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Office of Inspector General
United States Department of State

ISP-I-23-07

Office of Inspections

November 2022

Inspection of Embassy Kuwait City, Kuwait

BUREAU OF NEAR EASTERN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-23-07

What OIG Inspected

OIG inspected the executive direction, policy and program implementation, resource management, and information management operations of Embassy Kuwait City.

What OIG Recommends

OIG made 15 recommendations to Embassy Kuwait City. In its comments on the draft report, the embassy concurred with all 15 recommendations. OIG considers all 15 recommendations resolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal response is reprinted in its entirety in Appendix B.

November 2022

OFFICE OF INSPECTIONS

BUREAU OF NEAR EASTERN AFFAIRS

Inspection of Embassy Kuwait City, Kuwait

What OIG Found

- The former Ambassador and current Chargé d'Affaires, ad interim, led Embassy Kuwait City in a strategic and attentive manner consistent with Department of State leadership and management principles.
- The embassy's response to the COVID-19 pandemic was consistent with Department guidance on risk management.
- Consular Section locally employed staff were not cross-trained in U.S. citizen services functions, such as processing of passport applications, as required.
- The Management Section did not manage embassy property in accordance with Department standards, which resulted in excess nonexpendable and expendable property and unauthorized use of shipping containers for storage.
- The embassy's information systems security officers did not perform required duties.
- Insufficient oversight by embassy managers caused a 1-year delay in an important embassy radio upgrade project.
- Spotlight on Success: Embassy Kuwait City successfully managed the evacuation from Afghanistan and processing through Kuwait of more than 5,000 Afghan refugees and 1,500 American citizens, permanent residents, and third-country nationals in August and September 2021.
- Spotlight on Success: The Consular Section developed electronic tools to simplify back-office tasks and provide a more efficient and accurate workflow.
- Spotlight on Success: The Management Section's use of Microsoft Forms to process locally employed staff benefits reduced processing time from 4 weeks to less than 1 week with increased accuracy.

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CONTEXT

Kuwait, a constitutional monarchy governed by a hereditary emirate, is located at the head of the Persian Gulf. Approximately 7,780 square miles in size, Kuwait is bordered by Iraq to the north and west, Saudi Arabia to the south, and the Persian Gulf to the east.



Figure 1: Map of Kuwait. (Source: CIA World Factbook.)

Since the establishment of diplomatic relations in 1961, the United States and Kuwait have developed a friendship, shared interests, and institutional relationships. In August 1990, Iraq invaded and occupied Kuwait. A U.S.-led multinational coalition subsequently liberated Kuwait in February 1991. The United States has continued to support Kuwait's sovereignty and security, as well as its multilateral diplomatic efforts to build greater cooperation among the Gulf Cooperation Council¹ countries. A member of the Global Coalition to Defeat ISIS,² Kuwait hosts the headquarters of Combined Joint Task Force—Operation Inherent Resolve.³ Kuwait is also an important partner in U.S. counterterrorism efforts, including efforts to block financing of terrorist groups.

Kuwait is a large investor in the United States, with significant sovereign wealth fund investments⁴ in U.S. assets. According to Embassy Kuwait City's FY 2018-2022 Integrated Country Strategy, defense sales to Kuwait totaled \$26.3 billion and supported 141,000 U.S. jobs. The U.S.-Kuwaiti relationship contributes substantially to the United States' ability to defend and advance its strategic interests in the region. Additionally, Kuwait annually sends more than 10,000 students to U.S. colleges and universities and spends more than \$1 billion per year on academic scholarships.

Embassy Kuwait City's top three strategic objectives, as outlined in the FY 2018-2022 Integrated Country Strategy (ICS), are to:

¹ The Gulf Cooperation Council is a political and economic alliance of six Middle Eastern countries—Saudi Arabia, Kuwait, the United Arab Emirates, Qatar, Bahrain, and Oman—established in Riyadh, Saudi Arabia in May 1981. Its purpose is to achieve unity among its members based on their common objectives and similar political and cultural identities, which are rooted in Arab and Islamic cultures.

² The Global Coalition to Defeat The Islamic State of Iraq and Syria (ISIS), formed in September 2014, is a broad coalition of 78 nations and 5 institutions that work to diminish ISIS' military capability, territorial control, leadership, financial resources, and online influence.

³ In October 2014, the Department of Defense formally established Combined Joint Task Force—Operation Inherent Resolve to formalize ongoing military actions against the rising threat posed by ISIS in Iraq and Syria. Operation Inherent Resolve, the military component of the Global Coalition to Defeat ISIS, operates in Iraq at the request of the government of Iraq and in Syria in support of United Nations Security Council Resolution 2254.

⁴ Kuwait's sovereign wealth fund, which manages the Kuwaiti government's financial reserves, has an estimated \$500 to \$600 billion in assets under management.

- Improve the safety and welfare of U.S. citizens in Kuwait.
- Strengthen and broaden U.S.-Kuwaiti bilateral cooperation to improve regional stability and security.
- Strengthen Kuwaiti national stability through political reform, economic development, and an improved legal framework.

At the time of the inspection, Embassy Kuwait City had 142 U.S. direct-hire employees and 354 locally employed (LE) staff. Additionally, 9 eligible family members worked in the embassy. In addition to the Department of State (Department), embassy staff included representatives from the Departments of Defense, Homeland Security, Justice, Commerce, and Transportation and the U.S. Agency for Global Media. More than 35,000 private U.S. citizens work in Kuwait as military contractors and teachers and in private business, and approximately 15,000 U.S. government and military personnel are stationed in the country.

OIG evaluated Embassy Kuwait City's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.⁵ A related classified inspection report discusses the embassy'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

Tone at the Top and Standards of Conduct

The Ambassador arrived in Kuwait in February 2020, just as the COVID-19 pandemic began; she departed in April 2022, soon after the inspection began. A career member of the Senior Executive Service, she previously served as the Department's Principal Deputy Coordinator for Counterterrorism from 2016 to 2019, and in various U.S. government agencies, including the Department of Defense and the Intelligence Community. The Deputy Chief of Mission (DCM), who became Chargé d'Affaires upon the Ambassador's departure on April 16, 2022, arrived in July 2021. He is a career Senior Foreign Service officer who previously served as the Deputy Director of the Office of Iranian Affairs. His prior overseas assignments include positions in Iraq, Tunisia, Afghanistan, Somalia, and Italy. Upon the DCM becoming Chargé, the Consul General was named acting DCM. Because the Ambassador departed post during the inspection but most of OIG's interviews and questionnaires pertain to her tenure as Ambassador, this inspection report covers her tenure as well as that of the Chargé.

⁵ See Appendix A.

OIG found the Ambassador and the Chargé modeled many of the leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214b⁶ by displaying integrity, encouraging interagency collaboration, planning strategically, being decisive, and leading by example. With regard to the Ambassador, embassy staff members described her as approachable, hardworking, mission-oriented, and policy-focused, particularly on the political and military relationship. For example, one agency chief in the mission expressed appreciation for the counseling and mentorship the Ambassador provided on working with the Kuwaiti government. Several others commented on her purposeful incorporation of diversity issues into mission objectives and activities.

Embassy personnel perceived the Chargé as energetic, engaged, decisive, hard-charging, and very focused on mission objectives. For example, Country Team members credited the Chargé with spearheading the embassy's successful all-hands engagement on the Afghanistan non-combatant evacuation operation, which began soon after his arrival as DCM in July 2021. OIG found that he quickly forged close relations with key members of the Kuwaiti government during the evacuation operations. He also maintained a highly active schedule even through the traditionally dormant Ramadan period, attending numerous Diwali dinners with influential Kuwaitis. Despite the Chargé's successes, staff members also told OIG that they perceived his interpersonal communications and feedback to be dismissive and condescending at times and lacking in positive reinforcement, which they said had a "chilling effect" on morale and alienated some mission members. OIG brought the self-awareness (3 FAM 1214b(6)) and communication (3 FAM 1214b(4)) issues to the attention of the Chargé, who expressed appreciation for the feedback and said he would seek ways to improve his leadership in these areas.

