



**Office of Inspector General**  
United States Department of State

ISP-I-21-22

Office of Inspections

May 2021

# **Inspection of the Bureau of Overseas Buildings Operations' Office of Fire Protection**

DOMESTIC OPERATIONS



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-21-22

## What OIG Inspected

OIG inspected the Office of Fire Protection, located under the Directorate of Operations, in the Bureau of Overseas Buildings Operations.

## What OIG Recommends

OIG made 8 recommendations to the Bureau of Overseas Buildings Operations.

In its comments on the draft report, the Bureau of Overseas Buildings Operations concurred with all 8 recommendations. OIG considers all 8 recommendations resolved. The Bureau of Overseas Buildings Operations' response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The bureau's formal written response is reprinted in its entirety in Appendix B.

May 2021

OFFICE OF INSPECTIONS  
DOMESTIC OPERATIONS

## Inspection of the Bureau of Overseas Buildings Operations' Office of Fire Protection

### What OIG Found

- The Office Director did not fully model the Department of State's leadership and management principles.
- Overall, the office carried out its mission to prevent fire-related fatalities and injuries. The office reported three fatalities and five injuries from FY 2006 to FY 2020.
- The office lacked sufficient internal control procedures in the Department's annual Statement of Assurance templates and in the Department's Management Controls Checklist on fire protection.
- Limitations in the Bureau of Overseas Buildings Operation's Real Property Application database impeded the office's ability to fully monitor overseas posts' compliance with requirements of its high-rise building mitigation program.

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## CONTEXT

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The Department of State (Department) is required to establish and maintain an effective fire protection program for its overseas operations under 29 Code of Federal Regulations Parts 1910, 1926, and 1960. The Bureau of Overseas Buildings Operations (OBO), Directorate of Operations, Office of Fire Protection (FIRE) manages and directs this program, as outlined in 15 Foreign Affairs Manual (FAM) 800. The purpose of the program is to promote safe living and working conditions for Department employees located at overseas posts and in residences.<sup>1</sup> FIRE's program also protects other U.S. Government staff, contractors, and visitors located at overseas posts.

FIRE is led by an Office Director and the office's staff consists of 43 Civil Service employees, 1 personal services contractor, and 11 third-party contractors.<sup>2</sup> The office has three divisions: Fire Protection Analysis and Field Engineering (FPA) Division, Fire Protection Engineering (FPE) Division, and Fire Protection Systems and Engineering (FPS) Division. The FPA Division conducts fire and life safety evaluations, fire investigations, training, and fire as a weapon analysis.<sup>3</sup> The division also evaluates local and contract fire services, oversees the emergency incident management and disaster response oversight, and administers the fire and life safety equipment logistics program for overseas posts. The FPE Division contributes to the review and approval of life safety designs and fire protection reviews of capital construction and renovation projects for overseas posts. The FPS Division provides technical expertise and training on fire alarm detection and fire suppression systems. This division's responsibilities also include conducting acceptance testing and final inspections of construction projects prior to occupancy.

OBO's Functional Bureau Strategy for FY 2018 to FY 2022<sup>4</sup> included three goals:

- Enhance the security, safety, and functionality of facilities and residences for overseas personnel.
- Provide industry-leading resilient facilities that represent the nation and support personnel in achieving U.S. foreign policy objectives.
- Promote continuous improvement facilitated by a culture of optimizing people, processes, and supporting technology resources.

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<sup>1</sup> As of FY 2020, the total Department complement includes 24,265 Foreign Service and Civil Service employees and 50,424 locally employed staff located at 284 overseas posts.

<sup>2</sup> Personal services contractors are individuals who enter into a contract that generally establishes an employer-employee relationship with the Department. Third-party contractors are individuals hired and employed by an independent company that has a contract with the U.S. Government; the relationship is with the independent company and not the employee or employees performing the services.

<sup>3</sup> The fire as a weapon program emphasizes the importance of proper controlled storage of fire accelerants and other items that can be used as weapons of opportunity. Weapons of opportunity can cause extensive damage during attacks on U.S. embassies, consulates, and diplomatic missions.

<sup>4</sup> OBO, *Functional Bureau Strategy FY2018-2022* 11 (March 28, 2019).

## EXECUTIVE DIRECTION

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The FIRE Office Director had served in that position since January 2014. He previously served as the Division Director of the FPA Division from 2005 to 2014, and as a fire marshal in the division from 2001 to 2005.

FIRE's FPE, FPA, and FPS Division Directors served in their positions since 2006, 2014, and 2015, respectively. Overall, FIRE's three Division Directors received positive ratings in OIG's survey and in employee interviews.<sup>5</sup>

### ***Office Director Did Not Fully Model the Department's Leadership and Management Principles***

OIG found that the FIRE Office Director did not fully model the Department's leadership and management principles outlined in 3 FAM 1214,<sup>6</sup> especially with regards to communication, self-awareness, and managing conflict. In OIG interviews, 42 percent of FIRE staff interviewed described the director's leadership style as difficult, specifically "autocratic" or "micromanaging" because he preferred to retain control over decisions with little input from his staff and he often involved himself in administrative activities that would be better handled by first-line supervisors. Staff also told OIG that the Office Director had a propensity for favoritism toward some FIRE employees. Some staff also said FIRE had low morale because of the Office Director's stance on administrative issues such as not allowing overtime in situations where employees felt it was warranted to meet the office's mission and his failure to address concerns about the accuracy of FPE Division's engineer position descriptions and grade levels, which they believed were inaccurate.

