



Office of Inspector General
United States Department of State

ISP-I-23-06

Office of Inspections

December 2022

**Inspection of Embassy Buenos Aires,
Argentina**

BUREAU OF WESTERN HEMISPHERE AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-23-06

What OIG Inspected

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

What OIG Recommends

OIG made 18 recommendations: 17 to Embassy Buenos Aires and 1 to the Bureau of Information Resource Management. In its comments on the draft report, the Department concurred with 17 recommendations and did not fully concur with 1 recommendation. OIG considers all 18 recommendations resolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal responses are reprinted in their entirety in Appendix B.

December 2022

OFFICE OF INSPECTIONS

BUREAU OF WESTERN HEMISPHERE AFFAIRS

Inspection of Embassy Buenos Aires, Argentina

What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Buenos Aires in a professional and collaborative manner. They communicated clearly with embassy staff and emphasized diversity, equity, inclusion, and accessibility principles.
- Aspects of internal control, safety, and security did not meet Department of State requirements and needed attention from embassy leadership.
- The embassy's response to the COVID-19 pandemic was consistent with Department risk management standards.
- The embassy's deletion of nonimmigrant visa records did not adhere to Department standards.
- The embassy's fire protection program did not meet Department standards, and the embassy did not take steps to mitigate risks at the chancery. The embassy also did not mitigate fire risks in its high-rise residences.
- The embassy did not comply with Department standards regarding motor vehicle or driver safety standards.
- The embassy's information technology infrastructure did not meet Department physical security and installation standards.

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CONTEXT

Argentina is the eighth-largest country in the world geographically and is rich in natural resources. It has the third-largest economy in Latin America but is constrained by high inflation, a large deficit, and an ongoing recession that started in 2018. In March 2022, the International Monetary Fund's Executive Board approved a 30-month arrangement of funding equivalent to \$44 billion for Argentina to improve public finances, start to reduce persistent high inflation, and to set credible policies to strengthen macroeconomic stability. The United States is one of Argentina's primary trade partners, along with Brazil and China, and is Argentina's largest foreign investor.

Argentina has been a key ally as the United States has worked to strengthen counterterrorism and anti-crime efforts throughout the Western Hemisphere. Argentina and the United States also work together to build capacity in the areas of counternarcotics and criminal justice, and both prioritize climate issues. Argentina hosted the High-Level Dialogue on Climate Action in the Americas in September 2021, the first leaders-level meeting focused exclusively on the climate crisis in the region. Argentina joined U.S. initiatives at the 2021 United Nations Climate Change Conference. Argentina also increased its renewable energy target to 30 percent by 2030, committed to reducing methane emissions, and pledged to end illegal deforestation.

Embassy Buenos Aires' top strategic priorities, as outlined in the Integrated Country Strategy (ICS) published in April 2022, are:

- Argentina is a reliable democratic partner.
- Argentina has a prosperous, sustainable economy.
- Argentina is safe and secure for U.S. and Argentine peoples.

At the time of the inspection, Embassy Buenos Aires had 160 authorized U.S. direct-hire staff, 217 locally employed (LE) staff, and 2 eligible family member positions. The Departments of Agriculture, Commerce, Defense, Homeland Security, Justice, and Treasury and the Social Security Administration also were represented at the embassy.

OIG evaluated Embassy Buenos Aires' executive direction, policy and program implementation, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980.¹ A related classified inspection report discusses the embassy's security program, issues affecting the safety of mission personnel and facilities, and certain aspects of the embassy's information management program.

¹ See Appendix A.

EXECUTIVE DIRECTION

OIG assessed Embassy Buenos Aires' leadership based on interviews, staff questionnaires, and review of documents, and OIG's observations of embassy meetings and activities during the inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a non-career appointee, arrived in Buenos Aires in January 2022. A lawyer, he had served in leadership roles in both professional and charitable groups. The Deputy Chief of Mission (DCM), a member of the Senior Foreign Service, arrived in September 2019. She served as Chargé d'Affaires after the departure of the previous Ambassador in January 2021 until the arrival of the current Ambassador. She previously served as the DCM and Chargé at Embassy New Delhi, India. During the inspection, the Senate confirmed her as the Ambassador to the Philippines. The Public Affairs Officer served as acting DCM for almost the entire period from June 2021 through mid- January 2022 and again during the inspection. OIG observed positive interactions between the Ambassador, the DCM, and the acting DCM in meetings held to make decisions and to exchange information.

OIG found the Ambassador and the DCM exemplified the Department's leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214b.² Staff members told OIG the Ambassador showed his interest in them by getting to know them soon after his arrival through meetings, visits to their sections, and events he hosted for them at his residence. Staff also told OIG that the Ambassador sought to understand embassy procedures and requirements and took the time to personally check facts contained in documents. Consular Section employees related to OIG that the Ambassador and the DCM visited the section to demonstrate their support and appreciation during a Saturday work session to address the visa backlog caused by COVID-19 pandemic restrictions.

Staff members also told OIG the Ambassador clearly conveyed his priorities for the embassy and the bilateral relationship with Argentina in staff meetings and solicited their views and opinions. As part of their efforts to communicate with the embassy community and support morale, the Ambassador and the DCM sought opportunities to meet with employees whose positions normally would not require direct contact with the Front Office. The Ambassador met regularly with members of the interagency team and sought their counsel as he focused on development of bilateral relations, including trade promotion and the visit of the commander of SOUTHCOM.³

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

³ The U.S. Southern Command, known as SOUTHCOM, is located in Doral, FL, and is 1 of 11 unified combatant commands in the Department of Defense.

According to embassy staff, during her time as DCM and as Chargé, the DCM communicated frequently with them, including through town halls and individual meetings. Embassy staff said she set clear expectations. They also said she cared about and considered the needs of the embassy team in her decision-making.

Execution of Foreign Policy Goals and Objectives

OIG determined the embassy's process to develop its April 2022 ICS complied with 18 FAM 301.2-4(D), including by involving the interagency team and mid-level officers. The ICS also incorporated diversity, inclusion, equity, and accessibility (DEIA) principles, as required by cable 21 STATE 109880.⁴ However, despite following the required processes, OIG found that some embassy employees were unfamiliar with ICS goals and objectives. Additionally, although the Ambassador tried to sync his activities with the ICS, the embassy did not always make systematic use of the ICS to measure its activities and determine whether it was achieving policy successes. Regular ICS reviews are an important tool to assess progress against strategic objectives and ensure alignment of policy, planning, resources, and program decision-making. Embassy leadership told OIG they planned to review the new ICS goals in the next town hall with all staff.

OIG found the Front Office integrated the activities of all interagency representatives at the embassy under the chief of mission authority in the mission's strategic plan in accordance with 2 FAM 113.1a and c. For example, during the inspection, the Ambassador hosted the SOUTHCOM Commanding General and participated in her meetings with senior Argentine officials, including the Vice President and the Minister of Defense. The Ambassador summarized his approach to executing foreign policy, publicly and to embassy staff, as "friendship, cooperation, trade, and tourism" and was working through a plan to meet with Argentines important to achieving U.S. foreign policy goals, as indicated by OIG's review of his calendar and interviews with staff members.

OIG determined that the Ambassador used his own contacts, as well as the expertise and contacts of embassy staff, to advance U.S. interests. In addition, the Ambassador and members of the Country Team gained Argentine support for U.S. policy toward Ukraine and achieved a new agreement between the International Monetary Fund and Argentina.

Impact of COVID-19 Pandemic

OIG found that the Front Office's response to the COVID-19 pandemic was consistent with 2 FAM 031d and 2 FAM 032.6g guidance on risk management. The embassy moved to a maximum telework posture in March 2020, and employees told OIG they were able to carry out many programs and activities from home by using virtual platforms. However, some sections faced operational challenges because work could not be performed remotely. For example, at the beginning of the pandemic, the Consular Section suspended all routine U.S. citizen and visa

⁴ Cable 21 STATE 109880, "Guidance on Integrating Diversity, Equity, Inclusion, and Accessibility into Integrated Country Strategy Management Objectives and Sub-Objectives," October 29, 2021.

services, which resulted in backlogs, as discussed in the Consular Operations section of this report. Embassy staff praised the DCM, while serving as Chargé, for her clear communications throughout the pandemic in virtual town halls and Emergency Action Committee and Country Team meetings, as well as her focus on maintaining morale. The embassy resumed an onsite posture for all functions in October 2021, with approximately 80 percent of embassy staff returning to the office and eligible employees continuing to take advantage of workplace flexibilities, such as situational telework.

Adherence to Internal Controls

The Front Office generally prepared the FY 2021 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1) and (5), which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. However, although the Statement of Assurance affirmed that the embassy complied with requirements related to information systems security officer duties, OIG found these duties were not carried out, which constituted a significant deficiency for the embassy. Additionally, OIG found internal control issues in political-economic, public diplomacy, consular, resource management, and information management operations, as discussed later in this report.

