estimated the Department could recover funds of up to \$243,993 over 3 years per position by converting additional positions to ICASS.⁴⁴

Recommendation 15: Embassy Ottawa, in coordination with the Bureaus of Western Hemisphere Affairs and the Comptroller and Global Financial Services, should reprogram additional Diplomatic Engagement-funded Information Management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Ottawa, in coordination with WHA and CGFS)

⁴¹ ICASS, established in 1997, is the principal means by which U.S. government agencies share the cost of common administrative support services at more than 250 diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions. See 6 FAM 911 and 6 FAH-5 H-013.2.

⁴² Mission Canada had U.S. direct-hire information management staff at Embassy Ottawa and Consulates General Calgary, Montreal, Toronto, and Vancouver.

⁴³ See 6 FAH-5 H-341.9-1(B), 6 FAH-5 H-341.9-2(B), and 6 FAH-5 H-341.9-3(B).

⁴⁴ Relying on Department-provided figures, OIG estimated the Department could annually recover \$81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of \$268,419 and the worldwide average percentage of time U.S. direct-hire Information Management staff support other agencies of 30.3 percent ($\$268,419 \times .303 = \$81,331$). Because Ottawa is a 3-year tour, the total funds put to better use is calculated as $3 \times \$81,331$ for a total of \$243,993 per position reprogrammed to ICASS.

Cashiering Operations Lacked Management Controls

OIG found Mission Canada cashiering operations lacked required management controls and oversight.⁴⁵ In 2021, Consulates General Calgary, Halifax, and Vancouver received a high cash operations-based risk assessment score,⁴⁶ as determined by the Bureau of the Comptroller and Global Financial Services in its annual assessment. In reviewing the mission's 2021 leading risk indicators, OIG found additional risk factors, specifically:

- All consulates general except Consulate General Toronto conducted unannounced monthly cashier verifications on a predictable basis, according to Bureau of Comptroller and Financial Services assessment. This was contrary to 4 FAM 397.1-2 and Cashier User Guide, Chapters 3.6(6) and 13.2(1), which call for cashier verifications to be conducted at a different time each month.
- Consulates General Calgary and Halifax had high incidents of missed end of day reports, contrary to Cashier User Guide, Chapter 12.2.15.
- Embassy Ottawa and the six consulates general had alternate cashiers who did not regularly serve as principal cashier, as required by Cashier User Guide, Chapter 3.6(5).
- All consulates general except Consulate General Toronto had out-of-balance conditions⁴⁷ during monthly cashier verifications, contrary to Cashier User Guide, Chapter 13.7.3(1b).
- All posts except Consulate General Quebec City and Embassy Ottawa had incidents of in-transit transactions⁴⁸ not certified within 30 days, as required by Cashier User Guide, Chapter 13.7.4.2.

Mission staff told OIG these issues occurred because of insufficient staffing, restrictions on physical presence in the mission's facilities during the COVID-19 pandemic, and unfamiliarity with Department standards. Failure to ensure adequate management controls of cashiering operations increases the risk of theft, fraud, and misuse of funds.

⁴⁵ OIG reviewed cashier operations at the embassy and the six consulates general. Consulate Winnipeg does not have cashier operations.

⁴⁶ Developed by the Bureau of the Comptroller and Global Financial Services, the cash operations-based risk assessment score is a risk rating tool that assists U.S. disbursing officers, cashier monitors, financial management officers, and mission management in the prevention of theft, fraud, and misuse of cash from cashier operations at overseas posts. Leading indicators of potential risk of cash losses fall under the following three categories: operational risk, verification and controls, and the overall cashier operational assessment. A higher score indicates a greater potential risk of cash losses.

⁴⁷ An out-of-balance condition is one in which a difference is reflected on the cashier's accountability and is identified by either the mandatory daily reconciliation of funds or by the mandatory monthly verification performed by the cashier supervisor.

⁴⁸ In-transit transactions are made by a cashier but not yet reflected on the cashier's official accountability with the U.S. disbursing officer. Examples of in-transit documentation include payments, collections, debit vouchers, and accommodation exchange transactions.

Recommendation 16: Embassy Ottawa should bring its cashiering operations into compliance with Department standards. (Action: Embassy Ottawa)

Some Post Education Allowance Surveys Were Overdue

OIG found four post education allowance⁴⁹ surveys were overdue. According to documentation provided to OIG by the Bureau of Administration's Office of Allowances, Consulate Winnipeg last submitted an education allowance survey in 2011, and Consulates General Halifax, Montreal, and Quebec City last submitted the survey in 2020. Department of State Standardized Regulations 072.12 requires overseas posts to conduct an annual education allowance survey. Mission staff told OIG they were unaware of the overdue surveys. Failure to submit surveys on a timely basis could result in overpayment or underpayment of allowances to U.S. government personnel.

Recommendation 17: Embassy Ottawa should submit its education allowance surveys in accordance with Department standards. (Action: Embassy Ottawa)

INFORMATION MANAGEMENT

OIG reviewed Mission Canada's information management operations, including classified, unclassified, and dedicated internet network⁵⁰ computer operations; physical protection of IT resources; classified communications security; emergency communications preparedness; telephone programs; and mail services. Embassy Ottawa's IM Section provided guidance and operational support to the constituent posts⁵¹ and covered staffing gaps at the constituent posts as needed.

During the inspection, embassy IM staff took the following steps to remedy issues identified by OIG:

⁴⁹ The education allowance assists a U.S. direct-hire employee in meeting uncompensated primary or secondary educational expenses for their dependent children which are incurred while serving in a foreign area.

⁵⁰ A dedicated internet network is dedicated internet access from an internet service provider on a Department-owned and -operated discrete non-sensitive unclassified local area network that is not connected to any other Department system.

⁵¹ Consulates General Halifax and Quebec City and Consulate Winnipeg lack U.S. direct-hire IM positions. As a result, Embassy Ottawa IM staff support unclassified computer operations for the three constituent posts as well as classified computer operations for Consulate General Halifax, both remotely and through onsite visits. Consulate General Montreal supports Consulate General Quebec City's classified operations, both remotely and onsite. Consulate Winnipeg does not have classified operations. To augment the remote support, Consulates General Halifax and Quebec City assign staff to provide onsite IM support as added duties.

- Configured the mission's Microsoft Active Directory⁵² accounts and security groups to meet the principle of least privilege (12 FAH-10 H-112.5 and National Institute of Standards and Technology (NIST) Special Publication 800-53).⁵³
- Standardized the procedures for managing access request forms and subsequent change requests in Embassy Ottawa and Consulates General Montreal, Toronto, and Halifax (12 FAH-10 H-112.1-1a(1) and (5)).
- Installed air and humidity control gauges in the Embassy Ottawa and Consulates General Toronto and Halifax server rooms (12 FAH-10 H-272.12-1).
- Enforced the requirement⁵⁴ that users return mobile devices to allow for necessary hardware and software updates and patches (12 FAH-10 H-163.2(8) and 12 FAH-10 H-164.2 (12)).
- Developed a system operations log that contains a record of all normal daily operations; system power-ups and power-downs; and installation, removal, or modification of systems for the embassy and Consulates General Quebec City, Montreal, and Halifax (12 FAH-10 H-122.12(1)(a), (b), and (f)).
- Registered staff with systems administrator responsibilities in Consulates General Halifax, Toronto, Vancouver, and Montreal for information assurance refresher training (12 FAH-10 H-212.2-1(d)).

