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Office of Audits

September 2019

Management Assistance Report: Embassy Vienna, Austria, Should Strengthen Internal Controls Over Motor Vehicle Keys and Fuel Credit Cards

MANAGEMENT ASSISTANCE REPORT

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Summary of Review

The Department of State (Department) uses a fleet of motor vehicles to support its global diplomatic mission. As of April 2019, Embassy Vienna, Austria, had 48 motor vehicles in place to support operations. During an audit of the Department's overseas motor vehicle fleet, the Office of Inspector General (OIG) discovered that Embassy Vienna had not established adequate internal controls over vehicle keys and the fuel credit cards associated with its fleet. The purpose of this report is to provide early communication of the deficiencies identified and to prompt immediate corrective actions.

Specifically, OIG found that Embassy Vienna did not exercise internal controls over the keys associated with its motor vehicles. According to the Foreign Affairs Manual (FAM),¹ the motor vehicle accountable officer (MVAO) must establish effective management control procedures to ensure vehicles are used in accordance with Department requirements. These procedures must include a key control system and a vehicle key control log. OIG found that embassy personnel followed a post policy from 2010, which directed them to leave vehicle keys in unlocked and unattended vehicles on embassy property. This practice, however, does not prevent or provide a means to promptly detect unauthorized use of vehicles should it occur. OIG determined that the deficiency occurred, in part, because the MVAO failed to follow Department policy² and because of logistical difficulties associated with limited space and the motor pool office location, which post indicated was a challenge to implementing stricter controls. Additionally, embassy property could obtain and use the motor vehicles for a purpose other than that for which they were intended.

Similarly, OIG found that Embassy Vienna had not established adequate internal controls over the credit cards used to purchase fuel for its motor vehicle fleet. Credit cards used for the purchase of fuel for official vehicles must be carefully controlled.³ However, OIG discovered that the fuel credit cards associated with its vehicle fleet had identical personal identification numbers (PIN) and that the fuel credit cards were left in unlocked and unattended vehicles. Furthermore, post officials did not collect or regularly review fuel purchase receipts to ensure the fuel purchased was for official purposes. This deficiency occurred, in part, because Embassy Vienna had not designated a credit card control officer to ensure that fuel credit cards are used appropriately.

Until Embassy Vienna acts to implement internal controls over vehicle keys and fuel credit cards, the risk of theft and misuse of U.S. Government property will remain. OIG made five recommendations in this report to prompt action to improve controls over motor vehicle keys

¹ The FAM was reissued in April 2019 (2019 FAM), without key control language. This language, however, was in effect from April 2012 (2012 FAM) until April 2019, which included the timeframe covered by the audit. Accordingly, the 2012 FAM is used throughout this report, unless otherwise noted, and all references to 14 FAM 436.3 are from the 2012 FAM.

² 14 FAM 436.3(c), "Dispatching and Scheduling Vehicles."

³ 14 Foreign Affairs Handbook-1 H-814.3-3(a), "Credit Cards."

and fuel credit cards. In response to a draft of this report, Embassy Vienna concurred with all five recommendations. On the basis of Embassy Vienna's concurrence, OIG considers each recommendation resolved, pending further action. A synopsis of Embassy Vienna's response to the recommendations offered and OIG's reply follow each recommendation in the Results section of this report. Embassy Vienna's response to a draft of this report is reprinted in its entirety in Appendix A.

BACKGROUND

The Department uses a fleet of motor vehicles to support its global diplomatic mission. As of March 15, 2019, the Department's inventory system⁴ indicated that it had more than 10,500 unarmored vehicles worldwide. The Department's fleet is used to support security, enable support activities, and provide flexibility for the Department to execute its global diplomatic mission. The vehicle fleet is composed of a variety of vehicles, including sedans, sport utility vehicles, vans for transporting personnel, light-duty pickup trucks, and heavy-duty vocational trucks.

As of April 2019, Embassy Vienna had 48 unarmored motor vehicles in place to support its mission. At the time of OIG's audit fieldwork,⁵ 17 of these vehicles were located at the main embassy compound, 27 were located at the motor pool warehouse approximately 1 mile from the main embassy compound, and 4 were at other locations. Figure 1 is a photograph of Embassy Vienna's motor pool warehouse.