Neither the DCM nor the acting DCM consistently reviewed the Consular Section chief's nonimmigrant visa adjudications, as required in 9 FAM 403.12-1 and 9 FAM 403.12-2b. Specifically, they reviewed only 6 of the required 43 adjudications by the Consul General from March 31, 2021, to March 31, 2022. OIG determined that the DCM's extended service as Chargé during this period and the acting DCM's uncertainty about when the Consular Section chief adjudicated visas contributed to this issue. Visa adjudication reviews are an important management tool to maintain the highest professional standard of adjudications and ensure consistent and correct application of Department standards. During the inspection, the DCM and acting DCM reviewed all required adjudications and the Consular Section chief agreed to inform them when there were cases to review. Therefore, OIG did not make a recommendation to address this issue.

Security and Emergency Planning

The Ambassador and the DCM generally oversaw the embassy's security and emergency preparedness program consistent with risk management principles in 2 FAM 031d and 2 FAM 032.6f. The embassy postponed safety and security drills during the period of COVID-19 maximum telework but began to resume them in spring 2022. Embassy staff told OIG the Ambassador and the DCM emphasized in Country Team meetings the importance of full participation in drills and radio checks. In November 2021, the staff participated in a crisis management exercise to assess its handling of the pandemic. In addition, the embassy updated security directives after the Ambassador's arrival, as required by 12 FAM 424.1h, and conducted the annual review of the Memorandum of Agreement between the Chief of Mission

and the Geographic Combatant Commander.⁵ Although the embassy updated its emergency action plan in winter 2022, OIG found staff members were unfamiliar with the plan's specifics. Given the return to all onsite functions in October 2021, the Front Office told OIG it planned to conduct more drills and undertake mission-wide communications to raise awareness of the emergency action plan.

OIG found that preparations for fire related emergencies required increased attention from the Ambassador and the DCM. The chancery building did not meet fire safety standards, posing a threat to staff and visitors, an issue the Ambassador had raised with the Bureau of Overseas Buildings Operations (OBO). During the inspection, OIG observed four fire incidents, including one in which embassy personnel had difficulties evacuating the building. OIG observed that staff did not know where to go or what to do during the emergency and that emergency exit doors were locked. OIG determined these difficulties occurred in part because neither the embassy nor OBO had conducted recent fire safety training. Fire safety issues are discussed in more detail in the Resource Management section of this report.

Equal Employment Opportunity and Diversity, Equity, Inclusion, and Accessibility

The Ambassador and the DCM promoted Equal Employment Opportunity and DEIA principles and practices as described in 3 FAM 1514 and cable 22 STATE 13392.⁶ For example, embassy staff told OIG the Ambassador expressed support for DEIA principles and practices at town halls and in other messages to the embassy community. In addition, the Ambassador met with the embassy DEIA Council at his residence soon after his arrival, and demonstrated his support for religious communities by hosting a seder and an iftar at his residence, both in April 2022. During the inspection, the DCM met with female LE staff members to discuss leadership. OIG observed that participants were interested and engaged and told the DCM they appreciated her remarks. Additionally, the DEIA Council and the embassy's Federal Women's Program Coordinator each organized embassy events and promoted other relevant Department virtual events on topics such as mitigating bias. The Ambassador and the DCM showed support by attending and encouraging participation at events.

When the DCM learned of racially motivated discriminatory treatment by Argentines outside the embassy community against embassy staff members, the DCM spoke directly to the embassy family involved and supported communications with the management of the housing unit where the incidents occurred to stop the discriminatory treatment. Separately, during the inspection, LE staff told OIG of sexually harassing comments made by an LE supervisor. OIG

⁵ The Memorandum of Agreement between the Department of State and Department of Defense assigns security responsibility for Department of Defense personnel in foreign areas. Under the terms of the agreement, the chief of mission is responsible for providing security to all Department of Defense personnel in country who are not under the command of a geographic combatant commander. The agreement is required to be reviewed and signed annually.

⁶ Cable 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices," February 11, 2022.

brought this to the attention of the DCM and the Management Officer, and they reported the issue to the Office of Civil Rights, as required.⁷

Developing and Mentoring Foreign Service Professionals

OIG found the Front Office oversaw the embassy's First- and Second-Tour (FAST) employee program, as required in 3 FAM 2242.4. The DCM led an active FAST program that included seminars on preparing employee evaluation reports and control officer duties, and the Ambassador met with them at his residence soon after his arrival. The embassy also invited FAST professionals from other U.S. embassies in the region to attend these seminars virtually. In addition, FAST employees organized a reception in Buenos Aires for their counterparts at other embassies. Staff members interviewed by OIG found these events to be useful.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Buenos Aires' policy and program implementation work performed by the Political; Economic, Environment, Science, Technology, and Health (EESTH); Public Diplomacy; and Consular Sections. OIG found the sections generally met Department requirements for policy and program implementation. However, OIG also found areas for improvement, as discussed below.

Political and Economic, Environment, Science, Technology, and Health Sections

OIG reviewed Embassy Buenos Aires' Political and EESTH Sections' leadership and management, policy implementation, reporting and advocacy, Leahy vetting,⁸ commercial promotion, and end-use monitoring functions.⁹ Through interviews with Department officials and interagency partners, OIG determined that both sections regularly engaged with Washington and collaborated well with other agencies. OIG also concluded that the embassy's reporting and advocacy work supported ICS goals and U.S. commercial interests. The embassy's issuance of a new standard operating procedure for Leahy vetting in April 2022 brought the program into compliance with Department guidance.

⁷ 3 FAM 1525.2-1c, "The Department's Responsibilities."

⁸ 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.

⁹ The Department requires certain property purchased with foreign assistance funds be monitored to ensure it is used for its intended purposes, known as end use monitoring. For instance, INL equipment valued at more than \$2,500 or items designated as defense articles, munitions, or dual-use items are subject to this requirement, a requirement posts are obligated to review and follow. See Bureau of International Narcotics and Law Enforcement Affairs (INL) Standard Operating Policy/Procedure for End Use Monitoring, Sections 6.3.2 and 6.3.3, June 30, 2021. End-use monitoring fulfills the requirements of Section 484(b) of the Foreign Assistance Act of 1961, as amended, and Chapter 3A, Section 40A of the Arms Export Control Act. See 22 U.S.C. § 2291c(b) and 22 U.S.C. § 2785.

Department and other agency officials praised the embassy's reporting for its quality, relevance, and usefulness, highlighting reporting on Argentina's negotiations with the International Monetary Fund, political events within Argentina, and human rights. In addition, they said the Political and EESTH Sections' engagement and implementation of U.S. government policy on security issues, civil-nuclear issues, energy issues, health, and civil aviation, as well as on priorities such as the Russian invasion of Ukraine, was noteworthy. OIG's review of 200 embassy cables from October 1, 2021, to March 31, 2022, found the reporting to be relevant to embassy strategic objectives, with coverage across a range of pertinent issues. Despite the embassy's generally strong political and EESTH work, OIG found three areas for improvement, as described below.

Joint Evaluation Reviews Not Conducted as Required

The Political Section did not conduct joint evaluation reviews from FY 2017 through FY 2021 with the government of Argentina for in-country activities funded by the Bureau of International Narcotics and Law Enforcement Affairs (INL). A 2017 amendment to a 2004 Letter of Agreement between the United States and Argentina¹⁰ specifies that there be joint evaluation reviews bi-annually and that written reports be prepared and provided to the two governments. Embassy staff told OIG they met often with their counterparts to further project activities but were unaware of this requirement. The lack of joint reviews to evaluate progress could hinder the efficient use of funding and hamper the measurement of results against both the embassy's ICS objectives and INL's program objectives.

Recommendation 1: Embassy Buenos Aires should conduct joint evaluation reviews with the government of Argentina for Bureau of International Narcotics and Law Enforcement Affairs-funded assistance. (Action: Embassy Buenos Aires)

Embassy Did Not Document Evaluation of Assistance Activities as Required

The Political Section, which oversaw implementation of INL assistance activities, including two INL-funded LE staff members, did not document evaluations of those activities. Guidance in 18 FAM 301.4-4a states that offices should conduct evaluations to examine the performance and outcomes of programs and 18 FAM 301.4-4(G)a states that the offices must maintain copies of such reports. OIG found that the Political Section monitored performance but did not always document its evaluations of the activities' outcomes. The lack of documented evaluations could hinder the measurement of funding effectiveness and results against the embassy's ICS and INL's program objectives. Acknowledging lapses in evaluation procedures, INL issued instructions on April 8, 2022, to formalize the evaluation system used for INL in-country programs. Because the embassy began to implement the new instructions during the inspection, OIG did not make a recommendation to address this issue.

¹⁰ "Amendment #9 to the Letter of Agreement on Narcotics Control and Law Enforcement of September 17, 2004, between the Government of the Argentine Republic and the Government of the United States of America," September 27, 2017.

Some Embassy Replies on Blue Lantern End-Use Monitoring Were Not Timely

OIG found that some embassy replies to inquiries regarding the end-use monitoring program Blue Lantern¹¹ were not timely. Two of the four embassy replies submitted to the Bureau of Political Military Affairs from March 2021 through February 2022 took 103 and 374 days, respectively, to complete, rather than the 45 days required in the bureau's October 2021 Blue Lantern Guidebook. The other two met the timeliness guidelines. Delays in obtaining information from arms export consignees could raise questions as to whether the transfers were conducted properly. Because the Political Counselor agreed to make greater efforts to obtain more timely replies from host-country officials, OIG did not make a recommendation to address this issue.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's leadership, strategic planning, reporting, resource and knowledge management, federal assistance awards, educational and cultural programs, and media engagement. OIG determined the section's efforts supported the embassy's ICS goals and public diplomacy efforts were integrated throughout the embassy. Washington stakeholders described the Public Diplomacy Section as high performing, praise which Department staff serving in regional positions supporting the section echoed. Despite the section's programmatic success, staff told OIG the confluence of the effects from COVID-19, the 2021 reorganization of the section as part of the Public Diplomacy Staffing Modernization Initiative,¹² and the Public Affairs Officer serving as acting DCM for all but 7 weeks from June 2021 through April 2022 created feelings of burnout. However, despite these issues, OIG found that the section generally performed well and met Department standards and guidance, with the following exceptions.

