



## Office of Inspector General United States Department of State

ISP-I-22-04

Office of Inspections

December 2021

# (U) Inspection of the U.S. Mission to the Dutch Caribbean

### BUREAU OF WESTERN HEMISPHERE AFFAIRS

~~**IMPORTANT NOTICE:** This report is intended solely for the official use of the Department of State or the U.S. Agency for Global Media, or any agency or organization receiving a copy directly from the Office of Inspector General. No secondary distribution may be made, in whole or in part, outside the Department of State or the U.S. Agency for Global Media, by them or by other agencies or organizations, without prior authorization by the Inspector General. Public availability of the document will be determined by the Inspector General under the U.S. Code, 5 U.S.C. 552. Improper disclosure of this report may result in criminal, civil, or administrative penalties.~~



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-22-04

## **(U) What OIG Inspected**

(U) OIG inspected the executive direction, program and policy implementation, resource management, and information management operations of the U.S. Mission to the Dutch Caribbean in Curaçao.

## **(U) What OIG Recommends**

(U) OIG made 26 recommendations: 25 to the U.S. Mission to the Dutch Caribbean and 1 to the Bureau of Western Hemisphere Affairs.

(U) In its comments on the draft report, the Department concurred with 25 recommendations and neither agreed nor disagreed with 1 recommendation. OIG considers all 26 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 responses are reprinted in their entirety in Appendix B.

**(U) December 2021**

**(U) OFFICE OF INSPECTIONS**

(U) BUREAU OF WESTERN HEMISPHERE AFFAIRS

**(U) Inspection of the U.S. Mission to the Dutch Caribbean**

## **(U) What OIG Found**

- (U) The Chief of Mission led the U.S. Mission to the Dutch Caribbean in a professional and collaborative manner, especially during the challenges of the COVID-19 pandemic.
- (U) A lack of clarity between the authorities of the Chief of Mission to the Dutch Caribbean and the Chief of Mission to the Netherlands could delay a U.S. Government response to a crisis in the region.
- (U) The mission lacked documentation to support its 2019 and 2020 Annual Chief of Mission Management Control Statement of Assurance.
- (U) The Consular Section's fraud prevention strategy was outdated and did not include standard operating procedures.
- (U) The mission did not follow Department of State requirements to monitor unliquidated obligations, resulting in \$400,000 that could be put to better use.
- (U) The Mission to the Dutch Caribbean lacked adequate oversight and management controls for its property inventory, cashiering operations, and safety certifications for residential and nonresidential properties.
- (U) The mission had deficiencies associated with emergency readiness due to problems with equipment and user training. Additionally, the mission did not comply with Department standards in records management or record emails.
- (U) Spotlight on Success: The Consular Section produced engaging and effective "Consular Roundup" emails to stakeholders, featuring photos from outreach events, workload graphs and charts, and project updates.

## (U) CONTENTS

---

(U) CONTEXT .....	1
(U) EXECUTIVE DIRECTION .....	2
(U) Tone at the Top and Standards of Conduct .....	2
(U) Execution of Foreign Policy Goals and Objectives .....	3
(U) Adherence to Internal Controls.....	5
(U) Emergency Planning .....	6
(U) Equal Employment Opportunity .....	6
(U) Developing and Mentoring Foreign Service Professionals .....	7
(U) POLICY AND PROGRAM IMPLEMENTATION .....	7
(U) Political-Economic Section .....	7
(U) Public Diplomacy .....	9
(U) Consular Affairs .....	10
(U) RESOURCE MANAGEMENT .....	12
(U) Financial Management.....	13
(U) General Services .....	15
(U) Facility Management.....	16
(U) Human Resources.....	17
(U) INFORMATION MANAGEMENT.....	19
(U) RECOMMENDATIONS.....	22
(U) PRINCIPAL OFFICIALS .....	30
(U) APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	31
(U) APPENDIX B: MANAGEMENT RESPONSES .....	33
(U) ABBREVIATIONS .....	42
(U) OIG INSPECTION TEAM MEMBERS .....	43

## (U) CONTEXT

---

(U) The U.S. Mission to the Dutch Caribbean (Consulate General Curaçao), is headed by a Consul General who reports directly to the Bureau of Western Hemisphere Affairs and exercises Chief of Mission authority. The mission is responsible for six Caribbean islands of the Kingdom of the Netherlands. Three of the islands—Aruba, Curaçao, and Sint Maarten—are semi-autonomous countries, while the other three—Bonaire, St. Eustatius, and Saba—are overseas municipalities of the Netherlands. In 1954, these six islands formed the Netherlands Antilles, a constituent country of the Kingdom of the Netherlands. Aruba seceded from the Kingdom in 1986, and the Netherlands Antilles dissolved in 2010. The Kingdom of the Netherlands retains responsibility for defense and foreign affairs, while each island has its own local government. The two largest islands, Curaçao and Aruba, have populations of approximately 150,000 and 120,000, respectively.

(U) More than 3 million American tourists visit the Dutch Caribbean every year, and thousands of American permanent residents reside there. The COVID-19 pandemic has caused a decrease in tourism, although Aruba reopened for travel in June 2020 and Curaçao began allowing visitors in January 2021.

(U) The mission's top strategic priorities, as detailed in its 2018 Integrated Country Strategy (ICS), are to:

- (U) Strengthen cooperation to combat transnational criminal threats, particularly in narcotics, human, and weapons trafficking.
- (U) Promote U.S. business interests, including energy, tourism, and finance.
- (U) Protect U.S. citizens and increase people-to-people connections.
- (U) Enhance positive attitudes toward the United States and support for U.S. policies.

(U) There are 43 authorized U.S. direct hire positions (USDH) under Chief of Mission authority, including 24 U.S. Customs and Border Protection (CBP) staff in Aruba and Drug Enforcement Administration (DEA) and Departments of Defense and Homeland Security staff in Curaçao, as well as 20 locally employed (LE) staff. The U.S. Forward Operating Location,<sup>1</sup> located in Curaçao, is not under Chief of Mission authority.

(U) OIG evaluated the mission'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, OIG conducted the inspection remotely and therefore could not review some areas. OIG did not review the mission's security program.<sup>2</sup>

---

<sup>1</sup> (U) The Forward Operating Location allows U.S. military assets to support counter-narcotics missions in the vicinity of Curaçao. The U.S. presence is under the framework of an agreement between the governments of the Netherlands and the United States.

<sup>2</sup> (U) See Appendix A.

## **(U) EXECUTIVE DIRECTION**

---

(U) OIG assessed leadership based on remote interviews, staff questionnaires, a review of documents, and virtual observations of mission meetings and activities.

### **(U) Tone at the Top and Standards of Conduct**

(U) The Chief of Mission and Consul General, a member of the Senior Foreign Service, arrived at Mission to the Dutch Caribbean in June 2019. He served in Russia, Poland, and Japan, and two of those postings were as a Consul General in Krakow, Poland and Osaka-Kobe, Japan. He also served in Morocco, and he gained Caribbean experience as a Political/Economic Officer at the Interests Section in Havana, Cuba and as Director of Haitian Affairs. There is no Deputy Chief of Mission.