Figure 1: Embassy Vienna's motor pool warehouse. **Source:** OIG photograph taken at the Embassy Vienna motor pool warehouse on April 16, 2019.

⁴ The official inventory system for the Department is the Integrated Logistics Management System.

⁵ OIG performed audit work at Embassy Vienna from April 15 to April 19, 2019.

According to the FAM, each post is responsible for establishing its own policies and procedures for motor vehicle business use and other authorized use of motor vehicles, in accordance with Department policy.⁶ In addition, each post must review the motor vehicle policies at least annually to incorporate any updates to Department vehicle control policy.⁷

Purpose of This Management Assistance Report and Ongoing Audit

This Management Assistance Report is intended to provide early communication of deficiencies that OIG discovered during its audit of the Department's overseas motor vehicle fleet, which is currently underway. The objective of the audit is to determine whether the Bureau of Administration managed the Department's overseas motor vehicle fleet in accordance with Federal guidelines and Department policy and whether selected overseas posts acquired, accounted for, used, maintained, and disposed of motor vehicles in accordance with applicable policy and guidelines. OIG is reporting the deficiencies discussed in this Management Assistance Report in accordance with generally accepted government auditing standards. In performing the work related to these deficiencies, OIG interviewed responsible Embassy Vienna personnel, reviewed motor vehicle operations, and reviewed applicable criteria and supporting documentation. OIG believes that the evidence obtained provides a reasonable basis for the findings outlined in this report.

RESULTS

Finding A: Embassy Vienna Lacks Adequate Controls Over Motor Vehicle Keys

OIG found that Embassy Vienna failed to exercise internal control over keys for its motor vehicle fleet. The MVAO, in this case the General Services Officer (GSO), must establish effective management control procedures to ensure vehicles are used in accordance with Department requirements.⁸ These control procedures "must include a key control system and a vehicle key control log."⁹ However, Embassy Vienna personnel followed a post policy that permitted vehicle keys to be left in unlocked and unattended vehicles on the embassy compound, as shown in Figure 2. This deficiency occurred, in part, because the MVAO was using an outdated post motor vehicle policy and because of logistical difficulties associated with limited space and the motor pool office location, which post indicated was a challenge to implementing stricter controls. Although OIG acknowledges that post had certain logistical difficulties, some measures could have been taken to adequately control the vehicle keys. Leaving keys in motor vehicles is a practice that does not prevent or provide a means to promptly detect the unauthorized use of vehicles should it occur, thereby increasing the risk of theft, fraud, and misuse.

⁶ 14 FAM 431.2-1(a), "Chief of Mission."

⁷ 14 FAM 432.5, "Country-Wide Policies."

⁸ 14 FAM 436.3(c), "Dispatching and Scheduling Vehicles."

⁹ Ibid.



Figure 2: Example of an unlocked Embassy Vienna vehicle with keys placed inside on the console. **Source:** OIG photograph taken at Embassy Vienna on April 15, 2019.

Motor Vehicle Key Accountability

According to the Foreign Affairs Handbook (FAH), "posts are required to maintain good oversight and control on the use of U.S. Government vehicles."¹⁰ The MVAO must establish effective management control procedures to ensure vehicles are used in accordance with Department requirements.¹¹ The control procedures "must include a key control system and a vehicle key control log; entries must include the requesting operator's name, vehicle identification number, and date/time when keys are picked up and returned."¹² Furthermore, "keys and the log must be under the control of the individual given motor vehicle control responsibility."¹³¹⁴ The FAH also states that supervisory personnel must pay attention to the

¹⁰ 14 FAH-1 H-813(a), "Operation of Motor Vehicles."

¹¹ 14 FAM 436.3.

¹² Ibid.

¹³ Ibid.