Fulbright Program Lacked Balanced Participation

OIG found that the allocation of Fulbright educational exchange grants to Argentina and U.S. participants contravened the guiding principles for administration of the Fulbright Program.¹³ The policies of the J. William Fulbright Foreign Scholarship Board require maintaining "a reasonable balance, over the years, of participants from both partner countries."¹⁴ However, 2022 Argentine Fulbright grantees numbered more than twice their U.S. counterparts (102

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. See 22 U.S.C. § 2785(a)(2)(A). In order to detect and deter illegal and unauthorized arms transfers, the Department may request embassy officers to conduct inquiries with foreign government and business representatives and make site visits.

¹² The Public Diplomacy Staffing Modernization Initiative is the Department's holistic review and realignment of the organizational structure of public diplomacy sections. The new framework job descriptions for public diplomacy LE staff were authorized in January 2018. Global deployment is underway and scheduled for completion by the end of 2022.

¹³ The Fulbright Program is the U.S. government's flagship international educational and cultural exchange program, led by the U.S. government in partnership with 160 countries worldwide.

¹⁴ The Policies of the J. William Fulbright Foreign Scholarship Board, revised November 2019, Guiding Principle 8.

Argentina to 42 U.S. grantees). Additionally, from 2008 to 2019, the Binational Fulbright Commission, which administers U.S.-Argentina Fulbright scholarly exchanges, issued grants to Argentines at a rate more than three times higher than those awarded to U.S. grantees, representing the most skewed balance of the nine Binational Fulbright Commission countries within the Americas over the same period.¹⁵ The Binational Fulbright Commission's decisions related to the allocation and structure of available grants, as well as requirements by some Argentine contributors that funding only support Argentine participants, contributed to this imbalance. The Mutual Educational and Cultural Exchange Act of 1961 as amended, which serves as the authorizing legislation for the Fulbright Foreign Scholarship Board, identifies as its purpose increasing "mutual understanding."¹⁶ Failure to maintain the reasonable balance guiding principle risks undermining that founding goal of mutual benefit.

Recommendation 2: Embassy Buenos Aires, in coordination with the Bureau of Educational and Cultural Affairs, should develop and present options for Binational Fulbright Commission review to address reasonable balance between Argentine and U.S. Fulbright Educational Exchange participation. (Action: Embassy Buenos Aires, in coordination with ECA)

Required Documentation Not Consistently Added to Public Diplomacy Grant Files

OIG's review of grants administered by the Public Diplomacy Section found the section did not consistently upload all required documentation to the Department's online grants database.¹⁷ OIG reviewed 28 grant files (total value \$2.81 million) out of a total universe of 79 grant files (total value \$4.58 million).¹⁸ Specifically, OIG found:

- None of the 12 files with a period of performance exceeding 12 months had evidence of the required annual risk assessment (Federal Assistance Directive, (FAD), Chapter 2, Section K).
- Only 1 of the 10 files for which the period of performance had expired at the time of review contained the required grants officer or grants officer representative written assessment of the program (FAD, Chapter 5, Section C).
- Only 4 of the 11 open or limited competition awards¹⁹ contained documentation of the required merit review (FAD, Chapter 2, Section H).

¹⁵ The nine countries with Binational Fulbright commissions within the Americas are: Argentina, Brazil, Canada, Chile, Colombia, Ecuador, Mexico, Peru, and Uruguay.

¹⁶ Mutual Educational and Cultural Exchange Act of 1961, 22 U.S.C. § 2451 and § 2456(a)(1).

¹⁷ Grants reviewed by OIG were subject to the Department's Federal Assistance Directive (FAD), Version 4.0, effective October 1, 2019, through October 20, 2020; FAD, Version 5.0, effective October 21, 2020, through October 7, 2021; and FAD, Version 6.0, which took effect on October 8, 2021.

¹⁸ The figure of \$4.58 million encompassed all public diplomacy grants issued since October 1, 2020, that were active at the time of the grants review on March 17, 2022, including multi-year grants with initial funding from prior fiscal years. OIG's sample included all grants signed between April 1, 2021, and March 17, 2022.

¹⁹ FAD, Chapter 2, Part F, requires that assistance awards generally be competed in a full and open manner and identifies programs or awards that are not competed as either limited competition or sole source.

Section staff told OIG that COVID-19 disruptions caused these issues in grants administration. During the inspection, the section uploaded the missing documentation, instituted a tracking system for risk assessment renewals, created a standard procedure for drafting final program assessments, and scheduled regular spot checks for missing documentation. Based on the added documentation, OIG determined that the grants were competed and awarded in accordance with Department standards, and therefore made no recommendation.

Consular Operations

OIG reviewed the embassy's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. Due to COVID-19 pandemic restrictions, the embassy accrued backlogs for non-emergency U.S. citizen and passport services, and immigrant and nonimmigrant visa (NIV) services. By December 2021, the embassy had eliminated the backlogs in U.S. citizen, passport, and immigrant visa services by shifting personnel to those units as pandemic restrictions eased. The embassy also fully resumed processing NIV applications in December 2021. However, as of May 2, 2022, the embassy estimated that the NIV backlog consisted of approximately 172,500 cases.

The embassy's strategy for reducing the NIV backlog prioritized addressing applications that did not require an interview²⁰ and increasing the number of interview cases as it filled staff positions that had become vacant during the pandemic. It also relied on an offsite processing center operated by a contractor under the Bureau of Consular Affairs' Global Support Strategy Service program.²¹ While the center had been able to meet the section's processing capacity, its ability to increase capacity was constrained by its limited space and operational procedures. For example, 65 percent of applicants who were issued visas chose to pick them up at the center, which required an appointment, rather than having them mailed. This reduced the number of appointments available for other purposes, such as dropping off documents and taking finger scans. OIG found that the embassy's consular managers were fully engaged with the center and the Bureau of Consular Affairs. However, it ultimately will be up to the bureau, which directs the center's contractor, to address the impediments.

During the inspection, the embassy corrected five internal control issues identified by OIG. Specifically, the embassy:

- Posted country specific information for Argentina and embassy working hours on its website (7 Foreign Affairs Handbook (FAH)-1 H-832a and 7 FAH-1 H-833a).

²⁰ See 9 FAM 403.5-4 and 9 FAM 403.5-4(A)(1) for guidance on applicants for whom nonimmigrant visa interviews can be waived.

²¹ The Global Support Strategy Services program is a worldwide consular program created in 2010 to bring greater global standardization, accountability, and transparency to the delivery of visa applicant support functions. The program provides support services for nonimmigrant and immigrant visa operations at approximately 175 U.S. consulates and embassies for public inquiry services, appointment services, fee collection, document delivery, and greeters through a multiple-awardee indefinite duration/indefinite quantity contract.

- Required accountable consular officers to complete mandatory annual training for management controls (7 FAH-1 H-632f).
- Reviewed and corrected roles for users of consular automated systems (7 FAH-1 H-662b, c, and d).
- Updated consular crisis contingency plans and specified roles and responsibilities for consular staff (7 FAM 1814.1-4 and 7 FAM 1812).
- Placed the most recent Schedule of Consular Fees in the consular waiting room (7 FAH-1 H-713b).

OIG determined Embassy Buenos Aires' consular operations complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions noted below.

Deletion of Nonimmigrant Visa Records Did Not Adhere to Department Standards

OIG reviewed 21 of the 311 NIV cases deleted from the embassy's local database from March 5, 2021, to March 2, 2022, and found that none of the deletions were performed correctly. Guidance in 9 FAM 403.2-7(A)b states that consular officers can authorize deletions only when there have been no applications or when the case is a duplicate record. The guidance also states that an accountable consular officer or manager must review end-of-day reports to monitor deletions daily. In addition, 9 FAM 403.2-7(C) requires that case notes reflect the reason for the deletion. None of the cases OIG reviewed included case notes, evidence that a consular officer authorized the deletion, or evidence that a manager had reviewed the cases. Consular managers told OIG they were unaware NIV cases had been deleted from the local database. Failure to document and review NIV case deletions puts the integrity of consular records at risk.

Recommendation 3: Embassy Buenos Aires should delete nonimmigrant visa case records in accordance with Department standards. (Action: Embassy Buenos Aires)

Consular Operations in Outbuildings Lacked Proper Oversight

Embassy Buenos Aires' consular managers did not regularly oversee consular staff and operations located in two outbuildings within the chancery compound. During business hours, three LE staff members and one eligible family member processed NIV applications in these outbuildings. OIG observed that since consular managers did not have daily responsibilities in the outbuildings, they did not make regular visits to those areas. Guidance in 7 FAH-1 H-642 requires consular managers to supervise by frequently walking around their work areas, especially if units of the consular section are located in separate areas. In addition, 7 FAH-1 H-644.1b states that visa processing areas should be clearly visible to consular managers. Maintaining clear visibility of work areas and walking around them allows managers to be aware of all aspects of consular operations and uphold transparency and integrity in the visa process. Failure to do so could increase the risk of malfeasance by consular employees.