The overall rapid pace of engagement and high energy from the Front Office, while producing several foreign policy successes, also created a degree of fatigue and frustration according to staff in the Political and Public Diplomacy Sections, which engaged with the Front Office on programmatic and public outreach activities. OIG conveyed these concerns to the Chargé and acting DCM, who said they would monitor the workload more closely and establish a Front Office tasker system that would help organize and prioritize taskings to avoid overloading sections at any given time. OIG confirmed that the system was in place prior to the end of the inspection.

OIG found that the Ambassador and the Chargé both generally acted with integrity and ensured that Embassy Kuwait City adhered to ethical standards. For example, staff said the Ambassador instructed them to return an expensive gift presented by Kuwaiti counterparts, and the Chargé, while DCM, declined a gift from a departing Marine on ethical grounds. However, OIG found the embassy did not implement the gift policy uniformly within all sections. During the inspection, the embassy took corrective action to bring its gift registry into compliance with guidance in 2 FAM 964. Additionally, OIG found there was a longstanding ethical issue involving

⁶ The Department's leadership and management principles outlined in 3 FAM 1214 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.

a special arrangement for embassy personnel at a local hotel which embassy management had failed to address. The hotel, used by U.S. government visitors and with which the embassy did business, offered free beach club memberships to U.S. embassy personnel but not to other diplomatic missions or organizations, in contravention of 11 FAM 613.1, which bans employees from soliciting or receiving gifts given because of their position. Furthermore, 2 FAM 962.13 states that Department policy is not to accept gifts of club memberships. Exceptions to this policy require approval by the Under Secretary for Management. Although embassy leadership was aware of this issue prior to the inspection, after discussing it with OIG, they sent a notice revoking this arrangement to embassy personnel and the hotel. Due to this action, OIG did not make a recommendation to address this issue.

Spotlight on Success: Afghan Non-Combatant Evacuation Operation

Embassy Kuwait City successfully managed the all-embassy effort to assist with the evacuation and processing of more than 5,000 Afghan refugees and 1,500 American citizens, lawful permanent residents, and third-country nationals from Afghanistan through Kuwait in August and September 2021. Several factors led to this success. Embassy leadership quickly forged relationships in the lead-up to the evacuation with key interagency and host nation partners and coordinated closely with U.S. military elements based in Kuwait. This allowed the embassy to develop a solid understanding of the needs of, and tools available from, interagency partners. The embassy established a team of translators from the embassy's local guard force, a "community council" at the main evacuation site to help Afghans coordinate among themselves, and a separate team to address routine on-site logistics questions from evacuees. To support the substantial number of children among evacuees—41 percent were under 12 years of age—the embassy took steps such as setting up barriers to protect children from vehicles and providing children's toys and games. Religious and cultural considerations required the embassy to make special food and dietary arrangements and ensure gender-appropriate medical care. The Ambassador and the DCM were engaged personally in the operation and at least one of them visited an evacuation site every day. Embassy leadership also worked closely with the Department to report daily information on evacuee numbers, nationalities, and locations, and with the government of Kuwait to establish timelines and a final deadline for the evacuation operation, which was met.

Equal Employment Opportunity and Diversity

OIG found the Ambassador and the Chargé supported Equal Employment Opportunity practices consistent with 3 FAM 1511.1a, 3 FAM 1514c(3)a and c, and 21 STATE 60514.⁷ The Ambassador actively engaged on diversity, gender, and inclusion issues, frequently taking part in embassy programs addressing these themes and interceding on at least one occasion after learning of an incident of potentially discriminatory behavior within the embassy. Embassy Kuwait City's Diversity Council, chaired by the acting DCM, issued frequent notices to embassy staff emphasizing the importance of respect for diversity and inclusion and encouraging staff participation in activities focused on diversity. At the time of the inspection, the acting DCM,

⁷ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

the embassy's only Equal Employment Opportunity counselor, was seeking another employee to fill that role.

Effects of COVID-19 on Embassy Operations

Embassy staff had generally favorable views of the Front Office's handling of the COVID-19 pandemic, and OIG found the Front Office's response to the pandemic was consistent with 2 FAM 031d and 2 FAM 032.6g guidance on risk management. In accordance with Department guidance and local ordinances, the Front Office restricted embassy access and limited social gatherings. The Front Office also instituted maximum telework, although several sections needed to maintain full- or part-time physical presence on the compound to keep the embassy secure, perform maintenance and repairs on facilities and equipment, maintain motor pool operations, and run the mailroom. There were also some support functions that required use of Department systems that were not accessible while teleworking, thus necessitating staff to come into the embassy to work. Embassy Kuwait City returned to a regular operating posture in October 2021, with nearly all staff back in the office instead of teleworking.

The Department and the embassy's introduction of remote access electronic applications and additional resources to support telework enabled the embassy to continue to operate, albeit at reduced capacity, between March 2020 and October 2021. Strict COVID-19 restrictions by the government of Kuwait on movement in the city prevented LE staff from traveling to the embassy, although the government approved a special appeal from the Ambassador to exempt local guard force members. Additionally, the Kuwaiti government restricted international travel between March 2020 and August 2021, which delayed the return of some LE staff members who had been out of the country at the beginning of the pandemic.

During the inspection, the embassy experienced another surge in COVID-19 cases. The Emergency Action Committee, chaired by the acting DCM, responded rapidly to the new outbreak by issuing two management notices to clarify the situation and mitigate false information and rumors. OIG also observed first-hand the embassy's leadership making prudent and measured decisions during the surge in cases to ensure embassy operations could continue, while keeping personnel safe and avoiding further spread of the outbreak.

Execution of U.S. Foreign Policy Goals and Objectives

OIG determined the Ambassador and the Chargé advanced key embassy and U.S. goals as defined in the ICS, as required in 2 FAM 113.1b and 18 FAM 301.2-4c and d. The Ambassador told OIG she was committed and engaged in the ICS process and saw it as a mechanism to obtain resources and to meld policy, process, and resources. She often discussed the ICS process with newly arrived officers and required them to read the document so they would understand the objectives and their role in achieving them. The Ambassador also was actively involved in the September 2021 ICS review, which the Economic Counselor coordinated, and according to embassy section heads, she would often refer to ICS objectives in policy meetings with the sections.

The Ambassador's counterparts within the Department and at other U.S. government agencies told OIG that her contacts with key Washington policymakers helped to include Kuwait in broader regional policy discussions in areas such as defense, counterterrorism, and U.S. exports. The Chargé and embassy section heads also were familiar with, and focused on, the ICS process and objectives, and reviewed them periodically as part of their sections' workplans. The embassy's ICS was approved by the Department in June 2022.

As part of the strategic planning process, in January 2022 the embassy supported the fifth U.S.-Strategic Dialogue with the government of Kuwait. The Secretary and Kuwaiti Foreign Minister met in Washington while the dialogue's six working groups met remotely to address issues and common objectives in six major areas of bilateral interest.⁸ OIG found that all sections involved in the dialogue considered it valuable as it helped them set a working agenda with the government of Kuwait and to also keep focus on the agenda to achieve positive outcomes for both the United States and Kuwait.

Adherence to Internal Controls

OIG determined that the Front Office completed the FY 2021 Annual Chief of Mission Management Control Statement of Assurance on time and oversaw the embassy's adherence to internal controls in accordance with 2 FAM 022.7(1) and (5) and 2 FAM 024, which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. The Statement of Assurance included one significant deficiency identified in OIG's 2010 inspection report on Embassy Kuwait City⁹ regarding safe areas on the embassy compound. During the inspection, OIG found several internal control issues, which are addressed in the Resource Management section of this report.

The Chargé (while DCM) and the acting DCM regularly reviewed the required percentage of nonimmigrant visa adjudications in a timely manner, in accordance with Department guidance in 9 FAM 403.12-1 and 2.

