



Office of Inspector General United States Department of State

ISP-I-21-31

Office of Inspections

August 2021

(U) Inspection of Embassy Praia, Cabo Verde

BUREAU OF AFRICAN AFFAIRS

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HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-21-31

(U) What OIG Inspected

(U) OIG inspected executive direction, program and policy implementation, resource management, and information management operations of Embassy Praia.

(U) What OIG Recommends

(U) OIG made 18 recommendations: 17 recommendations to Embassy Praia and 1 recommendation to the Bureau of Information Resource Management.

(U) In its comments on the draft report, the Department concurred with all 18 recommendations. 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 written response is reprinted in its entirety in Appendix B.

(U) August 2021

(U) OFFICE OF INSPECTIONS

(U) BUREAU OF AFRICAN AFFAIRS

(U) Inspection of Embassy Praia, Cabo Verde

(U) What OIG Found

- (U) The Ambassador and the Deputy Chief of Mission led Embassy Praia in a professional and collaborative manner consistent with Department of State leadership principles. Both leaders established a positive, inclusive, and supportive tone for the embassy.
- (U) Department and other U.S. Government officials praised the embassy's efforts to broaden the commercial relationship with Cabo Verde, its handling of sensitive bilateral cooperation issues, and its support for the Department's regional response to the COVID-19 pandemic.
- (U) The embassy's crisis preparedness posture, including consular crisis preparedness, allowed it to respond effectively during the initial stages of the COVID-19 pandemic, including the repatriation of approximately 600 U.S. citizens and permanent residents, and third country nationals in Cabo Verde.
- (U) The embassy did not administer public diplomacy grants in accordance with Department standards.
- (U) Embassy Praia's facilities suffered from several life and safety deficiencies.
- (U) Some management controls for financial management and general services did not meet Department standards.
- (U) Information management operations and services focused on customer support and remote telework but lacked proper controls on asset management and mandated documentation of systems and programs.
- (U) Spotlight on Success: Information management staff distributed a comprehensive daily system monitoring report to embassy management, which increased awareness of information management operations and allowed a proactive approach to information technology support.

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(U) CONTEXT

(U) Cabo Verde is located approximately 300 miles off the west coast of Africa and has an estimated population of 583,000 living on nine inhabited islands. A former Portuguese colony, it gained independence in 1975 and is regarded as one of Africa's most stable democratic governments and one of its most stable economies. Cabo Verde's economy is dependent on tourism: the World Bank¹ estimates that tourism and travel-related business constitute 25



(U) **Figure 1:** Map of Cabo Verde.
(Source: CIA World Factbook)

percent of gross domestic product and contribute to approximately 40 percent of total economic performance. According to data from Johns Hopkins University,² at the time of this inspection, Cabo Verde had been consistently among the top five countries in Africa for per capita rate of transmission for new COVID-19 infections. The COVID-19 pandemic led to an estimated economic contraction of more than 14 percent in 2020, an increase in public debt to one of the highest levels in Africa, and a doubling of the unemployment rate to 20-25 percent.³

(U) The relationship between the United States and Cabo Verde dates back more than 200 years. As a result of emigration to the U.S., the Cabo Verdean diaspora in the United States is roughly equal to the country's population. Cabo Verde's location makes it an important U.S. partner

in combatting the trafficking of drugs, weapons, and people. In FY 2020, the U.S. Government obligated more than \$3.2 million in foreign assistance to Cabo Verde for economic development, health, peace and security, and multi-sector programs.

(U) Embassy Praia's FY 2019 Integrated Country Strategy (ICS) focused on three goals:

- (U) Promoting broad-based economic growth, development, prosperity, and opportunity.
- (U) Improving military and security forces' capabilities through expanded bilateral cooperation and training.

¹ (U) World Bank, "The World Bank in Cabo Verde," Economic Overview, <https://www.worldbank.org/en/country/caboverde/overview>.

² (U) "New Confirmed COVID-19 Cases per Day, Normalized by Population," data provided by Johns Hopkins University Center for Systems Science and Engineering, interactive visualization provided at <http://www.91-DIVOC.com>.

³ (U) International Monetary Fund, "Cabo Verde: Third Review Under the Policy Coordination Instrument," April 2, 2021, <https://www.imf.org/en/Publications/CR/Issues/2021/04/02/Cabo-Verde-Third-Review-of-the-Policy-Coordination-Instrument-Press-Release-and-Staff-Report-50334>, and U.S. Department of State, "2020 Investment Climate Statement: Cabo Verde," Executive Summary, <https://www.state.gov/reports/2020-investment-climate-statements/cabo-verde/>.

- (U) Supporting social inclusion by encouraging a robust program to address social rights.

(U) At the time of the inspection, Embassy Praia had 12 U.S. authorized staff members and 202 locally employed (LE) staff members. Of the 12 U.S. direct-hire employees, 11 worked for the Department of State (Department) and one worked for the Department of Defense. In addition, the Department's Bureau of International Narcotics and Law Enforcement Affairs employed one contractor. Embassy facilities included the chancery, an annex, a warehouse, and a recreation center.

(U) OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980. Due to the COVID-19 pandemic, the inspection was conducted remotely.⁴

(U) EXECUTIVE DIRECTION

(U) OIG assessed Embassy Praia's leadership on the basis of interviews, staff questionnaires, a review of documents, and video observations of embassy meetings.

(U) Tone at the Top and Standards of Conduct

(U) The Ambassador, a career member of the Senior Foreign Service, arrived in Praia in July 2019 after serving as Acting Executive Director of the U.S. Advisory Committee on Public Diplomacy. From 2016 to 2018, he served as Chief of Staff for the Under Secretary of State for Public Diplomacy and Public Affairs. His previous assignments included public diplomacy positions in the Department and overseas and as the Deputy Chief of Mission (DCM)/Chargé d'Affaires, a.i. at Embassy Phnom Penh. The DCM arrived in June 2019 after serving at the Foreign Service Institute as a coordinator in the Political Training Division. Her previous assignments included positions in the Bureau of Human Resources (now the Bureau of Global Talent Management), in the Bureau of African Affairs, and in political, economic, and consular positions in South America and Africa.

(U) The Ambassador and the DCM fully modeled leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214. In interviews and questionnaires, embassy staff consistently described them as inclusive, approachable, and supportive of their programs and operations. OIG observed that the Ambassador and the DCM included all U.S. direct-hire employees in the embassy's Country Team and Emergency Action Committee meetings and that attendees freely offered input and feedback. Both U.S. and LE staff members provided examples of the Front Office's care for their well-being and appreciation for their work. For instance, the DCM played a key role in the decision to close the embassy to the public because of the COVID-19 pandemic and to move to maximum telework status in March 2020, before the

⁴ (U) See Appendix A.

local government declared a state of emergency. Both the Ambassador and the DCM insisted that employees who continued to work in the embassy wear masks to minimize exposing others to the virus.⁵ In another instance, staff told OIG that when the pandemic precluded holding an embassy-wide awards ceremony in December 2020, the Ambassador hosted each award winner and a family member in individual socially distanced events, with photos and home baked goods to take with them, in the specially decorated entry of his residence. Prior to the COVID-19 pandemic, the Ambassador took particular care to reach out to LE staff by, for example, creating a guard of the month program and inviting embassy cleaners and their families to his residence to show appreciation for their work.

(U) Embassy employees told OIG that the Ambassador “led from the front” and noted that when half of the American staff left Praia on Global Authorized Departure⁶ at the start of the COVID-19 pandemic, he assisted with the repatriation of U.S. citizens and permanent residents at the airport and served as duty officer. Additionally, he filled in when embassy sections were overwhelmed or short-staffed, for example, drafting emergency messages to U.S. citizens, preparing diplomatic notes, and delivering demarches. Staff reported that the DCM had a strong and detailed grasp of embassy programs and operations and praised her problem-solving abilities, her encouragement and empowerment of others, and her positive outlook.