The Office Director acknowledged to OIG that his leadership style was difficult for some FIRE employees. He noted that a longstanding dispute about the accuracy of the FPE Division's engineer position descriptions and grade levels had a detrimental effect on morale.<sup>7</sup> In addition, at OBO's request,<sup>8</sup> the Bureau of Global Talent Management (GTM) conducted an

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<sup>5</sup> OIG survey respondents rated the three Division Directors very good to excellent for all the 10 leadership and management principles found in 3 FAM 1214, "Leadership and Management Principles for Department Employees."

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

<sup>7</sup> The Office Director also noted that OBO addressed the FPE engineers' concerns about the accuracy of their position descriptions and grade levels in previous desk audits conducted in 2010 and 2015.

<sup>8</sup> In a July 16, 2019, action memo to the OBO Director, the Director General of the Foreign Service and Director of Global Talent proposed two options to address long standing position classification issues: (1) to conduct a desk audit and review all position descriptions within the office, or (2) to convene a working group to determine the optimal structure and assignment of work to establish documented and valid position descriptions. In the August 2, 2019, action memo response, the OBO Director agreed to the latter option, which resulted in the organizational assessment.

organizational assessment in 2019.<sup>9</sup> The organizational assessment focused on FIRE leadership issues, including communication, technical expert participation in the decision-making process, and collaboration among FIRE divisions. It also focused on a range of administrative issues, including the accuracy of the FPE Division's engineer position descriptions, standard operating procedures for overtime, and service passports for third-party contractors.

During the inspection, FIRE began implementing the recommendations in GTM's organizational assessment report. However, based on FIRE's lack of progress on standard operating procedures for overtime and obtaining service passports for third-party contractors at the time of the inspection, OIG made recommendations to address these issues, as described in the Operational Effectiveness and Program Implementation and Resource Management sections of this report.

Additionally, OIG suggested to the Office Director that he contact the Foreign Service Institute's Leadership and Management School to engage a neutral third-party facilitator to address the leadership, morale, and administrative issues reported by FIRE staff. He agreed to use these Foreign Service Institute Leadership and Management School resources to address the issues described above.

## **OPERATIONAL EFFECTIVENESS AND PROGRAM IMPLEMENTATION**

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OIG assessed FIRE's operational effectiveness and program implementation by reviewing its policies, programs, and work performed by FIRE employees. OIG found FIRE generally met Department requirements for operational program implementation, with the exceptions noted below.

### **Program Overview**

Over the past 14 years, FIRE reported three fatalities and five injuries.<sup>10</sup> Although the number of fire-related fatalities and injuries remained low, the number of fire incidents and the associated monetary loss fluctuated over the past 6 fiscal years, ranging from 95 to 154 incidents per fiscal year, with associated annual losses from \$358,206 to \$37,291,962.<sup>11</sup> Overall, OIG found that FIRE carried out its mission to prevent fire-related fatalities and injuries and generally met its performance objectives.

Because of insufficient staffing and vacancies, however, FIRE officials reported that its fire marshals in the FPA Division were unable to meet their internal performance metric of

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<sup>9</sup> GTM's organizational assessment of FIRE was conducted from September to December 2019, and GTM published its report in May 2020.

<sup>10</sup> FIRE reported three fatalities: one locally employed staff in Islamabad in 2006, one Foreign Service officer in Moscow in 2014, and one local contractor in Addis Ababa in 2017. FIRE also reported five injuries: one locally employed staff in Islamabad in 2006, one Foreign Service officer and one locally employed staff in Dhaka in 2007, one locally employed staff in Addis Ababa in 2015, and one Foreign Service officer in Quito in 2019.

<sup>11</sup> Of the \$37,291,962 total loss, which occurred in FY 2020, \$35 million was attributable to a fire at Embassy Baghdad following a terrorist attack.

conducting fire inspections of 130 overseas posts annually. Instead, fire marshals conducted 108 inspections in 2018 and 92 inspections in 2019. In 2020, fire marshals conducted only 21 on-site inspections because of the COVID-19 pandemic and travel restrictions. In response to travel restrictions, FIRE switched to an alternative inspection program, which allowed facility managers and post occupational safety and health officers to conduct inspections with the fire marshals' oversight. Through this alternative approach, FIRE oversaw 162 inspections in 2020.

From FY 2013 to FY 2019, FIRE generally met its internal performance objective of replacing or upgrading three fire detection systems per year at overseas posts. However, in FY 2020, because of the COVID-19 travel restrictions, FIRE's FPS Division employees were able to upgrade only two fire detection systems.

### ***Office Engaged in Department COVID-19 Pandemic Response Efforts***

As the coordinating office for OBO's response to the COVID-19 pandemic, FIRE played a leading role in the activation and operation of OBO's Operations Center. From March to August 2020, FIRE staff provided 24/7 support to the Operations Center, with FIRE's Office Director assuming the role of the center's team leader and two of the office's fire marshals serving as senior watch officers. During that time, the Operations Center provided real-time information, coordination, and field support to OBO personnel on overseas travel and OBO contractors working on construction projects overseas. Furthermore, the OBO Operations Center coordinated with the Department's Operations Center and the Diplomatic Security's Command Center on Department COVID-19 response efforts.