OIG determined the mission implemented most required information management and security controls in accordance with Department standards and applicable laws, except as described below.

Information Systems Security Officers Did Not Perform All Required Duties

Mission Canada's primary and alternate information systems security officers (ISSO) did not perform all required systems security duties.⁵⁵ Specifically, OIG found the ISSOs did not:

- Review and analyze audit logs on the dedicated internet networks across the mission (12 FAH-10 H-122.5-2).

⁵² Active Directory is a Microsoft technology used by the Department to manage users, computers, and other devices on its networks, and assign permissions to access Department resources.

⁵³ NIST defines the principle of least privilege as "allowing only authorized accesses for users (or processes acting on behalf of users) that are necessary to accomplish assigned organizational tasks." See NIST Special Publication 800-53, Revision 5, "Security and Privacy Controls for Information Systems and Organizations," page 36, "AC-6 Least Privilege" (September 2020).

⁵⁴ U.S. Mission Canada, Mobile Devices and Services Policy, January 21, 2021.

⁵⁵ The embassy designated a primary ISSO with regional responsibility for the cyber security operations and maintenance of all unclassified and classified networks and automated systems for the embassy and constituent posts. The embassy also designated alternate ISSOs at the embassy and each constituent post.

- Ensure that Consulate General Montreal only used its dedicated internet network for processing non-sensitive unclassified information (5 FAM 872.2⁵⁶ and 12 FAH-10 H-112.8-3(4)).
- Check mobile devices for compliance with Department standards across Mission Canada (12 FAH-10 H-163.3(8) and 12 FAH-10 H-164.3(12)).

OIG determined these issues occurred because the primary ISSO could not perform all duties remotely for the constituent posts, and the alternate ISSOs assumed the regional ISSO had performed them. Furthermore, the designated alternate ISSOs did not have the required ISSO accounts to perform these duties.⁵⁷ During the inspection, the mission created ISSO accounts for all alternate ISSOs. OIG issued management assistance reports in May 2017 and December 2020⁵⁸ that highlighted widespread Department failures to perform ISSO duties. Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 18: Embassy Ottawa should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Ottawa)

Consulates General Halifax and Quebec City Lacked Standard Operating Procedures for Onsite Computer Support

OIG determined Consulates General Halifax and Quebec City staff assigned with collateral IM responsibilities, including systems administration duties,⁵⁹ did not have standard operating procedures for unclassified and classified operations. As a result, OIG found weaknesses in electronic file access control procedures and network cabling at Consulate General Halifax. In addition, Consulates General Halifax and Quebec City staff told OIG they were unclear about their classified operations responsibilities because of the lack of documentation to guide them. Department standards in 5 FAM 121.2.7h and 5 FAM 121.3.7c require Information Programs Officers and Information Systems Officers⁶⁰ to create and maintain standard operating

⁵⁶ Department standards in 5 FAM 872.2 state that Department Sensitive But Unclassified information must not be processed, stored, or transmitted on dedicated internet networks, except in limited amounts under exigent circumstances.

⁵⁷ ISSOs are required to use ISSO accounts to maintain separation of ISSO functions from systems management duties. According to NIST, separation of duties includes “ensuring that security personnel who administer access control functions do not also administer audit functions.” See NIST Special Publication 800-53, Revision 5, page 36.

⁵⁸ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017); OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

⁵⁹ Consulates General Halifax and Quebec City staff with IM responsibilities had full systems administrator access to manage the unclassified systems. According to 12 FAH-10 H-112.1-2a(2), this allows “full access to all operating system related devices, programs, and resources” and requires an understanding of the technology used and the procedures needed to maintain the systems.

⁶⁰ The Information Programs Officer manages the information program center and is responsible for all of the center’s classified systems, programs, and telecommunications operations. See 5 FAM 121.2. The Information

procedures for all operations and tasks for staff to use. As noted earlier, Embassy Ottawa IM staff, under the oversight of the Information Programs and Information Systems Officers, provided operational support for Consulates General Halifax and Quebec City, while Consulate General Montreal, under the Information Programs Officer's oversight, supported classified operations at Consulate General Quebec City. Despite this support, the embassy and Consulate General Montreal did not define and document the specific onsite computer operations, including required procedures. The failure to create and maintain standard operating procedures specific to the consulates general could result in the lack of operational continuity and consistency, unintended outages, and the risk of loss of data.

Recommendation 19: Embassy Ottawa should create and maintain standard operating procedures for unclassified and classified computer operations and support at Consulates General Halifax and Quebec City. (Action: Embassy Ottawa)

SharePoint Configuration Granted General User Accounts Privileged Access to Shared Files

OIG found Mission Canada's IM staff incorrectly administered the mission's SharePoint sites using general user accounts⁶¹ with elevated privileges. In addition, SharePoint security settings, configured by the Bureau of Information Resource Management, incorrectly allowed Washington general user accounts to have administrative access to the mission's shared files. This configuration also gave the IM staff access to all mission section files when performing non-administrative functions, contrary to Department and industry standards. Guidance in NIST Special Publication 800-53, section AC-6(2),⁶² states general user accounts (non-privileged) should not be used for security functions. Furthermore, 12 FAH-10 H-112.1-2a(5) prohibits granting a general user account administrator, programmer, or developer privileges. These permissions are unnecessary for staff to perform their normal duties and are contrary to 12 FAH-10 H-112.5, which outlines the concept of "least privilege."

Prior to migrating to SharePoint, the mission stored information in shared folders; IM staff managed the permissions to those folders with a secondary system administrator account. However, after the shared folders migrated to the SharePoint cloud in April 2022, the Bureau of Information Resource Management instructed the mission's IM staff to manage SharePoint permissions from their general user accounts. A general user account with elevated privileges increases the risk for unintentional, unwanted, or improper use of privilege and could be used by internal or external actors to gain unauthorized access to Department information.

Systems Officer manages the Information Systems Center and is responsible for all unclassified Department equipment and systems. See 5 FAM 121.3.

⁶¹ The Department defines general user access as "access to applications and data files based on supervisor-defined user profiles." Additionally, "[this] level of access must not permit ISSO, system administrator or programmer [or] developer privileges." See 12 FAH-10 H-112.1-2a. This category of access is referred to as non-privileged.

⁶² NIST Special Publication 800-53, Revision 5, page 37.

Recommendation 20: The Bureau of Information Resource Management, in coordination with Embassy Ottawa, should configure SharePoint permissions to comply with Department standards at Mission Canada. (Action: IRM, in coordination with Embassy Ottawa)

Local Information Technology Configuration Control Board Did Not Comply With Department Standards

OIG found Mission Canada's local IT Configuration Control Board⁶³ did not comply with all Department standards. Specifically, OIG found the board lacked a configuration lifecycle management plan to track, maintain, and report locally developed, procured, and approved hardware and software, as required by 5 FAM 861.1a and c. In addition, the board did not consistently update iMATRIX⁶⁴ with information on locally installed hardware and software, as required by 5 FAM 862.1c. For example, OIG found three locally developed applications listed as active in iMATRIX that were no longer being used by the mission. IM staff told OIG that the IT Configuration Control Board had been inactive for several years, until the embassy's Information Systems Officer reactivated the board and updated its charter in February 2022. Without a configuration lifecycle plan to manage locally approved hardware and software and regular updates in iMATRIX, the mission risks network vulnerabilities that could compromise Department information.