(U) As a result of the embassy’s maximum telework posture and COVID-19 pandemic restrictions, some employees worked longer hours than normal or unusual schedules. Staff told OIG that the DCM encouraged them to take breaks and time off and that both she and the Ambassador limited emails after hours to emphasize that they did not expect immediate responses. Despite these efforts, OIG heard that information management personnel felt compelled to check emails and respond to requests for assistance after-hours to uphold good customer service standards. During the inspection, the Front Office agreed that it would be helpful to set clear expectations for response time when employees request help after-hours.

(U) Execution of Foreign Policy Goals and Objectives

(U) Embassy Praia developed its ICS in 2019, before the arrival of the Ambassador. OIG determined that the embassy met requirements to monitor and review the ICS as required in 18 FAM 301.2-4(D)c. The Front Office established several working groups tied to ICS-specific objectives. OIG reviewed agendas and meeting notes from two of the groups to confirm that they existed and that they enabled the embassy to regularly review progress towards ICS goals.

⁵ (U) The embassy told OIG the majority of LE staff, including guards, cleaning personnel, drivers, and information technology employees, were required to work at embassy facilities because of the nature of their jobs. The embassy estimated a 20 percent infection rate among its staff members as of January 2021.

⁶ (U) Global Authorized Departure was the Department’s program allowing the evacuation of U.S. direct-hire employees and their families who, after confidential consultation with the Bureau of Medical Services, determined they were at higher risk of a poor outcome if exposed to COVID-19, or who requested departure based on a commensurate justification in foreign areas. See cable 20 STATE 28418, “Global Authorized Departure for Individuals at Higher Risk from COVID-19,” paragraph 1, March 15, 2020. The Department approved the program on March 20, 2020, and terminated it on September 9, 2020.

In addition, the embassy reviewed the ICS during a February 2020 offsite and used it to formulate the FY 2022 Mission Resource Request.

(U) OIG found that the Ambassador fulfilled his responsibilities to oversee the embassy's strategic activities as defined in 2 FAM 113.1c. Officials in the Department praised the work the embassy did in making the business case for advancing commercial ties with Cabo Verde. Using an analytical framework focusing on economic and commercial development, the ICS working group identified eight opportunities for investment and worked with the first U.S. company identified for U.S. Government advocacy. Although the COVID-19 pandemic delayed the embassy's ability to pursue some activities, the Ambassador successfully lobbied for funding to support Cabo Verdean businesses. In addition, the embassy partnered with the U.S. Agency for International Development to stage a webinar, attended by nearly 100 participants, to promote Cabo Verdean exports to the United States.

(U) Washington interlocutors commented favorably on the Ambassador's knowledge of Cabo Verde and his engagement with local officials, citing in particular his handling of bilateral justice and security sector cooperation. They also noted his role in facilitating the Bureau of Medical Services' operations to transport people and supplies to and from U.S. embassies in Africa as part of the Department's initial response to the COVID-19 pandemic. OIG reviewed the Ambassador's calendar and determined he had an appropriate range of contacts in the government, business, media, civil society, and diplomatic communities. For example, in November 2020, he and the Prime Minister of Cabo Verde jointly spoke at the launch of a project to improve the justice system's capacity to handle child sexual abuse cases. This project was funded by the U.S. Government's largest-ever grant in the area of human rights to Cabo Verde. Additionally, during the inspection, the Ambassador engaged in a variety of outreach activities: he called on the newly appointed Foreign Minister, hosted dinners for opposition leaders, media representatives, and businessmen, and met with two ambassadors.

(U) Adherence to Internal Controls

(U) The Ambassador and the DCM prepared the FY 2019 and FY 2020 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7, which requires chiefs of mission to develop and maintain appropriate systems of management control of their organizations. Embassy staff confirmed to OIG that the Ambassador and the DCM met with individual section chiefs to review the Bureau of the Comptroller and Global Financial Services' internal control checklists to develop the FY 2019 Statement of Assurance. The Front Office noted that these reviews constituted an important means to help them understand embassy operations early in their tenure and significantly informed their completion of the FY 2020 Statement of Assurance. OIG determined that by using the Bureau of the Comptroller and Global Financial Services' internal control checklists, the Front Office took appropriate care in ensuring that its Statements of Assurance accurately captured the vulnerabilities identified by the embassy. Additionally, the Front Office said it would assess operations on an ongoing basis,

identify internal control deficiencies, and take corrective action as directed in cable 20 STATE 123846.⁷ Internal control issues are discussed later in this report.

(U) Security and Emergency Planning

(U) Although OIG did not conduct a comprehensive review of Embassy Praia's security program because it conducted the inspection remotely, it determined that the Front Office was attentive to the safety and security of embassy personnel and the non-official U.S. community, in accordance with Department guidelines in 2 FAM 113.1c(5) and (7) and the President's letter of instruction to bilateral chiefs of mission. After her arrival in 2019, the DCM led the embassy's efforts to review its emergency action plan, which was several years out of date. OIG also observed that Emergency Action Committee meetings were inclusive and efficiently run. The embassy's crisis preparedness posture, including consular crisis preparedness, allowed it to respond effectively during the initial stages of the COVID-19 pandemic. In particular, the embassy repatriated approximately 600 U.S. citizens and permanent residents, and third country nationals in Cabo Verde, after half of its U.S. direct-hire staff, including both consular officers, departed on Global Authorized Departure in March 2020. Additionally, the embassy provided logistical support to the Bureau of Medical Services' operations to deliver 126 mission critical pouches to embassies in Africa and other countries and to repatriate 44 U.S. citizens. Embassy staff also commented favorably on the Front Office's emphasis on measures to keep them healthy, such as the early move to remote work status in March 2020.

(U) Finally, OIG confirmed the embassy carried out an annual review of the security memorandum of agreement between the Chief of Mission and the Department of Defense geographic combatant commander in 2020, in accordance with 2 FAH-2 H-116.4b.

(U) Equal Employment Opportunity

(U) OIG determined that the embassy's Equal Employment Opportunity (EEO) program met Department requirements in 3 FAM 1514. The embassy nominated an EEO counselor and appointed two LE staff EEO liaisons. At the time of the inspection, the nomination of the EEO counselor was pending with the Office of Civil Rights (S/OCR) until the establishment of a remote training course for new EEO counselors. In February 2020, the embassy issued a notice to inform employees that they had the right to contact S/OCR to request counseling in the interim. S/OCR conducted on-site EEO training at the embassy in September 2019, which the Ambassador required all U.S. and LE staff to attend. Embassy staff told OIG that the Front Office demonstrated its commitment to equal treatment and inclusion by its efforts to create a safe space for employees to express their views in the aftermath of the murder of George Floyd and to address the history of racial tensions in the United States.

⁷ (U) Cable 20 STATE 123846, "Your Role in Assuring Strong Management Controls and Oversight Over Post Operations," paragraph 5, December 23, 2020.

(U) Developing and Mentoring Foreign Service Professionals

(U) OIG found that the DCM oversaw the embassy's sole First- and Second-Tour employee's professional development in accordance with 3 FAM 2242.4. The DCM and the employee formulated a list of career-enhancing activities to complete, such as making an in-person demarche and speaking at a public outreach event. In addition, the DCM provided the employee with other development opportunities, such as serving as acting chief of another section of the embassy. While the embassy had no formal mid-level employee development program, the Ambassador and the DCM engaged in a variety of formal and informal mentoring activities with all personnel, including training sessions on cable writing, emails on Department organization and practices, and one-on-one encounters.

(U) POLICY AND PROGRAM IMPLEMENTATION

(U) OIG assessed Embassy Praia's policy and program implementation through a review of the advocacy and analysis work of the Political-Economic Section, the public diplomacy efforts of the Public Diplomacy Section, and the provision of American citizen and visa services by the Consular Section. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions discussed below.

(U) Political-Economic Section

(U) OIG reviewed the Political-Economic Section's leadership and management, policy implementation, unclassified reporting and advocacy, Leahy vetting,⁸ grants, commercial promotion, and end-use monitoring functions.

(U) OIG concluded that the embassy's reporting and advocacy work supported ICS goals and other U.S. national interests. Department offices praised the embassy's efforts to broaden the commercial relationship with Cabo Verde and report on topics relevant to policy needs. OIG reviewed 57 unclassified embassy cables from June 2020 to January 2021 and found the reporting to be tied to embassy strategic objectives. OIG also found that the embassy's Leahy vetting standard operating procedures were current, and that the embassy implemented the program in accordance with Department standards.⁹ The embassy vetted 27 individuals in 2020.