Security and Emergency Planning

The Ambassador and the Chargé oversaw embassy security and emergency preparedness programs in a manner consistent with 2 FAM 113.1c(5) and (13) and the President's Letter of Instruction to Chiefs of Mission. OIG found the embassy updated its emergency action plan and security directives, regularly conducted drills and radio checks, and held crisis management exercises as required. The Chargé led by example in participating in the drills, and specifically requested to be at the chancery during the drills. Embassy leadership met with the Overseas Security Advisory Committee annually and with groups of resident American citizens, as

⁸ On January 26, 2022, Secretary Blinken and his Kuwaiti counterpart met in Washington as the capstone of the 5th U.S.-Kuwaiti Strategic Dialogue. The first dialogue was held in 2016. In view of the continuing pandemic, the six working groups met remotely to cover the following topics: consular and border security; education and scientific cooperation; security (counterterrorism, cybersecurity, and preparation for the financial action task force); political, development, and human rights; defense; and trade and investment.

⁹ OIG, *Report of Inspection Embassy Kuwait City, Kuwait* (ISP-I-10-33A, March 2010).

required in 2 FAM 113.1c(13). Finally, the embassy submitted its annual review of the security memorandum of agreement between the chief of mission and the geographic combatant commander, as required by 2 Foreign Affairs Handbook (FAH)-2 H-116.4b.

Developing and Mentoring Foreign Service Professionals

OIG found that the Ambassador contributed to mentoring staff members to advance their careers. Upon her departure, the Chargé and the acting DCM oversaw the activities of the embassy's First- and Second-Tour (FAST) employees in accordance with 3 FAM 2713b and 3 FAM 2242.4. OIG found through surveys and interviews that the then-DCM generally took the lead in mentoring and developing all Foreign Service personnel. FAST employees told OIG they generally were pleased with the level of Front Office engagement, and noted that prior to becoming Chargé, the then-DCM arranged individual meetings with all FAST employees in addition to attending bi-weekly group FAST meetings. The acting DCM also made himself available to FAST employees as needed and conducted sessions on employee evaluation report writing and bidding strategies, to which the Chargé also contributed.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Kuwait City's policy and program implementation work performed by the Political, Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements for policy and program implementation, particularly in the Political, Economic, and Public Diplomacy Sections, as described below. However, OIG found issues in the Consular Section related to training and crisis preparedness, as also discussed below.

Political and Economic Sections

OIG reviewed the Political and Economic Sections' leadership and management, policy implementation, reporting and advocacy, Leahy vetting,¹⁰ and Blue Lantern end-use monitoring¹¹ functions. Washington consumers of embassy reporting produced by the Political and Economic Sections told OIG the reporting was timely, accurate, concise, and useful in assessing the situation and context of key developments in Kuwait. In interviews with OIG, Department and interagency stakeholders praised the Political and Economic Sections' initiative

¹⁰ 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. See 22 U.S.C. § 2378d and 9 FAM 303.8-5(B). 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. The Department 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.

¹¹ Blue Lantern is a Department-managed end-use monitoring program established to implement the Arms Export Control Act and International Traffic in Arms regulations and verify the legitimacy of the export of items on the United States Munitions List. Under the program, the Department may request embassy officers to conduct inquiries with foreign government and business representatives and make site visits in order to detect and deter illegal and unauthorized arms transfers. See 22 U.S.C. § 2785(a)(2)(A).

and engagement with the government of Kuwait and other local interlocutors in support of Department objectives. In particular, Washington and interagency stakeholders recognized the Political Section for its work advancing human rights for marginalized communities and the Economic Section for securing progress on intellectual property rights, enabling the U.S. government to remove Kuwait from its intellectual property watch list. Stakeholders also commended the Political and Economic Sections' work on the bilateral Strategic Dialogue. Based on these findings, OIG concluded that the Political and Economic Sections generally complied with Department standards.

In the lead up to and during the inspection, the Political and Economic Sections accelerated the process of archiving WhatsApp text messages and diplomatic notes and retiring remaining paper files in accordance with 5 FAM 444.2c and the 5 FAH-1 Correspondence Handbook. In addition, during the inspection the Political Section updated its Leahy vetting standard operating procedure¹² and finalized a section reporting plan.

Finally, staff told OIG that the Political Section struggled to maintain work-life balance, with long hours being the norm even in non-crisis periods. OIG determined that the embassy had requested an additional Political Foreign Service officer position for the section to address this. Additionally, during the inspection, the Front Office began to introduce a more formalized tasking system to help prioritize its and the sections' workloads.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's leadership and federal assistance awards. Washington stakeholders told OIG that the Public Diplomacy Section performed well despite high turnover and multiple staffing gaps. OIG determined that the section linked its work with the embassy's ICS goals, encouraging the next generation of Kuwaiti leaders to take advantage of U.S. opportunities and share U.S. values and increasing residents' participation and confidence in Kuwaiti society. OIG reviewed ten grant files—one recently closed and nine open grant files—with a total value of \$555,438, and found they generally complied with Department standards.

Consular Operations

OIG reviewed Embassy Kuwait City's consular operations, including U.S. citizen services, fraud prevention programs, nonimmigrant and immigrant visa services, training, management controls, communications and outreach, anti-fraud programs, consular cashing and fees, consular space, and crisis preparedness. During the inspection, the Consular Section corrected issues related to outdated policies for U.S. citizen services and nonimmigrant visa referrals, and procedures for deleting duplicate nonimmigrant visa cases and destroying expired immigrant visa files. Except for the issues discussed below, OIG found consular programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies.

¹² Bureau of Democracy, Human Rights, and Labor, 2017 Leahy Vetting Guide.

Embassy Did Not Cross-Train Local Staff in U.S. Citizen Services Functions

OIG found Embassy Kuwait City did not cross-train consular LE staff in U.S. citizen services procedures, such as processing passport applications, as called for in 7 FAM 1812.3-2. Because direct-hire consular associates can be among the first to depart a country during a crisis, LE staff should know how to perform consular functions related to U.S. citizen services such as issuing passports, emergency financial assistance, and emergency medical assistance. Consular managers told OIG they had focused on maintaining operations during the COVID-19 pandemic, which prevented full engagement on crisis preparedness activities, including cross-training employees. Failure to adequately cross-train LE staff in all aspects of consular work could limit the Consular Section's ability to assist U.S. citizens in the event of future crises.

Recommendation 1: Embassy Kuwait City should cross-train Consular Section locally employed staff in U.S. citizen services functions, in accordance with Department standards. (Action: Embassy Kuwait City)

Consular Disaster Assistance Kits, Duty Officer Handbook Did Not Meet Department Standards

The Consular Section's disaster assistance kits and duty officer handbook did not comply with Department standards. OIG found the disaster assistance kits were in disarray and lacked the supplies, equipment, and information required in 7 FAM 1814.3. Disaster assistance kits should contain everything that a consular officer needs to function offsite in emergency. In addition, the kits were not easily accessible because they were stored outside of the chancery in a warehouse. Furthermore, the embassy did not have a duty officer handbook containing comprehensive guidance preparing embassy duty officers to successfully address unfamiliar issues and emergencies as required in 7 FAH-1 H-291.2. Consular managers instead relied on a Power Point briefing provided to duty officers at the beginning of each duty week. During the inspection, the consular section prepared two complete disaster assistance kits and placed them in a consular manager's office and developed and issued a comprehensive duty officer handbook. Therefore, OIG did not make recommendations to address these issues.

Spotlight on Success: Consular Section Harnessed Technology to Improve Efficiency and Productivity

Embassy Kuwait's Consular Section developed two electronic tools to improve workflow and performance. The embassy developed the Immigrant Visa and Consular Report of Birth Abroad Intake and Prescreening Tool, known as iVIP, to simplify, combine, and accelerate the back-office tasks of processing these two documents. iVIP decreases the amount of time consular staff spend drafting emails to applicants, writing case notes in the consular system, and sharing case information among consular staff. The tool can be used on any computer with Microsoft Outlook and is fully customizable for use at any embassy. In another example, consular staff used AutoHotkey to develop scripts that resulted in a more efficient and accurate workflow across the full range of consular operations. (AutoHotkey, a free, open-source scripting language for Windows, allows users to easily create small to complex scripts for all kinds of tasks such as form fillers, auto-clicking, and macros.) The scripts allow the section to run a

specified series of searching and clicking functions within the nonimmigrant visa computer system to automate many tasks that normally require multiple steps and keystrokes.