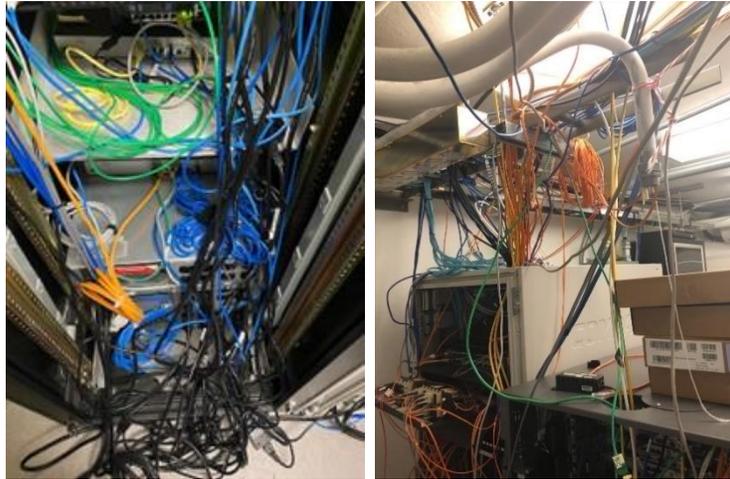
Recommendation 21: Embassy Ottawa should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Ottawa)

⁶³ Mission-wide local IT Configuration Control Boards are responsible for ensuring hardware, software, and network components installed on IT networks do not adversely affect the existing infrastructure, as described in 5 FAM 862.1b.

⁶⁴ The integrated Management Analytics and Technology Resource for Information eXchange, or iMATRIX, is the Department's tool for organizing and tracking its IT investments, projects, and assets, including services, systems, and products.

Consulates General Halifax and Toronto's Unclassified Server Rooms Did Not Meet Department Cabling Standards

OIG found the unclassified server rooms at Consulates General Halifax and Toronto did not meet Department cabling standards. For example, OIG observed disorganized cabling in the server rooms at both consulates general, as shown in Figures 1 and 2, which could hinder the staff's ability to troubleshoot network outages. OIG determined Consulate General Toronto's IM staff did not devote time to maintain the network cables, and Consulate General Halifax's part-time IM staff did not have cable management training.



Figures 1 and 2: Network cabling in the server rooms at Consulates General Halifax (left) and Toronto (right). (Source: OIG.)

As described in 5 FAH-9 H-221 and 5 FAH-9 H-353, Department cabling standards are intended to enable a uniform identification process for cabling to prevent unauthorized access and facilitate installation or removal of cabling. In addition to creating a network security vulnerability, non-standard cabling makes it difficult for staff to address connectivity problems quickly and could create a risk to employee safety.

Recommendation 22: Embassy Ottawa should bring the network cabling at Consulates General Halifax and Toronto into compliance with Department standards. (Action: Embassy Ottawa)

Consulate General Montreal Did Not Limit Access to the Information Systems Center

Consulate General Montreal did not limit access to the Information Systems Center, where IM staff manage unclassified workstations and configure mobile devices, by unauthorized individuals. In accordance with 12 FAH-10 H-272.16-2, systems administrators must position information systems and components (e.g., computers, removable media, and network devices) to prevent accidental or malicious interruption of service and unauthorized access. However, due to the consulate general's space design, facilities and financial management staff (and their customers) walk through the Information Systems Center to access facilities and financial management workspaces. Staff told OIG the consulate general was considering leasing additional space. Failure to limit unauthorized access to information systems increases the risk of an accidental or malicious interruption of service and the theft of computing equipment.

Recommendation 23: Embassy Ottawa should limit access to the Consulate General Montreal's Information Systems Center in accordance with Department standards. (Action: Embassy Ottawa)

Consulate General Vancouver's Mail Screening Facility Did Not Meet Department Standards

Consulate General Vancouver's off-site mail screening facility did not fully meet Department standards. OIG observed the facility had significant rust and water leakage that led to standing water inside the initial screening area, causing damage to the flooring (Figures 3 and 4, below). Department standards in 15 FAM 613a and b and 14 FAH-4 H-121.1b require overseas posts to properly maintain mail screening facilities. The high concentration of rain and moisture in Vancouver contributed to the deterioration. Water leaks put staff working inside the mail screening facility at risk of injury while rust could impair the facility's structural integrity and allow hazardous substances to enter, which could expose staff to harmful materials.



Figures 3 and 4: The exterior and interior conditions of Consulate General Vancouver's mail screening facility. (Source: Consulate General Vancouver.)

Recommendation 24: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring the mail screening facility at Consulate General Vancouver into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Consulate General Montreal Did Not Have Standard Operating Procedures, Maintenance Logs for Its Telephone System

OIG found Consulate General Montreal did not have standard operating procedures for operating and maintaining its telephone system as required in 5 FAH-2 H-621. In addition, IM staff did not keep maintenance logs of all work performed on the phone system as required by 12 FAH-6 H-651.5-6c. OIG determined the IM specialist responsible for the telephone system did not develop the required documents because of other work responsibilities, such as

assuming responsibility for the Management and General Services Officer positions during staffing gaps and absences. The lack of standard operating procedures and maintenance log records could create knowledge gaps in telephone operations and delay problem resolution when addressing outages.

Recommendation 25: Embassy Ottawa should implement standard operating procedures and maintenance log records for Consulate General Montreal’s telephone system. (Action: Embassy Ottawa)

Consulate General Toronto Incorrectly Placed Its Telecommunications Demarcation Point

Consulate General Toronto incorrectly placed its telecommunications demarcation point in the limited access main telephone frame room, contrary to 12 FAH-6 H-651.5-2. The telecommunications demarcation point connects the consulate general’s telecommunications systems with the public telecommunications network. Therefore, non-cleared internet service provider employees must work in the limited access frame room when repairs are needed. Consulate general staff told OIG the lack of consulate office space contributed to this issue. However, OIG determined the consulate general had options to reconfigure the space to locate the telecommunications demarcation point outside the main telephone frame room. Locating public telecommunications equipment in the main telephone frame room creates security vulnerabilities each time the consulate general grants access to non-cleared internet service provider employees.

Recommendation 26: Embassy Ottawa should relocate the telecommunications demarcation point outside the limited access main telephone frame room at Consulate General Toronto. (Action: Embassy Ottawa)

Records Management Program Did Not Comply With Department Standards

OIG found Mission Canada’s records management program did not comply with Department standards for records lifecycle processes, including organization, retirement, and oversight.⁶⁵ OIG reviewed a sample of electronic files on SharePoint and Microsoft Teams sites and found that most embassy and constituent post sections did not organize program records to allow for quick retrieval, consistent with 5 FAM 418.9b(4)(c)ii. In addition, according to the Department’s Records Service Center, the mission did not retire records on schedule. For example, Consulates General Calgary and Halifax had not retired any records, including for principal officers, since 1972 and Embassy Ottawa had not retired Political Section records on an annual basis, as required, since 2018. Guidance in 5 FAM 418.9b(5) requires overseas posts to retire eligible

⁶⁵ As defined in 44 U.S.C. § 3301, official records include “all recorded information, regardless of form or characteristics, made or received by a federal agency under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States government or because of the informational value of data in them.” Official records do not include “library and museum material made or acquired and preserved solely for reference or exhibition purposes; or duplicate copies.”

records in accordance with records disposition schedules. The Department also issued cables to remind posts of the requirement to retire eligible records annually,⁶⁶ and of the requirement that senior officials' permanent records must be retired at the end of the incumbent's tenure.⁶⁷

Furthermore, OIG found the embassy and constituent posts did not delegate records management responsibility and provide guidance to an assigned employee in each section, as required in 5 FAH-4 H-215.3-2b, which led to the lack of proper records oversight. OIG issued management assistance reports in September 2020 and June 2022⁶⁸ that highlighted deficiencies in records management, including records retirement, across the Department. Without a records management program that follows Department requirements for organization, records retirement disposition, and oversight, the mission is vulnerable to inefficient information retrieval and loss of critical documentation

Recommendation 27: Embassy Ottawa should implement a records management program that complies with Department standards. (Action: Embassy Ottawa)

⁶⁶ Cable 17 STATE 44062, "Annual Records Retirement Reminder," May 5, 2017.