(U) OIG found some errors in the section's grant documentation, including two grants that each had a missing closeout document required by the Federal Assistance Directive (FAD).¹⁰ The

⁸ (U) The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department from furnishing assistance to foreign security forces if the Department receives credible information that such forces have committed gross violations of human rights. See 22 U.S.C. § 2378d.

⁹ (U) Bureau of Democracy, Human Rights, and Labor, 2017 Leahy Vetting Guide.

¹⁰ (U) The Department's Federal Assistance Directive (FAD) establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department when administering

section corrected the errors during the inspection. OIG also noted that COVID-19 restrictions created impediments for grants implementation and monitoring. For example, implementers requested no-cost extensions due to postponement of events caused by the pandemic. Furthermore, embassy personnel used indirect techniques, such as obtaining photographs of work done, to monitor progress. Additionally, the embassy agreed to create a more complete record of grantee contacts to better document monitoring.

(U) Public Diplomacy

(U) OIG reviewed the Public Diplomacy Section's strategic planning, reporting, section leadership, resource management, Federal assistance awards, American Shelves,¹¹ educational and cultural exchanges, and media engagement. OIG found the section used an adequate range of public diplomacy tools and programs, including Federal assistance grants and social media, to advance ICS goals. Moreover, the embassy addressed issues OIG had identified in its preliminary inspection work in early 2020.¹² Specifically, it submitted the embassy's Public Diplomacy Country Context and the Public Diplomacy Implementation Plan to the Office of Public Diplomacy and Public Affairs in the Bureau of African Affairs, and it also began monitoring grants to two American Shelves in Cabo Verde. OIG determined that the Public Diplomacy Section operations generally met Department standards and guidance, with the exceptions noted below.

(U) Public Diplomacy Grant Files Did Not Meet Department Standards for Documentation

(U) OIG found that although the Public Diplomacy Section's grants had intrinsic objectives that supported the embassy's ICS goals, the grant files did not consistently meet FAD standards for documentation. For example, many grant files lacked evidence of a merit review,¹³ monitoring and evaluation, or documents required for closeout.¹⁴ Specifically, OIG reviewed 20 grants, issued from June 25, 2018, to September 30, 2020, totaling \$266,616, and found that 17 lacked documentation of a merit review; 13 lacked evidence of monitoring; and 7 of the 11 grants that needed to be closed out were still open.¹⁵ These issues resulted from a lack of oversight due to

Federal financial assistance. FAD, October 2019, Chapter 3E (Federal Award Requirements: Notice of Award Components) and Chapter 5C (Closeout: Grant Officer Responsibilities) address the errors found.

¹¹ (U) American Shelves, usually placed in well-known locations in the host country, contain American books and reference materials to help educate interested audiences about the United States by promoting the understanding of American history, culture, and values.

¹² (U) See Appendix A, Methodology, for information about the previously scheduled inspection of Embassy Praia in 2020.

¹³ (U) A merit review is an objective process of evaluating Federal award applications in accordance with written standards set forth by the Federal awarding agency. See 2 C.F.R. § 200.205.

¹⁴ (U) FAD, October 2019, Chapters 2.H (Pre-Federal Award Requirements: Conduct a Merit Review of Proposals and Recipient Selection), Chapter 4.D (Post Federal Award Requirements: Monitoring and Reporting), and Chapter 5 B-C (Closeout: Recipient Responsibilities and Grant Officer Responsibilities).

¹⁵ (U) OIG reviewed a selection of 20 grants out of a total universe of 50 with activity from June 25, 2018, to September 30, 2020. These grants were subject to the FAD (issued May 2017, revised October 2019) and the Federal Assistance Policy Directive.

competing priorities that limited the Grants Officer's ability to properly manage the files. Despite the grant files being incomplete, the section, along with the responsible Bureau of Administration grants policy analyst and the Bureau of African Affairs Grants Officer, provided sufficient information for OIG to determine that grant funds were used as intended. However, failure to fully document grants and their activities impairs the ability of grants officers to identify and mitigate risk, monitor program implementation, evaluate program results, and ensure accountability for public diplomacy resources.

Recommendation 1: (U) Embassy Praia should document grants in accordance with Department standards. (Action: Embassy Praia)

(U) Public Diplomacy Grants Awarded Contrary to Department Standards

(U) OIG found that the Public Diplomacy Section did not award grants in accordance with FAD requirements.¹⁶ Specifically, OIG found that of the 20 grants it reviewed, the section awarded 3 to commercial entities and issued another 3 grants for non-intrinsically public diplomacy purposes, neither of which was permitted by the FAD. This happened because the Grants Officer did not have a full understanding of the FAD requirements. When the section became aware of the problems during OIG's preliminary work for the delayed 2020 inspection, it brought the non-intrinsically public diplomacy grants into compliance with Department standards by closing them out or transferring them to grants officers outside of the Public Diplomacy Section. Additionally, at the time of this inspection, the embassy was working to close out the three grants to the commercial entities. As a result of the embassy's actions, OIG did not make a recommendation to address this issue.

(U) Consular Affairs

(U) OIG reviewed Embassy Praia's consular operations, including U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. The Consular Section consisted of a mid-level consular chief, a first-tour vice consul, and five LE staff members. Due to the COVID-19 pandemic, the embassy suspended consular services on March 19, 2020, and shifted to maximum telework. While both consular officers left Praia on Global Authorized Departure soon after, they worked remotely with embassy staff to repatriate approximately 600 American citizens, U.S. permanent residents, and third country nationals on a series of chartered flights that spring. In July 2020, a backup consular officer re-opened the Consular Section to handle emergency U.S. citizen services and visa casework. The Consular Section resumed routine passport processing with the return of a second backup officer in September 2020. On December 1, 2020, with the return of the two consular officers, the section resumed all U.S. citizen services and some limited visa services.

¹⁶ (U) FAD, May 2017, revised October 2019, V4.3, Chapter 2.E.2. Federal Awards to For-profit Entities and Chapter 1.D.2.d. Signature and Management of Non-Public Diplomacy Awards at Post.

(U) Overall, OIG found that the embassy's consular operations generally complied with the guidance contained in 7 FAM, 9 FAM, 7 Foreign Affairs Handbook (FAH), applicable statutes, and other Department policies, with the exception of the panel physician program,¹⁷ as described below. In addition, the Consular Section made progress in correcting two deficiencies OIG identified during the inspection.

(U) Specifically:

- (U) The section completed formal designations for the backup consular officer's management control duties in accordance with 7 FAH-1 H-732.1b and 7 FAH-1 H-653.2.
- (U) The section agreed to update formal training plans for officers and LE staff as called for in 7 FAH-1 H-242c(3).

(U) Panel Physician Program Did Not Comply with Department Standards

(U) Embassy Praia did not meet FAM requirements in administering its panel physician program in the following areas:

- (U) Embassy Praia had agreements with panel physicians to conduct medical exams for a total of 1,700 immigrant visa applicants a year. Guidance in 9 FAM 302.2-3(E)(2)c calls for each panel physician to see a minimum of 2,000 patients a year.
- (U) The embassy had not renewed the written agreements with the panel physicians since May 2019, contrary to 9 FAM 302.2-3(E)(3)f(4)(a), which requires each agreement to be renewed annually.
- (U) The embassy did not complete annual evaluations of the four panel physician clinics, as required by 9 FAM 302.2-3(E)(3)f(2).

(U) While the embassy cited convenience to visa applicants as a reason to have four panel physicians, it was unable to meet Department requirements to physically inspect the four clinics due to budgetary and staffing issues, as well as COVID-19 pandemic-related travel restrictions. Embassy staff last inspected the two panel physician sites on São Vicente Island in August 2018 and the two Praia sites in December 2019. In addition, the embassy did not renew the annual agreements with the panel physicians in 2020 due to competing priorities during the pandemic. The number of panel physician clinics, outdated agreements, and the embassy's inability to routinely inspect the sites may increase the likelihood of fraud, mismanagement, or abuse in the immigrant visa process.