Recommendation 4: Embassy Buenos Aires should oversee nonimmigrant visa operations in the two consular outbuildings in accordance with Department standards. (Action: Embassy Buenos Aires)

RESOURCE MANAGEMENT

OIG reviewed Embassy Buenos Aires' operations and internal controls in facility management, general services, human resources, financial management, and general management. During the inspection, the embassy corrected multiple internal control issues that OIG identified. Specifically, the embassy:

- Inventoried and secured all materials that could be used as improvised weapons (14 FAH-1 H-313a, 14 FAH-1 H-313.1, and 14 FAH-1 H-313.2).
- Designated a fuel credit card control officer to receive, control, issue, and account for fuel cards (Motor Pool Procedures Overseas Guide, Section 2.4a).
- Reviewed \$405,000 worth of unliquidated obligations with no activity in the previous year and deobligated invalid obligations (4 FAM 225d).
- Updated reports for foreign travel per diem rates and post differential allowances (Department of State Standardized Regulation, Sections 074.2 and 075.1).

OIG found the embassy's Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, except as described below.

Facility Management

Embassy's Fire Protection Program Did Not Comply With Department Standards

OIG found that Embassy Buenos Aires' fire protection program did not comply with Department standards. In addition, OBO conducted inspections in May 2017 and September 2019 that noted several deficiencies with the embassy's fire protection program, including the assessment that the layout of the chancery did not meet current fire codes.²² The chancery, completed in 1978, had a fire alarm and detection system, fire extinguishers, and a fire standpipe system as fire protection measures, but lacked a fire sprinkler system, which was not required at the time of construction.²³ In addition, the embassy compound did not have any fire hydrants. In its 2019 inspection report, OBO recommended that the embassy coordinate with its Office of Fire Protection to install an automatic sprinkler system in the chancery. OBO planned a selective improvement project to start in 2022 that would address some of the chancery's more significant deficiencies, including installing a new fire alarm and detection

²² According to OBO's February 2019 fire inspection report, the chancery did not meet National Fire Protection Association fire codes because the travel distance to an emergency exit door exceeded the requirement for a non-sprinklered building of 100 feet. Additionally, emergency egress was insufficient because there were two stairways within the same shaft.

²³ The only exception was in the kitchen, which had two hood fire suppression systems above the grills.

system. However, the project did not include installation of a fire sprinkler system, and OBO told OIG one would not be installed unless a complete major renovation of the chancery took place. At the time of the inspection, the selective improvement project was delayed due to a lack of bidders on the contract.

During the inspection, OIG observed four fire incidents on the embassy compound, including three electrical fires.²⁴ During the fourth incident, OIG observed that embassy employees were unable to exit the chancery when the alarm sounded due to locked emergency exit doors.²⁵ Even though employees eventually were able to open the doors, OIG observed confusion throughout the incident, including how to exit the building, where to go upon exiting, and identifying what triggered the fire alarm and where in the building it occurred.²⁶

During the inspection, OIG also identified the following additional deficiencies in the embassy's fire protection program:

- The embassy did not maintain an accurate fire extinguisher inventory. According to 15 FAM 813.6b, embassies must track all fire extinguishers on approved property records and must validate its inventory when requesting new fire extinguishers from OBO.
- The embassy did not inspect all fire extinguishers monthly. As required by 15 FAM 843c, every fire extinguisher must be visually inspected monthly for operable condition and inspection dates must be recorded.
- Some fire extinguishers located in chancery controlled access areas and the chief of mission residence were overdue for hydrostatic testing. OBO also cited this issue in its 2019 fire inspection report. According to 15 FAM 843a and e, embassies must administer a maintenance program for fire extinguishers in all buildings occupied by U.S. government personnel that includes hydrostatic testing for fire extinguishers that are 12 years past the manufacturer's date.
- The embassy did not document a daily check of the fire alarm panel. According to 15 FAM 841a, embassies are responsible for monitoring installed fire protection systems to ensure they are operational and must review the main fire alarm panel daily and document the check.

²⁴ A faulty electrical cable and conduit near the front walkway leading to the chancery caused two of the three electrical fires. The third electrical fire was caused by an overloaded transformer on the chancery's second floor. The fourth fire incident was caused by steam from a coffee and tea maker that triggered the fire alarm, although the cause was not determined until later.

²⁵ Embassy staff told OIG that the Marine Security Guards improperly locked the fire doors during the fire emergency. Immediately after the incident, the Regional Security Officer and Marine Security Guards convened an after-action review to discuss and evaluate the fire incident response. The embassy took immediate corrective measures, including additional training for Marine Security Guard staff on the proper use of fire egress doors during emergencies and conducting a fire drill to test the standard operating procedures discussed during the training.

²⁶ Embassy staff later told OIG that the fire alarm was triggered by steam emitting from a coffee pot and electric kettle directly underneath a smoke detector, located in a break room in the building's basement. Even though the fire alarm panel showed that the incident occurred in the basement, staff told OIG that they were unable to identify the exact location of the hazard due to errors in their smoke detector layout plan documentation.

- The embassy's kitchen hood suppression system was not cleaned and inspected every 6 months by a qualified technician, as required in OBO's Fire Protection Guide, Section I-9.²⁷ The embassy told OBO that it performed full maintenance in June 2020, but was unable to provide OIG with documentation of this maintenance or subsequent cleaning and inspections.
- The embassy only reported three of the four fire incidents discussed above to OBO, and it did not report them within the required timeframe. According to 15 FAM 822.2a and OBO's Fire Protection Guide, Section H-1, every fire incident must be reported to OBO's Office of Fire Protection. Guidance in 15 FAM 822.1a and OBO's Fire Protection Guide, Section H-1, further require all major fire incidents be reported immediately to the Department's Operations Center. All other fire incidents must be reported within 48 hours, per 15 FAM 822.2a.
- Neither the Post Occupational Safety and Health Officer (POSHO) nor OBO's Office of Fire Protection provided any recent fire-safety training for embassy staff. OBO last provided training in February 2019, and the embassy last provided fire extinguisher training in September 2019. According to 15 FAM 965j, POSHOs must conduct fire-safety training for embassy staff, while 15 FAM 965a states employees should receive the appropriate safety and occupational health training within 30 days of their arrival at post. Additionally, 15 FAM 813.3a(2) states that OBO's Office of Fire Protection provides periodic training on fire prevention strategies, fire evacuation, and extinguishing practices.

Embassy staff told OIG that these issues occurred because of workload constraints. In addition, OIG determined that embassy and section leadership did not provide proper oversight, did not make fire safety a priority, or require fire safety training for embassy personnel. Fire alarm testing, inspection of fire extinguishers, and fire safety training are especially important since the chancery does not have a sprinkler system. Malfunctioning and poorly serviced fire protection equipment and a lack of training limit the ability of the embassy to protect against fires and increases the risk of injury and loss of life.

Recommendation 5: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Embassy High Rise Properties Did Not Meet Department Standards

Embassy Buenos Aires leased or owned 78 residences in high-rise buildings that did not meet Department fire standards, with 55 of those on the sixth floor or higher.²⁸ OIG found that although the embassy requested and received property-specific mitigation measures from OBO, after not finding any high-rise properties that complied with Department guidance, it did not

²⁷ OBO's Fire Protection Guide requires that systems using a moderate volume of cooking be cleaned every 6 months. This 6-month requirement also was noted in OBO's 2019 inspection report.

²⁸ Of the 78 residences in high-rise buildings, 4 were vacant at the time of the inspection. Embassy staff told OIG they were in the process of selling one of the vacant residences due to the high costs to maintain the property.

complete the required mitigation measures. Guidance in 15 FAM 813.7c states that embassies must use the minimum level of equivalency measures²⁹ in evaluating fire risks to determine when to acquire residences in high-rise properties that do not meet U.S. building and fire codes. In addition, 15 FAM 813.7e requires the embassy to coordinate its decision to lease properties that do not meet Department standards with OBO, which provides the embassy with property-specific mitigation measures. In August 2019, after it could not identify any compliant properties available for lease, the embassy asked OBO for mitigation actions for the high-rise properties in the embassy's housing pool. OBO issued fire mitigation memoranda in September 2020 for each of the embassy's high-rise properties. These letters detailed the fire risks associated with each high-rise building and listed specific mitigation measures that both the embassy and residents must take to compensate for the fire risks. One mitigation measure required the embassy to give residents of the high-rise buildings copies of the letters and notify them of the building's lack of fire protection features. However, the embassy only could provide OIG with documentation showing that 6 of the 74 residents received their letters. Additionally, the embassy could not provide evidence that it completed any of the mitigation actions required in the letters. Finally, OIG found the embassy did not have mitigation letters for 9 of the 78 properties, 6 of which were acquired after OBO issued the letters. Management Section staff were unsure why the embassy did not issue letters to all residents or take appropriate fire mitigation actions. However, OIG determined this issue was caused by a lack of coordination among section staff. Without appropriate notifications, embassy employees may be unaware of the steps needed to mitigate fire risks in their residences. Taking appropriate residential fire mitigation measures is critical for the life safety of occupants and failure to do so puts embassy staff and their families at risk.