(U) OIG found that the Chief of Mission exercised leadership in accordance with the Department's leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214b, particularly in communicating and collaborating. The Chief of Mission set a professional, collaborative, and positive tone in weekly Department officers and Country Team meetings, as well as a biweekly meeting with U.S. military units in the Dutch Caribbean. The Chief of Mission had biweekly phone calls with the Director of the Caribbean Affairs Office in the Bureau of Western Hemisphere Affairs to ensure mission operations were aligned with Washington policy priorities. USDH employees and LE staff appreciated the Chief of Mission's inclusiveness and open-door policy and felt comfortable raising any issue with him. Employees told the OIG that the Chief of Mission conducted himself according to high ethical standards and held them accountable for the same. Mission personnel and Washington officials commended the Chief of Mission for his professional expertise and judgment.

(U) OIG also found that the Chief of Mission effectively coordinated and collaborated across agencies in accordance with 3 FAM 1427b and 3 FAM 1214b(7). CBP and DEA commended the Chief of Mission for his inclusiveness and strong support for their activities in the Dutch Caribbean. Department of Defense and Forward Operating Location staff described relations with the mission as "excellent," and particularly helpful in eliciting cooperation from Curaçao authorities.

(U) Finally, the Chief of Mission responded to USDH staff concerns caused by the reduction in cost-of-living allowances (COLAs) in Curaçao and Aruba. In August 2020, the Department announced that in FY 2021, the COLA for Curaçao would be reduced from 20 percent to zero and in Aruba from 25 percent to 5 percent, the maximum reductions allowed.<sup>3</sup> Mission USDH staff described the Department's action as a major blow to their morale. Officials of the two largest non-Department agencies at the mission believed the decision would have a negative

---

<sup>3</sup> (U) The Department's Office of Allowances implemented a new system for determining COLAs worldwide that went into effect at the beginning of FY 2021. This action was taken in response to a recommendation made in an OIG audit report, *Audit of Select Cost-of-Living Allowances for American Employees Stationed in Foreign Areas* (AUD-FM-17-51, August 2017).

effect on the retention and recruitment of USDH personnel and their families to serve in the Dutch Caribbean. As called for in 3 FAM 1214b(4), the Chief of Mission was cognizant of the morale and attitude of his team with respect to this issue and advocated with the Department to provide greater transparency, including information about the methods and data used to calculate the COLA. Although the Chief of Mission was ultimately unsuccessful in this effort because the Office of Allowances said that it would not release this proprietary information, he kept USDH staff informed of his actions and effectively managed staff expectations on this sensitive issue through open and honest communication.

## **(U) Execution of Foreign Policy Goals and Objectives**

### ***(U) COVID-19 Presented Challenges to the Execution of U.S. Foreign Policy Goals and Objectives***

(U) OIG found that the Chief of Mission modeled 3 FAM 1214b(3) and (10) leadership and management principles by taking decisive action and fostering resilience in his handling of the mission's response to the operational challenges posed by the COVID-19 pandemic. The pandemic caused an unprecedented economic downturn, and, in June 2020, contributed to rioting in Curaçao. The six Dutch Caribbean islands each imposed separate travel restrictions, making travel between the islands, as well as travel to the United States and to U.S. facilities in the region, difficult for mission personnel. At times, Curaçao also implemented internal restrictions, making trips from residences to the consulate general difficult for mission staff. To meet mission requirements while still protecting the health of all staff, the Chief of Mission, in accordance with Department guidelines, instituted maximum telework for the mission. He sent weekly emails to USDH personnel and their spouses to keep them apprised of the extent of the pandemic, curfews and lockdowns, and the availability of vaccines. The Chief of Mission worked with Curaçao officials to overcome the internal travel restrictions and received permission for mission personnel to drive to the consulate general and for the transfer of COVID vaccines to CBP personnel in Aruba. The mission also maintained an active network of contacts throughout the six islands, which it called on when necessary to assist American citizens living on or visiting the islands during the pandemic.

### ***(U) Delineation of Authorities Between the Missions to the Dutch Caribbean and the Netherlands Was Unclear***

(U) The delineation of authorities between the Chief of Mission to the Dutch Caribbean and the Chief of Mission to the Netherlands was not clear and could impede their ability to meet Chief of Mission responsibilities according to 1 FAM 013.2. The ambiguity in the authorities reflect the unique relationships of the six islands of the Dutch Caribbean with the Netherlands. The Government of the Netherlands manages foreign affairs and defense for all six islands of the Dutch Caribbean, but as noted previously, three of the islands are municipalities of the Netherlands and the three remaining islands are semi-autonomous countries. Curaçao, Aruba, and Sint Maarten each maintain their own foreign affairs departments. However, when the Chief of Mission to the Dutch Caribbean needed to engage on defense and foreign policy issues, he relied on the U.S. embassy in The Hague, the Netherlands, to engage with Dutch authorities. For example, the effort to establish the U.S. military Forward Operating Location and

coordinate approval of a Status of Forces Agreement in the Dutch Caribbean required the approval of the Chief of Mission to the Netherlands.

(U) Although the Chief of Mission to the Dutch Caribbean was accredited by the Government of the Netherlands, he did not receive a President's Letter of Instruction.<sup>4</sup> According to 1 FAM 013.2e, the President's Letter of Instruction is a foundational document that explicitly addresses the authority and responsibility of the chief of mission and outlines the roles and responsibilities of executive branch agencies conducting official U.S. Government activities in the chief of mission's country of responsibility. The President's Letter of Instruction for the most recent Chief of Mission to the Netherlands states that the individual is the "U.S. [G]overnment's representative to the Kingdom of the Netherlands," and "[a]s Chief of Mission, [has] full responsibility for the direction, coordination, and supervision of all executive branch personnel, regardless of their employment categories of location, within [his or her] geographic area of responsibility." Although the letter does not mention the Dutch Caribbean, the Dutch Caribbean is part of the Kingdom of the Netherlands and thus is not explicitly excluded from the geographic area listed in the letter.

(U) Although Washington officials and the Chief of Mission to the Dutch Caribbean did not cite any recent problems involving unclear Chief of Mission authorities, they credited this to the good personal relationship between the two Chiefs of Mission rather than a clear delineation of responsibilities. Both 1 FAM 013.2k(5)(c) and 3 FAM 1427d state that chiefs of mission, on behalf of the Secretary, shall develop and implement policies and programs that provide for the safe and efficient evacuation of U.S. Government personnel, dependents, and private U.S. citizens when their lives are endangered. Yet, in the case of a natural disaster or security instability in or near the Dutch Caribbean, such as the evacuation of U.S. citizens requiring military assistance, the Chief of Mission in Curaçao lacks the authority to undertake immediate action with relevant Dutch Government officials on foreign affairs and defense matters. Action in such cases would depend on the understanding and agreement of the Chief of Mission in The Hague—which is 5 to 6 hours ahead of Curaçao, depending on the time of year—to engage Dutch and Dutch Caribbean officials. A lack of clarity between the authorities of the Chief of Mission to the Dutch Caribbean and the Chief of Mission to the Netherlands in such situations could delay a U.S. Government response to a crisis in the region and presents a potential risk to U.S. citizens and interests.