RESOURCE MANAGEMENT

OIG reviewed operations and internal controls in financial management, general services, facility management, human resource management, the health unit, and the Community Liaison Office. During the inspection, the embassy corrected multiple internal control issues identified by OIG. Specifically, the embassy:

- Published an updated motor pool policy that included new rates for other authorized users and the requirement for personal liability insurance for personal vehicles (14 FAM 435.1a-b).
- Submitted a new hotel and restaurant report that resulted in updated per diem rates for Kuwait (Department of State Standard Regulation 074.2).
- Updated and re-issued the LE staff handbook (3 FAM 7155a).
- Processed proceeds of sale from a November 2021 auction out of the Suspense Deposit Abroad account¹³ and adjusted procedures to ensure timely processing of the proceeds of future auctions (4 FAM 326.2-7b).
- Adjusted permissions in the time and attendance system so timekeepers no longer have access to record or revise their own records (4 FAH-3 H-525.3-4).
- Stopped the practice of LE staff accepting personal funds from direct-hire employees to pay for their household employees' civil identifications (Government Accountability Office's *Standards for Internal Control in the Federal Government*, Section 5.07, page 33).
- Completed and processed all delinquent performance evaluation reports (3 FAM 8113 and the Office of Overseas Employees' Performance Management Policy Guidebook, page 62).
- Completed an embassy-wide inventory of position descriptions and classification status (3 FAH-2 H-443).
- Corrected errors associated with the employment of an employee's household member and undertook actions to recover payments for improperly authorized rest and recuperation travel associated with this employee (3 FAM 7121 and 14 FAM 532.6b).

OIG found the embassy's Management Section generally implemented processes and procedures in accordance with Department guidance. However, OIG found some exceptions in financial management, general services, and facility management, as described below.

¹³ Suspense Deposits Abroad transactions are official collections for payments on behalf of and as directed by the depositors. The U.S. government is responsible to each such depositor for ensuring that amounts received are appropriately disbursed or returned.

Financial Management

Department Time and Attendance Standards Not Followed

The embassy did not comply with Department standards for time and attendance records. OIG reviewed 263 of 518 (51 percent) of Embassy Kuwait City's time and attendance records for the last 10 pay periods in 2021 and the first 6 pay periods in 2022 and found multiple instances of non-compliance with Department standards. Of the 263 records reviewed, 211 (80 percent) had one or more issues, including:

- Incomplete, unsigned, or missing documentation (4 FAH-3 H-523.3 and 4 FAH-3 H524.3).
- Electronic approving official signatures on supporting documentation that did not comply with signature requirements (4 FAH-3 H526.1-4).
- Lack of documented prior approval for leave or overtime (4 FAH-3 H-525.4-1b and 4 FAH-3 H-523.2).
- Use of non-standard forms for documenting premium compensation approvals (4 FAH-3 H-518(b)).

OIG determined that a lack of oversight and enforcement of time and attendance requirements contributed to this issue. Failure to comply with Department standards for time and attendance increases the risk for waste, fraud, and mismanagement of government resources.

Recommendation 2: Embassy Kuwait City should implement and monitor controls to confirm compliance with the Department's standards for time and attendance. (Action: Embassy Kuwait City)

Spotlight on Success: Use of Microsoft Forms Created Efficiencies in Processing Staff Benefits

The Management Section's use of Microsoft Forms to process payments for LE staff benefits greatly reduced processing time and increased accuracy. Previously, Embassy Kuwait City's more than 300 LE staff would document their eligibility for two annual benefits by submitting paper-based applications to Human Resources. Human Resources would review and compile the data from the applications and then forward them to the Financial Management Office for funding and the Department for processing. By transitioning to Microsoft Forms, the office reduced the amount of time required for processing these payments from 4 weeks to less than 1 week, while significantly reducing data errors.

General Services

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

The embassy did not comply with elements of the Department's overseas motor vehicle safety standards. Specifically, OIG found:

- Chauffeurs exceeded the 10-hour per day limit on driving shifts (14 FAM 433.8a). OIG's review¹⁴ of time and attendance records found 168 instances of an embassy chauffeur working more than 10 hours in a day.
- Fifty-six chauffeurs and incidental (self-drive) drivers out of 213 drivers did not receive driver safety training or required retraining (14 FAM 433.5a-b).
- Seventy-seven chauffeurs and incidental drivers out of 213 drivers held expired medical clearances (14 FAM 433.4a).

These problems occurred, in part, because the embassy tracked compliance with medical clearance and driver safety training requirements using spreadsheets rather than the Department's Fleet Management Information System¹⁵ as required by 14 FAM 433.4e and 14 FAM 433.5e. Additionally, staff attributed lack of compliance with the 10-hour per day limit on driving shifts to official visits or unforeseeable circumstances. During the inspection, the embassy assigned responsibility for tracking all driver safety data to the Accountable Motor Vehicle Officer, ensuring that a single individual is responsible for compliance with the Department's safety standards. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as of damage to U.S. government property.

Recommendation 3: Embassy Kuwait City should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Kuwait City)

Embassy Did Not Properly Account for Its Vehicle Fleet Usage

The embassy did not record daily vehicle usage data for all U.S. government vehicles as required by Department standards. Guidance in 14 FAM 437.2 requires the embassy to maintain a complete record of the use of each vehicle. An analysis of vehicle daily use records for 12 out of 57 government-owned vehicles from June 2020 to March 2022 showed inaccurate vehicle information, unaccounted usage ranging from 3 to 7,241 kilometers, and other errors. Management staff told OIG this problem occurred because they used templates without verifying vehicle information, they lost some records in a recent project to digitize paper files, and some drivers did not know they needed to account for each stop during day-long use of a vehicle. Incomplete recording of vehicle information prevents the embassy from having accurate cost and usage data essential for an effective fleet management system.

Recommendation 4: Embassy Kuwait City should record all embassy vehicle usage in accordance with Department standards. (Action Embassy Kuwait City)

¹⁴ OIG reviewed time and attendance records covering 16 pay periods (August 15, 2021, through March 26, 2022).

¹⁵ The Fleet Management Information System, a module within the Integrated Logistics Management System, is the Department's enterprise system for managing all fleet operations. It is designed to capture key operational data on vehicle dispatch, maintenance, and fuel.

Embassy Did Not Adhere to Department Property Management Standards

OIG found the embassy did not adhere to Department property management standards. Specifically, Embassy Kuwait City:

- Maintained an excess amount of nonexpendable property, primarily furniture and furnishings, in storage. OIG's review of 3,267 stored items found 491 (15 percent) had been stored for more than 3 years. Of these, 106 items exceeded the Department's replacement cycle of 12 years for household furniture. Guidance in 14 FAH-1 H-112.2h requires the accountable property officer to identify unneeded items in the warehouse and discard unserviceable and obsolete items.
- Retained excess office and maintenance expendable supply stock, such as sandpaper, ball point pens, and wall plates, contrary to Department guidance. At the time of the inspection, the embassy had 477 expendable items in stock with no issuances during the previous year. Guidance in 14 FAH-1 H-418.1(4) recommends that inactive or slow-moving items be removed from the stock program.
- Did not account for some types of expendable and nonexpendable property—including an unknown amount of construction materials left over from previous projects, spare parts, and personal protective equipment—in the Integrated Logistics Management System¹⁶ as required in 14 FAM 414.2-1, 14 FAM 415.1-3, and 14 FAH-1 H-415.3.

Management staff told OIG the embassy's excess property resulted from past over-ordering of unneeded items. In addition, they said a lack of personnel impeded their ability to enter items into the Integrated Logistics Management System. Failure to adhere to Department property management standards creates an additional burden for section staff and increases the risk of property mismanagement and internal control issues.