Recommendation 2: (U) Embassy Praia should bring its panel physician program into compliance with Department standards. (Action: Embassy Praia)

¹⁷ (U) As defined in 9 FAM 302.2-3(E)(3)f(1), panel physicians, under agreements with consular sections, conduct the medical examinations of U.S.-bound immigrants and refugees.

(U) RESOURCE MANAGEMENT

(U) OIG reviewed Embassy Praia's internal control systems and processes in financial management, general services, human resources, and facilities management operations. Overall, OIG found that the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exceptions and issues noted below.

(U) OIG found that certain management operations were affected by constraints imposed by the COVID-19 pandemic, which resulted in authorized departures and a maximum telework status. OIG noted that the Management Officer, during various periods in 2020, served as acting DCM, acting Consular Chief, and acting Information Management Officer due to other officers taking the Global Authorized Departure. Furthermore, the Accountable Property Officer did not conduct periodic, unannounced spot counts of nonexpendable property¹⁸ in the warehouse to verify the accuracy of property records, in accordance with 14 FAM 411.2-2c. In addition, the Alternate Cashier did not routinely assume principal cashier duties in 2020 in accordance with the Cashier User Guide, Chapter 3.6(5).

(U) The Embassy Did Not Receive Consistent Regional Support and Lacked Up-To-Date Memoranda of Understanding

(U) OIG determined that regional support for human resources and facility management was insufficient and not based on clearly defined responsibilities formalized in memoranda of understanding. Embassy Lisbon historically provided human resources support to Embassy Praia because of a common language and similar labor laws. The two embassies signed a memorandum of understanding in 2008 in which Embassy Lisbon staff agreed to visit Praia at least semiannually and up to four times a year. However, Embassy Praia staff told OIG that Embassy Lisbon's last visit was in 2018, and in recent years, they had provided support only through email and telephone conversations. Embassy Praia staff also told OIG that they would welcome more consistent and formal regional support for its human resource operations and had discussed revisiting the agreement with Embassy Lisbon. In addition to Embassy Lisbon's support, the Frankfurt Regional Center provided facility management support to the embassy, but OIG found the support provided by the center was inconsistent and did not include regular periodic visits. Additionally, the embassy did not have a memorandum of understanding with the Frankfurt Regional Center.

(U) OIG determined that Embassy Praia would benefit from more consistent and reliable regional support, particularly as the two officers in the Management Section had multiple responsibilities but lacked training in human resources and facility management. The

¹⁸ (U) Guidance in 14 FAM 411.4 defines nonexpendable property as "property such as furniture, office machines, information technology (IT) equipment, and communications equipment, which is (1) complete in itself; (2) does not lose its identity or become a component part of another item when used; and (3) is of a durable nature with anticipated useful life of over 2 years."

Management Officer served as the Human Resources Officer and the Financial Management Officer. As a first-time Human Resources Officer, he received only one week of human resources training before arriving at the embassy. The General Services Officer, who also acted as the Facility Manager, did not receive any facility management training before arriving in Praia. In addition, both officers served as back-up support to other sections of the embassy: the Management Officer was a back-up consular officer, while the General Services Officer also served as back-up security officer, a back-up consular officer, the communications security custodian, and one of the information systems security officers (ISSO).

(U) As a result of the inconsistent facility management support, OIG found several facility management issues during the inspection, as discussed later in this report. Without dependable and consistent human resources and facility management regional support formalized in memoranda of understanding, Embassy Praia cannot benefit from guidance on human resources processes, consult on complex facility management issues, and carry out the necessary oversight and maintenance of the embassy's aging facilities and building systems.

Recommendation 3: (U) Embassy Praia, in coordination with the Bureau of African Affairs and the Bureau of Overseas Buildings Operations, should formalize its regional support for human resources and facility management in memoranda of understanding that define clear responsibilities and expectations. (Action: Embassy Praia, in coordination with AF and OBO)

(U) Financial Management

(U) Embassy Did Not De-Obligate Unliquidated Obligations in a Timely Manner

(U) OIG found that, as of January 2021, Embassy Praia had approximately \$118,000 in unliquidated obligations with no activity in more than 1 year. According to 4 FAM 225d, such unliquidated obligations must be targeted and de-obligated if they cannot be documented as valid obligations. The embassy told OIG that the \$118,000 in unliquidated obligations were not de-obligated because the Financial Management Section was waiting on guidance from the other embassy sections to validate or de-obligate the funds. Failure to review and de-obligate unliquidated obligations in a timely manner results in an accumulation of funds that could be put to better use.¹⁹

Recommendation 4: (U) Embassy Praia should review all unliquidated obligations with no activity in over one year, de-obligate those which are no longer valid in accordance with Department standards, and put up to \$118,000 to better use. (Action: Embassy Praia)

¹⁹ (U) In accordance with 1 FAM Exhibit 050(3)d(4), funds put to better use are funds that could be used more efficiently if management took certain actions, to include the de-obligation of funds from programs or operations.

(U) Unannounced Cashier Verifications Remained Predictable

(U) OIG found that unannounced cashier verifications, which ensure proper care and control of funds and records, were predictable and often occurred during the last few days of the month. The Bureau of the Comptroller and Global Financial Services, in a review of the embassy's cashing operations in March 2016, recommended that the dates be varied. According to the Department's Cashier User Guide, Chapter 3.6(6), unannounced cashier verifications should be unpredictable in the days and times in which they are performed and differ from month to month. Embassy staff told OIG that cashier verifications continued to occur at the end of the month because of competing priorities. Unpredictable cash verifications compel cashiers to maintain good records, while predictable verification dates diminish their effectiveness.

Recommendation 5: (U) Embassy Praia should conduct monthly unannounced cashier verifications at unpredictable times in accordance with Department standards. (Action: Embassy Praia)

(U) General Services

(U) Embassy Did Not Enter Motor Vehicle Operational Costs into the Fleet Management Information System

(U) The embassy did not enter all the required motor vehicle operational costs into the Department's Fleet Management Information System.²⁰ In accordance with 14 FAM 431.6-2b (7) and 14 FAM 431.6-4a(1-2), the embassy must use the Fleet Management Information System to track daily trip reports and record maintenance and fuel costs, while monitoring the accuracy and timeliness of the data. OIG found missing data on daily trips, fuel costs, and preventive maintenance. Motor vehicle data must be entered and routinely reviewed for effective fleet management and management controls, according to 14 FAM 437.1a. Although embassy staff told OIG that they had made efforts to address the backlog of missing data, at the time of the inspection they had yet to complete the data entry because of competing priorities. Incomplete motor vehicle data prevents effective fleet management and oversight and increases the risk for potential fraud and mismanagement of government resources.

Recommendation 6: (U) Embassy Praia should enter motor vehicle operational costs into the Fleet Management Information System and verify the data integrity in accordance with Department standards. (Action: Embassy Praia)

²⁰ (U) According to the 14 FAM 431.4, the Fleet Management Information System, a module within the Integrated Logistics Management System, is the Department's enterprise system for managing all fleet operations. It is designed to capture key operational data on vehicle dispatch, maintenance, and fuel.

(U) Facility Management

(U) Chancery Generator Fuel Tank Lacked Secondary Containment

(U) The chancery generator fuel tank did not have a double walled tank or any other secondary containment. The fuel tank is located on the roof directly above the Consular Section and, without secondary containment, any fuel spill or leakage from the tank could result in a workplace hazard and a safety, health, and environmental concern. The Bureau of Overseas Buildings Operations' (OBO) maintenance alert on diesel fuel



(U) Figure 2: Uncontained fuel tank. (Source: Embassy Praia)

system spills²¹ states that overseas facilities need to take steps to reduce or eliminate potential fuel spills and requires a double walled tank or other secondary containment. The scope of the Department's Safety, Health, and Environmental Management Program, outlined in 15 FAM 912, seeks to protect and conserve Department resources abroad through the avoidance, elimination, proper management, and control of hazardous conditions that can result in physical harm, illness, death, property loss, or environmental damage. OIG found the embassy did not take steps to control this workplace hazard because it lacked the expertise to write the necessary scope of work and required assistance from OBO. Diesel fuel spills within embassy facilities pose a significant hazard to workplace health and could result in fires, explosions, or a hazardous materials contamination that may threaten people, property, and equipment.