⁶⁷ Cable 21 STATE 1816, "Message from Undersecretary for Management Brian Bulatao Regarding Records Management Responsibilities Related to Department Officials and Separating Employees," January 8, 2021.

⁶⁸ OIG, *Management Assistance Report: Deficiencies in Overseas Records Management* (ISP-20-25, September 2020); and OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

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 Embassy Ottawa and the Bureau of Information Resource Management. The Department's complete responses can be found in Appendix B.¹ The Department also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Ottawa should implement a First- and Second-Tour program that complies with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa implemented a First- and Second-Tour program that complies with Department standards.

Recommendation 2: Embassy Ottawa should implement procedures to improve working group relationships and collaboration on Integrated Country Strategy and Department priorities related to the Arctic and countering malign People's Republic of China activities in Canada. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with certain aspects of this recommendation. The embassy noted it is in the process of reconfiguring its working groups and working group leadership. However, the embassy also noted that it disagreed with OIG's conclusion that the working groups' need for improved collaboration puts at risk Mission Canada's ability to counter People's Republic of China activities in Canada, as well to plan and respond to issues relating to the Arctic and provided examples of successful collaboration efforts.

OIG Reply: OIG considers the recommendation resolved. OIG acknowledges the examples of the working groups' successful collaboration efforts and notes that, without procedures to improve working group relationships and collaboration, Mission Canada's ability to counter People's Republic of China activities in Canada, as well as respond to issues relating to the Arctic is *potentially* at risk. OIG revised its conclusion to acknowledge the potential risk. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa implemented procedures to improve working group relationships and collaboration on Integrated Country Strategy and Department priorities related to the Arctic and countering malign People's Republic of China activities in Canada.

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: Embassy Ottawa should implement clearance procedures for reporting on Integrated Country Strategy priorities in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa generally concurred with this recommendation. The embassy noted that it has a clearance process in place across Mission Canada for reporting and analysis, but that the Front Office will issue written guidance on the clearance process by January 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa implemented clearance procedures for reporting on Integrated Country Strategy priorities in accordance with Department standards.

Recommendation 4: Embassy Ottawa should include all required documents in its public diplomacy grants files in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of December 31, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa included all required documents in its public diplomacy grants files in accordance with Department standards.

Recommendation 5: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought all consular spaces into compliance with Department standards.

Recommendation 6: Embassy Ottawa should bring its consular file storage into compliance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought its consular file storage into compliance with Department standards.

Recommendation 7: Embassy Ottawa should conduct audits of passport adjudications in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa conducts audits of passport adjudications in accordance with Department standards.

Recommendation 8: Embassy Ottawa should create a fraud prevention strategy for Consulate General Montreal in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of October 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa created a fraud prevention strategy for Consulate General Montreal in accordance with Department standards.

Recommendation 9: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of residential and nonresidential properties at Consulate General Vancouver, in accordance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Management Response: In its September 29, 2022, response, Embassy Ottawa disagreed with this recommendation. The embassy noted that, consistent with 15 Foreign Affairs Manual (FAM) 252.6f(3)(c) and 15 FAM 971.2(6), it has sought guidance from Bureau of Overseas Buildings Operations (OBO) engineering staff and seismic consultants. The embassy further noted that Canada is a first-world country with sophisticated building codes. According to the embassy, it is not practical to seismically evaluate a high-rise building when an employee is planning to lease an apartment or for the embassy to evaluate the building that houses Consulate General Vancouver. Additionally, it is also not realistic for the embassy to seismically evaluate single family residences. The embassy also noted the province of British Columbia updates its provincial building codes every five years. The embassy proposed not approving the acquisition (lease or purchase) of any residential or non-residential property that was constructed before 1990 without a formal review by OBO seismic consultants.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa performed seismic evaluations of residential and nonresidential properties at Consulate General Vancouver, or

when OIG receives and accepts documentation that the embassy, with concurrence from OBO, will not approve the acquisition (lease or purchase) of any residential or non-residential property constructed before 1990 without a formal review by OBO seismic consultants.

Recommendation 10: Embassy Ottawa should comply with all Department Motor Vehicle Safety Management Program standards for incidental drivers under chief of mission authority. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of January 15, 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa complied with all Department Motor Vehicle Safety Management Program standards for incidental drivers under chief of mission authority.

Recommendation 11: Embassy Ottawa should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of February 1, 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa used the Integrated Logistics Management System to account for all expendable property in accordance with Department standards.

Recommendation 12: Embassy Ottawa should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought its contracting officer's representative program into compliance with Department standards.

Recommendation 13: Embassy Ottawa should bring its living quarters allowance leasing program into compliance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought its living quarters allowance leasing program into compliance with Department standards.

Recommendation 14: Embassy Ottawa should submit its hotel and restaurant reports to the Bureau of Administration's Office of Allowances, in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of November 1, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa submitted its hotel and restaurant reports to the Bureau of Administration's Office of Allowances, in accordance with Department standards.

Recommendation 15: Embassy Ottawa, in coordination with the Bureaus of Western Hemisphere Affairs and the Comptroller and Global Financial Services, should reprogram additional Diplomatic Engagement-funded Information Management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Ottawa, in coordination with WHA and CGFS)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa reprogrammed additional Diplomatic Engagement-funded Information Management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use.

Recommendation 16: Embassy Ottawa should bring its cashiering operations into compliance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of November 30, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought its cashiering operations into compliance with Department standards.

Recommendation 17: Embassy Ottawa should submit its education allowance surveys in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation. The embassy noted an estimated completion date of October 31, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa submitted its education allowance surveys in accordance with Department standards.

Recommendation 18: Embassy Ottawa should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa completed all information systems security officer responsibilities in accordance with Department standards.

Recommendation 19: Embassy Ottawa should create and maintain standard operating procedures for unclassified and classified computer operations and support at Consulates General Halifax and Quebec City. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa created and maintained standard operating procedures for unclassified and classified computer operations and support at Consulates General Halifax and Quebec City.

Recommendation 20: The Bureau of Information Resource Management, in coordination with Embassy Ottawa, should configure SharePoint permissions to comply with Department standards at Mission Canada. (Action: IRM, in coordination with Embassy Ottawa)

Management Response: In its September 23, 2022, response, the Bureau of Information Resource Management (IRM) disagreed with this recommendation. IRM noted that the SharePoint site collection administrator (SCA) role does not serve the same function or have similar responsibilities that network or systems administrators do. The SCA role does not align with the definition of privileged user accounts. According to 5 Foreign Affairs Handbook (FAH) 12 H-114, examples of personnel that may utilize these types of accounts are system administrators, [information systems security officers], [organizational unit] administrators, workstation administrators, server administrators, domain administrators, and enterprise administrators. Administrator accounts are made to be members of domain-specific security groups, thus giving them access to files, folders, and systems that normal end-users do not have access to.