As discussed above, FIRE also responded to the COVID-19 pandemic by providing remote support to overseas posts to conduct fire inspections and, in some instances, to repair fire systems. In addition, FIRE developed guidance for overseas posts on critical activities to be performed during the pandemic including daily fire alarm checks, weekly fire pump and fire controller checks, and weekly walk-throughs of functional building spaces.

## **Fire Protection Program**

### ***Department's Annual Statement of Assurance Lacked Sufficient Internal Control Procedures on Fire Protection***

OIG found The Department's annual Statement of Assurance (SOA) used by chiefs of mission (COM) lacked sufficient internal control procedures on fire protection.<sup>12</sup> In accordance with 2 FAM 022.1, the Secretary provides an annual SOA to the President and Congress on the adequacy of management controls. Department standards in 2 FAM 022.7(5) state that each COM completes an SOA that is submitted to regional bureaus for consolidated reporting to the Secretary. Every year, COMs are required to attest to the effectiveness of their mission's system

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<sup>12</sup> 2 FAM 021.3, "Definitions;" 2 FAM 024d, "Annual Management Assurance Process." The Department's collective statement of assurance states whether the organization's systems of management control taken as a whole complies with the Government Accountability Office's standards for internal control.

of management and internal control.<sup>13</sup> The Bureau of the Comptroller and Global Financial Services provides detailed guidance and templates annually to COMs and overseas post staff to help them fulfill this critical responsibility.

Specifically, OIG found no requirement for COMs to attest or certify in the annual SOA that their posts had an effective fire protection program. In addition, the templates in Annex 1 of the SOA required COMs to attest to the effectiveness of eight facility management programs but none were related to the fire protection program. Furthermore, OIG found that the fire protection program was not listed among the 25 internal control programs in the SOA Management Controls Checklist. OIG noted three fire-related items on the checklist but found no items focused on the fire protection program. The most prominent item—“Does every post residence have usable and safe secondary fire exits?”—was on a list for OBO’s safety, health, and environmental management program. The other two fire-related items were listed under the management and diplomatic and regional security programs, respectively. FIRE officials told OIG they did not recall having input into the annual SOA templates or the Management Controls Checklist, and they acknowledged the need to do so to improve overseas posts’ compliance with Department fire protection standards. The lack of COMs’ assurances that missions are complying with fire protection program requirements creates an internal control weakness and could increase the risk of fires and expose staff to unsafe facilities.

**Recommendation 1:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should incorporate in the Annual Statement of Assurance templates an attestation requiring overseas posts to have an effective fire protection program that complies with all applicable Department standards. (Action: OBO, in coordination with CGFS)

**Recommendation 2:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should update and include fire protection program internal control procedures in the Department’s Management Controls Checklist. (Action: OBO, in coordination with CGFS)

### ***Low Participation in Fire Prevention Training at Overseas Posts Hindered the Effectiveness of the Fire Protection Program***

OIG found that low participation in fire prevention training at overseas posts hindered the effectiveness of FIRE’s fire protection program. According to a cable sent to all overseas posts,<sup>14</sup> often fewer than 20 percent of personnel assigned to post attend fire prevention training<sup>15</sup> provided by fire marshals during their visits. Of particular concern to FIRE officials was the low

<sup>13</sup> 2 FAM 024d, “Annual Management Assurance Process.”

<sup>14</sup> Cable 19 STATE 55574, “Corrected – Fire Safety Message From the Director, Bureau of Overseas Buildings Operations,” May 24, 2019.

<sup>15</sup> During fire and life safety visits to overseas posts, FIRE’s fire marshals provide fire prevention lectures and hands-on fire extinguisher training. The fire prevention lectures are designed to help staff recognize fire hazards and learn fire survival techniques, while the hands-on extinguisher training affords staff the opportunity to use portable fire extinguishers to put out a live fire.

participation rate of American employees despite statistics showing that 61 percent of fires occurred in these employees' residences over the last 5 years. According to 15 FAM 813.4a, the principal officer has overall responsibility for the safety and health of post employees and must ensure the highest staff participation in the fire prevention training. Additionally, all employees under COM authority must make attendance a priority. FIRE officials told OIG that, because the training was not mandatory and overseas posts did not always make attendance a priority, staff participation was substantially below FIRE's desired goal of 90 percent. Absent requirements making fire prevention training mandatory, FIRE is unable to achieve its goal of 90 percent participation.

**Recommendation 3:** The Bureau of Overseas Buildings Operations should implement a plan to increase American employees' participation in fire protection training at overseas posts. (Action: OBO)

***Bureau Real Property Application Limitations Impeded the Office's Ability to Fully Monitor Overseas Posts' Compliance With the High-Rise Building Mitigation Program***

OIG found that limitations in OBO's Real Property Application<sup>16</sup> (RPA) database impeded FIRE's ability to fully monitor overseas posts' compliance with requirements of the high-rise building mitigation program.<sup>17</sup> Specifically, the RPA did not include data fields and related reports that would allow FIRE to determine whether a residential unit or functional space was in a high-rise building. According to 15 FAM 813.7b, occupying higher floors in buildings above 75 feet presents an increased risk of injury or death due to the time it takes to evacuate the facility from higher floors. For this reason, U.S. building and fire codes mandate prescriptive measures for these buildings to ensure the occupants can safely vacate the premises in the event of a fire. For high-rise properties that overseas posts wish to lease but that do not meet some or all U.S. building and fire codes, FIRE issues a mitigation letter with specific measures to address identified deficiencies in accordance with 15 FAM 813.7e.<sup>18</sup> While FIRE officials told OIG that the office had fire safety mitigation letters on file for 1,723 buildings, because of the RPA's limitations, it was unable to determine the total universe of buildings that might be subject to the standards in 15 FAM 813.7c. Although OBO planned to enhance RPA, the bureau had not defined requirements to identify high-rise residential units and functional space in the database. Without a function in RPA to identify all property located in high-rise buildings, FIRE cannot determine what properties are subject to mandated prescriptive measures as noted above to ensure occupants can safely vacate the building in the event of a fire.