Recommendation 7: (U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operations, should install secondary containment for the chancery generator fuel tank, in accordance with Department standards. (Action: Embassy Praia, in coordination with OBO)

(U) Fire Protection Program Did Not Fully Comply With Department Standards

(U) OIG identified two elements of the embassy's fire protection program that did not comply with Department standards:

- (U) The embassy did not perform annual fire alarm inspections and testing at the chancery and annex. Guidance in 15 FAM 841a states that posts must monitor installed fire protection systems to ensure that they are operational, while 15 FAM 841e requires

²¹ (U) Bureau of Overseas Buildings Operations, Maintenance Alert #A15-004 - Diesel Fuel System Spills, September 4, 2015.

posts with fire protection systems to enroll in the Building Maintenance Expenses Program to ensure annual inspection and testing is conducted by certified subject matter experts.

- (U) The embassy did not service its fire extinguishers annually as required by 15 FAM 843c and the OBO Fire Protection Guide.²²

(U) The embassy did not perform these annual tests and inspections due to competing priorities. In addition, it did not annually service its fire extinguishers because it lacked a suitable location to perform the required work, which involves disassembling and removing the powder from the unit. Fire alarm testing and inspection and fire extinguisher maintenance are especially important as neither the chancery nor the annex have a fire suppression system. Malfunctioning and poorly serviced fire protection systems and equipment limit the ability of the embassy to protect against fires and increases the risk of injury and property damage.

Recommendation 8: (U) Embassy Praia should bring its fire protection program into compliance with Department standards. (Action: Embassy Praia)

(U) Annex Secondary Egress Not Fully Operational and Did Not Meet Department Standards

(U) The secondary egress staircase at the embassy annex was not fully operational and did not meet Department standards. To comply with a 2018 OBO fire inspection report recommendation,²³ the embassy constructed a secondary egress, completed in July 2020, at the annex. However, the egress did not fully address the recommendation and did not meet National Fire Protection Association standards contained in life safety code 101.²⁴

(U) OIG found that there was no exit on the second floor of the building to the egress staircase and the third-floor exit did not have the required fire resistant rated self-closing door. In addition, OIG found that the third-floor exit to the egress staircase was locked, which violated Department requirements. According to 15 FAM 846.2a, the security locks on doors in the path of egress must allow for unimpeded access to the exit without significant delay and that locking stairways is in violation of 29 Code of Federal Regulations 1910.36(d). The embassy informed OIG that it would rectify this issue.

²² (U) OBO Fire Protection Guide, updated June 2020, provides information related to fire and life safety and fire prevention. The information can also assist in interpreting fire and life safety recommendations made following OBO fire prevention inspections and provide the rationale on which recommendations are based.

²³ (U) OBO Fire Inspection of Embassy Praia, February 8, 2018, recommended action 13: Construct a secondary exit from the third floor to ground level. Enclose the stairway separately from the rest of the building with barriers not less than a 1-hour fire resistance rating, with self-closing doors having not less than a 1-hour fire protection rating.

²⁴ (U) The National Fire Protection Association develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks. These codes and standards are used throughout the world. The association's National Fire Code 101 39.2.4, Number of Means of Egress and 101 7.1.3.2.1, Exits, states that not less than two separate exits shall be provided on every story and shall be accessible from every part of every story. The code also states that separation shall have a minimum 1-hour fire resistance rating where the exit connects three or fewer stories.

(U) Embassy staff told OIG that they were waiting for OBO guidance to install a door for egress on the second floor and to replace the third-floor egress door. Without a fully operational secondary egress, embassy staff cannot evacuate the building rapidly in the event of a fire, which increases the risk of potential injury and death.

Recommendation 9: (U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operation, should complete the secondary egress project at the embassy annex in accordance with Department standards. (Action: Embassy Praia, in coordination with OBO)

(U) Controls Lacking for Facility Management Expendable Supplies

(U) The embassy lacked adequate internal controls over its facility management expendable supplies (building materials and spare parts). OIG observed, during a video walkthrough of the warehouse, that the embassy did not control access to the facility management expendable supply area within the warehouse and that all warehouse staff had unrestricted access to the area. In addition, embassy staff told OIG the embassy did not assign a dedicated person to control these supplies. In accordance with 14 FAM 424, internal procedures must ensure that a limited number of employees are authorized to request, receive, and control supplies. In addition, the embassy lacked safeguards and controls to ensure supplies were issued only for official use, as required by 14 FAM 414.4(2), and adequate internal requisitioning processes, as required by 14 FAM 414.5. Embassy staff told OIG that the warehouse staff provided supplies to facilities staff as and when needed but did not document what was taken, contrary to 14 FAM 414.1. Embassy staff told OIG that they had planned to work on improving controls in this area, but the COVID-19 pandemic led them to focus on other priorities. Failure to properly account for and safeguard expendable supplies leaves the embassy vulnerable to waste and theft.

Recommendation 10: (U) Embassy Praia should establish internal controls for the administration and disbursement of facility management expendable supplies in accordance with Department standards. (Action: Embassy Praia)

(U) Embassy Did Not Review Its Use of the Government-Owned Recreational Facility

(U) Embassy Praia did not review its use of the Government-owned recreational facility. According to 15 FAM 512.1a, embassies must review U.S. Government-owned, and capital leased properties annually to identify those excess to requirements, not fully utilized, or uneconomical to retain based on 18 factors outlined in 15 FAM Exhibit 512.1.²⁵ The facility, acquired in 1981, includes a swimming pool, tennis court, gym, clubhouse, and gardens on approximately 1.2 acres of land. In addition, the embassy used approximately 160 square feet of the lot for mail screening. The embassy did not charge staff for use of the facility, which was closed at the start of the COVID-19 pandemic. The embassy re-opened it for limited

²⁵ (U) The 18 factors include whether the property is uneconomical to retain, whether it is being put to optimum use, and whether operating and maintenance costs are excessive. See 15 FAM Exhibit 512.1.

recreational use in February 2021. Although the embassy did not formally track use of the facility, embassy staff told OIG that it was primarily used by LE staff rather than by U.S. direct-hire staff.

(U) OIG found that the recreation facility was in poor condition, needed upgrades, and incurred significant monthly operating costs.²⁶ OBO rated the facility poor in its 2019 Facility Condition Index,²⁷ an assessment OIG confirmed during a video walkthrough. According to both the Facility Manager and OBO area management, the facility needed several upgrades, including repairs and upgrades to the tennis court,²⁸ swimming pool, fuel storage area, canopies, and the cobblestone driveway.

(U) OIG determined that a cost-benefit analysis would help the embassy assess whether to continue to operate and maintain the recreational facility, or whether the property could be repurposed or sold, and the funds put to better use. This would be particularly timely as the embassy was in the process of finalizing a land purchase for a new embassy compound.²⁹ At the time of the inspection, the embassy had begun considering whether to retain the facility, sell the site, or develop it for alternative uses, such as embassy housing, but it had yet to conduct a cost-benefit analysis. Embassy management staff told OIG they did not conduct an annual review of the use of the recreational facility due to competing priorities. Without an annual review, including a cost-benefit analysis of the facility, the embassy does not have the information needed to decide on the optimal use of the land, while ensuring the effective use of U.S. Government funds.

Recommendation 11: (U) Embassy Praia should conduct an annual review of the embassy recreational facility, including a cost-benefit analysis, to determine the most effective use of the site. (Action: Embassy Praia)

(U) INFORMATION MANAGEMENT

(U) OIG reviewed Embassy Praia's information management operations, including unclassified and dedicated internet network computer operations; emergency communications preparedness; radio and telephone programs; mail and pouch services; and records management.

²⁶ (U) Average monthly operating costs for water to maintain the site's gardens was approximately \$1,200 per month, and electricity was approximately \$1,200 per month. Monthly charges for water, in a country where water is considered scarce, were comparatively high to water charges at other embassy facilities. In addition, the embassy had to pay local guard force salaries and overtime to provide security at the facility.