The SCA role does not reflect 12 FAH-10 H-112.1-2a(2) and (3), which categorizes administrative accounts as having full or limited “access to operating system related devices, programs, and resources.” Additionally, 12 FAH-10 H-112.1-2a(5) “allows access to applications and data files based on supervisor-defined user profiles.” The designation of the SCA role to individuals, and if they may use their user account or a separate account, is at the discretion of the supervisor. According to IRM, this is described in the Site Collection Administrator Rules of Behavior. The bureau stated that its Systems Integration Office technical team uses separate administrative accounts and cards when performing the administrative functions needed to manage the platform, in accordance with 12 FAH-10 H-112.1-2a(2) and (3). IRM concluded that platforms are now designed in a way that supports every user’s ability to develop new capabilities in a constrained ecosystem of tools (e.g., Power Apps, Power Automate, Power BI), manage folder and file level permissions to collaborate with colleagues more effectively (e.g., OneDrive), and manage the permissions to collections of information (e.g., Teams site ownership and SharePoint site collection and site owner administrator roles).

OIG Reply: OIG considers the recommendation unresolved. The issue identified by OIG is not whether the SCA role serves the same function as network or system administrators, but rather, whether the use of general user accounts with privileged access to resources was appropriate. OIG acknowledges the Site Collection Administrator Rules of Behavior included in IRM’s response. However, the guidance does not address OIG’s concern regarding the principle of least privilege for the management of embassy shared files and folders. OIG found that, due to IRM’s SharePoint configuration, Embassy Ottawa administered its SharePoint sites using general user accounts that had privileged access to files, folders, and other resources. That is, these general user accounts had greater access than what was required for day-to-day work, contrary to Department standards in 12 FAH-10 H-112.5, which defines the concept of least privilege. Furthermore, as noted in the report, 12 FAH-10 H-112.1-2a(5) prohibits granting a general user account administrator, programmer, or developer privileges.

OIG asserts that, although the SCA role may not equate to a network or system administrator role, the SCA role does have access to the files, folders, and other resources that normal end-users would not. The bureau posits that the SCA role does not meet the Department’s definition of the types of roles warranting a secondary privileged account. However, in 5 FAH-12 H-114, the Department defines a secondary privileged user account as an “account utilized by an individual to perform specialized tasks that require elevated privileges.” Moreover, as IRM cited, 5 FAH-12 H-114 includes examples of the roles that may use a secondary privileged account; inherently, such a list of examples is not exhaustive. Furthermore, 5 FAH-12 pertains to active directory management, not SharePoint management. Additionally, IRM cited 12 FAH-10 H-112.1-2a(2) and (3), which describes administrator accounts as having full or limited “access to operating system related devices, programs, and resources.” The SCA role administers resources such as SharePoint document libraries.

Lastly, although 12 FAH-10 H-112.1-2a(5) “allows access to applications and data files based on supervisor-defined user profiles,” this does not mean there is supervisory discretion in defining privileged accounts. The National Institute of Standards and Technology defines a privileged

user as “[a] user that is authorized (and therefore, trusted) to perform security-relevant functions that ordinary users are not authorized to perform.”² Even though tools such as OneDrive enable the owner to grant access to an individual document to other users, managing permissions for shared documents in SharePoint—as an organizational resource—requires the use of a privileged account. Adhering to the principle of least privilege and using the appropriate role-based account is critical to assuring information security. The use of general user accounts, which allows users to have access to email and the internet, to administer SharePoint sites containing sensitive Department information could potentially introduce security vulnerabilities. The recommendation can be closed when OIG receives and accepts documentation that IRM configured SharePoint permissions to comply with Department standards at Mission Canada or when OIG receives and accepts a memorandum from IRM accepting the risks associated with granting general user accounts access to resources beyond what is necessary to perform the individual’s assigned responsibilities.

Recommendation 21: Embassy Ottawa should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa required its local Information Technology Configuration Control Board to comply with Department standards.

Recommendation 22: Embassy Ottawa should bring the network cabling at Consulates General Halifax and Toronto into compliance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought the network cabling at Consulates General Halifax and Toronto into compliance with Department standards.

Recommendation 23: Embassy Ottawa should limit access to the Consulate General Montreal’s Information Systems Center in accordance with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

² National Institute of Standards and Technology (NIST) Special Publication 800-53, Rev. 5, Appendix A, page 412 (September 2020).

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa limited access to the Consulate General Montreal's Information Systems Center in accordance with Department standards.

Recommendation 24: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring the mail screening facility at Consulate General Vancouver into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa brought the mail screening facility at Consulate General Vancouver into compliance with Department standards.

Recommendation 25: Embassy Ottawa should implement standard operating procedures and maintenance log records for Consulate General Montreal's telephone system. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa implemented standard operating procedures and maintenance log records for Consulate General Montreal's telephone system.

Recommendation 26: Embassy Ottawa should relocate the telecommunications demarcation point outside the limited access main telephone frame room at Consulate General Toronto. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa relocated the telecommunications demarcation point outside the limited access main telephone frame room at Consulate General Toronto.

Recommendation 27: Embassy Ottawa should implement a records management program that complies with Department standards. (Action: Embassy Ottawa)

Management Response: In its September 29, 2022, response, Embassy Ottawa concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ottawa implemented a records management program that complies with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	David L. Cohen	12/2021
Deputy Chief of Mission	Katherine A. Brucker	7/2020
Constituent Posts:		
Calgary	Holly Waeger Monster	7/2021
Halifax	Lyra S. Carr	7/2021
Montreal	Ana A. Escrogima	7/2020
Quebec City	Melanie Zimmerman	8/2019
Toronto	Susan R. Crystal	10/2020
Vancouver	Brent D. Hardt	8/2020
Winnipeg	Bryan Koontz	11/2020
Chiefs of Sections:		
Management	Martina C. Polt	8/2021
Consular (Minster Counselor Consular Affairs)	Eric Fichte	8/2019
Consular	Evan McCarthy	8/2021
Political	Gregory D'Elia	9/2021
Economic	Karen Choe-Fichte	8/2019
Public Affairs	Christina Higgins	7/2021
Regional Security	Lance Bailey	6/2020
Other Agencies:		
Defense Attaché Office	Colonel Chadwick Sterr	8/2021
Drug Enforcement Agency	Michael Carovillano	6/2018
Federal Bureau of Investigations Legal Attaché	Brian P. Boetig	6/2019
Foreign Agricultural Service	Katie Nishiura	9/2020
U.S. Commercial Service	James Rigassio	8/2019
Department of Homeland Security Attaché	Ted Sobel	6/2020
Department of the Treasury - Internal Revenue Service	Nolan Fuller	7/2021

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 14 to July 14, 2022, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 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. 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 U.S. interests are accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy; and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; and whether instances of fraud, waste, or abuse exist and whether adequate steps for detection, correction, and prevention have been taken.

In addition to these three broad areas, OIG also determined whether:

- COVID-19 affected Mission Canada's operations and internal controls, and if so, to what extent.
- COVID-19 related telework affected mission accomplishments, customer service to the public, and employee performance.