**Recommendation 1:** (U) The Bureau of Western Hemisphere Affairs, in coordination with the Bureau of European and Eurasian Affairs, the Office of Management Strategy and Solutions, and the Office of the Legal Adviser, should formally clarify and deconflict, if necessary, the delineation of authorities between the Chiefs of Mission to the Dutch Caribbean and the Netherlands. (Action: WHA, in coordination with EUR, M/SS, and L)

---

<sup>4</sup> (U) The mission is designated by the Secretary of State as a post "diplomatic in nature" and because the chief of mission is not appointed by the President nor Senate-confirmed, the chief of mission does not receive a President's Letter of Instruction.

***(U) Chief of Mission Promoted Integrated Country Strategy Goals, but the Mission Did Not Review Integrated Country Strategy Annually***

(U) OIG found that the Chief of Mission advanced all four ICS goals. For example, he obtained the Prime Minister of Curaçao's agreement to permit the U.S. Forward Operating Location in Curaçao to be used for a large counter-narcotics deployment involving U.S. Navy and Air Force assets. He finalized a Status of Forces Agreement with the Government of Curaçao that had languished for 8 years by enlisting support from Dutch parliamentarians and the president of the Curaçao Parliament. The Chief of Mission also successfully lobbied for a large liquified natural gas investment by a U.S. firm in Curaçao. At the onset of the COVID-19 pandemic, he oversaw mission efforts to repatriate American citizens on 29 flights and maintained mission effectiveness as the pandemic intensified in the Dutch Caribbean.

(U) Despite these successes, the mission had not reviewed the ICS since November 2018. According to 18 FAM 301.2-4(D)c, a mission should review its ICS annually. The Chief of Mission told OIG that he believed that the major mission objectives in the ICS were still valid, although some subobjectives should be revised. He also said that ICS goals and objectives were frequently discussed at Country Team meetings. Some mission personnel told OIG that they had not incorporated ICS goals and objectives into their work and one Country Team member was not acquainted with ICS goals. The Chief of Mission told OIG that the need to respond to the COVID-19 pandemic prevented an ICS review he planned to conduct in 2020. Not conducting an annual review could result in mission activities not being aligned with mission goals and objectives.

**Recommendation 2:** (U) Mission to the Dutch Caribbean should conduct formal, annual reviews of its Integrated Country Strategy in accordance with Department guidelines.  
(Action: Mission to the Dutch Caribbean)

**(U) Adherence to Internal Controls**

(U) OIG found that Mission to the Dutch Caribbean's FY 2020 Annual Chief of Mission Management Control Statement of Assurance did not comply with Department guidance on chief of mission responsibilities as listed in Department cable 20 STATE 123846.<sup>5</sup> The Statement of Assurance, which the mission submitted, included eight program reviews, which did not identify potential material weaknesses or significant deficiencies. However, the mission lacked documentation showing that all units within the mission conducted program reviews to identify internal control deficiencies and take corrective action to mitigate vulnerabilities, as required by 2 FAM 022.8c(3) and the Department's Bureau of the Comptroller and Global Financial Services.

(U) OIG determined that some of the internal control issues it identified, as described later in this report, such as IT contingency plan testing and residential safety, could have been detected

---

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

earlier had the mission used the checklists included in the comptroller's guidance. Chiefs of mission are responsible for developing and maintaining appropriate systems of internal control for their organization, as described in 2 FAM 022.7. Furthermore, the Government Accountability Office's *Standards for Internal Control in the Federal Government* requires documentation of internal control reviews and corrective actions.<sup>6</sup> The Chief of Mission did not require sections to submit completed comptroller checklists prior to submitting the 2020 statement. Without a documented, comprehensive system of internal controls, the mission is at risk of not managing its activities and programs effectively, efficiently, economically, and with integrity.

**Recommendation 3:** (U) Mission to the Dutch Caribbean should prepare the Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance. (Action: Mission to the Dutch Caribbean)

### **(U) Emergency Planning**

~~(SBU)~~ The Chief of Mission's leadership of mission emergency preparedness was consistent with the Department's guidelines in 12 Foreign Affairs Handbook (FAH)-(b) (5) [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] OIG found, however, that there were some problems with emergency equipment readiness, which is discussed in the Information Management section of this report.

### **(U) Equal Employment Opportunity**

(U) OIG found the Mission to the Dutch Caribbean's equal employment opportunity (EEO) practices were largely consistent with applicable Department guidance in 3 FAM 1514. At the time of the inspection, the mission did not have an EEO Counselor. The mission had one LE staff EEO Liaison. She said that she had received some training at an adjacent post and if an EEO issue were to arise in the mission, she would immediately notify the EEO Counselor at that post.

(U) Additionally, mission staff told OIG that the Chief of Mission demonstrated the importance of EEO principles through his participation in a mission pride event and by protesting the mistreatment of same-sex couples by Curaçao immigration authorities. The Chief of Mission told OIG that he ensures EEO awareness by making EEO notices available to all mission personnel using the mission's bulletin board, as well as raising EEO awareness at Country Team meetings.

---

<sup>6</sup> (U) Government Accountability Office, *Standards for Internal Control in the Federal Government* 19-20, 66-67 (GAO-14-704G, September 2014).

## **(U) Developing and Mentoring Foreign Service Professionals**

(U) At the time of the inspection, Mission to the Dutch Caribbean did not have any First- and Second-Tour (FAST) personnel. As such, the mission did not have a FAST professional development program.<sup>7</sup> However, OIG found that the Chief of Mission satisfied 15 STATE 96434<sup>8</sup> and 3 FAM 1214b(8) leadership and management principles to value and develop people. For example, he informally mentored USDH staff. Mission personnel told OIG that they appreciated the Chief of Mission's career advice, guidance, and efforts to help them with their careers.

## **(U) POLICY AND PROGRAM IMPLEMENTATION**

---

(U) OIG assessed Mission to the Dutch Caribbean's policy and program implementation work by the Political-Economic Section, the Public Diplomacy Section, and the Consular Section. One officer, assisted by two LE staff, managed both the Political-Economic and Public Diplomacy Sections. The Consular Section had one officer and two LE staff.

### **(U) Political-Economic Section**

(U) OIG reviewed the mission's Political-Economic Section's leadership and management, policy implementation, reporting, commercial promotion and advocacy, Leahy vetting,<sup>9</sup> grants, and end-use monitoring functions. OIG determined that the section regularly worked with Washington offices and other agencies. Due to the Dutch Caribbean's foreign policy and defense linkages to the Netherlands, the section also regularly coordinated specific activities with the U.S. embassy in the Netherlands, such as required Department reports.