Recommendation 6: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should mitigate the fire and life-safety risks of its high-rise residential properties that do not comply with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Embassy Lacked Post Occupational Safety and Health Officer Certifications for Real Property

OIG found that Embassy Buenos Aires did not complete safety certifications for 4 percent of its occupied residential properties and 87 percent of its nonresidential properties and upload them to the POSHO Certification Application.³⁰ In accordance with 15 FAM 971, the POSHO must complete a certification in the POSHO Certification Application for each residential and

²⁹ According to 15 FAM 813.7a-c, occupying floors that are more than 75 feet (approximately six floors) from the lowest level of access for fire department vehicles presents an increased risk of injury or death due to the time it takes to evacuate from the higher floors. U.S. building and fire codes mandate prescriptive measures for these buildings to ensure that occupants can safely evacuate the premises in the event of a fire. Since it may be difficult to locate high-rise properties that meet U.S. building and fire code standards, embassies must use the minimum level of equivalency when evaluating risks to determine when to lease a property. Minimum level of equivalency measures prescribes requirements for fire alarm systems, sprinkler systems, and interior and exterior exit stairs.

³⁰ The POSHO Certification Application generates and documents the form used by POSHOs to certify that a residence meets the requirements of 15 FAM 252.5. 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.

nonresidential property, and no employee under chief of mission authority may occupy a U.S. government-owned or -leased property unless the POSHO certifies that the property certification requirements are met. Embassy staff cited resource and time constraints as the main reasons for not certifying all properties. Failure to conduct safety certifications and correct identified safety issues could expose occupants to serious safety hazards, such as electrocution, falls, carbon monoxide poisoning, and accidental fires.

Recommendation 7: Embassy Buenos Aires should complete and document safety certifications for all embassy properties in the Post Occupational Health and Safety Officer Certification Application and correct any identified safety issue prior to occupancy, in accordance with Department standards. (Action: Embassy Buenos Aires)

Unauthorized Use of Shipping Containers on Embassy Compound

OIG found Embassy Buenos Aires used eight unauthorized shipping containers located on the embassy compound for maintenance shops, mail screening, office space for local guards, and permanent storage. Two of the containers used as occupied spaces were stacked on top of one another with an external staircase. The Department issued guidance in September 2018 and October 2021³¹ stating that it does not support using shipping containers as occupied structures or to accommodate functional space needs. According to 15 FAM 641b(10), embassies must obtain prior approval from OBO to procure, place, or construct nonpermanent structures, including modular or prefabricated units. Embassy staff told OIG they did not know why the embassy did not request authorization from OBO to use the containers but said the embassy did not have enough space in the chancery and needed the containers for additional storage space. Using unapproved shipping containers that do not meet the required building and fire codes for permanent storage and functional space needs increases the risk of damage to U.S. government property in the event of a fire and puts employees' safety at risk.

Recommendation 8: Embassy Buenos Aires should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage and office space or dismantle and remove them in accordance with Department requirements. (Action: Embassy Buenos Aires)

General Services

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

Embassy Buenos Aires did not comply with elements of the Department's overseas motor vehicle safety standards. Specifically, OIG found that 6 of the embassy's 14 chauffeurs and 60 of the 75 incidental (self-drive) drivers held expired medical certifications, contrary to guidance in 14 FAM 433.4a. In addition, 21 of the 75 incidental drivers did not receive driver safety training or required retraining, as called for in 14 FAM 433.5a-b.

³¹ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018; and cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

Furthermore, the embassy did not track all chauffeurs and incidental drivers' compliance with medical certification and safe driving training requirements using the Department's Fleet Management Information System³² as required in 14 FAM 433.4e and 5e. OIG found the embassy tracked only 10 of its 14 chauffeurs and 47 of the 75 incidental drivers in the system. Management Section staff said that COVID-19 pandemic protocols limited in-person safe driving training and delayed the renewal of medical clearances. Furthermore, OIG found a lack of management oversight by embassy sections and agencies regarding these requirements. Staff also acknowledged that they were unaware of the requirement to enter certifications into the Fleet Management Information System. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. government property.

Recommendation 9: Embassy Buenos Aires should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Buenos Aires)

Embassy Did Not Comply With Driver Duty Shift Limits

OIG found that embassy chauffeurs exceeded the 10-hour duty limit on driving shifts, contrary to guidance in 14 FAM 433.8a and c.³³ OIG's review of time and attendance records for all 14 chauffeurs from January 2 to March 26, 2022, showed that 8 of 14 chauffeurs exceeded the limit on 52 occasions. Section staff told OIG these instances occurred in support of the Ambassador's trips scheduled on weekends and that the staff lacked control over driver duty hours for chief of mission drivers and those from non-Department agencies. Failure to enforce driver duty limits increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. government property.

Recommendation 10: Embassy Buenos Aires should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Buenos Aires)

Embassy Maintained Excess Motor Vehicle Inventory

Embassy Buenos Aires had an inventory of 44 official vehicles, 13 above the target fleet size of 31 vehicles authorized by the Bureau of Administration. The Department, in coordination with embassies worldwide, uses the vehicle allocation methodology survey to set a target fleet size

³² 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 designated to capture key operational data on vehicle dispatch, maintenance, and fuel.

³³ The embassy's chauffeurs included drivers for the Marine Security Guard (MSG) detachment. Department guidance in 14 FAM 433.8e states that MSG drivers may operate on a 12-hour duty shift. In accordance with 14 FAM 433.8e(1) through (4), MSG drivers may operate on a 12-hour shift, of which they may drive for no more than 10 hours, when an alternate work schedule—of one day on duty, followed by one day off duty—is in place and the schedule enables drivers to spend 14 hours off duty. However, staff told OIG that the MSG drivers were not on an alternate work schedule of 12 hours on duty and 14 hours off duty, which OIG confirmed in its review of the time and attendance records. Therefore, OIG determined that the 10-hour duty limit applied to the MSG drivers.

based on industry fleet standards and embassy necessity, as required by 14 FAM 436.2a. Embassy staff told OIG the excess motor vehicle inventory occurred due to host government regulations that made it difficult to sell or otherwise dispose of vehicles. Retaining excess vehicles increases costs to the embassy.

Recommendation 11: Embassy Buenos Aires, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines. (Action: Embassy Buenos Aires, in coordination with A)

Property Management Duties Were Improperly Segregated

OIG found that the embassy assigned receiving and property record-keeping duties for expendable and nonexpendable property to the same staff members, contrary to Department standards. Both the receiving clerk and alternate receiving clerk were involved in all stages of property management, including receiving goods, record-keeping, annual inventory, property transfers, and property auctions and disposals. Guidance in 14 FAM 416.2c and 14 FAH-1 H-112.2j(1) through (4) states that no one individual should control all aspects of property receipt, storage, and disposition of expendable or nonexpendable personal property. Embassy staff were aware of this issue but did not take steps to address it. Failure to maintain an adequate separation of duties increases the risk of fraud, waste, and mismanagement of resources.

Recommendation 12: Embassy Buenos Aires should separate property management responsibilities in accordance with Department standards. (Action: Embassy Buenos Aires)

Human Resources

Embassy Improperly Processed Mutual Separation Agreements

OIG found that the embassy improperly processed four mutual separation agreements³⁴ for LE staff members from March 2021 to March 2022. According to 3 FAM 7732.9b, embassies must request Department authorization prior to entering into a mutual agreement to separate an LE staff member, to allow for policy input and guidance. Specifically for Argentina, the Bureau of Global Talent Management told OIG that the Department approved the embassy to process its mutual separation agreements without prior consultation, provided that the embassy used an approved country-specific template for its agreements. However, neither the Bureau of Global Talent Management nor embassy staff could provide evidence that the Department officially had granted such an exemption. Embassy staff also told OIG that they were unaware of this guidance and were unsure if they used the approved template to process the four mutual separation agreements because they had not been issued one. OIG determined that the agreements were not processed using any template because of turnover in human resources

³⁴ According to 3 FAM 7732, embassies are responsible for consulting with local counsel to ensure that separation actions and procedures are consistent with local law. Per 3 FAM 7732.9a, it sometimes may be in the best interest of the U.S. government to enter into a mutual separation agreement when separating an LE staff member. In a mutual separation agreement, an employee terminated without cause, who disagreed with the initial severance amount, accepts the embassy's alternative settlement amount, and waives all claims against the United States.

staff and a lack of continuity in operating procedures. Agreements not authorized by the Bureau of Global Talent Management, either through prior approval or by an approved template, may increase litigation risk or establish unsustainable precedence.

Recommendation 13: Embassy Buenos Aires, in coordination with the Bureau of Global Talent Management, should document an exception to Department guidance or process its mutual separation agreements in accordance with Department requirements. (Action: Embassy Buenos Aires, in coordination with GTM)

INFORMATION MANAGEMENT

OIG reviewed Embassy Buenos Aires' information management (IM) operations, including unclassified, classified, and dedicated internet network³⁵ computer operations, communications security, emergency communications preparedness, telephone operations, mail and pouch service, and physical and environmental controls protecting IT assets.