¹⁴ The FAM references throughout this report were in place beginning June 2012. However, the Department updated the FAM in April 2019 and removed the specific guidance on internal controls governing vehicle keys. Notwithstanding this change, Bureau of Administration officials stated that FAM language regarding vehicle keys will be included in a revision of the FAH by the end of 2019. According to Bureau of Administration officials, this revision will likely include a number of procedures, such as key management and a sample post motor vehicle policy. OIG believes that the 14 FAM 436.3 guidance in effect before the April 2019 update was reasonable and should be used at Embassy Vienna to prevent the potential misuse of U.S. Government property. Accordingly, the 2012 FAM is used throughout this report, unless otherwise noted, and all references to 14 FAM 436.3 are from the 2012 FAM.

management of vehicle operations at post because "the potential for theft, fraud and misuse of U.S. Government property is considerable."¹⁵

OIG found that the MVAO failed to implement internal controls over motor vehicle keys, such as a key control system and vehicle key control log. Instead, Embassy Vienna followed its "Tri Missions Vehicle Policy," dated July 15, 2010, which states "keys must be left inside the vehicle in order to move the vehicle should the need arise."¹⁶ The MVAO stated that the policy was "barebones" and a "bit dated" and that OIG's visit had motivated him to update the policy, a step that he had wanted to take for some time. OIG also found a "Motor Vehicle Policy for the Vienna Tri Missions" on Embassy Vienna's intranet site, dated May 20, 2014, that states, "keys will be kept in a locked key box." However, the MVAO was not following this guidance and did not appear to know it existed. OIG also found that the embassy's motor vehicle policies had not been updated since May 20, 2014. The FAM states that a post's motor vehicle policy "must be reviewed at least annually and republished to incorporate any updates to [Department] vehicle control policy."¹⁷

The deficiencies occurred, in part, because the MVAO was using an outdated post motor vehicle policy and because of logistical difficulties associated with limited space and the motor pool office location, which post indicated was a challenge to implementing stricter controls. Specifically, embassy officials explained, because Embassy Vienna has limited parking, some vehicles need to be parked in a manner that blocks other vehicles. Therefore, the keys are left with the vehicles to facilitate moving them when needed. Furthermore, the MVAO stated that, because the motor pool office is not located on the embassy compound, the embassy did not have a place to store vehicle keys or have a method for personnel to maintain control over them. As a result of these deficiencies, personnel with access to embassy property could obtain and use the motor vehicles for a purpose other than that for which they were intended. Although OIG acknowledges that post had certain logistical difficulties, some measures could have been taken to sufficiently protect vehicle keys. The MVAO provided OIG with a draft of the embassy's newly developed "2019 Motor Pool & GOV Handbook." OIG's review of the policy, however, noted that it did not include guidance related to controls for motor vehicle keys.

The practice of leaving keys in vehicles that are unlocked and unattended on the embassy compound does not prevent, or provide a means to promptly detect, unauthorized use of vehicles, should it occur, increasing the risk of theft, fraud, and misuse.

Recommendation 1: OIG recommends that Embassy Vienna, Austria, develop and implement internal controls, including a key control system and a key control log to safeguard motor vehicle keys to prevent and detect the unauthorized use of vehicles.

Management Response: Embassy Vienna concurred with this recommendation, stating that post will procure two key management systems and install one key watcher at the Chancery

¹⁵ 14 FAH-1 H-813(a).

¹⁶ Embassy Vienna, Management Notice: Vienna Tri Missions (10-122, July 15, 2010), 4.

¹⁷ 14 FAM 432.5.

and a second at the motor pool. These devices will control key and fuel credit card issuance, and they include software to safeguard and track use.

OIG Reply: On the basis of Embassy Vienna's concurrence with the recommendation and planned actions, OIG considers the recommendation resolved, pending further action. This recommendation will be closed once OIG receives documentation demonstrating that Embassy Vienna has implemented internal controls, including a key control system and a key control log, to safeguard motor vehicle keys as well as to prevent and detect the unauthorized use of vehicles.

Recommendation 2: OIG recommends that Embassy Vienna, Austria, update its mission motor vehicle policy, as required by Volume 14 of the current Foreign Affairs Manual, 435.1, to reflect the new controls implemented in response to Recommendation 1.

Management Response: Embassy Vienna concurred with this recommendation, stating that a draft Motor Vehicle Policy that reflected updates required by Volume 14 of the FAM is in the clearance process. Post expects the updated policy to be published by September 30, 2019.