²⁷ (U) The Facility Condition Index, calculated by OBO using data provided by overseas missions, is a critical industry-standard mechanism for measuring overall facility condition and performance.

²⁸ (U) The embassy had received \$80,000 from OBO to repair the tennis court. At the time of the inspection, these funds had yet to be expended.

²⁹ (U) OBO scheduled a new embassy compound project in Praia for 2024 (back-up project for 2023), with possible completion by 2027.

(U) The office, led by the Information Management Officer, consisted of three LE staff systems administrators and one telephone operator/mailroom clerk. The move to maximum telework status in March 2020 changed many aspects of the office's operations. For example, its geographic support footprint expanded as the staff set up teleworking equipment for U.S. and LE staff and then provided ongoing assistance, including home visits and after-hours support.

(U) OIG determined that the staff implemented most required information management and security controls in accordance with Department policies and applicable laws, with the exceptions noted below. Additionally, the staff agreed to address issues OIG observed during the video walk-throughs, such as the public telecommunication line entry point, which was in the server room instead of a separate location; excess equipment and file cabinets stored in the unclassified server room; lack of access and maintenance logs for the telephone operation; and spare equipment stored outside the designated secured IT storage space at the warehouse. Furthermore, the staff agreed to correct issues involving the local IT configuration control board, incident response, and Active Directory³⁰ distribution and security groups management.

(U) Information Systems Security Officers Did Not Perform All Duties

(U) The embassy's unclassified ISSOs did not perform all information systems security duties as required in 12 FAH-10 H-112.9-2. For example, they did not review Active Directory security groups and electronic file folders or monitor the dedicated internet network as required. Additionally, OIG found the Department added administrator groups to the embassy administrator security groups to provide remote support but did not remove them after completing the support tasks. As a result, non-embassy members had full access to embassy folders (e.g., Front Office and Human Resources Office), that contained sensitive information, they did not need to perform their duties. In December 2020, OIG issued a management assistance report to address continued deficiencies in performance of ISSO responsibilities at overseas posts, especially the need for increased attention by embassy management over ISSO performance.³¹

(U) The primary ISSO, who was also the Information Management Officer, arrived in Praia in November 2020 and did not dedicate time for ISSO duties due to increased customer support demands because of the shift to maximum telework, as discussed above. Neglecting these duties could put security of the Department's computer systems and information at risk of compromise.

³⁰ (U) Active Directory, a Microsoft technology, is used to manage users and computers and assign permissions to access resources.

³¹ (U) OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

Recommendation 12: (U) Embassy Praia should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Praia)

(U) Information Systems Security Officers Did Not Know Outcome of the Bureau of Information Resource Management’s Monitoring of Embassy Information Stored in the Cloud

(U) OIG found that Embassy Praia’s ISSOs were not being informed of the outcome of monitoring being done by Bureau of Information Resource Management (IRM) ISSOs on the embassy’s information stored in the cloud. Although embassy ISSOs are responsible for embassy information security as stated in 12 FAM 613.4, embassy information stored in the Department cloud systems, such as Microsoft 365, falls under the purview of IRM ISSOs assigned to the cloud systems.³² At the time of the inspection, Embassy Praia’s staff personal folders and shared records, including emails, were stored in Microsoft 365. It is important for the embassy ISSOs to know the outcome of IRM’s monitoring in case they need to take corrective action or educate embassy users on acceptable use of automated information systems.

(U) OIG determined that although IRM established processes for its ISSOs to perform the required monitoring of the records in the Department-centralized cloud system,³³ to include those of Embassy Praia, it had not established a process to communicate the results to the embassy’s ISSOs. Failure to communicate the results of the monitoring to Embassy Praia’s ISSOs could limit their ability to ensure that users are adequately protecting embassy information.

Recommendation 13: (U) The Bureau of Information Resource Management should communicate outcomes from monitoring information stored in the cloud to Embassy Praia’s Information Systems Security Officers. (Action: IRM)

(SBU) [REDACTED]

(SBU) [REDACTED]

³² (U) IRM, ISSO Reference Guide, version 1.1, 7 (no version date); 12 FAH-10 H-112.9-2; and 12 FAM 645.5.

³³ (U) According to 5 FAM 1113, cloud computing is a model for enabling convenient, on-demand network access to a shared pool of configurable computing resources (e.g., networks, servers, storage, applications, and services) that can be rapidly provisioned and released with minimal management effort or service provider interaction.

³⁴ (U) OpenNet is the Department’s Sensitive But Unclassified network. See 5 FAM 871.2a.

Recommendation 16: (U) Embassy Praia should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Praia)

(U) Embassy Did Not Conduct Annual Information Technology Contingency Plan Testing and Training

(U) Embassy Praia did not test its IT contingency plan annually for effectiveness and to determine readiness to execute the plan during unplanned system outages or disruptions, as required in 12 FAH-10 H-232.3-1b(1-3). Furthermore, the embassy did not conduct initial and annual refresher IT contingency training for employees with those responsibilities. According to 12 FAH-10 H-232.2-1, management must ensure that such training is delivered to employees based on their roles and responsibilities, as defined in the IT contingency plan. Information management staff assumed responding to system outages could be considered as testing the plan and therefore did not plan time to test it. In addition, the staff was unaware of the training requirement. Failure to meet these requirements impedes the embassy's ability to effectively respond to unplanned systems outages or disruptions.

Recommendation 17: (U) Embassy Praia should implement a plan to test its information technology contingency plan annually and to conduct initial and annual refresher training for employees with information technology contingency planning responsibilities, in accordance with Department standards. (Action: Embassy Praia)

(U) Records Management Program Did Not Comply With Department Standards

(U) Embassy Praia did not have a records management program and thus did not meet Department standards outlined in 5 FAM 414.5. As a result, the embassy did not archive principal officers' and program files going back to 2016. OIG also found embassy staff did not properly archive diplomatic notes as required in cable 18 STATE 50952.³⁶ Moreover, despite moving embassy shared files to a Department centralized, cloud-based SharePoint platform in September 2020, embassy sections continued to create and save documents on the local file server in addition to the cloud. This created the potential for inconsistent and duplicative records that could complicate the embassy's records management. The lack of a compliant records management program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

Recommendation 18: (U) Embassy Praia should implement a records management program that complies with Department standards. (Action: Embassy Praia)

(U) Spotlight on Success: Daily Systems Monitoring Report Increased Awareness

(U) Embassy Praia's information management staff produced a daily system monitoring report and included the Management Officer, Regional Security Officer, and DCM in its distribution. This comprehensive report provided details on a broad range of data, such as

³⁶ (U) Cable 18 STATE 50952 "Updated Archival Procedures for Diplomatic Notes," paragraph 3, May 23, 2018.

the embassy's iPost³⁷ cyber risk score, users' mandatory training, incoming pouches, a list of outstanding customer support requests by date, cybersecurity incidents, voice over internet protocol telephone operational status, environmental conditions in the server room and telephone switch room, and internet latency issues on embassy circuits and at U.S. direct-hire residences. Sending this information to embassy management increased awareness of section operations and allowed embassy management to take a proactive approach to IT support.

³⁵ (U) iPost is a continuous diagnostics and mitigation application custom designed for the Department of State.

(U) RECOMMENDATIONS

(U) 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 Praia and the Bureau of Information Resource Management. The Department's complete response can be found in Appendix B.¹ The Department also provided technical comments that were incorporated into this report, as appropriate.

Recommendation 1: (U) Embassy Praia should document grants in accordance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021,² response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia documented grants in accordance with Department standards.

Recommendation 2: (U) Embassy Praia should bring its panel physician program into compliance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia brought its panel physician program into compliance with Department standards.

Recommendation 3: (U) Embassy Praia, in coordination with the Bureau of African Affairs and the Bureau of Overseas Buildings Operations, should formalize its regional support for human resources and facility management in memoranda of understanding that define clear responsibilities and expectations. (Action: Embassy Praia, in coordination with AF and OBO)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia formalized its

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

² (U) OIG received Embassy Praia's undated response on July 13, 2021.

regional support for human resources and facility management in memoranda of understanding that define clear responsibilities and expectations.