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

- Removed Washington-based accounts with elevated privileges (12 FAH-10 H-112.5-1d(1)).
- Updated incident response procedures (12 FAH-10 H-242.5).
- Registered its dedicated internet networks with the Enterprise IT Configuration Control Board (5 FAM 872.1b).
- Retired embassy-developed applications that did not have authority to operate (5 FAM 619e, 12 FAH-10 H-312.1-1a, 12 FAM 623.14a(3), and 12 FAH-10 H-330).
- Updated its information technology contingency plan (5 FAM 852.9b and g).
- Submitted exception requests for non-department employee OpenNet accounts (5 FAM 1064.1-2(B)a).
- Handled a classified spillage incident (12 FAH-10 H-242.8-1d).

OIG determined section staff implemented most required IM and security controls in accordance with Department policies and applicable laws, with the exceptions noted below.

Bureau of Information Resource Management SharePoint Configuration Granted General User Accounts Privileged Access to Shared Files

OIG found Embassy Buenos Aires IM staff administered the embassy SharePoint site using general user accounts³⁶ with elevated privileges, contrary to Department and industry

³⁵ A dedicated internet network is dedicated internet access from an internet service provider on a Department-owned and -operated discrete non-sensitive unclassified local area network that is not connected to any other Department system. See 5 FAM 872, "Dedicated Internet Networks (DIN)."

³⁶ The Department defines general user access as "access to applications and data files based on supervisor-defined user profiles." Additionally, "[t]his level of access must not permit [information systems security officers],

standards. In addition, SharePoint security settings, configured by the Bureau of Information Resource Management, allowed Washington-based general user accounts to have administrative access to the embassy's shared files. This configuration also gave Embassy Buenos Aires IM staff access to embassy section files when performing non-administrative functions. Guidance from the National Institute of Standards and Technology Special Publication 800-53, section AC-6(2)³⁷ states general user accounts (non-privileged) should not be used for security functions. Furthermore, 12 FAH-10 H-112.1-2a(5) prohibits granting a general user account administrator, programmer, or developer privileges. These permissions are unnecessary for staff to perform their normal duties and are contrary to 12 FAH-10 H-112.5, which outlines the concept of "least privilege."³⁸

When embassy shared folders previously were stored on servers located on the embassy premises, IM staff managed those folders with a secondary system administrator account. After the shared folders were migrated to the SharePoint cloud, IM staff could manage SharePoint permissions from their general user accounts. The difference between network system administration policy and SharePoint administration practice led to this issue. A general user account with elevated privileges increases the risk for unintentional, unwanted, or improper use of privilege and could be used by internal or external actors to gain unauthorized access to Department information.

Recommendation 14: The Bureau of Information Resource Management, in coordination with Embassy Buenos Aires, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Buenos Aires)

Information Systems Security Officers Did Not Perform All Required Duties

Embassy Buenos Aires' information systems security officers (ISSO) did not perform all required systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing security policies and procedures for information systems, of which the minimum requirements are detailed in the Bureau of Information Resource Management ISSO checklist. OIG found embassy ISSOs did not perform routine duties included in the ISSO checklist or outlined in the Department's Information System Security Controls and

system administrator or programmer [or] developer privileges." See 12 FAH-10 H-112.1-2a, "Account Management – System Administrator Responsibilities." This category of access is referred to as non-privileged.

³⁷ National Institute of Standards and Technology (NIST) Special Publication 800-53 provides a catalog of security and privacy controls for information systems and organizations to protect organizational operations and assets, individuals, other organizations, and the nation from a diverse set of threats and risks, including hostile attacks, human errors, natural disasters, structural failures, foreign intelligence entities, and privacy risks. See NIST Special Publication 800-53, Rev. 5, "Security and Privacy Controls for Information Systems and Organizations" (September 2020).

³⁸ NIST Special Publication 800-53 states, "The principle of least privilege is allowing only authorized accesses for users (or processes acting on behalf of users) which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions." See NIST Special Publication 800-53, Section AC-6, "Least Privilege," pg. 36.

Procedures handbook.³⁹ OIG found that this issue occurred because of insufficient training for one ISSO and a lack of management oversight. OIG issued two management assistance reports, one in May 2017 and the other in December 2020, that highlighted continued widespread Department failures to perform ISSO duties.⁴⁰ Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 15: Embassy Buenos Aires should require information systems security officers to perform their duties in accordance with Department standards. (Action: Embassy Buenos Aires)

Telecommunications Cabling Infrastructure Did Not Comply With Department Standards

The embassy's telecommunications cabling infrastructure did not comply with Department standards outlined in 5 FAH-9 H-110. For example, OIG observed disorganized cabling that was outside of the conduit or cable raceway in the server room, as shown in Figure 1, below. In some embassy sections, distribution and transmission lines for different information systems were not visually distinguishable from each other, as required by 12 FAH-10 H-272.3-1(2). Much of the embassy's communications infrastructure was not installed using cable raceway or conduit and, in some cases, lay directly on false ceilings, as shown in Figure 2, below, contrary to 5 FAH-9 H-312.1(10). Additionally, OIG found bundles of inactive cables in the ceiling that had not been removed as required in 5 FAH-9 H-353.1. Finally, cables in the server room and office outlets did not match the Department's color codes defined in 5 FAH-9 H-314.2. The IM staff told OIG they inherited the cabling issues and had attempted to remediate some of the issues but lacked sufficient time due to competing priorities. Non-standard cabling infrastructure could affect systems availability and the ability to address connectivity problems expeditiously, and could create a risk to employee safety.

³⁹ Guidance in 12 FAH-10 establishes the minimum mandatory security controls and procedures for managing risk that results from threats and vulnerabilities that could impact the confidentiality, integrity, and availability of strictly unclassified, Sensitive But Unclassified, and classified (up to Top Secret collateral) information.

⁴⁰ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017); and *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).



Figures 1 and 2: On the left, server room cabling. On the right, ceiling cables. (Source: OIG)

Recommendation 16: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Information Resource Management, should remediate the network cabling infrastructure to comply with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and IRM)

Telecommunications Demarcation Points Were Improperly Located

OIG found the demarcation points⁴¹ connecting the embassy's telephone and internet service provider connections were located in the main telephone frame room and the server room, respectively, both of which are limited access areas. This placement is contrary to 12 FAH-6 H-651.5.2(1-2), which requires the demarcation points to be located in a separate, locked building within the facility grounds or in a separate locked room. OIG determined that IM staff were unaware of Department standards on telecommunications demarcation points. Locating the public telecommunication equipment in limited access areas creates security vulnerabilities when non-cleared internet service provider employees need to work on the public telecommunications system.

Recommendation 17: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Overseas Buildings Operations, should relocate the telecommunications demarcation points outside limited access area communications rooms

⁴¹ A demarcation marks the point where communications facilities owned by one organization interface with that of another organization. In telecommunications terminology, this is the interface between customer-premises equipment and network service provider equipment.

in accordance with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and OBO)

Embassy's Records Management Program Did Not Fully Comply With Department Standards

Embassy Buenos Aires' records management program did not fully comply with Department standards in 5 FAM 414.5⁴² and the Department's Records Handbook. During the inspection, the embassy issued a comprehensive management policy detailing records management responsibilities, including links to disposition schedules, transferring records from non-Department messaging platforms like WhatsApp, and records management retirement procedures. This policy motivated the Political Section and the Human Resources Unit to submit limited records for archiving. However, OIG found that the embassy did not fully comply with Department records management standards issued by the Bureau of Administration.⁴³ Specifically, the embassy did not:

- Assign a responsible person to manage the operations of the files, ensure the integrity of the data, assist in access to, filing, and disposition of data (5 FAH-4 H-215.3-2b).
- Comply with record retirement requirements outlined in 5 FAM 451. For example, OIG's review of files on SharePoint shared document libraries found that sections' electronic records contained files beyond the retention dates in records disposition schedules.
- Archive electronic records annually, apart from previous chiefs of mission records archived in 2019 and 2020 (5 FAM 433b).⁴⁴

OIG found these issues occurred due to embassy management's lack of understanding of the records management roles and a lack of records management oversight. OIG issued a management assistance report in June 2022 that highlighted continued widespread Department deficiencies in records management duties.⁴⁵ A deficient records management program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

⁴² According to 5 FAM 414.5, the principal officer is responsible for implementing and administering the records policies, standards, systems, and procedures issued by the Department's records officer, beginning with those set forth in 5 FAM 400 and 5 FAH-4. The Department updated and renumbered this section of the FAM in September 2022, after the end of the inspection, although the requirement remains basically the same. The new cite is 5 FAM 418.9a.

⁴³ Bureau of Administration, Office of Information Programs and Services, Records Handbook for All Overseas Personnel, February 2021.

⁴⁴ According to 5 FAM 433b, offices and overseas posts must retire records (except official personnel records) to the Records Service Center in accordance with the records disposition schedules issued by the Bureau of Administration and approved by the National Archives and Records Administration, pending ultimate transfer to the National Archives or a Federal Records Center. The Department updated and renumbered this section of the FAM in August 2022, after the end of the inspection, although the requirement remains basically the same. The new cite is 5 FAM 451b.