OIG Reply: On the basis of Embassy Vienna's concurrence with the recommendation and planned actions, OIG considers the recommendation resolved, pending further action. This recommendation will be closed once OIG receives documentation demonstrating that Embassy Vienna has updated its mission motor vehicle policy to reflect the new controls.

Recommendation 3: OIG recommends that Embassy Vienna, Austria, develop and implement a policy requiring an annual review of the mission motor vehicle policy, including any updates, as required by Volume 14 of the current Foreign Affairs Manual, 435.1.

Management Response: Embassy Vienna concurred with this recommendation, stating that the new Motor Vehicle Policy "will be reviewed and re-issued annually, in coordination with the annual designation of responsibilities."

OIG Reply: On the basis of Embassy Vienna's concurrence with the recommendation and planned actions, OIG considers the recommendation resolved, pending further action. This recommendation will be closed once OIG receives documentation demonstrating that Embassy Vienna has implemented a policy requiring an annual review of the mission motor vehicle policy, as required.

Finding B: Embassy Vienna Lacks Adequate Internal Controls Over Fuel Credit Cards

OIG found that Embassy Vienna had not established adequate internal controls over the credit cards used to purchase fuel for its motor vehicle fleet, even though the FAH specifically states

that such credit cards must be carefully controlled.¹⁸ OIG found that the fuel credit cards associated with the embassy's vehicle fleet had identical PINs and the fuel credit cards were left in unlocked and unattended vehicles. Furthermore, post officials did not collect or regularly review fuel purchase receipts to ensure the fuel purchased was for official purposes. This deficiency occurred, in part, because Embassy Vienna had not designated a credit card control officer to ensure that fuel credit cards are used appropriately. Failure to establish standard operating procedures and implement internal controls increases the risk of fuel theft and billing inaccuracies or overcharges.

Motor Vehicle Fuel Credit Card Accountability

According to the FAH, credit cards used to purchase fuel should be carefully controlled by a credit card control officer.¹⁹ This control officer should "receive, control, issue, and account for credit cards," and the cards should be checked by the control officer at least once a month as a safeguard against loss. However, OIG found that each of the vehicles at the main embassy compound and motor pool warehouse had a dedicated fuel credit card stored in the unlocked vehicle in the center console or glove compartment. Additionally, all the fuel credit cards reviewed had identical PINs, which allows the fuel credit cards to be used by anyone with access to them, an example of which is shown in Figure 3.



Figure 3: Example of a fuel credit card and the PIN written on a sticky note found in an unlocked vehicle. Source: OIG photograph taken at Embassy Vienna on April 15, 2019.

In addition, OIG found instances in which credit card receipts from fuel purchases covering multiple days were kept in the vehicles. The FAH, however, states that, when fuel is purchased using a credit card, "the receipt is returned to the control officer, who reviews it to ensure that

¹⁸ 14 FAH-1 H-814.3-3(a).

¹⁹ Ibid.

the card has been used appropriately. Receipts are kept on hand for use in verifying invoices."²⁰ The Motor Pool Supervisor²¹ confirmed that most drivers do not turn in their fuel receipts; instead, the drivers leave the receipts in the vehicles with the fuel credit cards. The Motor Pool Supervisor stated that the receipts are collected when the vehicle is cleaned, but there is no set schedule for collecting the receipts and no method for ensuring all receipts are collected.

The deficiencies occurred, in part, because Embassy Vienna had not designated a credit card control officer. The FAH states that the Motor Pool Manager,²² who in this case is the GSO, should ensure that "sound management controls are in place covering...designated credit cards."²³ OIG found that the GSO did not provide sufficient oversight to ensure fuel credit cards were properly controlled or that the use of the credit cards was properly monitored, for example, by reviewing receipts. Furthermore, OIG found that Embassy Vienna's "Tri Missions Vehicle Policy" included only limited information on the protection of the fuel credit cards. Specifically, policy language stated merely that "use of fuel cards is restricted to fuel and shall not be used to obtain other items."²⁴ Regarding the use of the same PIN, the Motor Pool Supervisor stated it would be impossible to have a separate PIN for each fuel card because multiple people may drive the same vehicle on any given day.