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<sup>16</sup> The OBO Real Property Application is the Department's single comprehensive database for all U.S. Government-leased and -owned real property overseas. It was designed to support local planning, operation, management, and control of U.S. Government-held property abroad.

<sup>17</sup> Department standards in 15 FAM 813.7 details requirements for acquiring high rise property. High-rise buildings are buildings with an occupied floor more than 75 feet above the lowest level of fire department vehicle access.

<sup>18</sup> If an overseas post cannot find properties that meet U.S building and fire codes or the minimal equivalency standards listed 15 FAM 813.7c, the chief of mission or the deputy chief of mission may make an informed decision to lease the property even though it does not meet standards. In that situation, the overseas post must coordinate its decision with FIRE, which will provide the overseas post with unit- or property-specific mitigation measures and assistance in appropriate documentation of the lease file.

**Recommendation 4:** The Bureau of Overseas Buildings Operations should modify the Real Property Application database to identify residential units and functional spaces located in high-rise buildings. (Action: OBO)

***Lack of Service Passports for Third-Party Contractors Affected Operational Effectiveness***

OIG found that a lack of service passports<sup>19</sup> for FIRE's 11 third-party contractors, which would allow them to carry work tools and fire system repair parts through foreign customs, affected operational effectiveness.<sup>20</sup> FIRE's third-party contractors sometimes were subjected to increased scrutiny from local customs and immigration officials when traveling on their tourist passports. For example, one of FIRE's third-party contractors was detained for several hours when host government authorities discovered hand tools and electronic detection and testing equipment in his luggage, while in another instance, some of his equipment was seized. FIRE reported that obtaining a business visa from the host country has not prevented these issues.

According to 8 FAM 503.3-4a, a service passport may be issued to a non-personal services contractor traveling abroad to carry out duties in support of and pursuant to a contract with the U.S. Government when necessary to enable the individual to carry out their contractual obligations. Guidance from the Bureau of Consular Affairs (CA) further states that a Government official requesting a service passport for a third-party contractor must demonstrate what impediments prevent the contractor from meeting their contractual obligations when using a regular passport.<sup>21</sup> CA recommends that most third-party contractors should continue to travel on tourist passports. FIRE first tried to obtain a service passport for a third-party contractor in 2017, but CA denied the request because it determined that FIRE's justification was insufficient. At the time of the inspection, FIRE had not further defined courses of action to address this issue. FIRE concluded that without service passports, the risk of equipment confiscation or delays due to increased scrutiny by host government authorities is higher for its third-party contractors.

**Recommendation 5:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Consular Affairs, should implement options to address impediments faced by the Office of Fire Protection's third-party contractors carrying work tools and fire system repair parts through foreign customs. (Action: OBO, in coordination with CA)

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<sup>19</sup> Contrary to regular passports, service passports demonstrate a contractual relationship between the bearer's employer and the U.S. Government as the reason for travel, thereby demonstrating the bearer's support function on behalf of the U.S. Government. In contrast, U.S. direct-hire employees travel on diplomatic and official passports to carry out their official duties. Official passports are issued to officers or employees of the U.S. Government traveling abroad to carry out official duties.

<sup>20</sup> Third-party contractors supported FIRE's mission to perform maintenance, installations commissioning, and repairs on overseas post's fire safety systems. They carried a variety of hand tools such as screwdrivers, pliers, and wrenches. They also carried electronic equipment such as multi-meters, fiber optical installation kits, and fire suppression system replacement parts and equipment.

<sup>21</sup> 8 FAM 503.3-4a, "Eligibility for Issuance of a Service Passport."

### ***System for Tracking Overseas Posts' Compliance With Fire Safety Inspections Was Inefficient***

OIG found FIRE had an inefficient manual system for tracking overseas posts' compliance with its fire safety inspection recommendations. Specifically, FIRE used spreadsheets to track compliance with its recommendations for more than 90 overseas post inspections. FIRE officials told OIG that its manual tracking system was burdensome; had limited trend analysis, oversight, and monitoring capabilities; and was less efficient than an automated system. FIRE officials also noted they had to perform manual reconciliations of multiple spreadsheets to provide information to regional bureaus or OBO on the number of closed, open, and unresolved fire safety recommendations for each overseas post.

In 2020, FIRE evaluated an off-the-shelf application used by fire departments but found the application did not meet office requirements. At the time of the inspection, FIRE had secured funding in its FY 2022 budget request for this purpose. Based on the action that FIRE took to resolve this issue, OIG did not make a recommendation.