Recommendation 5: Embassy Kuwait City should dispose of excess expendable and nonexpendable property, in accordance with Department guidelines. (Action: Embassy Kuwait City)

Recommendation 6: Embassy Kuwait City should account for all expendable and nonexpendable property in the Integrated Logistics Management System, in accordance with Department guidelines. (Action: Embassy Kuwait City)

Furniture and Appliance Pool Program Did Not Comply With Department Standards

OIG found the embassy's furniture and appliance pool program did not comply with Department standards. For example, the embassy lacked an updated furniture and appliance pool policy, approved by the embassy's International Cooperative Administrative Support

¹⁶ The Integrated Logistics Management System 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 areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

Services (ICASS)¹⁷ Budget Committee, the Washington ICASS Service Center, and the Bureau of Near Eastern Affairs, as required in 6 FAH-5 H-512.3-2b Note 2. During the inspection, the embassy released an updated policy, but did not seek approval from the appropriate offices. Management office staff acknowledged the policy should have been approved by the embassy ICASS Budget Committee but did not know it also required approval from the Washington ICASS Service Center or the Bureau of Near Eastern Affairs. In addition, the embassy permanently issued 245 furniture and appliance pool assets valued at more than \$54,000 to office locations or designated residences,¹⁸ contrary to 6 FAH-5 H-512.3-1. Staff told OIG this occurred because they misunderstood the process for providing furniture for these locations.

Failure to have an up-to-date furniture and appliance pool policy approved by the required entities deprives agencies of a voice in how shared administrative services are managed and delivered and limits their role in ensuring the most cost-effective use of resources. In addition, issuing furniture and appliance pool assets to unapproved locations risks inflating ICASS costs charged to agencies.

Recommendation 7: Embassy Kuwait City should bring its furniture and appliance pool into compliance with Department standards. (Action: Embassy Kuwait City)

Embassy Inappropriately Used Shipping Containers for Permanent Storage

The embassy used 65 shipping containers located at the embassy compound to store furniture and equipment for multiple offices, contrary to Department standards. Guidance issued in September 2018 and October 2021¹⁹ states the Department does not support the use of shipping containers as occupied structures or to accommodate functional space needs. In accordance with 15 FAM 641b(10), embassies must obtain prior approval from the Bureau of Overseas Buildings Operations (OBO) for the procurement, placement, or construction of nonpermanent structures, including modular or prefabricated units. Embassy Kuwait City did not obtain prior approval for the 65 shipping containers. Staff said they used the shipping containers because the embassy lacked adequate warehouse space due to growth in staffing and operations. The use of uncertified shipping containers for permanent storage increases the risk of damage to Department property.

¹⁷ The International Cooperative Administrative Support Services, or ICASS, is the principal means by which U.S. government agencies share the cost of common administrative support services at most 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.

¹⁸ Designated residences include the residences for the Ambassador, DCM, and Marine Security Guards. Furniture and furnishings for designated housing and offices are funded through other allotments.

¹⁹ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018; cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

Recommendation 8: Embassy Kuwait City should comply with Department standards related to the use of the shipping containers as permanent storage. (Action Embassy Kuwait City)

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

The embassy's contracting officer's representative (COR) program did not comply with Department standards. At the time of the inspection, the embassy had seven CORs who oversaw 28 contracts valued at approximately \$13 million. Specifically, OIG found:

- COR files were incomplete and lacked invoices, a payment register, and copies of correspondence or synopses of telephone calls to and from the contractor (14 FAH-2 H-142b(16) and 14 FAH-2 H-517).
- CORs did not maintain files electronically for all awards made after October 1, 2020 (Procurement Information Bulletin No. 2020-04).
- CORs did not certify to the contracting officer that they properly maintained their COR files (14 FAH-2 H-517c).

Despite these issues, OIG discussions with embassy staff and reviews of documentation showed the embassy monitored the contracts, received the goods and services for which it had contracted, and addressed contractor performance when issues arose. OIG determined that the issues with the COR program occurred because the embassy did not enforce COR requirements. However, just prior to the inspection, the embassy began to take steps to enforce the requirements. A non-compliant COR program increases the risk of contract mismanagement.

Recommendation 9: Embassy Kuwait City should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Kuwait City)

Embassy Did Not Adhere to Lease Terms Requiring Payment of Actual Residential Utility Bills

OIG found that since 2021, Embassy Kuwait City had not received residential utility bills reflecting actual tenant consumption prior to paying these costs, as required. Instead, the embassy paid landlords based on estimated residential utility bill costs listed in the lease agreement. For one residence, for example, the 2022 estimated residential utility bill costs for 6 months was greater than the actual expenses for the previous 3½ years. According to embassy staff, the local utility authority typically issued residential utility bills irregularly and generally did not read meters or issue bills during the COVID-19 pandemic. Article 5.B.ii in OBO's Overseas Building Office model lease, used by the embassy, required that all non-rent expenses reflect the actual amounts paid by the landlord based on tenant consumption. Management staff told OIG they did not know how the practice of paying landlords despite their not submitting an actual residential utility bill began. Paying residential utility bills based only on an estimate risks the embassy overpaying or underpaying for these expenses.

Recommendation 10: Embassy Kuwait City should comply with the Department's model standard lease and pay residential utility bills based on actual expenses. (Action: Embassy Kuwait City)

Facility Management

Embassy Structures Did Not Comply With Department Construction Standards

The embassy did not comply with all Department standards for two buildings constructed on the chancery compound. OIG found the embassy built the permanent structures, used as facility management workshops and breakrooms and a bodyguard breakroom, without requesting the required OBO technical review to ensure the projects conformed to Department building codes. In addition, the embassy failed to obtain permits from OBO before proceeding with construction, as required by 15 FAM 641b(5). OIG determined that these issues occurred because of a lack of management oversight. Construction and subsequent use of structures without ensuring building code requirements are met poses significant life safety risks to employees.

Recommendation 11: Embassy Kuwait City, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as facility management workshops and breakrooms and a bodyguard breakroom and submit the survey for approval, in accordance with Department standards. (Action: Embassy Kuwait City, in coordination with OBO)

Post Occupational Safety and Health Officer Certifications for Non-Residential Properties Were Incomplete

OIG found the embassy did not complete 90 percent²⁰ of its required Post Occupational Health and Safety Officer (POSHO) certifications for non-residential properties. It also did not upload these same POSHO certifications in the POSHO Certification Application,²¹ as required in 15 FAM 971. The POSHO told OIG they were aware the certifications needed to be done but not that they needed to be uploaded to the POSHO Certification Application. Failure to complete certifications of U.S. government-owned and -leased properties puts personnel under chief of mission authority at risk of injury.

Recommendation 12: Embassy Kuwait City should complete safety certifications for all its real property and upload them in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Embassy Kuwait City)

²⁰ According to OBO's Post Compliance Report from May 16, 2022.

²¹ The POSHO Certification Application generates and documents the form used by POSHOs to certify that real property meets Department safety, health, and environmental requirements. The form lists the safety requirements that must be certified prior to occupancy. The application allows relevant documentation to be electronically attached to the form.

Fire Protection Program Did Not Fully Comply With Department Standards

OIG found the embassy did not perform monthly testing of its emergency lighting system, as required by OBO's Fire Protection Guide.²² Management staff told OIG they were unaware of the requirement. Malfunctioning emergency lighting could limit the ability of personnel to safely evacuate buildings during power failures or other emergencies and increases the risk of injury.

Recommendation 13: Embassy Kuwait City should perform monthly testing of its emergency lighting system, in accordance with Department standards. (Action: Embassy Kuwait City)

INFORMATION MANAGEMENT

OIG reviewed Embassy Kuwait City's unclassified network operations, information systems and mobile computing administration, mail and pouch services, cyber security practices, records management, and emergency communications systems. During the pandemic, the Information Management Office provided the tools and support embassy staff needed to continue operations while working remotely. During the inspection, OIG identified four internal control issues, which the embassy corrected during the inspection. Specifically, the embassy:

- Relocated the emergency power-off control inside the server room (12 FAH-10 H-272.8-1(1-3)).
- Improved mail screening facility safety equipment (14 FAH-4 H-121.1).
- Tested IT contingency plans for information systems (12 FAH-10 H-232.3-1).
- Established a local IT Configuration Control Board (5 FAM 862.1a).