⁴⁵ OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

Recommendation 18: Embassy Buenos Aires should implement a records management program in accordance with Department standards. (Action: Embassy Buenos Aires)

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

Recommendation 1: Embassy Buenos Aires should conduct joint evaluation reviews with the government of Argentina for Bureau of International Narcotics and Law Enforcement Affairs-funded assistance. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires conducted joint evaluation reviews with the government of Argentina for Bureau of International Narcotics and Law Enforcement Affairs-funded assistance.

Recommendation 2: Embassy Buenos Aires, in coordination with the Bureau of Educational and Cultural Affairs, should develop and present options for Binational Fulbright Commission review to address reasonable balance between Argentine and U.S. Fulbright Educational Exchange participation. (Action: Embassy Buenos Aires, in coordination with ECA)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of February 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires developed and presented options for Binational Fulbright Commission review to address reasonable balance between Argentine and U.S. Fulbright Educational Exchange participation.

Recommendation 3: Embassy Buenos Aires should delete nonimmigrant visa case records in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of December 31, 2022.

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.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires deleted nonimmigrant visa case records in accordance with Department standards.

Recommendation 4: Embassy Buenos Aires should oversee nonimmigrant visa operations in the two consular outbuildings in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires oversaw nonimmigrant visa operations in the two consular outbuildings in accordance with Department standards.

Recommendation 5: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires' fire protection program complied with Department standards.

Recommendation 6: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should mitigate the fire and life-safety risks of its high-rise residential properties that do not comply with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires mitigated the fire and life-safety risks of its high-rise residential properties that do not comply with Department standards.

Recommendation 7: Embassy Buenos Aires should complete and document safety certifications for all embassy properties in the Post Occupational Health and Safety Officer Certification Application and correct any identified safety issue prior to occupancy, in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires 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 Buenos Aires completed and documented safety certifications for all embassy properties in the Post Occupational Health and Safety Officer Certification Application and corrected any identified safety issue prior to occupancy, in accordance with Department standards.

Recommendation 8: Embassy Buenos Aires should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage and office space or dismantle and remove them in accordance with Department requirements. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of June 30, 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires obtained authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage and office space or dismantled and removed them in accordance with Department requirements.

Recommendation 9: Embassy Buenos Aires should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of April 2023.

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

Recommendation 10: Embassy Buenos Aires should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires did not concur with this recommendation in its entirety. The embassy noted that of the 52 instances of embassy drivers exceeding the 10-hour duty limit on driving shifts, 38 (78%) represent the dedicated drivers for the Marine Security Guard (MSG) detachment. The embassy stated that following guidance in 14 Foreign Affairs Manual (FAM) 433.8e, these drivers may drive a 12-

hour shift. Of the remaining 14 occurrences, the embassy recognized that the drivers exceeded the duty limit. Violations of the 10-hour rule tend to occur primarily with visits and out of town travel, when additional drivers are not readily available to accommodate programmatic changes that necessitate a driver for more than 10 hours. In those instances, the embassy endeavors to provide the drivers with the required rest time mandated in 14 FAM 433.8d.

OIG Reply: OIG considers the recommendation resolved. OIG acknowledges that Department guidelines in 14 FAM 433.8e permit a 12-hour duty shift for MSG drivers, with not more than 10 hours of driving. However, OIG determined that the 10-hour duty limit applied to MSG drivers, as these drivers did not have an alternate work schedule of 12-hours on duty and 14-hours off duty as set forth in 14 FAM 433.8e(1), (3), and (4). OIG revised the finding to acknowledge this criteria and to note how it made this determination. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires enforced driver duty limits for all embassy drivers in accordance with Department guidelines.

Recommendation 11: Embassy Buenos Aires, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines. (Action: Embassy Buenos Aires, in coordination with A)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires disposed of excess vehicles according to Department guidelines.

Recommendation 12: Embassy Buenos Aires should separate property management responsibilities in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of March 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires separated property management responsibilities in accordance with Department standards.

Recommendation 13: Embassy Buenos Aires, in coordination with the Bureau of Global Talent Management, should document an exception to Department guidance or process its mutual separation agreements in accordance with Department requirements. (Action: Embassy Buenos Aires, in coordination with GTM)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation. The embassy noted an estimated completion date of January 31, 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires documented an exception to Department guidance or processed its mutual separation agreements in accordance with Department requirements.

Recommendation 14: The Bureau of Information Resource Management, in coordination with Embassy Buenos Aires, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Buenos Aires)

Management Response: In its November 29, 2022, response, the Bureau of Information Resource Management concurred with this recommendation. The bureau noted estimated completion by the third quarter of FY 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Information Resource Management configured SharePoint permissions to comply with Department standards.

Recommendation 15: Embassy Buenos Aires should require information systems security officers to perform their duties in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires required information systems security officers to perform their duties in accordance with Department standards.

Recommendation 16: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Information Resource Management, should remediate the network cabling infrastructure to comply with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and IRM)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires remediated the network cabling infrastructure to comply with Department standards.

Recommendation 17: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Overseas Buildings Operations, should relocate the telecommunications demarcation points outside limited access area communications rooms in

accordance with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and OBO)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Buenos Aires relocated the telecommunications demarcation points outside limited access area communications rooms in accordance with Department standards.

Recommendation 18: Embassy Buenos Aires should implement a records management program in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: In its November 25, 2022, response, Embassy Buenos Aires 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 Buenos Aires implemented a records management program in accordance with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Marc Stanley	1/2022
Deputy Chief of Mission	MaryKay Carlson ^a	9/2019
Chiefs of Sections:		
Management	R. Chance Sullivan	7/2019
Consular	Mark Ellis	9/2020
Political	Robert Allison	7/2021
Economic	Ernest Abisellan	9/2020
Public Affairs	Michelle Riebeling ^b	7/2020
Regional Security	Rosendo Cedeño	6/2021
Other Agencies:		
Department of Defense	Steven Winkleman	9/2021
Department of Homeland Security	Erin Keegan	9/2020
Drug Enforcement Agency	John Wallace	3/2022
Federal Bureau of Investigation	Ricardo Hernandez	6/2021
Foreign Agriculture Service	Rachel Bickford	8/2021
U.S. Commercial Service	Eric Olson	8/2021

^a MaryKay Carlson served as Chargé d’Affaires from January 20, 2021, until the arrival of the Ambassador.

^b Michelle Riebeling served as acting Deputy Chief of Mission for most of 2021, as well as during a portion of the inspection.

Source: Generated by OIG from data provided by Embassy Buenos Aires.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 14 to August 17, 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 Buenos Aires' operations and internal controls, and if so, to what extent.
- COVID-19 related telework affected mission accomplishments, customer service to the public, and employee performance.

Methodology

OIG used a risk-based approach to prepare for this inspection. OIG reviewed pertinent records; circulated surveys and compiled the results; conducted interviews with Department and on-site personnel; observed daily operations; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG conducted portions of the inspection remotely and relied on audio- and video-conferencing tools in addition to in-person interviews with Department and other personnel. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSES

November 25, 2022

UNCLASSIFIED

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

FROM: Embassy Buenos Aires – Marc R. Stanley, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Buenos Aires, Argentina

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

OIG Recommendation 1: Embassy Buenos Aires should conduct joint evaluation reviews with the Government of Argentina for Bureau of International Narcotics and Law Enforcement Affairs-funded assistance.

Management Response: Embassy Buenos Aires concurs with the recommendation. The embassy is implementing the recommendation by holding bi-annual joint evaluation reviews with Argentina's Ministries of Security and Foreign Affairs that result in a written report that assesses program objectives, achievements, and necessary adjustments.

OIG Recommendation 2: Embassy Buenos Aires, in coordination with the Bureau of Educational and Cultural Affairs, should develop and present options for Binational Fulbright Commission review to address reasonable balance between Argentine and U.S. Fulbright Educational Exchange participation. (Action: Embassy Buenos Aires, in coordination with ECA)

Management Response: Embassy Buenos Aires concurs with the recommendation. The embassy is discussing options with ECA to address the reasonable balance between Argentine and U.S. Fulbright Educational Exchange participation and will present options to the Board of the Fulbright Commission of Argentina at the next board meeting in the first quarter of 2023. Expected completion date is by February 2023.

OIG Recommendation 3: Embassy Buenos Aires should delete nonimmigrant visa case records in accordance with Department standards

Management Response: Embassy Buenos Aires concurs with the recommendation. The accountable officer has begun reviewing the end-of-day reports to monitor deletions daily, and

the consular section is currently writing a standard operating procedure that incorporates guidance found in 9 FAM 403.2-7(A)b and 9 FAM 403.2-7(C). The SOP will be completed by December 31, 2022.

OIG Recommendation 4: Embassy Buenos Aires should oversee non-immigrant visa operations in the two consular outbuildings in accordance with Department standards.

Management Response: Embassy Buenos Aires concurs with the recommendation. Consular managers have begun monitoring visa operations by making unannounced visits daily to the two consular outbuildings.

OIG Recommendation 5: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Management Response: Embassy Buenos Aires concurs with the recommendation. Compliance with Department standards depends on mitigation of fire/life safety deficiencies as part of the Selective Improvement Project (SIP). Items like installation of fire-rated doors and partitions, relocation of equipment rooms present in the exit stairway, and the addition of a secondary egress stairway are contingent upon significant design and capital investment efforts.