## **RESOURCE MANAGEMENT**

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OIG reviewed management controls related to FIRE's operations in human resources, financial management, procurement and contracting, and information management. OIG found that FIRE generally implemented the required processes and procedures in accordance with applicable laws and Department guidance, with the three exceptions described below.

### ***Office's Overtime Policy and Procedures Did Not Fully Comply With Department Standards***

FIRE's overtime policy did not fully comply with Department standards in 3 FAM 3133.1, 3 FAM 3133.2, and 3 FAM 3133.3 governing regularly and irregularly scheduled overtime.<sup>22</sup> Although FIRE's overtime policy addressed irregularly scheduled overtime, it did not include guidelines for regularly scheduled overtime that must be scheduled in advance of a workweek.

Additionally, OIG reviewed statements from supervisors in FIRE documents instructing employees that the office does not pay overtime, that employees should not submit requests for paid overtime, and that FIRE has had for many years an unwritten policy that overtime is and shall be unscheduled and therefore paid by compensatory time and not overtime pay. The Office Director told OIG that employees did not need to schedule overtime in advance to complete assignments because all work, including disruptive fire alarm systems testing, could

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<sup>22</sup> The Department has an official policy on regularly and irregularly scheduled overtime, which is aligned with Office of Personnel Management rules under Title 5 of the United States Code. Under this policy, "regularly scheduled" overtime is overtime work that is scheduled in advance of the start of the administrative workweek in which it is to be performed. Employees working regularly scheduled overtime are eligible to receive overtime pay, but no compensatory time can be earned. "Irregularly scheduled overtime" is overtime work that is scheduled after the start of the administrative workweek in which it is to be performed. Employees working irregularly scheduled overtime are entitled to earn compensatory time off if they earn more than the GS-10, step 10 rate; employees who are at the GS-10, step 10 rate or below may choose overtime pay or compensatory time off. See 3 FAM 3133.1, "General Overtime Provisions," which cites 5 CFR 550.101 - 550.187; 3 FAM 3133.2, "Regular Compensatory Time Off," which cites 5 CFR 550.114 and 5 CFR 551.531; and 3 FAM 3133.3, "Requirement for Regular Compensatory Time Off for Irregular Overtime Work."

be performed during an overseas posts' office hours, and division directors had the option to increase the length of their employees' assignments during the trip planning phase to avoid overtime.

Nevertheless, some employees disagreed with the Office Director's view on the office's need for scheduled overtime. For example, FIRE employees reported that as a courtesy to overseas posts, they often scheduled fire alarm testing during a post's nonworking hours to minimize disrupting operations.

FIRE employees also raised the office's overtime policy as an issue in GTM's organizational assessment. GTM recommended that FIRE develop a standard operating procedure for overtime that complies with Department standards.<sup>23</sup> As a result, the Office Director began working on a new FIRE overtime policy during the inspection. OIG determined that the absence of an overtime policy that complied with Department standards negatively impacted employee morale.

**Recommendation 6:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Global Talent Management, should implement overtime policy and procedures for the Office of Fire Protection that comply with Department standards. (Action: OBO, in coordination with GTM)

***Contracting Officer's Representatives Did Not Fully Administer Contracts in Accordance With Department Standards***

FIRE's six contracting officer's representatives (COR) did not fully administer assigned contracts in accordance with Department standards. The CORs oversaw 18 contracts valued at a total of \$49.9 million. OIG found several missing documents in its review of 4 of 18 COR files valued at \$30.3 million. For example, two COR files did not have a copy of the procurement request package or solicitations and four of the COR files did not include documentation on the contractors' performance in accordance with standards in 14 FAH-2 H-142b(16) and 14 FAH-2 H-517a. In addition, neither the Contracting Officer nor the CORs documented the contractors' annual performance for any of the 18 contracts in the Contractor Performance Assessment Reporting System,<sup>24</sup> as required by 14 FAH-2 H-572<sup>25</sup> and 48 Code of Federal Regulations 42.1502a. Despite these deficiencies, OIG's discussions with CORs and review of other documentation in the files showed that the CORs monitored the contracts, received the goods

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<sup>23</sup> According to staff in GTM's Office of Organization and Talent Analytics, which conducts organizational assessments, when it comes to assessments that are requested by specific bureau leadership to streamline their organizations and improve efficiency, the office follows up and assists its clients with guidance, oversight, and implementation of recommended changes. Not all GTM recommendations to bureau leadership are required changes, and it is the bureau leadership's responsibility to decide which recommendations are most appropriate to implement.

<sup>24</sup> The Contractor Performance Assessment Reporting System, or CPARS, is the government-wide evaluation reporting tool for all past performance reports on contracts and orders.

<sup>25</sup> The contracting officer is responsible for ensuring that the evaluation takes place, but the COR may be tasked with evaluating contractor performance. 14 FAH-2 H-572e, "Final Evaluation."

and services contracted for, and addressed contract issues when they arose. The CORs told OIG these deficiencies occurred because they were unaware of some of the requirements and competing priorities. However, failure to comply with COR requirements increases the risk of contract mismanagement, misuse of U.S. Government resources, and substandard contractor performance.