Recommendation 4: (U) Embassy Praia should review all unliquidated obligations with no activity in over one year, de-obligate those which are no longer valid in accordance with Department standards, and put up to \$118,000 to better use. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of December 2021.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia reviewed all unliquidated obligations with no activity in over one year, de-obligated those which are no longer valid in accordance with Department standards, and put up to \$118,000 to better use.

Recommendation 5: (U) Embassy Praia should conduct monthly unannounced cashier verifications at unpredictable times in accordance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia conducted monthly unannounced cashier verifications at unpredictable times in accordance with Department standards.

Recommendation 6: (U) Embassy Praia should enter motor vehicle operational costs into the Fleet Management Information System and verify the data integrity in accordance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of December 2021.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia entered motor vehicle operational costs into the Fleet Management Information System and verified the data integrity in accordance with Department standards.

Recommendation 7: (U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operations, should install secondary containment for the chancery generator fuel tank, in accordance with Department standards. (Action: Embassy Praia, in coordination with OBO)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia installed secondary containment for the chancery generator fuel tank, in accordance with Department standards.

Recommendation 8: (U) Embassy Praia should bring its fire protection program into compliance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of the end of 2021.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia brought its fire protection program into compliance with Department standards.

Recommendation 9: (U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operation, should complete the secondary egress project at the embassy annex in accordance with Department standards. (Action: Embassy Praia, in coordination with OBO)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of the end of the first quarter of 2022.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia completed the secondary egress project at the embassy annex in accordance with Department standards.

Recommendation 10: (U) Embassy Praia should establish internal controls for the administration and disbursement of facility management expendable supplies in accordance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia established internal controls for the administration and disbursement of facility management expendable supplies in accordance with Department standards.

Recommendation 11: (U) Embassy Praia should conduct an annual review of the embassy recreational facility, including a cost-benefit analysis, to determine the most effective use of the site. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia conducted an annual review of the embassy recreational facility, including a cost-benefit analysis, to determine the most effective use of the site.

Recommendation 12: (U) Embassy Praia should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia required the Information Systems Security Officers to perform their duties in accordance with Department guidance.

Recommendation 13: (U) The Bureau of Information Resource Management should communicate outcomes from monitoring information stored in the cloud to Embassy Praia's Information Systems Security Officers. (Action: IRM)

Management Response: (U) In its July 13, 2021, response,³ the Bureau of Information Resource Management concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Information Resource Management communicated outcomes from monitoring information stored in the cloud to Embassy Praia's Information Systems Security Officers.

Recommendation 14: ~~(SBU)~~ Embassy Praia, in coordination with the Bureau of Information Resource Management, [REDACTED] (Action: Embassy Praia, in coordination with IRM)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: ~~(SBU)~~ OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation [REDACTED].

³ (U) In an email to OIG dated July 14, 2021, the Bureau of Information Resource Management indicated it agreed with Embassy Praia's response to this recommendation.

Recommendation 15: (U) Embassy Praia should use the Inventory and Logistics Management System loanable property module to issue and track information technology assets. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of the end of 2021.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia used the Inventory and Logistics Management System loanable property module to issue and track information technology assets.

Recommendation 16: (U) Embassy Praia should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia complied with Department standards for managing its dedicated internet networks.

Recommendation 17: (U) Embassy Praia should implement a plan to test its information technology contingency plan annually and to conduct initial and annual refresher training for employees with information technology contingency planning responsibilities, in accordance with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of December 2021.

OIG Reply: (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Praia implemented a plan to test its information technology contingency plan annually and to conduct initial and annual refresher training for employees with information technology contingency planning responsibilities, in accordance with Department standards.

Recommendation 18: (U) Embassy Praia should implement a records management program that complies with Department standards. (Action: Embassy Praia)

Management Response: (U) In its July 13, 2021, response, Embassy Praia concurred with this recommendation. The embassy noted an estimated completion date of the end of the first quarter of 2022.

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

(U) PRINCIPAL OFFICIALS

(U) Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	John Jefferson Daigle	7/2019
Deputy Chief of Mission	Amanda Porter	6/2019
Chiefs of Sections:		
Management	Jamison Pixley	10/2019
Consular	Beth Chesterman	4/2019
Political-Economic	Jason Evans	8/2020
Public Affairs	LaSean Knox-Brown	8/2020
Regional Security	Marc Jackson	8/2019
Other Agencies:		
Department of Defense	Jacob Coutre	9/2020

(U) Source: Generated by OIG from data provided by Embassy Praia.

(U) APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

(U) This inspection was conducted from January 4 to March 18, 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).

(U) Objectives, Scope, and Methodology

(U) 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:

- **(U) 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.
- **(U) 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.
- **(U) 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.

(U) OIG used a risk-based approach to prepare for this inspection. Due to the COVID-19 pandemic and taking into consideration relevant guidance, OIG conducted the inspection remotely and relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. Additionally, embassy staff conducted video walkthroughs so OIG could see embassy facilities relevant to the inspection. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop its findings, conclusions, and actionable recommendations.

(U) OIG initiated an inspection of Embassy Praia in February 2020. At that time, OIG reviewed materials submitted by the embassy and the Department and conducted interviews with Department officials and some embassy staff. However, OIG postponed on-site portion of the inspection, which had been scheduled to begin in March 2020, as a result of the COVID-19 pandemic. The inspection was rescheduled and completed remotely from January to March

2021. The embassy and Department submitted updated materials to OIG for the rescheduled inspection.

(U) Because the inspection was conducted remotely, some elements of a standard, on-site OIG inspection could not be completed. Specifically, OIG did not review Embassy Praia's classified reporting, classified computer and communications security operations, or security program. Additionally, during the course of the inspection, OIG found that it could not assess certain areas due to lack of access to local applications, limitations in audio- and video-conferencing tools, or the need to confirm information on-site. These areas included review of records maintained in paper files, controls over consular accountable items and inventory, consular cashiering functions, embassy cash counts, physical inspection of embassy motor vehicles, verification of compliance with housing safety requirements, adequacy of contract and contractor officer representative files, telephone operations, IT emergency preparedness, and the environmental and physical security of IT operating spaces.

(U) APPENDIX B: MANAGEMENT RESPONSE



*Embassy of the United States of America
Praia, Cabo Verde*

UNCLASSIFIED

THRU: AF – Robert F. Godec, Acting Assistant Secretary

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

FROM: Embassy Praia – John J. Daigle, Chief of Mission

SUBJECT: Response to Draft OIG Report – Inspection of U.S. Embassy Praia, Cabo Verde

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

OIG Recommendation 1:

(U) Embassy Praia should document grants in accordance with Department standards. (Action: Embassy Praia)

PD and P/E Response: Embassy Praia, including the leadership in the Public Diplomacy (PD) and Political/Economic (P/E) sections, concurs with this recommendation and has already made significant progress toward addressing the issue. PD has reassigned the duties for its Grants Officer and Grants Officer Representatives, uploaded required documents to grant files, is in the process of closing out all grants for completed projects, and instituted A/OPE’s standard operating procedures to ensure that the section awards future grants competitively, transparently, and fairly in accordance with FAD requirements and that grant files have complete documentation. P/E continues to confirm that grant files contain all required documents before being closed out, upload records of all contact with grantees to relevant grant files, and ensure all newly funded grant projects include robust monitoring and evaluation plans for both pandemic and post-pandemic conditions.

OIG Recommendation 2:

(U) Embassy Praia should bring its panel physician program into compliance with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. On March 10, 2021, the Consular Section informed the two panel physicians located in Sao Vicente that their agreements would not be renewed. Additionally, post’s renewed agreements with the two remaining Praia-based panel physicians are effective June 1-May 31, 2022. The Consular Section will perform the required annual evaluations of the panel physician clinics before July 31, 2021.