Notwithstanding these explanations, failure to establish standard operating procedures and implement internal controls increases the risk of fuel theft and billing inaccuracies or overcharges. For example, OIG learned that, in early 2019, the Motor Pool Supervisor identified a suspicious charge on a fuel credit card totaling about \$100. Because all the fuel credit cards had identical PINs and the purchase did not require a signed receipt, the Motor Pool Supervisor was unable to determine who made the purchase or whether it was for an official purpose. Although the amount of the transaction was nominal, the situation underscores the potential effect of not having adequate internal controls over fuel credit cards.

Recommendation 4: OIG recommends that Embassy Vienna, Austria, designate a credit card control officer to receive, control, issue, and account for the credit cards, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3.

Management Response: Embassy Vienna concurred with this recommendation, stating that post designated the Assistant General Services Officer who supervises the motor pool as the credit card control officer. This designation will be included in the updated annual designation of responsibilities.

²⁰ 14 FAH-1 H-814.3-3(d).

²¹ According to 14 FAH-1 H-811.5, "Motor Pool Supervisor," this position generally reports directly to the Motor Pool Manager and has first-line supervisory responsibility over the motor pool staff.

²² According to 14 FAH-1 H-811.4, "Motor Pool Manager," this position generally falls under the responsibility of the General Services Officer at post.

²³ 14 FAH-1 H-811.4(5).

²⁴ 10-122, at 5.

OIG Reply: On the basis of Embassy Vienna's concurrence with the recommendation and planned actions, OIG considers the recommendation resolved, pending further action. This recommendation will be closed once OIG receives documentation demonstrating that Embassy Vienna has formally designated the Assistant General Services Officer as the credit card control officer.

Recommendation 5: OIG recommends that Embassy Vienna, Austria, develop and implement policies and procedures for receiving, controlling, issuing, accounting for, and safeguarding fuel credit cards, including collecting and reviewing credit card receipts, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3. Credit card controls should include a separate personal identification number for each card, a sign-out sheet for each card, or cards should be permanently assigned to specific individuals. In addition, controls should include the required submission of fuel receipts that include vehicle identification information.

Management Response: Embassy Vienna concurred with this recommendation, stating that post "requested new fuel cards from its vendors and will complete issuing these with separate personal identification numbers for each card by December 31, 2019. Post will also use the new key management system being purchased to control, issue, and account for these fuel cards." In addition, Embassy Vienna stated that recruitment of an administrative assistant for the motor pool, "whose duties will include timely collection and processing of fuel card receipts, is underway."

OIG Reply: On the basis of Embassy Vienna's concurrence with the recommendation and planned actions, OIG considers the recommendation resolved, pending further action. This recommendation will be closed once OIG receives documentation demonstrating that Embassy Vienna has implemented policies and procedures for receiving, controlling, issuing, accounting for, and safeguarding fuel credit cards, including collecting and reviewing credit card receipts, as required.

CONCLUSION

Department policies and procedures require overseas posts to maintain good oversight and control on the use of U.S. Government vehicles and fuel credit cards. However, OIG found that Embassy Vienna did not establish adequate internal controls to safeguard motor vehicle keys and fuel credit cards. Until Embassy Vienna acts to implement internal controls, the risk of theft and misuse of U.S. Government property will remain. Moreover, implementing adequate internal controls is important to demonstrate that Embassy Vienna is prudently overseeing U.S. taxpayer funds and property to advance its mission.

RECOMMENDATIONS

Recommendation 1: OIG recommends that Embassy Vienna, Austria, develop and implement internal controls, including a key control system and a key control log to safeguard motor vehicle keys to prevent and detect the unauthorized use of vehicles.

Recommendation 2: OIG recommends that Embassy Vienna, Austria, update its mission motor vehicle policy, as required by Volume 14 of the current Foreign Affairs Manual, 435.1, to reflect the new controls implemented in response to Recommendation 1.

Recommendation 3: OIG recommends that Embassy Vienna, Austria, develop and implement a policy requiring an annual review of the mission motor vehicle policy, including any updates, as required by Volume 14 of the current Foreign Affairs Manual, 435.1.