(U) The Political-Economic Section managed a complicated workload associated with U.S. relations with the three semi-autonomous countries (including separate governments, parliaments, and legal systems) and the three special municipalities of the Dutch Caribbean. Washington audiences cited the section's responsiveness to issues of stakeholder interest and expressed interest in the daily press summary written by the LE staff member. To account for COVID-19-related restrictions on the mission's operations, OIG expanded its review of the mission's reporting to cover the period from 2019 to 2021 and found the mission's 70 political-economic cables during that time focused on local political developments, Venezuela and related migrant issues, relations with the Netherlands, energy infrastructure, economic conditions, and mandatory reports, including contributions to four separate annual Trafficking

---

<sup>7</sup> (U) FAST professional development programs, which vary depending on the size of the post and the number of entry-level employees, are the responsibility of the Deputy Chief of Mission (with input from entry-level employees) and involve formal and informal activities for employees to network and learn more about the Department.

<sup>8</sup> (U) Cable 15 STATE 96434, "Promoting Professional and Leadership Development in Mid-Level Foreign Service Employees," August 14, 2015.

<sup>9</sup> (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.

in Persons reports.<sup>10</sup> OIG determined that the reporting was well-sourced, and discussed with the section chief the benefit of a reporting plan to expand reporting and to align the section's work with ICS goals. The section also conducted commercial advocacy for two large U.S. business ventures,<sup>11</sup> and engaged local authorities in support of the U.S. military counter-narcotics-focused Forward Operating Location. Overall, OIG concluded that the Political-Economic Section generally met Department requirements, with the two exceptions noted below.

***(U) Mission Lacked Leahy Vetting Standard Operating Procedures***

(U) OIG found that the mission lacked standard operating procedures for processing Leahy vetting requests.<sup>12</sup> In accordance with the Foreign Assistance Act of 1961 as amended, the Department requires that missions have Leahy vetting standard operating procedures in place and approved by the Office of Security and Human Rights in the Bureau of Democracy, Human Rights, and Labor.<sup>13</sup> Although the mission processed a small number of Leahy requests, OIG observed plans for training of local officials from one or more islands of the Dutch Caribbean which would need to follow Leahy vetting procedures. The lack of Leahy vetting standard operating procedures increases the risk that training and assistance provided to host government personnel will not meet Leahy vetting requirements.

**Recommendation 4:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Democracy, Human Rights, and Labor, should draft and implement approved Leahy vetting standard operating procedures. (Action: Mission to the Dutch Caribbean, in coordination with DRL)

***(U) Foreign Assistance Management Did Not Comply With Department Standards***

(U) The Political-Economic Section did not manage foreign assistance in accordance with the Department's Federal Assistance Directive.<sup>14</sup> The mission issued one Julia Taft Refugee Fund

---

<sup>10</sup> (U) The mission contributed to separate Trafficking in Persons reports for Aruba, Curaçao, and Sint Maarten, which are considered semi-autonomous countries of the Kingdom of the Netherlands, and supplied content about the three other Dutch Caribbean islands (Bonaire, Saba, and St. Eustatius), which are identified as municipalities of the Netherlands, for inclusion in the Trafficking in Persons report for the Netherlands written by the U.S. embassy in The Hague.

<sup>11</sup> (U) Formal commercial advocacy requires a Department of Commerce Advocacy Center determination that commercial advocacy is in the U.S. national interest, which was done in these two instances.

<sup>12</sup> (U) Leahy vetting standard operating procedures requirements are outlined in Government Accountability Office report, *HUMAN RIGHTS: Additional Guidance, Monitoring, and Training Could Improve Implementation of the Leahy Laws* (GAO-13-866, September 2013) and the Department's 2017 Leahy Vetting Guide.

<sup>13</sup> (U) See 9 FAM 303.8-5.

<sup>14</sup> (U) The Department's Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department when administering Federal financial assistance. See Federal Assistance Directive, Chapter 1, Section A. Introduction (October 2018, and later revisions).

grant<sup>15</sup> valued at \$19,874 for an after-school program to aid Venezuelan migrant children in assimilating into the local school system. However, OIG observed that the grant file lacked required documentation, such as the application, risk assessment, and evidence of a due diligence check to verify that the implementing partner was not excluded from doing business with the U.S. Government.<sup>16</sup> During the inspection, mission staff addressed some documentation gaps in the grants file. Mission staff explained that a lack of experience in managing foreign assistance, partially due to the inability of the Grants Officer Representative to take in-person assistance training, contributed to lapses in grants management. Failure to adhere to Federal Assistance Directive requirements increases the risk that foreign assistance grants and programs are awarded to entities that do not meet established requirements.

**Recommendation 5:** (U) Mission to the Dutch Caribbean should bring its management of foreign assistance grants into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

## **(U) Public Diplomacy**

(U) Mission to the Dutch Caribbean's public diplomacy goals were focused on enhancing positive attitudes toward the United States and developing support for U.S. policies and programs, including cooperation in combating transnational criminal threats, protecting U.S. citizens, and promoting U.S. business interests. The mission did not have an annual public diplomacy budget and it did not administer public diplomacy Federal assistance awards.<sup>17</sup> The lack of a predictable budget notwithstanding, OIG determined that the Public Diplomacy Section focused on and actively advanced its goals through traditional and social media engagement and through programs that promote study in U.S. universities, English-language study, and entrepreneurship. Furthermore, OIG determined that the Public Diplomacy Section generally met Department standards and guidance, with the exceptions noted below.

### ***(U) Mission Did Not Report on Public Diplomacy Activities***

(U) OIG found that although Mission to the Dutch Caribbean produced a daily media summary, the Public Diplomacy Section was not reporting on its public diplomacy activities via cable, the Mission Activity Tracker, or PD Tools.<sup>18</sup> Department standards in 10 FAH-1 H-021g7 state that, "The [Public Affairs Officer] and his/her section are responsible for...accounting for, reporting

---

<sup>15</sup> (U) The Julia Taft Refugee Fund supports one-time, low-cost interventions that address important gaps in refugee protection and assistance.

<sup>16</sup> (U) Federal Assistance Directive, Chapter 1, Section G; Chapter 2, Section J; and Chapter 2, Section K (October 2018, and later revisions).

<sup>17</sup> (U) The Public Diplomacy Section had no discretionary budget. However, the Bureau of Western Hemisphere Affairs' Office of Public Diplomacy and Public Affairs periodically provided end-of-year funds when they were available. The mission requested a budget for the Public Diplomacy Section in the FY 2021 Mission Resource Request, but at the time of the inspection, no decision had been made on the request.