OIG Recommendation 3:

(U) Embassy Praia, in coordination with the Bureau of African Affairs and the Bureau of Overseas Buildings Operations, should formalize its regional support for human resources and facility management in memoranda of understanding that defines clear responsibilities and expectations. (Action: Embassy Praia, in coordination with AF and OBO)

Management Response: Embassy Praia concurs with this recommendation. Post is working with AF/EX and OBO regional support to update these arrangements. For human resources support specifically, AF/EX indicated it is working to add Praia to the portfolio of a U.S.-based Regional Human Resources Officer, who would be able to provide more thorough and proactive HR support. OBO indicated its overseas regional support center assigned a facility manager to cover Praia and projects an in-person visit in approximately August 2021.

OIG Recommendation 4:

(U) Embassy Praia should review all unliquidated obligations with no activity in over one year, de-obligate those which are no longer valid in accordance with Department standards and put up to \$118,000 to better use. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation, with clearance by OBO and L/BA. The majority of the unliquidated obligations were withheld from post's lease payments per host country tax law requirements. Cabo Verdean law dictates that the lessee must withhold a percentage of each rent payment equal to the tax the landlord is required to pay for rents; the lessee is then required to pay this portion of the lease payment directly to the Cabo Verdean government. However, post has not made these payments due to a problem with the online payment system. Furthermore, before making these payments, post, in coordination with L, OBO, and the local government, must determine if a letter of protest to the Cabo Verdean government is necessary. Post anticipates this issue will be resolved by the end of December 2021.

OIG Recommendation 5:

(U) Embassy Praia should conduct monthly unannounced cashier verifications at unpredictable times in accordance with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. With cashier operations returned to five days per week after nearly eight months of limited operations (one day per week), the Financial Management Officer fully implemented this recommendation starting immediately following the OIG visit. This action is completed.

OIG Recommendation 6:

(U) Embassy Praia should enter and verify the data integrity of its motor vehicle operational costs in accordance with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with the recommendation. In addition to ensuring this information is entered and verified as part of motor pool's standard practices, post identified and trained an additional employee to assist with data entry to clear out the current backlog. Post is recruiting a GSO administrative assistant who will, among other things, assist with motor pool data entry. Post expects to eliminate the backlog and be in full compliance by the end of December 2021.

OIG Recommendation 7:

(U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operations, should install secondary containment for the chancery generator fuel tank, in accordance with Department standards (Action: Embassy Praia, in coordination with OBO).

Management Response: Embassy Praia concurs with this recommendation. As a first step, post has awarded a contract to analyze the structural integrity of the chancery roof. Based on the results of this analysis, post will work with OBO to issue a contract for a secondary containment barrier. Post expects this contract will be issued before the end of 2021.

OIG Recommendation 8:

(U) Embassy Praia should bring its fire protection program into compliance with Department standards (Action: Embassy Praia).

Management Response: Embassy Praia concurs with this recommendation. As a first step, post will construct a fire extinguisher table, necessary to conduct annual maintenance. Post will then implement an annual maintenance schedule for all extinguishers. Post is in contact with OBO/FIRE to implement annual fire system inspections and testing. Post expects to be in full compliance with this requirement by the end of 2021.

OIG Recommendation 9:

(U) Embassy Praia, in coordination with the Bureau of Overseas Buildings Operation, should complete the secondary egress project at the embassy annex in accordance with Department standards. (Action: Embassy Praia, in coordination with OBO)

Management Response: Embassy Praia concurs with this recommendation. Post is working with OBO and Dakar's Security Engineering Office (SEO) to procure the required FEBR doors for the third and second floors of the Annex. Once received, post will award a contract to install the doors in coordination with Dakar's SEO team and the Annex landlord to establish safe and secure access from the second floor to the secondary egress. Post expects this work will be complete by the end of the first quarter of 2022.

OIG Recommendation 10:

(U) Embassy Praia should establish internal controls for the administration and disbursement of facility management expendable supplies in accordance with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. Post will secure facility management's expendable supply storage area and restrict those with access to the following: warehouse supervisor, GSO, property clerk, and EPAP A/GSO. Post will install the required physical barrier and implement a standard operating procedure to document supplies issued to facilities staff by the end of September 2021.

OIG Recommendation 11:

(U) Embassy Praia should conduct an annual review of the embassy recreational facility, including a cost-benefit analysis, to determine the most effective use of the site. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. After closing the recreational facility to all use during the early phases of the global COVID-19 pandemic, the facility

is now available, by reservation only, for limited use by embassy staff and their families. However, due to continuing pandemic-related restrictions on gatherings, a usage analysis at this time would not produce data reflective of normal operations. That said, Post has begun tracking usage to help build metrics while gatherings are restricted that can be compared to metrics that will be tracked once restrictions are rescinded. With OBO expecting to complete construction of a NEC in Praia within the next five years (with an anticipated doubling in the number of post's USDH positions), post believes it would be worthwhile to explore the possibility of building USDH housing on the site given Praia's austere housing market. Post believes the site could accommodate up to six apartments or townhouses, which would reduce the need for residential leases by up to 50 percent at current staffing levels and up to 25 percent based on projections once the NEC is open. Post contacted OBO/PRE/ML requesting assistance to analyze current use and conduct a cost-benefit analysis to determine the most effective use of the site.

OIG Recommendation 12:

(U) Embassy Praia should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. The IMO, as ISSO, implemented all of the position's required duties immediately upon completion of the inspection. He will continue to randomly scan all Chancery, Annex and Warehouse OpenNet workstations in conjunction with all mission DINS in accordance with ISSO Department guidance and recommended procedures. This action is completed.

OIG Recommendation 13:

(U) The Bureau of Information Resource Management should communicate outcomes from monitoring information stored in the cloud to Embassy Praia's information systems security officers. (Action: IRM)

Management Response: Embassy Praia concurs with this recommendation. The IMO contacted the AF Regional IMO in Washington DC for assistance in initiating discussions with IRM on the establishment by IRM of a standard operating procedure to communicate to post on a regular and ongoing basis the results of IRM's monitoring of post's information stored in the Department cloud systems, such as Microsoft 365, so that the IMO can take corrective action as necessary, to include education of embassy users. Post expects this work will be complete by October 2021.

OIG Recommendation 14:

~~(SBU)~~ *Embassy Praia, in coordination with the Bureau of Information Resource Management, [REDACTED] (Action: Embassy Praia, in coordination with IRM)*

Management Response: Embassy Praia concurs with this recommendation. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

OIG Recommendation 15:

(U) Embassy Praia should use the Inventory and Logistics Management System loanable property module to issue and track information technology assets. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. The ILMS loanable property module has been brought online at post, and all loanable items are being added to the system and will be strictly managed to ensure full accountability is maintained going forward. Post expects to be in full compliance with this requirement by the end of 2021.

OIG Recommendation 16:

(U) Embassy Praia should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with the recommendation and scanned all DINS on Praia's Enterprise Network in accordance with Department standards. This action is completed.

OIG Recommendation 17:

(U) Embassy Praia should implement a plan to test its information technology contingency plan annually and to conduct initial and annual refresher training for employees with information technology contingency planning responsibilities, in accordance with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. Post updated the Information Technology Contingency document, which will be uploaded to an IRM SharePoint folder location. Post will initiate annual IT contingency plan tests, along with employee responsibility refresher training briefings, as recommended in accordance with Department standards. This action will be complete by the end of December 2021.

OIG Recommendation 18:

(U) Embassy Praia should implement a records management program that complies with Department standards. (Action: Embassy Praia)

Management Response: Embassy Praia concurs with this recommendation. This effort is underway, and post has reached out to the Office of Records Management to consult on the latest records management procedures and best practices. Post has created a SharePoint folder location for each section to store their electronic record files and no longer allows "write access" to the shared folders on legacy file servers. The IMO has already provided presentations to staff on proper access to their new file structure. IRM will conduct training and seminars and provide guidance on how to properly identify files that require records management, and how to devise naming conventions for filing and retrieval, as well as ensure all staff understand and adhere to proper disposition procedures and schedules. This project has a number of components, some of which will require several months to complete. Post estimates full implementation of this project by the end of the first quarter of 2022.

The point of contact for this memorandum is DCM Amanda Porter.

(U) ABBREVIATIONS

DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
EEO	Equal Employment Opportunity
FAD	Federal Assistance Directive
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
IRM	Bureau of Information Resource Management
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations
S/OCR	Office of Civil Rights

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