OIG determined Embassy Kuwait City's information management programs and services generally met the embassy's day-to-day computing and communications needs, with the two exceptions described below.

Information Systems Security Officers Did Not Perform All Required Duties

The embassy's four information systems security officers (ISSO) did not perform all required information systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing cybersecurity policies and procedures for information systems and using the ISSO checklist to document all required duties. Specifically, OIG found that the ISSOs did not use the ISSO checklist to review network logs monthly, nor did they monitor security controls. Office staff told OIG they did not perform these duties due to multiple vacancies in direct-hire information management positions and additional staff responsibilities in supporting customer telework requirements during the pandemic. OIG issued two management assistance reports in May 2017 and December 2020 that highlighted

²² OBO's Fire Protection Guide, updated June 2020, provides information related to fire and life safety and fire prevention.

widespread Department failures to perform ISSO duties.²³ Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 14: Embassy Kuwait City should perform all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Kuwait City)

Embassy's Radio Upgrade Project Delayed by More Than a Year

OIG found the embassy's ultra-high frequency point-to-point radio communications upgrade project was delayed for more than 1 year. Department standards for overseas embassy radio network projects in 5 FAH-2 H-750 define procedures for each project phase—planning, procurement, project development, and equipment installation. OIG found embassy project staff departed without placing the main equipment procurement order or coordinating with incoming project staff, leading to the delay in completion. Insufficient management oversight allowed the departures to occur without first ensuring the outgoing employees had completed their assigned duties. Failure to complete the radio upgrade project limits the ability of the embassy to communicate during a crisis.

Recommendation 15: Embassy Kuwait City should complete its ultra-high frequency point-to-point radio communication project to upgrade the radio network. (Action: Embassy Kuwait City)

²³ 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).

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 Kuwait City. The embassy's complete response can be found in Appendix B.¹ The embassy also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Kuwait City should cross-train Consular Section locally employed staff in U.S. citizen services functions, in accordance with Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022,² response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City cross-trained Consular Section locally employed staff in U.S. citizen services functions, in accordance with Department standards.

Recommendation 2: Embassy Kuwait City should implement and monitor controls to confirm compliance with the Department's standards for time and attendance. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City implemented and monitored controls to confirm compliance with the Department's standards for time and attendance.

Recommendation 3: Embassy Kuwait City should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

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.

² OIG received Embassy Kuwait City's response, which was dated October 7, 2022, on October 14, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City complied with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority.

Recommendation 4: Embassy Kuwait City should record all embassy vehicle usage in accordance with Department standards. (Action Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City recorded all embassy vehicle usage in accordance with Department standards.

Recommendation 5: Embassy Kuwait City should dispose of excess expendable and nonexpendable property, in accordance with Department guidelines. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City 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 Kuwait City disposed of excess expendable and nonexpendable property, in accordance with Department guidelines.

Recommendation 6: Embassy Kuwait City should account for all expendable and nonexpendable property in the Integrated Logistics Management System, in accordance with Department guidelines. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation. The embassy noted an estimated completion date of January 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City accounted for all expendable and nonexpendable property in the Integrated Logistics Management System, in accordance with Department guidelines.

Recommendation 7: Embassy Kuwait City should bring its furniture and appliance pool into compliance with Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City's furniture and appliance pool complied with Department standards.

Recommendation 8: Embassy Kuwait City should comply with Department standards related to the use of the shipping containers as permanent storage. (Action Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City complied with Department standards related to the use of the shipping containers as permanent storage.

Recommendation 9: Embassy Kuwait City should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City's contracting officer's representative program complied with Department standards.

Recommendation 10: Embassy Kuwait City should comply with the Department's model standard lease and pay residential utility bills based on actual expenses. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City complied with the Department's model standard lease and paid residential utility bills based on actual expenses.

Recommendation 11: Embassy Kuwait City, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as facility management workshops and breakrooms and a bodyguard breakroom and submit the survey for approval, in accordance with Department standards. (Action: Embassy Kuwait City, in coordination with OBO)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City conducted a technical review of the design plans for the two structures used as facility management workshops and breakrooms and a bodyguard breakroom and submitted the survey for approval, in accordance with Department standards.

Recommendation 12: Embassy Kuwait City should complete safety certifications for all its real property and upload them in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City completed safety certifications for all its real property and uploaded them in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards.

Recommendation 13: Embassy Kuwait City should perform monthly testing of its emergency lighting system, in accordance with Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City performed monthly testing of its emergency lighting system, in accordance with Department standards.

Recommendation 14: Embassy Kuwait City should perform all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

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

Recommendation 15: Embassy Kuwait City should complete its ultra-high frequency point-to-point radio communication project to upgrade the radio network. (Action: Embassy Kuwait City)

Management Response: In its October 7, 2022, response, Embassy Kuwait City concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kuwait City completed its ultra-high frequency point-to-point radio communication project to upgrade the radio network.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Alina Romanowski ^a	02/2020
Deputy Chief of Mission	James Holtsnider ^b	07/2021
Chiefs of Sections:		
Management	Kirby Nelson	08/2020
Consular	Hadi Deeb ^c	08/2021
Political	Shannon Ross	07/2020
Economic	Patrick Chow	07/2020
Public Affairs	Christy Watkins	02/2022
Regional Security	Brian Zartman ^d	07/2018
Assistance Coordination Regional Office	Abraham Lee	08/2019
Other Agencies:		
Department of Defense	Brig. General Darrin Slaten	07/2020
Department of Justice	John Bassinger	04/2019
U.S. Agency for Global Media	Gy Williams	08/2020
U.S. Commercial Service	Eric Podzorski	01/2022

^a Alina Romanowski departed post March 2022.

^b James Holtsnider became Chargé d’Affaires ad interim on April 16, 2022.

^c At the time of the inspection, Hadi Deeb was serving as the acting Deputy Chief of Mission.

^d At the time of the inspection, Brian Zartman was serving as the acting Regional Security Officer.

Source: Generated by OIG from data provided by Embassy Kuwait City.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 14 to July 20, 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 Embassy Kuwait City'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. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted portions of the inspection remotely and relied on audio- and video-conferencing tools in addition to in-person interviews with embassy, Department, and other personnel. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE

U.S. Embassy Kuwait City
Kuwait City, Kuwait

October 7, 2022

UNCLASSIFIED

THRU: Bureau of Near Eastern Affairs – Barbara Leaf, Assistant Secretary

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

FROM: James W. Holtsnider, Charge d’Affaires, a.i., Embassy Kuwait City

SUBJECT: Response to Draft OIG Report – Embassy Kuwait City

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

1: Embassy Did Not Cross-Train Local Staff in U.S. Citizen Services Functions

OIG found Embassy Kuwait City did not cross-train consular LE staff in U.S. citizen services procedures, such as processing passport applications, as called for in 7 FAM 1812.3-2. Because direct-hire consular associates can be among the first to depart a country during a crisis, LE staff should know how to perform consular functions related to U.S. citizen services such as issuing passports, emergency financial assistance, and emergency medical assistance. Consular managers told OIG they had focused on maintaining operations during the COVID-19 pandemic, which prevented full engagement on crisis preparedness activities, including cross-training employees. Failure to adequately cross-train LE staff in all aspects of consular work could limit the Consular Section’s ability to assist U.S. citizens in the event of future crises.

OIG Recommendation 1: Embassy Kuwait City should cross-train Consular Section locally employed staff in U.S. citizen services functions, in accordance with Department standards. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by completing the training of three locally employed staff in ACS functions. The consular section has also updated its training plan to ensure the rest of the section will be fully trained over the next six months.