Methodology

OIG used a risk-based approach to prepare for this inspection. OIG reviewed pertinent records; circulated surveys and compiled the results; conducted interviews with Department and on-site personnel; observed daily operations; 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 and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSES



Embassy of the United States of America

Ottawa

UNCLASSIFIED

September 29, 2022

THRU: WHA Assistant Secretary, Brian Nichols

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

FROM: Embassy Ottawa, Ambassador David L. Cohen

SUBJECT: Response to FY 22 Inspection of Embassy Ottawa and Constituent Posts, Canada

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

Recommendation 1: Embassy Ottawa should implement a First- and Second-Tour program that complies with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. The Ambassador and DCM, in coordination with the Consulates and the First and Second Tour Officers and Specialists (FASTOS), has for the first time created a formal FASTOS Committee and accompanying structure. The first charge for the FASTOS Committee will be to create a charter for its work, with a leading responsibility to work with the DCM and the Ambassador to create a formal First- and Second-Tour mentoring program to strengthen the informal mentoring that has been in place. The FASTOS Committee and its charge were announced to the Mission via Management Instruction on September 21, 2022. We have selected a steering committee among FASTOS from across Mission Canada that represents the diversity of our team (generalists, specialists, State, and other agencies); the first meeting with the Ambassador and DCM will take place in October.

Our FASTOS program will be hybrid – some mentoring done for the entire group and in a virtual format – with posts hosting FASTOS responsible for on-site

professional development activities (representation, supporting visits, out-of-cone tasks, etc.).

Recommendation 2: Embassy Ottawa should implement procedures to improve working group relationships and collaboration on Integrated Country Strategy and Department priorities related to the Arctic and countering malign People's Republic of China activities in Canada. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with certain aspects of the recommendation. Mission Canada is in the process of reconfiguring its working groups and working group leadership and providing a consistent charge to the working groups from the Ambassador about expected responsibilities of the working groups. For example, the Ambassador and DCM are leading an updated structure and management of the Arctic Regional Committee (ARC) to improve Mission-wide coordination and interagency participation, given that the Arctic encompasses a range of U.S. and Mission national security, economic, and environmental policy priorities. The ARC is chaired by our new Consul General in Quebec City, and in response to the OIG recommendation, we have added a newly created vice chair position from the Embassy's Political Section. In coordination with the Mission's interagency representatives, the ARC will: increase the frequency of regularly held meetings; conduct a review of the Mission's strategic objectives in the Arctic; develop short- and medium-term goals to advance ICS and Department goals; and improve information sharing and coordination of Mission engagement in the Arctic.

To better align with the Mission's and the Department's key priorities, including concerns on economic security, forced labor, and human rights, we also have made adjustments to the leadership and organization of the China Working Group (CWG). The CWG will coordinate efforts across Mission Canada to track PRC investment and influence activities in Canada and act as a clearing house for information on PRC activities in Canada. Previously led by the Special Assistant to the Ambassador, who conducted quarterly meetings across Mission Canada, the new Trade and Investment Deputy Counselor – who has just come off an assignment in Beijing – will now chair the CWG. The current Political/Economic Chief at Consulate Vancouver will serve as vice chair, reflecting British Columbia's role as Canada's gateway to Asia, its influence on political and economic developments regarding China, and its significant Chinese diaspora communities that have been targets of PRC influence. (This also will reflect a goal of the Ambassador to ensure that Mission Canada functions under a "one Mission" philosophy, with leadership shared between Embassy and Consulate

officers.) *The CWG will draw on the robust interagency presence in Mission Canada to conduct a review of Mission strategic objectives and develop short- and medium-term goals to advance ICS and Department goals.*

Embassy Ottawa disagrees with the conclusion that the working groups' need for improved collaboration puts at risk Mission Canada's ability to counter "malign PRC activities" in Canada and/or to plan and respond to Arctic-related issues. For example, coordination among Embassy Ottawa Executive Office, the CWG, the ARC, and Washington (Department of State and NSC staff) supported successful USG engagement with the Canadian government regarding a PRC state-owned enterprise's plan to purchase a Nunavut gold mine by pressing the GOC to fully deploy its authorities under the Investment Canada Act (ICA). (See reporting cables 21 Ottawa 184, 21 Ottawa 158, and 20 Quebec 36.) In addition, through the CWG, the Mission coordinated meaningful responses to the Department's China Activities Prioritization (CAP) database. The Department used that work to find that Canada is "both highly resilient and not very susceptible to PRC influence." There was substantial Mission Canada engagement and reporting activity regarding PRC influence in Canada and Canadian efforts to develop an effective response. For instance, the Embassy's Political Section regularly engaged with Global Affairs Canada and facilitated sensitive consultations with the EAP Front Office and the Office of the Special Presidential Envoy for Hostage Affairs to advance the "Declaration Against Arbitrary Detention in State-to-State Relations," an initiative launched by Canada in February 2021 in response to the PRC's arbitrary detention of two Canadian citizens. In a testament to the success of that collaboration, the "Declaration" now includes upwards of 70 signatories globally. The Embassy's Political Section and Consulate General Vancouver also examined concerns of inappropriate PRC pressure on Canadian officials and institutions, and Consulate General Vancouver documented allegations of PRC interference in the 2021 Canadian federal elections. Embassy's Political Section and Economic Section, Consulate General Vancouver, and Consulate General Toronto also maintain communications and engagement, carefully calibrated with EAP at the Department of State, with representatives of the Taipei Economic and Cultural Office, which is the diplomatic face of Taiwan in Canada.

Embassy Ottawa acknowledges the multi-month gap in meetings of the Quebec City-led ARC, but the ARC updated its membership in late 2021, developed a priorities document in early 2022, and convened three times in the first half of 2022. In December 2021, Department of Defense and Department of Homeland

Security staff confirmed their participation in the ARC and their respective roles as chair and vice chair of the Security sub-committee.

Embassy Ottawa acknowledges that increased collaboration on China-related issues can be conducted through the CWG. While the CWG held quarterly meetings throughout 2021 with meeting requests going out to the interagency, moving forward the CWG will request that agencies appoint a designated “China Watcher” representative to serve on the working group. Embassy Ottawa recognizes the importance of coordinating messaging and actions across multiple agencies as reflected in its mission-wide effort to highlight another potential gap in the Investment Canada Act with regard to the purchase of a Toronto-based lithium mining company by a corporation headquartered in China (see reporting cables 22 Ottawa 108 and 21 Vancouver 234).

Recommendation 3: Embassy Ottawa should implement clearance procedures for reporting on Integrated Country Strategy priorities in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa generally concurs with the recommendation, taking note that there is a clearance process in place across Mission Canada for reporting and analysis. The Embassy will review that process to ensure continual attention to objectives and sub-objectives in the Integrated Country Strategy (ICS) priorities. Mission principals will continue to reinforce ICS objectives and sub-objectives through regular communications among sections with the Consulates and within the interagency. Mission Canada will enhance discussion of the ICS at the monthly Political/Economic virtual meeting with reporting staff at all Consulates and will feature ICS reporting as a regular feature of Country Team meetings. The ICS is an ongoing and dynamic process that also needs to allow some elasticity in reporting and analysis, especially at the local level, in response to emergent situations and incidents where Mission leadership assesses a priority need to update the Washington-based interagency. The border blockages in February 2022 were such a case in point and required a “whole of mission” response under time-pressure in response to urgent developments. The need for the flow of timely information and initiative on the part of the Consulates at times prevented full implementation of the clearance process; nonetheless, the Embassy continued to exercise oversight and strove to consolidate reporting and maintain a coherent and accurate narrative for events. In addition, Embassy Ottawa recognizes that some reporting, while-not directly linked to ICS goals, has a high degree of relevance. These topics, as approved by principal officers at the Consulates, help inform a continual review of the scope of ICS objectives and

subobjectives. Importantly, these initiatives can also be useful for training and skill development for reporting officers and locally engaged staff. The Embassy's Political and Economic Sections will continue coordination and collaboration with the Consulates to provide guidance on the selection of cable topics and timely clearances on reporting, with renewed emphasis on the overarching importance of the ICS. Consulates will continue to endeavor to share reporting with all relevant offices in Ottawa. To better communicate expectations for reporting, the Executive Office will issue written guidance regarding the clearance process by January 2023.