**Recommendation 7:** The Bureau of Overseas Buildings Operations should bring its contract administration into compliance with Department standards. (Action: OBO)

***Office Lacked Records and Information Life Cycle Management Standard Operating Procedures***

FIRE did not have standard operating procedures for records and information life cycle management as required by Department standards. Specifically, the office lacked guidance or procedures to instruct staff on the creation, maintenance and use, and disposition of records, or standards and procedures for classifying, indexing, and filing records. In accordance with guidelines in 5 FAM 414.4a, Department bureaus and offices are responsible for implementing and administering the records policies, standards, systems, and procedures issued by the Department's records officer. According to FIRE staff, the office did not know that it needed office-level standard operating procedures. However, without office records and information life cycle management standard operating procedures, FIRE cannot determine its compliance with Federal information access laws and regulations; properly classify, protect, and declassify sensitive national security information; and meet the Department domestic and internal copyright and other intellectual property obligations.

**Recommendation 8:** The Bureau of Overseas Buildings Operations should implement records and information life cycle management standard operating procedures for the Office of Fire Protection in accordance with Department standards. (Action: OBO)

## RECOMMENDATIONS

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

**Recommendation 1:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should incorporate in the Annual Statement of Assurance templates an attestation requiring overseas posts to have an effective fire protection program that complies with all applicable Department standards. (Action: OBO, in coordination with CGFS)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations incorporated in the Annual Statement of Assurance templates an attestation requiring overseas posts to have an effective fire protection program that complies with all applicable Department standards.

**Recommendation 2:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should update and include fire protection program internal control procedures in the Department's Management Controls Checklist. (Action: OBO, in coordination with CGFS)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations updated and included fire protection program internal control procedures in the Department's Management Controls Checklist.

**Recommendation 3:** The Bureau of Overseas Buildings Operations should implement a plan to increase American employees' participation in fire protection training at overseas posts. (Action: OBO)

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<sup>1</sup> OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau noted an estimated completion date of September 2021.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations implemented a plan to increase American employees' participation in fire protection training at overseas posts.

**Recommendation 4:** The Bureau of Overseas Buildings Operations should modify the Real Property Application database to identify residential units and functional spaces located in high-rise buildings. (Action: OBO)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau noted an estimated completion date of January 2022.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations modified the Real Property Application database to identify residential units and functional spaces located in high-rise buildings.

**Recommendation 5:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Consular Affairs, should implement options to address impediments faced by the Office of Fire Protection's third-party contractors carrying work tools and fire system repair parts through foreign customs. (Action: OBO, in coordination with CA)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau noted an estimated completion date of September 2021.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations implemented options to address impediments faced by the Office of Fire Protection's third-party contractors carrying work tools and fire system repair parts through foreign customs. (Action: OBO)

**Recommendation 6:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Global Talent Management, should implement overtime policy and procedures for the Office of Fire Protection that comply with Department standards. (Action: OBO, in coordination with GTM)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations implemented overtime policy and procedures for the Office of Fire Protection that comply with Department standards.

**Recommendation 7:** The Bureau of Overseas Buildings Operations should bring its contract administration into compliance with Department standards. (Action: OBO)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau noted an estimated completion date of August 2021.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations brought its contract administration into compliance with Department standards.

**Recommendation 8:** The Bureau of Overseas Buildings Operations should implement records and information life cycle management standard operating procedures for the Office of Fire Protection in accordance with Department standards. (Action: OBO)

**Management Response:** In its May 3, 2021, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations implemented records and information life cycle management standard operating procedures for the Office of Fire Protection in accordance with Department standards.

## PRINCIPAL OFFICIALS

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Title	Name	Arrival Date
<b>Office Director</b>		
FIRE Office Director	Edward J. Babczak	1/2014
<b>Division Directors</b>		
Fire Protection Analysis and Field Engineering Division	Darrell Dantzler	6/2014
Fire Protection Engineering Division	David A. Stobaugh	5/2006
Fire Protection Systems and Engineering Division	Kevin T. Darmody	10/2015

**Source:** Generated by OIG from data provided by the Office of Fire Protection.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from August 31, 2020 to February 9, 2021, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

### Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. 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.

OIG's specific objectives for this inspection were to determine whether:

- The Bureau of Overseas Buildings Operations' Office of Fire Protection (FIRE) Office Director and three division directors modeled the leadership and management principles in 3 Foreign Affairs Manual 1214.
- FIRE took steps to address its staffing shortages, including the possible use of third-party and personal service contractors.
- FIRE mitigated potential fire safety issues that could arise from its inability to conduct inspections to support compliance and quality assurance and to provide training for fire safety, and service fire systems.
- FIRE took steps to address the recommendations in the Bureau of Global Talent Management's (GTM) organizational assessment of FIRE.
- FIRE, in coordination with GTM, reviewed certain position descriptions in the Fire Protection Systems and Engineering Division and the Fire Protection Engineering Division.