<sup>18</sup> (U) PD Tools replaced Mission Activity Tracker as the Department's consolidated system for strategic planning, activity tracking, and reporting on public diplomacy activities in August 2020. See cable 20 STATE 72176, "Transition from Mission Activity Tracker (MAT) to PD Tools," July 28, 2020.

on, and evaluating the use of resources and activities through the [Mission Activity Tracker],” and cable 20 STATE 72176 states that, “Regular, comprehensive, and quantitative documentation of [public diplomacy] contributions to foreign policy goals are crucial to evaluate effectiveness, share best practices, and sustain [public diplomacy] funding.” Staff told OIG that it was not doing the required reporting due to competing demands on the section’s limited staff. Failure to report on public diplomacy activities weakens the mission’s case for securing an annual public diplomacy budget and for sustaining the Bureau of Educational and Cultural Affairs’ support for the Aruba academic advising center that was launched in April 2021.<sup>19</sup>

**Recommendation 6:** (U) Mission to the Dutch Caribbean should use PD Tools to report on public diplomacy programs and activities. (Action: Mission to the Dutch Caribbean)

### ***(U) Mission Lacked a Social Media Strategy***

(U) Mission to the Dutch Caribbean’s website and social media accounts generally supported mission objectives. OIG found, however, that the Public Diplomacy Section did not have a social media strategy. As noted in 13 STATE 144456,<sup>20</sup> “An overarching strategic plan for social media engagement is essential to ensure that a mission’s commitment of personnel and program resources delivers a measurable return on investment.” Staff told OIG that this deficiency was the result of competing demands on the section’s limited staff. Given the importance of social media to a mission with limited resources serving six islands of the Dutch Caribbean and the recent launch of an academic advising center<sup>21</sup> with its own social media presence, a strategic approach to online engagement would help ensure that content is linked to mission objectives and delivers a measurable return on the mission’s investment. Recognizing the importance of having a strategic plan for its social media engagement, the Public Diplomacy Section began drafting a social media strategy during the inspection. As a result of the section’s actions, OIG did not make a recommendation to address this issue.

### **(U) Consular Affairs**

(U) OIG reviewed Mission to the Dutch Caribbean’s consular operations, including American citizen services, crisis preparedness, management controls, visa services and processing,

---

<sup>19</sup> (U) Although the Public Diplomacy Section did not have an annual budget, the Bureau of Educational and Cultural Affairs transferred funds through the section to provide staff training and acquire materials for the Aruba academic advising center. The advising center is a partnership between the Public Diplomacy Section and the Aruba Ministry of Education to provide academic advising services for students interested in study in the United States.

<sup>20</sup> (U) Cable 13 STATE 144456, “Social Media Guidance Cable #5: Social Media Strategy Framework for Overseas Missions,” October 18, 2013.

<sup>21</sup> (U) “Educational advisers and advising centers are considered to be one of the programming tools and services of the Public Affairs Section, and an integral part of the Mission’s public diplomacy efforts. U.S. embassies have a responsibility to make available in-country unbiased, comprehensive, professional information on the U.S. educational system, to explain the strengths and diversity of U.S. higher education to foreign audiences, and to promote U.S. study opportunities.” See 10 FAM 227.8-5a, “Embassy Role in Educational Advising.”

outreach, and fraud prevention programs. Due to the COVID-19 pandemic, all consular services were suspended on March 13, 2020. Over the spring and summer of 2020, the Consular Section organized 29 flights to successfully repatriate almost 1,000 American citizens, U.S. permanent residents, and third country nationals from the six islands of the Dutch Caribbean. In June 2020, the Consular Section began accepting visa renewal applications by mail. On September 14, 2020, as local COVID-19 cases began to increase, the Consular Section began to work remotely 4 days a week, and, on March 24, 2021, stopped all routine services due to the Government of Curaçao's lockdown orders. Overall, OIG found that the mission's consular operations generally complied with the guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exception of the fraud prevention program and consular physical space, as described below.

***(U) Consular Section Lacked an Updated Strategy and Standard Operating Procedures for Fraud Prevention***

(U) The Consular Section's fraud prevention strategy was outdated<sup>22</sup> and did not include standard operating procedures as required by Department standards. In addition, the Consular Section lacked written standard operating procedures for fraud prevention activities, such as how to refer fraud cases for criminal investigations to the Bureau of Diplomatic Security, conduct site visits, and prescreen applications. Department standards in 7 FAH-1 H-941a(1), 7 FAH-1 H-941.1c, and 7 FAH-1 Exhibit H-940 require each consular section to define its fraud prevention program in a written strategy, which includes specific responsibilities, goals, and priorities for the year. In addition, the strategy must lead to the development of standard operating procedures, which are used to organize, communicate, and implement best practices. The Consular Section chief told OIG that the Consular Section did not comply with these requirements due to competing priorities. The absence of an overall updated strategy and established procedures for fraud prevention increases the risk that fraud cases and trends will not be identified, and that time and effort devoted to fraud prevention will be allocated improperly.

**Recommendation 7:** (U) Mission to the Dutch Caribbean should update its fraud prevention strategy and establish standard operating procedures to implement that strategy, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

***(U) Consular Section Physical Space Did Not Comply With Department Standards***

(U) OIG assessed the Consular Section's physical space during a virtual tour and found it did not meet Department standards in the following areas:

- (U) The consular cashier work area was not enclosed with a lockable door, leaving consular monetary collections and cashier equipment accessible to anyone in the section, contrary to requirements in 7 FAH-1 H-742a and 4 FAM 317.2-2.

---

<sup>22</sup> (U) The section's basic fraud prevention strategy included case assessment, outreach, training, and reporting goals, but it was last updated in FY 2018.

- (U) The Consular Section did not have a privacy booth for sensitive cases and fraud interviews, in accordance with 7 FAH-1 H-282(1)(j).
- (U) Although the consular waiting room was accessible to persons with disabilities, none of the interview windows was at the appropriate height for wheelchair access, as required by 7 FAH-1 H-282(1)(l).

(U) The mission cited airflow complications and the possible move to a new building in 2026 as the reasons they did not enclose or modify the consular window spaces to meet Department standards. Although a new building would address these issues, the timeline of the move could mean these deficiencies will go unaddressed for several years. The lack of an enclosed, controlled access cashier space increases the risk of fraud, mismanagement, or abuse in consular cashiering operations. In addition, the absence of a privacy booth and a wheelchair accessible interview window may make it difficult to conduct effective consular interviews.

**Recommendation 8:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the Consular Section's physical space into compliance with Department standards. (Action: Mission to the Dutch Caribbean, in coordination with OBO and CA)

#### **(U) Spotlight on Success: Mission's "Consular Round Ups" Praised by Bureau of Consular Affairs as an Effective Outreach Tool**

(U) The U.S. Mission to the Dutch Caribbean's Consular Section developed a unique reporting method to highlight its important projects, sending engaging and informative monthly "Consular Round Up" emails to U.S. Government stakeholders detailing the section's activities and workload. Each report included photos of consular staff at various outreach events, descriptions of the month's consular activities, workload graphs and charts, and updates on consular projects. The Bureau of Consular Affairs praised the "Consular Round Ups" as a proactive, effective communication tool for increasing the understanding of consular work within the mission, geographic region, and the Department. The Office of Fraud Prevention Programs featured the mission's "Consular Round Ups" in the November/December 2020 Fraud Digest as an example of how a small post can conduct consular outreach to a wide variety of stakeholders.