2: Department Time and Attendance Standards Not Followed

The embassy did not comply with Department standards for time and attendance records. OIG reviewed 263 of 518 (51 percent) of Embassy Kuwait City's time and attendance records for the last 10 pay periods in 2021 and the first 6 pay periods in 2022 and found multiple instances of non-compliance with Department standards. Of the 263 records reviewed, 211 (80 percent) had one or more issues, including:

- Incomplete, unsigned, or missing documentation (4 FAH-3 H-523.3 and 4 FAH-3 H524.3).
- Electronic approving official signatures on supporting documentation that did not comply with signature requirements (4 FAH-3 H526.1-4).
- Lack of documented prior approval for leave or overtime (4 FAH-3 H-525.4-1b and 4 FAH-3 H-523.2).
- Use of non-standard forms for documenting premium compensation approvals (4 FAH-3 H-518(b)).

OIG determined that a lack of oversight and enforcement of time and attendance requirements contributed to this issue. Failure to comply with Department standards for time and attendance increases the risk for waste, fraud, and mismanagement of government resources.

OIG Recommendation 2: Embassy Kuwait City should implement and monitor controls to confirm compliance with the Department's standards for time and attendance. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by providing additional training to all timekeepers to ensure compliance with properly signed documentation for leave, overtime, or other adjustments. The use of non-standard forms for premium compensation has been discontinued

3: Embassy Did Not Fully Comply With the Department's Motor Vehicle Safety Standards

The embassy did not comply with elements of the Department's overseas motor vehicle safety standards. Specifically, OIG found:

- Chauffeurs exceeded the 10-hour per day limit on driving shifts (14 FAM 433.8a). OIG's review of time and attendance records found 168 instances of an embassy chauffeur working more than 10 hours in a day.
- Fifty-six chauffeurs and incidental (self-drive) drivers out of 213 drivers did not receive driver safety training or required retraining (14 FAM 433.5a-b);
- Seventy-seven chauffeurs and incidental drivers out of 213 drivers held expired medical clearances (14 FAM 433.4a).

These problems occurred, in part, because the embassy tracked compliance with medical clearance and driver safety training requirements using spreadsheets rather than the Department's Fleet Management Information System as required by 14 FAM 433.4e and 14 FAM 433.5e. Additionally, staff attributed lack of compliance with the 10-hour per day limit on driving shifts to official visits or unforeseeable circumstances. During the inspection, the embassy assigned responsibility for tracking all driver safety data to the Accountable Motor Vehicle Officer, ensuring that a single individual is responsible for compliance with the Department's safety standards. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as of damage to U.S. government property.

OIG Recommendation 3: Embassy Kuwait City should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The monitoring of medical clearances for regular and incidental drivers has been moved from HR to Motorpool. Medical clearances for all drivers are up to date, and this information is checked before an incidental driver is allowed to check out a vehicle. Safety training for all drivers is now up to date. Motor Pool supervisors regularly monitor compliance with the 10-hour rule and are staggering driver leave requests to ensure chauffeur availability.

4: Embassy Did Not Properly Account for its Vehicle Fleet Usage

The embassy did not record daily vehicle usage data for all U.S. government vehicles as required by Department standards. Guidance in 14 FAM 437.2 requires the embassy to maintain a complete record of the use of each vehicle. An analysis of vehicle daily use records for 12 out of 57 government-owned vehicles from June 2020 to March 2022 showed inaccurate vehicle information, unaccounted usage ranging from 3 to 7,241 kilometers, and other errors. Management staff told OIG this problem occurred because they used templates without verifying vehicle information, they lost some records in a recent project to digitize paper files, and some drivers did not know they needed to account for each stop during day-long use of a vehicle. Incomplete recording of vehicle information prevents the embassy from having accurate cost and usage data essential for an effective fleet management system.

OIG Recommendation 4: Embassy Kuwait City should record all embassy vehicle usage in accordance with Department standards. (Action Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The Embassy has appointed a temporary dispatcher to ensure that administrative duties are completed on time. Usage data on form OF-108 is checked and entered daily in order to minimize errors and ensure timely reporting. New employees are being trained in the proper completion of form OF-108. Motorpool has scheduled refresher training on daily log usage for all motor pool chauffeurs.

5: and 6: Embassy Did Not Adhere to Department Property Management Standards

OIG found the embassy did not adhere to Department property management standards. Specifically, Embassy Kuwait City:

- Maintained an excess amount of nonexpendable property, primarily furniture and furnishings, in storage. OIG's review of 3,267 stored items found 491 (15 percent) had been stored for more than 3 years. Of these, 106 items exceeded the Department's replacement cycle of 12 years for household furniture. Guidance in 14 FAH-1 H-112.2h requires the accountable property officer to identify unneeded items in the warehouse and discard unserviceable and obsolete items;
- Retained excess office and maintenance expendable supply stock, such as sandpaper, ball point pens, and wall plates, contrary to Department guidance. At the time of the inspection, the embassy had 477 expendable items in stock with no issuances during the previous year. Guidance in 14 FAH-1 H-418.1(4) recommends that inactive or slow-moving items be removed from the stock program;
- Did not account for some types of expendable and nonexpendable property—including an unknown amount of construction materials left over from previous projects, spare parts, and personal protective equipment—in the Integrated Logistics Management System as required in 14 FAM 414.2-1, 14 FAM 415.1-3, and 14 FAH-1 H-415.3

Management staff told OIG the embassy's excess property resulted from past over-ordering of unneeded items. In addition, they said a lack of personnel impeded their ability to enter items into the Integrated Logistics Management System. Failure to adhere to Department property management standards creates an additional burden for section staff and increases the risk of property mismanagement and internal control issues.

OIG Recommendation 5: Embassy Kuwait City should dispose of excess expendable and nonexpendable property, in accordance with Department guidelines. (Action: Embassy Kuwait City)

OIG Recommendation 6: Embassy Kuwait City should account for all expendable and nonexpendable property in the Integrated Logistics Management System, in accordance with Department guidelines. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendations. GSO warehouse is reviewing nonexpendable and expendable property inventory levels. Unusable furniture and unserviceable/obsolete items will be sold at auction in December 2022 or discarded. Unsold items will be discarded and paperwork completed by December 31, 2022. GSO will enter all property not previously accounted for in ILMS by January 2023.

7: Furniture and Appliance Pool Program Did Not Comply With Department Standards

OIG found the embassy's furniture and appliance pool program did not comply with Department standards. For example, the embassy lacked an updated furniture and appliance pool policy, approved by the embassy's International Cooperative Administrative Support Services (ICASS).

Budget Committee, the Washington ICASS Service Center, and the Bureau of Near Eastern Affairs, as required in 6 FAH-5 H-512.3-2b Note 2. During the inspection, the embassy released an updated policy, but did not seek approval from the appropriate offices. Management office staff acknowledged the policy should have been approved by the embassy ICASS Budget Committee but did not know it also required approval from the Washington ICASS Service Center or the Bureau of Near Eastern Affairs. In addition, the embassy permanently issued 245 furniture and appliance pool assets valued at more than \$54,000 to office locations or designated residences, contrary to 6 FAH-5 H-512.3-1. Staff told OIG this occurred because they misunderstood the process for providing furniture for these locations.

Failure to have an up-to-date furniture and appliance pool policy approved by the required entities deprives agencies of a voice in how shared administrative services are managed and delivered and limits their role in ensuring the most cost-effective use of resources. In addition, issuing furniture and appliance pool assets to unapproved locations risks inflating ICASS costs charged to agencies.

OIG Recommendation 7: Embassy Kuwait City should bring its furniture and appliance pool into compliance with Department standards. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has drafted the FAP policy and it is currently being reviewed by the ICASS Service Center. It will be issued as soon as this review is complete.

8: Embassy Inappropriately Used Shipping Containers for Permanent Storage

The embassy used 65 shipping containers located at the embassy compound to store furniture and equipment for multiple offices, contrary to Department standards. Guidance issued in September 2018 and October 2021 states the Department does not support the use of shipping containers as occupied structures or to accommodate functional space needs. In accordance with 15 FAM 641b(10), embassies must obtain prior approval from the Bureau of Overseas Buildings Operations (OBO) for the procurement, placement, or construction of nonpermanent structures, including modular or prefabricated units. Embassy Kuwait City did not obtain prior approval for the 65 shipping containers. Staff said they used the shipping containers because the embassy lacked adequate warehouse space due to growth in staffing and operations. The use of uncertified shipping containers for permanent storage increases the risk of damage to Department property.