## **Methodology**

OIG used a risk-based approach to prepare for each inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted its inspections remotely and relies on audio- and video-conferencing tools in lieu of in-person interviews with Department and other appropriate personnel. OIG also reviewed pertinent records; circulated surveys and compiled the results, as appropriate. For this inspection, OIG also created and distributed two supplemental office questionnaires to gain an understanding of FIRE's fire protection safety program. At the conclusion of the inspection, OIG reviewed the substance of the report and its findings and recommendations with offices, individuals, and organizations affected by the inspection. OIG used professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

## APPENDIX B: MANAGEMENT RESPONSE

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United States Department of State  
Washington, D.C. 20520

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MEMORANDUM

May 3, 2021

TO: OIG/ISP – Sandy Lewis

FROM: OBO – Henry Jardine, Acting Director /s/

SUBJECT: **Draft Report - OIG Inspection of the OBO Office of Fire Safety (OBO/OPS/FIRE)**

OBO has reviewed the draft report and provides the following two comments:

1. On page 2 of the draft report, the OIG writes, “Some staff also said FIRE had low morale because of the Office Director’s stance on administrative issues such as not allowing overtime in situations where employees felt it was warranted to meet the office’s mission and **his failure to address concerns about the accuracy of FPE Division’s engineer position descriptions and grade levels, which they believed were inaccurate.**”

OBO requests that the portion of the statement in bold above be deleted given the FIRE Director’s strong efforts to update the position descriptions. If the OIG does not agree to delete the bolded section, OBO suggests the following amended language: “Some staff also said FIRE had low morale because of the Office Director’s stance on administrative issues such as not allowing overtime in situations where employees felt it was warranted to meet the office’s mission. In addition, some staff also cited low morale in relation to the FPE Division’s engineer position descriptions and grade levels, which they believed were inaccurate. Despite the FIRE Director’s significant efforts to address this issue, GTM determined on several occasions that these position descriptions were accurate.”

The efforts below may be included as a footnote in the report:

- In 2010, an audit was conducted that verified the accuracy of the position descriptions (PDs) at the current grade level.
- Beginning in 2015, the Bureau of Global Talent Management (GTM) conducted another desk audit and determined on April 24, 2017 that the Engineer PD and grade level was correct as written.
- GTM has ratified the current PD in the hiring of four engineers in the past five years.
- In July 2020, OBO/OPS/FIRE management solicited feedback from staff on the Engineer PD to comply with Recommendation 4 of GTM’s May 2020 Organizational Assessment to review all position descriptions.

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2. Also on page 2 of the draft report, the OIG writes, “Recognizing that he needed some help to address some leadership and administrative issues, in 2019, he requested that the Bureau of Global Talent Management (GTM) conduct an organizational assessment.”

OBO requests that this statement be corrected for accuracy. Per page 4 of GTM’s May 2020 Organizational Assessment, the FIRE Office Director, “requested approval from the Bureau of Global Talent Management to upgrade the classification of GS-12 Fire Engineering Technician positions to the GS-0802-13 level.” In a July 16, 2019, Action Memo to the OBO Director, the Director General of the Foreign Service and Director of Global Talent proposed two options,

- A desk audit to review classification of all position descriptions within the office; or
- For GTM to convene a working group to determine the optimal structure and assignment of work to establish documented and valid position descriptions.

In the August 2, 2019, Action Memo response, the OBO Director agreed to the latter, which resulted in the Organizational Assessment.

OBO provides the following responses to the recommendations:

**Recommendation 1:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should incorporate in the Annual Statement of Assurance templates an attestation requiring overseas posts to have an effective fire protection program that complies with all applicable Department standards. (Action: OBO, in coordination with CGFS)

**OBO Response:** OBO concurs with the recommendation. CGFS, in coordination with OBO/OPS/FIRE and OBO/RM/FM incorporated the following attestation into the FY 2021 Annual Statement of Assurance templates on April 21, 2021.

- I attest that (name of mission) has an effective fire protection program that complies with all applicable Department standards.

**Recommendation 2:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of the Comptroller and Global Financial Services, should update and include fire protection program internal control procedures in the Department’s Management Controls Checklist. (Action: OBO, in coordination with CGFS)

**OBO response:** OBO concurs with the recommendation. OBO/OPS/FIRE, in coordination with OBO/RM/FM and CGFS, provided the following checklist items to CGFS on April 20, 2021. Since CGFS already issued the FY 2021 Management Controls Checklist on March 31, 2021, the fire protection program internal control items below will be incorporated into the Department’s FY 2022 Management Controls Checklist.

1. Has the Annual Fire and Life Safety compliance report been reviewed, certified by the Management Officer, and sent to OBO/OPS/FIRE per 15 FAM 813.3?

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2. Are post fire protection systems - to include fire pumps, fire suppression systems, kitchen fire extinguishing systems, fire alarm detection systems and fire alarm sub-systems in operation?
3. Has testing and maintenance of fire protection systems been completed, and documentation maintained by Facility Management?
4. Has the COM/Principal Officer ensured the highest staff participation in the fire prevention training per 15 FAM 813.4?
5. Does post management and GSO perform due diligence in acquiring or leasing fire safe properties?
6. Has post reviewed their High-Rise properties for compliance under 15 FAM 813.7 and have actions been taken to terminate these properties when the current occupant departs post or when the lease expires, whichever is earlier?
7. Has post conducted an annual inventory of all OBO-supplied fire extinguishers and submitted a completed inventory document to OBO/OPS/FIRE?
8. Does post have a Standard Operating Procedure for notifying OBO/OPS/FIRE of fire and disaster incidents affecting the structural integrity or life-safety factors of U.S. Government property per 15 FAM 822?
9. For any reconfiguration or change of use of an existing building or portion thereof, has post submitted plans/SOW in advance to OBO/PDCS/DE and OBO/OPS/FIRE for review, approval, and permitting?
10. Are all fuel assets to prevent unauthorized access for possible use/exploitation in a terrorist attack (i.e., Fire as a Weapon) secure in accordance with 12 FAH 5 H-470?