## **(U) RESOURCE MANAGEMENT**

---

(U) The mission's Management Section consisted of a Management Officer and 10 LE staff who supported financial management, general services, facility management, and human resources operations for USDH employees in Curaçao, as well as 24 CBP staff in Aruba. Additionally, regional staff from the Bureau of Western Hemisphere Affairs and the Bureau of Overseas Buildings Operations provided support services for human resources, financial management, general services, and facility management to the mission. OIG reviewed the mission's internal controls and processes in the areas of financial management, general services, facilities management, and human resources operations, and identified some deficiencies.

(U) OIG determined that many of these deficiencies occurred because the Management Officer, had considerable additional responsibilities that would typically be shared by several officers. For example, he served as the Post Occupational Safety and Health Officer (POSHO), a role typically assumed by a Facility Manager at a larger mission. He also assumed duties such as Cash Verification Officer, usually held by the Financial Management Officer, and most General Services Officer duties. Additionally, because the mission did not have a Deputy Chief of Mission, the Management Officer handled some of those duties when needed. Finally, at the time of the inspection, 3 of the Management Section's 10 LE staff positions were vacant, creating additional constraints on the Management Officer and the section. As a result, the Management Officer and the LE staff had to juggle competing priorities on a regular basis, leading to some deficiencies in the section's implementation of Department guidance, as described below.

## **(U) Financial Management**

### ***(U) Cashier Operations Lacked Adequate Management Controls and Oversight***

(U) OIG found that the mission's cashier operations lacked sufficient management controls and oversight. In 2020, the mission received one of the highest cash operations-based risk assessment<sup>23</sup> scores worldwide, as determined by the Bureau of the Comptroller and Global Financial Services in its annual assessment. In reviewing the leading indicators of risk in cash operations, OIG found that the mission faced challenges in this area because it:

- (U) Missed 3 unannounced monthly cashier verifications (4 FAH-3 H-393.3-3a(3)).
- (U) Had fiscal irregularities due to discrepancies found during cash reconciliations (Cashier User Guide Chapter 15 - Fiscal Irregularities).
- (U) Failed to clear debit vouchers within the required 10 calendar days (Cashier User Guide Chapter 9 - Debit Vouchers).
- (U) Lacked sufficient training and proficiency in cashiering duties for its cashiers (Cashier User Guide Chapter 3.3.5 - Advance to Alternate Cashier).

(U) At the time of the inspection, the mission's alternate cashier had been serving as the primary cashier for over a year, due to the primary cashier's extended absence. The mission told OIG that the missed cashier verifications occurred because staff were out of the office and there were no designated alternates. OIG determined that the mission was considered high risk in the other three indicators because of a lack of management oversight, the lack of a designated alternate for the U.S. citizen cashier supervisor,<sup>24</sup> and a lack of training and expertise in cashiering operations by the alternate cashier. Failure to ensure adequate

---

<sup>23</sup> (U) The Bureau of the Comptroller and Global Financial Services developed the cash operations-based risk assessment (COBRA) score. This risk rating tool assists U.S. disbursing officers, cashier monitors, financial management officers, and management in the prevention of theft, fraud, and misuse of cash from cashier operations at posts abroad. Leading indicators of potential risk of cash losses fall under the following three categories: operational risk, verification and controls, and the overall cashier operational assessment. A higher score indicates a greater potential risk of cash losses.

<sup>24</sup> (U) Cashier User Guide, Chapter 13.3.1 (1-2) – Responsibilities for FMO, MO, U.S. Citizen Cashier Supervisor.

management controls and oversight of cashiering operations increases the risk of theft, fraud, and misuse of cash from cashier operations.

**Recommendation 9:** (U) Mission to the Dutch Caribbean should bring its cashier operations, including management oversight of those operations, into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

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

(U) OIG found that, as of March 2021, the mission had approximately \$400,000 in unliquidated obligations with no activity in over 1 year. According to Department standards in 4 FAM 225d, unliquidated obligations with no activity in over a year must be targeted and de-obligated if they cannot be documented as valid obligations. Staff told OIG that the mission did not review and de-obligate unliquidated obligations that were no longer valid because of competing priorities. Failure to review and de-obligate these unliquidated obligations in a timely manner results in an accumulation of funds that could be put to better use.

**Recommendation 10:** (U) Mission to the Dutch Caribbean should review and de-obligate all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so funds of up to \$400,000 can be put to better use. (Action: Mission to the Dutch Caribbean)

***(U) Mission Lacked Current Per Diem Rates and Living Quarters Allowances***

(U) OIG found that foreign per diem rates were out of date for Curaçao and living quarters allowances were out of date for both Curaçao and Aruba. The Bureau of Administration's Office of Allowances website showed that the mission had not submitted a report for foreign per diem rates since 2012 for Curaçao. The mission also had not submitted an updated report for living quarters allowance rates since 2009 for Curaçao and 2019 for Aruba. The Department of State Standardized Regulations (DSSR) section 074.2 states that missions should submit a biennial Hotel and Restaurant Report in accordance with reporting requirements in section 920 of the DSSR, which is used to review and establish appropriate foreign travel per diem rates. Additionally, DSSR section 077.2 states that all missions with employees eligible for a living quarters allowance are required to submit an annual expense report for employees initially occupying privately leased quarters or changing privately leased quarters in the past 12 months. The mission told OIG that it had not completed the required surveys because of competing priorities. Failure to submit reports on a timely basis could result in overpayment, or underpayment, to U.S. Government personnel.

**Recommendation 11:** (U) Mission to the Dutch Caribbean should submit reports for its outdated foreign per diem rates and living quarters allowance rates to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Mission to the Dutch Caribbean)

## **(U) General Services**

### ***(U) Property Management Deficiencies Exposed Internal Control Vulnerabilities***

(U) OIG identified the following five internal control deficiencies related to the mission's management of personal property, including \$1.4 million in nonexpendable property and approximately \$80,000 in expendable property:

- **(U) Lack of separation of duties:** One employee managed the receipt, storage, inventory, and disposition of expendable and nonexpendable personal property. According to 14 FAM 411.2d and 14 FAH-1 H-112.2j, a sound management control system must ensure that no one individual controls all aspects of property receipt, storage, and disposition of expendable or nonexpendable personal property. However, if separation of duties is not possible, a management review is required twice a year, but the mission did not conduct such reviews.
- **(U) High rates of early disposals:** In FY 2020, the mission disposed of 79 percent of all property disposals prior to the end of the asset's life cycle. Of those items, the mission disposed of 22 percent before one-third of the asset's assigned lifecycle. In accordance with 14 FAH-1 H-231.1 and Department replacement standards listed in 14 FAH-1 H-213, which predict the life span of nonexpendable property, the mission must inspect property to determine whether replacement is necessary, and items in good working condition must be retained.
- **(U) Missing documentation for property transfers:** The mission did not properly document all property transfers to residential locations in accordance with 14 FAM 414.5 and 14 FAM 416.3. Approximately 57 percent of all transfers were missing the required documentation.
- **(U) Missing documentation for property disposals:** From January 2020 to March 2021, the mission disposed of seven assets without the required documentation outlined in 14 FAM 411.2-3b.
- **(U) Missing expendable property:** The mission conducted its annual inventory for FY 2020 and identified nine percent of its expendable property was missing, compared to the Department standard of less than one percent as described in 14 FAM 416.5-1(B)c.