OIG Recommendation 8: Embassy Kuwait City should comply with Department standards related to the use of the shipping containers as permanent storage. (Action Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy is coordinating with OBO to lease off-site warehouse space. OBO has contracted a company to provide options for Build-to-Lease contracts for this purpose and the Embassy expects to have an offsite warehouse in place by CY 2024.

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

The embassy's contracting officer's representative (COR) program did not comply with

Department standards. At the time of the inspection, the embassy had seven CORs who oversaw 28 contracts valued at approximately \$13 million. Specifically, OIG found:

- COR files were incomplete and lacked invoices, a payment register, and copies of correspondence or synopses of telephone calls to and from the contractor. (14 FAH-2 H-142b(16) and 14 FAH-2 H-517);
- CORs did not maintain files electronically for all awards made after October 1, 2020 (Procurement Information Bulletin No. 2020-04);
- CORs did not certify to the contracting officer that they properly maintained their COR files (14 FAH-2 H-517c).

Despite these issues, OIG discussions with embassy staff and reviews of documentation showed the embassy monitored the contracts, received the goods and services for which it had contracted, and addressed contractor performance when issues arose. OIG determined that the issues with the COR program occurred because the embassy did not enforce COR requirements. However, just prior to the inspection, the embassy began to take steps to enforce the requirements. A non-compliant COR program increases the risk of contract mismanagement.

OIG Recommendation 9: Embassy Kuwait City should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The Contracting Officer continues to monitor COR compliance with eFiling requirements. The Contracting Officer will also draft reminders and/or hold training sessions for all CORs to ensure compliance with these requirements.

10: Embassy Did Not Adhere to Lease Terms Requiring Payment of Actual Residential Utility Bills

OIG found that since 2021, Embassy Kuwait City had not received residential utility bills reflecting actual tenant consumption prior to paying these costs, as required. Instead, the embassy paid landlords based on estimated residential utility bill costs listed in the lease agreement. For one residence, for example, the 2022 estimated residential utility bill costs for 6 months was greater than the actual expenses for the previous 3½ years. According to embassy staff, the local utility authority typically issued residential utility bills irregularly and generally did not read meters or issue bills during the COVID-19 pandemic. Article 5.B.ii in OBO's Overseas Building Office model lease, used by the embassy, required that all non-rent expenses reflect the actual amounts paid by the landlord based on tenant consumption. Management staff told OIG they did not know how the practice of paying landlords despite their not submitting an actual residential utility bill began. Paying residential utility bills based only on an estimate risks the embassy overpaying or underpaying for these expenses.

OIG Recommendation 10: Embassy Kuwait City should comply with the Department's model standard lease and pay residential utility bills based on actual expenses. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by discontinuing the use of non-standard leases that include an estimated amount for utility payments. Any existing lease agreements with such clauses will be corrected at the next lease renewal.

11: Embassy Structures Did Not Comply With Department Construction Standards

The embassy did not comply with all Department standards for two buildings constructed on the chancery compound. OIG found the embassy built the permanent structures, used as facility management workshops and breakrooms and a bodyguard breakroom, without requesting the required OBO technical review to ensure the projects conformed to Department building codes. In addition, the embassy failed to obtain permits from OBO before proceeding with construction, as required by 15 FAM 641b(5). OIG determined that these issues occurred because of a lack of management oversight. Construction and subsequent use of structures without ensuring building code requirements are met poses significant life safety risks to employees.

OIG Recommendation 11: Embassy Kuwait City, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as facility management workshops and breakrooms and a bodyguard breakroom and submit the survey for approval, in accordance with Department standards. (Action: Embassy Kuwait City, in coordination with OBO)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by contacting OBO and requesting to have a local Architect and Engineering firm conduct a survey of the buildings in question and submit their findings to OBO for review. OBO is working with post to obtain drawings of the two structures, and then will conduct a code and life-safety assessment.

12: Post Occupational Safety and Health Officer Certifications for Non-Residential Properties Were Incomplete

OIG found the embassy did not complete 90 percent of its required Post Occupational Health and Safety Officer (POSHO) certifications for non-residential properties. It also did not upload these same POSHO certifications in the POSHO Certification Application as required in 15 FAM 971. The POSHO told OIG they were aware the certifications needed to be done but not that they needed to be uploaded to the POSHO Certification Application. Failure to complete certifications of U.S. government-owned and -leased properties puts personnel under chief of mission authority at risk of injury.

OIG Recommendation 12: Embassy Kuwait City should complete safety certifications for all its real property and upload them in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The

embassy has implemented the recommendation by entering into the POSHO Certifications completed POSHO Certifications for all non-residential buildings into the OBO SHEM POSHO Certification Application.

13: Fire Protection Program Did Not Fully Comply With Department Standards

OIG found the embassy did not perform monthly testing of its emergency lighting system, as required by OBO's Fire Protection Guide. Management staff told OIG they were unaware of the requirement. Malfunctioning emergency lighting could limit the ability of personnel to safely evacuate buildings during power failures or other emergencies and increases the risk of injury.

OIG Recommendation 13: Embassy Kuwait City should perform monthly testing of its emergency lighting system, in accordance with Department standards. (Action: Embassy Kuwait City)

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by creating Standing Work Orders in the OBO Global Maintenance Management System to ensure and document that monthly testing of the emergency lighting systems are conducted.

14: and 15: Information Systems Security Officers Did Not Perform All Required Duties

The embassy's four information systems security officers (ISSO) did not perform all required information systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing cybersecurity policies and procedures for information systems and using the ISSO checklist to document all required duties. Specifically, OIG found that the ISSOs did not use the ISSO checklist to review network logs monthly, nor did they monitor security controls. Office staff told OIG they did not perform these duties due to multiple vacancies in direct-hire information management positions and additional staff responsibilities in supporting customer telework requirements during the pandemic. OIG issued two management assistance reports in May 2017 and December 2020 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.

OIG Recommendation 14: Embassy Kuwait City should perform all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Kuwait City) Embassy's Radio Upgrade Project Delayed by More Than a Year

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy has implemented the recommendation by assigning new ISSOs and alternative ISSOs for both the Classified Network and OpenNet computer systems. IRM USDH staff have completed the mandatory Cybersecurity Foundation Course (IA110) and other IA trainings and reviewing available ISSO checklist tasks. Once IRM is fully staffed, IRM will devote more time on all monthly ISSO responsibilities.

OIG found the embassy's ultra-high frequency point-to-point radio communications upgrade project was delayed for more than 1 year. Department standards for overseas embassy radio network projects in 5 FAH-2 H-750 define procedures for each project phase—planning, procurement, project development, and equipment installation. OIG found embassy project staff departed without placing the main equipment procurement order or coordinating with incoming project staff, leading to the delay in completion. Insufficient management oversight allowed the departures to occur without first ensuring the outgoing employees had completed their assigned duties. Failure to complete the radio upgrade project limits the ability of the embassy to communicate during a crisis.

OIG Recommendation 15: Embassy Kuwait City should complete its ultra-high frequency point-to-point radio communication

Management Response: Embassy Kuwait City concurs with the recommendation. The embassy is implementing the recommendation by collaborating closely with the Radio Program Branch (RPB) office to identify the equipment needed to build a bridge between the US Agency of Global Media (USAGM). We are also collaborating with Cynergy, and Motorola to expedite delivery of these equipment. Post is expecting a delivery in January 2023, at which point post will contact RPB to complete a survey and install.

The point of contact for this memorandum is Hadi Deeb, Acting Deputy Chief of Mission (DeebHK@state.gov).

ABBREVIATIONS

COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICASS	International Cooperative Administrative Support System
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations
POSHO	Post Occupational Health and Safety Officer

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