Recommendation 4: Embassy Ottawa should include all required documents in its public diplomacy grants files in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. The following corrective actions have already been taken: adding monitoring and evaluation documentation to FY21 grants, creating grants management training documents and videos, and certifying grant officer representatives (GOR) at all posts with Public Diplomacy (PD)-funded personnel. Specifically, added documentation includes post-award files, correspondence/monitoring notes, reports/close-out files and GOR memos. Across the eight posts, a few grants are still in the process of being updated as they reach the end of the performance period. Ottawa PD has recorded mission grants training TEAMS meetings, and with several posts, drafted SOPs to ensure all grants management requirements are consistently met. Constituent post PD staff are taking GOR training to become certified GORs. In Ottawa, a few grants are still missing GOR memos or close-out files, largely as the result of staff vacancies. These tasks will be finalized by December 31, 2022. Canada PD is taking the necessary steps to properly document all newly awarded grants.*

Recommendation 5: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Draft Comment: *Embassy Ottawa strongly concurs with this recommendation. FAC will submit requests for OBO minor construction and improvements (MCI) projects to address the following deficiencies as identified by the OIG, and urges OIG and Department support for the required actions by OBO:*

- *Consulate General Toronto's consular managers lacked line of sight into the cashier's booth in its U.S. Citizen Services unit. (7 FAH-1 H-282(2)(i) and 7 FAH-1 H-281e)*
- *Consulate General Quebec City did not have an enclosed booth for the consular cashier. (7 FAH-1 H-742a)*
- *Consulates General Quebec City, Vancouver, and Toronto lacked a window at the appropriate height to accommodate consulate applicants in wheelchairs. (7 FAH-1 H- 282(1)(m))*
- *Consulates General Halifax, Quebec City, and Vancouver did not have privacy booths in which to conduct sensitive consular interviews. (7 FAH-1 H-282(1)(k))*
- *Consulate General Quebec City did not control internal access to the Consular Section. (7 FAH-1 H-644.1a)*

Recommendation 6: Embassy Ottawa should bring its consular file storage into compliance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa strongly concurs with the recommendation. The Embassy has implemented the recommendation by storing consular files in Embassy Ottawa and Consulates General Halifax and Calgary in recently acquired bar-lock cabinets.*

Recommendation 7: Embassy Ottawa should conduct audits of passport adjudications in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. The Minister Counselor for Consular Affairs (MCCA) or Acting MCCA have been conducting audits of the passport adjudications by the Mission's consular chiefs since June 2022.*

Recommendation 8: Embassy Ottawa should create a fraud prevention strategy for Consulate General Montreal in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Consulate General Montreal is currently drafting a post-specific fraud prevention strategy. The expected completion date is October 2022.*

Recommendation 9: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of residential and nonresidential properties at Consulate General Vancouver, in accordance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Draft Comment: *Embassy Ottawa does not concur with this recommendation. Post has advised OBO of OIG Recommendation 9. Consistent with 15 FAM 252.6f (3) (c) and 15 FAM 971.2 (6), Post has sought guidance from and has requested the services of OBO in-house professional engineering staff and/or OBO seismic consultants. Canada is a first-world country with sophisticated building codes. It is not practical, for example, for Post to seismically evaluate a high-rise building when an employee is planning to lease an apartment or for post to evaluate the building that houses the Consulate. It is also not realistic for Post to seismically evaluate single family residences, etc. The province of British Columbia updates its provincial building codes every five years. Upon the OIG's acceptance of Post's response, Post will not approve the acquisition (lease or purchase) of any residential or non-residential property that was constructed before 1990 without a formal review by OBO seismic consultants.*

Recommendation 10: Embassy Ottawa should comply with all Department Motor Vehicle Safety Management Program standards for incidental drivers under chief of mission authority. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Mission Canada is working to track all incidental drivers' training and medical clearances in the Fleet Management Information System. The Mission is consulting with OBO/SHEM's Motor Vehicle Safety Management Program to help incidental drivers at Embassy Ottawa and its constituent posts complete the Smith System Driver Training. The Mission will complete both tasks by January 15, 2023.*

Recommendation 11: Embassy Ottawa should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Mission Canada, in consultation with the Bureau of Administration's Logistics Management Division, will ensure that expendable property is tracked in accordance with Department standards via the ILMS Expendable Supply module. This task should be resolved by February 1, 2023.*

Recommendation 12: Embassy Ottawa should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Per 14 FAH-2 H-142b(16)(b), Mission Canada will implement the use of the ILMS COR eFiling module by December 1, 2022. The Embassy's Contracting Officer will provide increased oversight for the Mission's COR program.*

Recommendation 13: Embassy Ottawa should bring its living quarters allowance leasing program into compliance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. On September 26, 2022, the Mission Canada IAHB voted to formally delegate to Management and GSO the responsibility for approval of all residential leases that are below size standards and/or LQA ceilings so that employees can proceed with private LQA leases in a timely and reasonable manner. In accordance with existing mission policy, the IAHB will continue to approve/disapprove leases that exceed the space authorizations and/or LQA ceilings.*

Recommendation 14: Embassy Ottawa should submit its hotel and restaurant reports to the Bureau of Administration's Office of Allowances, in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Embassy Ottawa and its constituent posts will complete hotel and restaurant surveys and submit them to the Office of Allowances by November 1, 2022. Mission Canada acknowledges that hotel and restaurant surveys must be completed biannually.*

Recommendation 15: Embassy Ottawa, in coordination with the Bureaus of Western Hemisphere Affairs and the Comptroller and Global Financial Services, should reprogram additional Diplomatic Engagement-funded Information Management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Ottawa, in coordination with WHA and CGFS)

Draft Comment: *Embassy Ottawa concurs with this recommendation. In 2018, the ICASS Council approved one Program IRM position (Ottawa IMO) be transferred to the ICASS platform in an effort to move these costs to all agencies*

using IRM services. Post will further review Program-funded IRM positions. If changes are required, Embassy Ottawa will first consult with WHA/EX and then obtain ICASS Council concurrence on any necessary changes on or before December 15, 2022. If successful, Mission Canada will request additional funds in the FY23 ICASS Initial Budget Submission for an increase to post's ICASS target.

Recommendation 16: Embassy Ottawa should bring its cashiering operations into compliance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. The Financial Management Officer (FMO) is revising Mission Canada's Cashier Policy to include guidance on how to lower COBRA scores, including varying the dates of random cash counts. The policy will be updated and finalized by November 30, 2022.

Recommendation 17: Embassy Ottawa should submit its education allowance surveys in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. The FMO has confirmed that all constituent posts – with one exception – have submitted Education Allowances Survey for the 2022-2023 school year. The remaining post will submit its survey to the Office of Allowances no later than October 31, 2022.