In response to other deficiencies noted in the embassy's fire protection program:

- FAC now maintains an accurate fire extinguisher inventory.
- A monthly fire extinguisher inspection program is in place.
- All fire extinguishers have now been hydrostatically tested and a program is in place for future testing.
- The fire alarm panel is now checked daily.
- FAC will contract a technician for semi-annual cleaning and inspection of the embassy's kitchen hood suppression system. FAC estimates contract will be in place by January 31, 2023.
- All fire incidents are reported within required timeline.
- FAC provided some fire-safety training to embassy staff in October 2022. Additional training will be provided by OBO/FIRE during a visit in January 2023.

OIG Recommendation 6: Embassy Buenos Aires, in coordination with the Bureau of Overseas Buildings Operations, should mitigate the fire and life-safety risks of its high-rise residential properties that do not comply with Department standards. (Action: Embassy Buenos Aires, in coordination with OBO)

Management Response: Embassy Buenos Aires concurs with the recommendation. Residential high-rise buildings in Argentina do not comply with OBO's High Rise Occupancy requirements, lacking secondary means of egress, and often lacking fire alarm systems, and fire suppression

systems. Following the OBO visit, OBO mitigation letters are now on file for each residential building in the Housing Pool where the DCM acknowledges the risks of high-rise occupancy in Argentina. This is an OBO requirement. Occupants receive copies of the OBO mitigation letters, which include both embassy and occupant responsibilities.

OIG Recommendation 7: Embassy Buenos Aires should complete and document safety certifications for all embassy properties in the Post Occupational Health and Safety Officer Certification Application and correct any identified safety issue prior to occupancy, in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. Post is now close to compliance with certifications of residential and non-residential properties. Only three residences have not had their certifications recorded (they already passed their POSHO inspections). 96% of non-residential properties have POSHO certification. FAC estimates that all remaining certifications will be recorded by December 31, 2022.

OIG Recommendation 8: Embassy Buenos Aires should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage and office space or dismantle and remove them in accordance with Department requirements. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. FAC in Buenos Aires is working with OBO to obtain permits for storage containers. FAC estimates permits should be received by June 30, 2023.

OIG Recommendation 9: Embassy Buenos Aires should comply with all Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. Since reviewing this issue with OIG inspectors, GSO has improved its tracking system for medical and training compliance for all chauffeurs and incidental drivers, as well as informing supervisors of their responsibility to enforce these requirements. These are now tracked through FMIS, and Post is currently tracking a total of 92 drivers (13 chauffeurs, 63 incidental drivers and 2 mechanics). We are currently at 84% compliance rate with fully approved medical certifications and current Smith Safe Driver Training. The remaining 16% of incidental drivers are in the process of updating their medical and training requirements and should be in compliance by April 2023.

OIG Recommendation 10: Embassy Buenos Aires should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires does not concur with the recommendation in its entirety. Of the 52 instances identified in the recommendation, 38 (78%) represent the dedicated drivers for the Marine Security Guard. Following guidance in 14 FAM 433.8e, these

drivers may drive a 12-hour shift. Of the remaining 14 occurrences, GSO recognizes that these do occur. Post Management and the Front Office have been extremely supportive of making all users of Embassy Motor Pool aware of the importance of honoring the 10-hour rule. Violations of the 10-hour rule tend to occur primarily in relation with VIP visitors and out of town travel, when additional drivers are not readily available to accommodate programmatic changes that necessitate a driver(s) for more than 10 hours. In those instances, GSO endeavors to provide the drivers who were on shift for more than 10 hours with the required rest time mandated in 14 FAM 433.8d.

OIG Recommendation 11: Embassy Buenos Aires, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines. (Action: Embassy Buenos Aires, in coordination with A)

Management Response: Post concurs with the recommendation and the Front Office has made engagement on this issue with the host Government a high priority. The Ambassador has raised the Embassy's inability to dispose of vehicles locally to the Foreign Minister and other senior officials as an Embassy priority. While the Government of Argentina has taken steps to implement new legislation which would provide Post with a mechanism for local destruction of vehicles, no concrete actions have occurred yet. In the meantime, Post continues to try to dispose of excess vehicles by holding sales within the diplomatic community. Post has slowly reduced our number of excess vehicles and, as of the date of this response, Post is six vehicles over target fleet. Post's target fleet is 38 vehicles and Post currently has 44 vehicles. Of these six excess vehicles, Post sold three vehicles in a recent auction, and these should be off Post's FMIS inventory by February 2023. Additionally, Post has identified two more vehicles for local sales and plans to auction these in February 2023. Post will continue to have at least two excess vehicles that are damaged/inoperable vehicles and do not have a commercial value. Until the host government provides an avenue for disposal, these will remain on Post's inventory as excess stock.

OIG Recommendation 12: Embassy Buenos Aires should separate property management responsibilities in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. GSO recognizes the lack of clarity in receiving duties for these two positions and is currently in the process of reclassifying the two positions to ensure that the separation of duties is clearly noted. Some changes in equipment available in the warehouse will be needed to finalize this separation of duties. GSO anticipates this process will be completed by the end of March 2023.

OIG Recommendation 13: Embassy Buenos Aires, in coordination with the Bureau of Global Talent Management, should document an exception to Department guidance or process its mutual separation agreements in accordance with Department requirements. (Action: Embassy Buenos Aires, in coordination with GTM)

Management Response: Embassy Buenos Aires concurs with the recommendation. Post currently coordinates with its local legal advisor and with the U.S. Department of Justice

regarding mutual separation agreements, is fully in compliance with local law, and has had no new legal actions filed against it in the past two years. To avoid delays in termination proceedings, Post will request an exception from GTM to work with an approved template going forward. Post has drafted language to formally request such an exception and is waiting for its local legal advisor's input on this issue, as requested by GTM/OE, before submitting the request. HR estimates this exception from GTM/OE will be received before January 31, 2023.

OIG Recommendation 14: The Bureau of Information Resource Management, in coordination with Embassy Buenos Aires, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. Post will work with IRM to resolve these rights issues. We believe this may be a widespread problem. We will look to IRM for a solution as they control enterprise SharePoint and are listed as the primary responsible part for this recommendation. Estimation of completion will be determined after IRM takes primary action.

OIG Recommendation 15: Embassy Buenos Aires should require information systems security officers to perform their duties in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. This will be difficult to implement in full as, like at many posts, we do not have a dedicated ISSO. We have already assigned some of the ISSO duties to our EL IMS. We are also hiring an LE Staff security specialist, and some of the ISSO duties can be performed by him or her. The LE Staff security specialist position should be onboard by June 30, 2023.

OIG Recommendation 16: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Information Resource Management, should remediate the network cabling infrastructure to comply with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and IRM)

Management Response: Embassy Buenos Aires concurs with the recommendation. This will need to be done either through IRM and an ITIR (Information Technology Infrastructure Remediation) or via OBO's proposed Selective Improvement Project (SIP). We do not have the resources at Post to complete a task of this scope and complexity. Currently, we are tentatively scheduled for an ITIR survey at some point in FY24 – our request has been in since FY19. We are in contact with IRM and are hoping they will bump us up the queue due to both our need and this OIG recommendation.

OIG Recommendation 17: Embassy Buenos Aires, in coordination with the Bureaus of Western Hemisphere Affairs and Overseas Buildings Operations, should relocate the telecommunications demarcation points outside limited access area communications rooms in accordance with Department standards. (Action: Embassy Buenos Aires, in coordination with WHA and OBO)

Management Response: Embassy Buenos Aires concurs with the recommendation. We do not have the resources at Post to complete a task of this scope and complexity. This will also need to be done as part of an ITIR or the SIP.

OIG Recommendation 18: Embassy Buenos Aires should implement a records management program in accordance with Department standards. (Action: Embassy Buenos Aires)

Management Response: Embassy Buenos Aires concurs with the recommendation. Post is drafting a Management Notice that will codify the records management duties and processes at Embassy Buenos Aires. IRM estimates this will be completed prior to December 31, 2022.



United States Department of State

Washington, D.C. 20520

Unclassified

November 29, 2022

☐ Read by _____

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

FROM: IRM – Kelly E. Fletcher (Signed)

SUBJECT: (U) Draft Report - Inspection of Embassy Buenos Aires,
Argentina

(U) The Bureau of Information Resource Management provides the following response to the Office of Inspector General's Draft Report - Inspection of Embassy Buenos Aires, Argentina

Recommendation 14: The Bureau of Information Resource Management, in coordination with Embassy Buenos Aires, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Buenos Aires)

Management Response (November 2022): IRM concurs with this recommendation. IRM will update the Rules of Behavior document that provides guidance to post on the recommended SharePoint administrative options.

IRM anticipates completion by Q3 FY2023.

If you have any questions or concerns, please contact Craig Hootselle or Robin Flemming.

ABBREVIATIONS

DCM	Deputy Chief of Mission
DEIA	Diversity, Inclusion, Equity, and Accessibility
EESTH	Economic, Environment, Science, Technology, and Health
FAD	Foreign Assistance Directive
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
IM	Information Management
INL	Bureau of International Narcotics and Law Enforcement Affairs
ISSO	Information Systems Security Officer
LE	Locally Employed
NIV	Nonimmigrant Visa
OBO	Bureau of Overseas Buildings Operations
POSHO	Post Occupational Safety and Health Officer

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