**Recommendation 3:** The Bureau of Overseas Buildings Operations should implement a plan to increase American employees' participation in fire protection training at overseas posts. (Action: OBO)

**OBO response:** OBO concurs with the recommendation. As outlined in Recommendation 3, OBO has included a question in the Management Controls Checklist regarding training. (4. Has the COM/Principal Officer ensured the highest staff participation in the fire prevention training per 15 FAM 813.4?)

OBO/OPS/FIRE provides fire protection training at overseas posts on a biennial basis as a part of the OBO on-site Fire/Life Safety assessment. In effort to notify and prepare overseas posts for the fire protection training, OBO Fire Marshals communicate fire protection training requirements to the Post Management Officer and Facility Managers at the following intervals. OBO Fire Marshals seek maximum participation, and request post management support at each communication interval.

1. Two to three months before the fire/life safety assessment: The Fire Marshal sends training requirements along with 19 State 55574, Fire Safety Message from the Director, Bureau of Overseas Buildings Operations.
2. Approximately one week before the fire/life safety assessment: The Fire Marshals send the training requirement, along with 19 State 55574, Fire Safety Message from the Director, Bureau of Overseas Buildings Operations.
3. During the first day of the trip at the in-brief: OBO Fire Marshals inform Post Management and the Facility Manager of the training requirements, select training classes based on a

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needs assessment, and assist in drafting a Management notice for participants to attend the training.

In addition, OBO/OPS/FIRE is developing two virtual training initiatives for posts that will be available apart from an OBO Fire/Life Safety assessment or the presence of an OBO Fire Marshal.

- FIRE is collaborating with FSI to assign an FSI course code for the virtual "Fire as a Weapon" and fire safety training course to be hosted on FSI Learn Center.
- FIRE is developing a voice-over presentation with fire extinguisher training and a fire-prevention briefing.

The expected completion date for both initiatives is September 2021.

**Recommendation 4:** The Bureau of Overseas Buildings Operations should modify the Real Property Application database to identify residential units and functional spaces located in high-rise buildings. (Action: OBO)

**OBO response:** OBO concurs with the recommendation. OBO/OPS/FIRE held a kick-off meeting with the Planning and Real Estate Directorate (OBO/PRE) on April 20, 2021, to modify the Real Property Application (RPA) to allow fire and life safety data entry for high rise properties. OBO/OPS/FIRE is identifying the property ID information required will coordinate further with OBO/PRE and RPA developers. The estimated completion date is January 2022.

**Recommendation 5:** The Bureau of Overseas Buildings Operations should implement options to address impediments faced by the Office of Fire Protection's third-party contractors carrying work tools and fire system repair parts through foreign customs. (Action: OBO)

**OBO response:** OBO concurs with the recommendation and respectfully requests including the Bureau of Consular Affairs as a coordinating office to this recommendation. OBO/OPS/FIRE will re-engage with the OBO Travel Office and the Special Issuance Agency (SIA) to seek additional guidance on the feasibility of issuing service passports for third party contractors assigned to OBO/OPS/FIRE. OBO/OPS/FIRE will subsequently draft a justification request and an accompanying Action Memo from the OBO Director to the Bureau of Consular Affairs requesting assistance in obtaining service passports. The expected completion date is September 2021.

**Recommendation 6:** The Bureau of Overseas Buildings Operations, in coordination with the Bureau of Global Talent Management, should implement overtime policy and procedures for the Office of Fire Protection that comply with Department standards. (Action: OBO, in coordination with GTM)

**OBO response:** OBO concurs with the recommendation. OBO/OPS/FIRE, in coordination with OBO/EX/HRD and GTM, updated and finalized the policy and procedure directive on overtime and compensatory time to comply with Department standards on April 23, 2021.

**Recommendation 7:** The Bureau of Overseas Buildings Operations should bring its contract administration into compliance with Department standards. (Action: OBO)

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**OBO response:** OBO concurs with the recommendation and expects to complete the following actions by August 2021.

- OBO/OPS/FIRE Contracting Officer's Representatives (CORs) will review 14 FAH-2 Contracting Officer's Representative Handbook, and update working files in accordance with section 14 FAH-2 H-517 Standard COR Working File.
- CORs will take Performance Assessment Rating System (CPARS) Training, offered by AQM Acquisition Training.
- CORs will work with their individual Contracting Officers to establish a CPARS assignment chain and will receive the required assignments in the CPARS "To Do List," with the result of completing the contractor's assessment.

**Recommendation 8:** The Bureau of Overseas Buildings Operations should implement records and information life cycle management standard operating procedures for the Office of Fire Protection in accordance with Department standards. (Action: OBO)

**OBO response:** OBO concurs with the recommendation. OBO published Standard Operating Procedure "Knowledge Management S01, Records Management" on February 18, 2021. OBO/OPS/FIRE will follow this SOP for management and disposition of records.

## ABBREVIATIONS

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CA	Bureau of Consular Affairs
COM	Chief of Mission
COR	Contracting Officer's Representative
FAM	Foreign Affairs Manual
FIRE	Office of Fire Protection
FPE	Fire Protection Engineering
FPS	Fire Protection Systems and Engineering
FPA	Fire Protection Analysis and Field Engineering
GTM	Bureau of Global Talent Management
OBO	Bureau of Overseas Buildings Operations
RPA	Real Property Application
SOA	Statement of Assurance

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