(U) Staff told OIG that the mission did not comply with Department guidance and best practices for management controls of expendable and nonexpendable personal property because of a property clerk's departure, as well as competing priorities. Failure to ensure sound management controls, separation of duties, and to properly document the receipt, issuance, transfer, and disposal of all expendable and nonexpendable property increases the risk of fraud, waste, and mismanagement of resources.

**Recommendation 12:** (U) Mission to the Dutch Caribbean should implement personal property management internal controls in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

***(U) Mission Did Not Comply With Department Motor Vehicle Safety Management Program***

(U) The mission did not comply with all elements of the Department's Motor Vehicle Safety Management Program, in accordance with 14 FAM 433.1a. Specifically, OIG found that the mission did not ensure all chauffeurs and incidental drivers received the appropriate medical certifications and safe driving training as required by 14 FAM 433.4a and 14 FAM 433.5d. For example, OIG found that at least one out of the two chauffeurs had outdated safe driving training and the mission was unable to provide documentation of safe driving training for any of the incidental operators. The mission also was unable to provide documentation for completed medical certifications for chauffeurs and incidental operators. The mission told OIG that the lack of oversight for ensuring all chauffeurs and incidental operators were appropriately trained and medically certified was due to a vacancy in the Motor Pool Supervisor position, which had been vacant for 4 months at the time of the inspection. Failure to enforce these standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. Government property.

**Recommendation 13:** (U) Mission to the Dutch Caribbean should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Mission to the Dutch Caribbean)

***(U) Forklift Operator Lacked Required Training***

(U) The mission leased an off-compound warehouse, managed by one property clerk. OIG found that the property clerk, who was also the forklift operator, had not taken training in operating, maintaining, and storing powered industrial trucks, such as forklifts, within the last 3 years. In accordance with 14 FAH-1 H-313.6-2c, d and 14 FAH-1 H-313.4a(1)-(3), operators must be properly trained in operating, maintaining, and storing forklifts or other powered materials-handling equipment and take refresher training at least every 3 years. Failure to ensure that employees are properly trained in the use of powered industrial trucks creates a potential workplace safety hazard.

**Recommendation 14:** (U) Mission to the Dutch Caribbean should comply with Department standards on training employees in the use of powered industrial trucks, such as forklifts. (Action: Mission to the Dutch Caribbean)

***(U) Facility Management***

***(U) Mission Lacked Post Occupational Safety and Health Officer Certifications for Residential and Nonresidential Properties***

(U) OIG found that the mission failed to complete some required real property safety certifications. At the time of the inspection, the POSHO completed only 10 residential safety, health, and environment certifications in the Bureau of Overseas Buildings Operations' POSHO Certification Application for Curaçao and none of the certifications for residential properties in Aruba. In addition, the POSHO had not certified any of the mission's

nonresidential properties, including the six listed in the Real Property Application<sup>25</sup> for Curaçao. OIG could not verify the total number of properties requiring certification because the mission did not maintain updated property records in the Real Property Application. In accordance with 15 FAM 252.5a, each residence acquired by an overseas post must be inspected and certified by the POSHO prior to occupancy. The Management Officer, who served as the POSHO, stated he was unaware of the need to complete the certifications in the POSHO Certification Application. Failure to inspect and certify residential properties prior to occupancy, and nonresidential properties can increase the risk of injury and loss of life to residents and visitors.

**Recommendation 15:** (U) Mission to the Dutch Caribbean should update the Real Property Application, and complete safety certifications for all its real property in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Mission to the Dutch Caribbean)

***(U) Mission Did Not Establish a Safety, Health, and Environmental Management Committee***

(U) OIG found that the mission had not established a Safety, Health, and Environmental Management (SHEM) committee since at least August 2019. As required by 15 FAM 933.2a, all posts with 25 or more employees are required to establish a standing SHEM committee that meets at least semi-annually. The purpose of the SHEM committee is to facilitate a team approach in dealing with safety, occupational health, and environmental issues to help establish program goals and objectives and to facilitate communications.<sup>26</sup> OIG determined the mission did not establish the committee due to the staff's general lack of facilities management experience. The absence of a SHEM committee also may have contributed to the failure of the mission to complete all POSHO certifications as discussed in the section above.

**Recommendation 16:** (U) Mission to the Dutch Caribbean should form a standing Safety, Health and Environment Management committee, as required by Department standards. (Action: Mission to the Dutch Caribbean)

**(U) Human Resources**

***(U) Lack of Standard Operating Procedures Hampered Human Resources Operations***

(U) OIG found that the mission's Human Resources unit lacked key planning and program management standard operating procedures. Specifically, the mission did not have procedures for payroll processing, timekeeping, position management, and training. As stated in the Government Accountability Office's *Standards for Internal Control in the Federal Government*,<sup>27</sup>

---

<sup>25</sup> (U) In accordance with 15 FAM 141a, b, the Real Property Application is the Department's single, centrally managed comprehensive database for all real property abroad. This application is the authoritative source of information for all foreign real property holdings managed and maintained by the Department as the single real property manager for U.S. Government agencies abroad.

<sup>26</sup> (U) 15 FAM 933.1, "Purpose."

<sup>27</sup> (U) GAO-14-704G, September 2014, at 29.

effective documentation assists in promoting internal controls by establishing and communicating responsibilities to personnel. Furthermore, guidance in 18 FAM 301.1-4 states that managing involves thoughtful planning and implementation of programs, projects, and processes in a manner that achieves their intended goals and objectives. OIG determined through interviews that the lack of standard operating procedures was caused by competing priorities. The absence of standard operating procedures for key business processes reduced the HR unit's efficiency and created risks that critical responsibilities, such as position management, time and attendance, and training, would not be carried out effectively and accurately.

**Recommendation 17:** (U) Mission to the Dutch Caribbean should prepare standard operating procedures for key human resources processes, including position management, time and attendance, and training. (Action: Mission to the Dutch Caribbean)

***(U) Mission Lacked Training Program for Locally Employed Staff***

(U) OIG found that the mission lacked a formal LE staff training program and did not plan and budget for training. The mission did not formally establish criteria for determining eligibility for training, as required by 3 FAM 7635.2. In addition, the Chief of Mission had failed to designate a post training officer as required by 13 FAM 101.2-2(F)(4). Although the mission had complied with the recommendation in the last inspection report to implement a training plan,<sup>28</sup> it did not follow through with an LE training plan in subsequent years. The absence of a training program can lead to performance deficiencies and employees' inability to increase their proficiency.

**Recommendation 18:** (U) Mission to the Dutch Caribbean should implement a formal training program for its LE staff in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

***(U) Mission Did Not Designate Officers to Fulfill Specific Functions***

(U) The mission did not designate officers to fulfill specific functions, such as Gift, Claims Assistance, and Protocol Officers, as required by 2 FAM 113.3a. The absence of designated officers increases the risk that key activities will not be performed, especially when the officer with primary responsibility is absent. The failure to designate responsibilities also hinders the mission's ability to design internal control systems that maintain appropriate segregation of duties.