Recommendation 18: Embassy Ottawa should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Mission Canada's Regional Information Systems Security Officer (RISSO) has established procedures to perform the required Dedicated Internet Network (DIN) log file analysis in accordance with (12 FAH-10 H-122.5-2). RISSO, in coordination with Montreal Information Programs Officer (IPO) have ensured that Consulate General Montreal only uses its DIN for processing non-sensitive unclassified information (5 FAM 872.256 and 12 FAH-10 H-112.8-3(4)). RISSO, in coordination with Ottawa Information Systems Officer (ISO) and Consulate IPOs, have established procedures to ensure mobile devices are checked for compliance with Department standards across Mission Canada per (12 FAH-10 H-163.3(8) and 12 FAH-10 H-164.3(12)). Embassy Ottawa considers action completed.

Recommendation 19: Embassy Ottawa should create and maintain standard operating procedures for unclassified and classified computer operations and

support at Consulates General Halifax and Quebec City. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Embassy Ottawa, in consultation with Consulates Halifax and Quebec City, developed tailored division of responsibilities matrixes to clarify local and remote IT duties. Post-COVID, Embassy Ottawa has resumed regularly scheduled quarterly visits for OpenNet and ClassNet support to Consulates Halifax and Quebec City. Embassy Ottawa considers action completed.

Recommendation 20: The Bureau of Information Resource Management, in coordination with Embassy Ottawa, should configure SharePoint permissions to comply with Department standards at Mission Canada. (Action: IRM, in coordination with Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Mission Canada RISSO, in coordination with IRM Bureau's Systems Integration Office (SIO), has determined that Mission Canada is properly using SIO's Rules of Behavior, and our administrative framework falls within their standards and best practices. Embassy Ottawa considers action completed.

Recommendation 21: Embassy Ottawa should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Ottawa's Local Change Control Board (LCCB) has included a formal automated SharePoint-based process to provide semi-annual reviews of all LCCB approved hardware and software per 5 FAM 861.1a and c. Ottawa's LCCB has completed its update of iMATRIX per 5 FAM 862.1c. Embassy Ottawa considers action completed.

Recommendation 22: Embassy Ottawa should bring the network cabling at Consulates General Halifax and Toronto into compliance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. In accordance with 5 FAH-9 H-221 and 5 FAH-9 H-353 Embassy Ottawa completed a cabling refurbishment project in Consulate Halifax's Server Room in August

2022 and considers action completed. Embassy Ottawa in coordination with Consulate Toronto, will pursue refurbishment efforts for their Unclassified Server room via IRM Bureau's Information Technology Infrastructure Remediation Program per 5 FAH-9 H-121.1.

Recommendation 23: Embassy Ottawa should limit access to the Consulate General Montreal's Information Systems Center in accordance with Department standards. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Consulate Montreal offered a plan to OBO in July 2022 to modify the existing Management Office layout that would resolve the recommendation per 12 FAH-10 H-272.16-2. Montreal's submission to OBO is FWP#295 – ProjNet project [Montreal - Expansion of Management Offices and Layout Change – 2022](#) Key 7974. Embassy Ottawa considers action completed.

Recommendation 24: Embassy Ottawa, in coordination with the Bureau of Overseas Buildings Operations, should bring the mail screening facility at Consulate General Vancouver into compliance with Department standards. (Action: Embassy Ottawa, in coordination with OBO)

Draft Comment: Embassy Ottawa concurs with this recommendation. Consulate Vancouver has reached out to OBO for guidance on obtaining a replacement Mail Screening Facility container. Embassy Ottawa is facilitating further liaison on this recommendation via OBO's Minor Construction and Improvement (MCI) program per 15 FAM 640.

Recommendation 25: Embassy Ottawa should implement standard operating procedures and maintenance log records for Consulate General Montreal's telephone system. (Action: Embassy Ottawa)

Draft Comment: Embassy Ottawa concurs with this recommendation. Mission Canada's newly hired LE Telephone Tech has provided updated SOPs to Consulate Montreal per 5 FAH-2 H-621. Montreal IPO has established a Telephone Maintenance Log per 12 FAH-6 H-651.5-6c. Embassy Ottawa considers action completed.

Recommendation 26: Embassy Ottawa should relocate the telecommunications demarcation point outside the limited access main telephone frame room at Consulate General Toronto. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Embassy Ottawa, in coordination with Consulate Toronto IPO and Facilities, will explore options for relocating external telecommunication vendor equipment outside of the Main Telephone Frame (MTF) room in accordance with 12 FAH-6 H-651.5-2.*

Recommendation 27: Embassy Ottawa should implement a records management program that complies with Department standards. (Action: Embassy Ottawa)

Draft Comment: *Embassy Ottawa concurs with this recommendation. Embassy Ottawa's Records Management Officer has published formal guidance to Mission Canada staff that highlights resources for conducting Records Management in accordance with FAM, FAH, and A/GIS/IPS/RA guidance. Embassy Ottawa is exploring formal training options with A/GIS/IPS/RA to bolster Records Management awareness and compliance across Mission Canada per 5 FAM 418.9b(4)(c)ii, 5 FAM 418.9b(5), and 5 FAH-4 H-215.3-2b.*



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

September 23, 2022

Read by _____

**NOTE FOR ASSISTANT INSPECTOR GENERAL FOR
INSPECTIONS LEWIS**

FROM: IRM – Glenn W. Miller, Acting (Signed)

SUBJECT: (U) Draft Report - Inspection of Embassy Ottawa and
Constituent Posts, Canada

(U) The Bureau of Information Resource Management provides the following response to the Office of Inspector General’s Inspection of Embassy Ottawa and Constituent Posts, Canada:

Recommendation 20: The Bureau of Information Resource Management, in coordination with Embassy Ottawa, should configure SharePoint permissions to comply with Department standards at Mission Canada. (Action: IRM, in coordination with Embassy Ottawa)

Management Response: IRM non concurs with this recommendation. IRM notes the SharePoint site collection administrator (SCA) role does not serve the same function or have similar responsibilities that network or systems administrators do. The SCA role does not align with the definition of privileged user accounts. According to 5 FAH 12 H-114, examples of personnel that may utilize these types of accounts are system administrators, [information systems security officers], [organizational unit] administrators, workstation administrators, server administrators, domain administrators, and enterprise administrators. Administrator accounts are made to be members of domain-specific security groups, thus giving them access to files, folders, and systems that normal end-users do not have access to.

The SCA role does not reflect 12 FAH-10 H-112.1-2a(2) and (3), which categorizes administrative accounts as having full or limited “access to operating system related devices, programs, and resources.”

Additionally, 12 FAH-10 H-112.1-2a(5) “allows access to applications and data files based on supervisor-defined user profiles.” The designation of the SCA role to individuals, and if they may use their user account or a separate account, is at the discretion of the supervisor. This is described in the Site Collection Administrator Rules of Behavior located  [here](#) The bureau stated that its Systems Integration Office technical team uses separate administrative accounts and cards when performing the administrative functions needed to manage the platform, in accordance with 12 FAH-10 H-112.1-2a(2) and (3). IRM concluded that platforms are now designed in a way that supports every user’s ability to develop new capabilities in a constrained ecosystem of tools (e.g., Power Apps, Power Automate, Power BI), manage folder and file level permissions to collaborate with colleagues more effectively (e.g., OneDrive), and manage the permissions to collections of information (e.g., Teams site ownership and SharePoint site collection and site owner administrator roles).

ABBREVIATIONS

COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
IM	Information Management
ISSO	Information Systems Security Officer
LE	Locally Employed
MCCA	Minister Counselor for Consular Affairs
NIST	National Institute of Standards and Technology
OBO	Bureau of Overseas Buildings Operations

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