Recommendation 4: OIG recommends that Embassy Vienna, Austria, designate a credit card control officer to receive, control, issue, and account for the credit cards, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3.

Recommendation 5: OIG recommends that Embassy Vienna, Austria, develop and implement policies and procedures for receiving, controlling, issuing, accounting for, and safeguarding fuel credit cards, including collecting and reviewing credit card receipts, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3. Credit card controls should include a separate personal identification number for each card, a sign-out sheet for each card, or cards should be permanently assigned to specific individuals. In addition, controls should include the required submission of fuel receipts that include vehicle identification information.

APPENDIX A: EMBASSY VIENNA, AUSTRIA, RESPONSE



Embassy of the United States of America

September 13, 2019

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TO:	OIG - Norman P. Brown, Assistant Inspector General for Audits
FROM:	Embassy Vienna – Trevor Traina, Ambassador ∬
SUBJECT: Austria,	Response to Draft Management Assistance Report: Embassy Vienna, Corrective Measures for Internal Controls Over Motor Vehicle Keys and Fuel Credit Cards.

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

<u>OIG Recommendation 1:</u> OIG recommends that Embassy Vienna, Austria, develop and implement internal controls, including a key control system and a key control log to safeguard motor vehicle keys to prevent and detect the unauthorized use of vehicles.

Management Response: Embassy Vienna concurs with this recommendation. Procurement of two key management systems (used and recommended by other Posts) is underway. Post will install one key watcher at the Chancery and the second one at motor pool. These devices will control key and fuel credit card issuance and they include software to safeguard and track use.

OIG Recommendation 2: OIG recommends that Embassy Vienna, Austria, update its mission motor vehicle policy, as required by Volume 14 of the current Foreign Affairs Manual, 435.1, to reflect the new controls implemented in response to Recommendation 1.

Management Response: Embassy Vienna concurs with this recommendation. A draft Motor Vehicle Policy that reflected updates as required by Volume 14 of the FAM was sent to Management Counselor Erica Renew for clearance in March 2019. Mrs. Renew did not approve this policy prior to her recent permanent departure from Post, so the policy has been refreshed and is undergoing clearance again. The Joint

Management Office expects this policy to be published and in effect by September 30, 2019.

<u>OIG Recommendation 3:</u> OIG recommends that Embassy Vienna, Austria, develop and implement a policy requiring an annual review of the mission motor vehicle policy, including any updates, as required by Volume 14 of the current Foreign Affairs Manual, 435.1.

Management Response: Embassy Vienna concurs with this recommendation. The new Motor Vehicle Policy will be reviewed and re-issued annually, in coordination with the annual designation of responsibilities.

<u>OIG Recommendation 4:</u> OIG recommends that Embassy Vienna, Austria, designate a credit card control officer to receive, control, issue, and account for the credit cards, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3.

Management Response: Embassy Vienna concurs with this recommendation. Post has designated the Assistant General Services Officer who supervises Motor Pool as the credit card control officer, in accordance with 14 FAH-1 H-814.3-3. This designation will be included in the updated annual designation of responsibilities Management Notice.

OIG Recommendation 5: OIG recommends that Embassy Vienna, Austria, develop and implement policies and procedures for receiving, controlling, issuing, accounting for, and safeguarding fuel credit cards, including collecting and reviewing credit card receipts, as required by Volume 14 of the Foreign Affairs Handbook, 1 H-814.3-3. Credit card controls should include a separate personal identification number for each card, a sign-out sheet for each card, or cards should be permanently assigned to specific individuals. In addition, controls should include the required submission of fuel receipts that include vehicle identification information.

Management Response: Embassy Vienna concurs with this recommendation. Post has requested new fuel cards from its vendors and will complete issuing these with separate personal identification numbers for each card by December 31, 2019. Post will also use the new key management system being purchased to control, issue, and account for these fuel cards. The recruitment of a Motor Pool Admin Assistant, whose duties will include timely collection and processing of fuel card receipts, is underway. The Joint Management Office anticipates that this position will be filled by November 30, 2019, barring any unforeseeable problems during the security clearance process.

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