**Recommendation 19:** (U) Mission to the Dutch Caribbean should comply with Department standards for the designation of officers for specific mission responsibilities. (Action: Mission to the Dutch Caribbean)

---

<sup>28</sup> (U) OIG, *Inspection of Consulate General Curacao, Kingdom of the Netherlands* (ISP-I-16-26A, September 2016).

***(U) Mission Lacked Duty Officer Guide***

(U) The mission did not have a duty officer guide, detailing instructions for emergencies, as required by 2 FAM 113.8-1a. Instead, the mission contracted a call center, Answer Force, to answer calls outside of office hours. The answering service forwarded all American citizen emergency calls to the Consular Officer, as the mission had not established a rotating duty officer system. OIG determined that the lack of a duty officer guide was caused by the lack of a structured duty program and the fact that the experienced Consular Officer took all urgent duty calls. Furthermore, the absence of a duty officer guide covering consular issues, as required by 7 FAH-1 H-291.2, increases the risk that effective American Citizen emergency services will not be performed correctly, especially after the current Consular Officer's departure from the mission. The failure to maintain a duty officer program also puts the burden on the Consular Officer to be on call every evening and weekend.

**Recommendation 20:** (U) Mission to the Dutch Caribbean should compile a duty officer guide. (Action: Mission to the Dutch Caribbean)

**(U) INFORMATION MANAGEMENT**

---

(U) The information management (IM) unit was led by an Information Management Officer (IMO), the sole USDH officer in the unit. The full-time IMO position was new, with the present incumbent, who arrived to post in August 2019, being the first to hold the position. The IMO was assisted by two LE staff members, one assigned as an Information Management Assistant, and the other assigned as the mail room clerk and chauffeur. OIG reviewed the mission's unclassified IM operations, information systems and mobile computing administration, mail and pouch services, cyber security practices, and emergency communications systems. OIG found the IM unit's operations generally met Department standards. However, as discussed below, OIG identified deficiencies in emergency readiness, as discussed below. Additionally, OIG identified deficiencies in records management oversight, organization, retirement, and use of record email.

***(U) Mission Did Not Test Information Technology Contingency Plan***

(U) OIG found that Mission to the Dutch Caribbean did not test its unclassified information technology contingency plan, as required by 12 FAH-10 H-232.3-1b(1)-(3). Department standards require annual contingency plan testing for effectiveness and to determine the mission's readiness to execute the plan during unplanned system outages or disruptions. Failure to regularly test its information technology contingency plan impedes the mission's ability to effectively respond to unplanned systems outages or disruptions.

**Recommendation 21:** (U) Mission to the Dutch Caribbean should test the information technology contingency plan for the unclassified network in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

~~(SBU)~~ (b) (7)(F) [Redacted]

~~(SBU)~~ (b) (7)(F) [Redacted]  
[Redacted]

**Recommendation 22:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management, (b) (7)(F) [Redacted]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

~~(SBU)~~ (b) (7)(F) [Redacted]

~~(SBU)~~ (b) (7)(F) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Recommendation 23:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management, (b) (7)(F) [Redacted]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

~~(SBU)~~ (b) (7)(F) [Redacted]

~~(SBU)~~ (b) (7)(F) [Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

(b) (7)(F)

**Recommendation 24:** (SBU) Mission to the Dutch Caribbean (b) (7)(F)

. (Action: Mission to the Dutch Caribbean)

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

(U) Mission to the Dutch Caribbean's records management program did not comply with Department standards for oversight, organization, and retirement. OIG found no records coordinator oversight, as required in 5 FAM 414.5b, and the mission had not delegated records management responsibility to an assigned responsible person in each section, in accordance with 5 FAH-4 H-215.3-2. OIG's random sampling of electronic files revealed that the mission did not organize records according to geography, relationship, and subject, as required in 5 FAM 415.2c. In addition, the mission did not retire program records in accordance with approved records disposition schedules, as required by 5 FAM 433. OIG found records dating back to 2002 with no clear purpose or value, which should have been retired or destroyed. Without a records management program that follows oversight, organization, and records retirement disposition standards, the mission is vulnerable to inefficient information retrieval, loss of position continuity, and incomplete historical material.

**Recommendation 25:** (U) Mission to the Dutch Caribbean should implement a records management program that complies with Department standards. (Action: Mission to the Dutch Caribbean)

***(U) Mission Did Not Use Record Email to Preserve Mission Records***

(U) OIG found that the Mission to the Dutch Caribbean did not use record email to document official business and to preserve records, as required in 5 FAH-1 H-212.2 and 5 FAM 1214.3. Additionally, the mission did not archive Diplomatic Notes to the State Messaging and Archiving Retrieval Toolset, in accordance with 5 FAH-1 H-621e. Staff told OIG they were not aware of these record email requirements. The lack of record email use can result in the loss of important data for insight into policy analysis, decision-making, and archival research.

**Recommendation 26:** (U) Mission to the Dutch Caribbean should implement use of record email to document official business and to archive Diplomatic Notes, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

## (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 the Mission to the Dutch Caribbean and the Bureau of Western Hemisphere Affairs. The Department's complete responses can be found in Appendix B.<sup>1</sup>

**Recommendation 1:** (U) The Bureau of Western Hemisphere Affairs, in coordination with the Bureau of European and Eurasian Affairs, the Office of Management Strategy and Solutions, and the Office of the Legal Adviser, should formally clarify and deconflict, if necessary, the delineation of authorities between the Chiefs of Mission to the Dutch Caribbean and the Netherlands. (Action: WHA, in coordination with EUR, M/SS, and L)

**Management Response:** (U) In its October 26, 2021, response, the Bureau of Western Hemisphere Affairs 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 Western Hemisphere Affairs formally clarified and deconflicted, if necessary, the delineation of authorities between the Chiefs of Mission to the Dutch Caribbean and the Netherlands.

**Recommendation 2:** (U) Mission to the Dutch Caribbean should conduct formal, annual reviews of its Integrated Country Strategy in accordance with Department guidelines. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of November 15, 2021.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean conducted formal, annual reviews of its Integrated Country Strategy in accordance with Department guidelines.

**Recommendation 3:** (U) Mission to the Dutch Caribbean should prepare the Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation.

---

<sup>1</sup> (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.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean prepared the Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance.

**Recommendation 4:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Democracy, Human Rights, and Labor, should draft and implement approved Leahy vetting standard operating procedures. (Action: Mission to the Dutch Caribbean, in coordination with DRL)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of January 31, 2022.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean drafted and implemented approved Leahy vetting standard operating procedures.

**Recommendation 5:** (U) Mission to the Dutch Caribbean should bring its management of foreign assistance grants into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean brought its management of foreign assistance grants into compliance with Department standards.

**Recommendation 6:** (U) Mission to the Dutch Caribbean should use PD Tools to report on public diplomacy programs and activities. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of January 2022.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean used PD Tools to report on public diplomacy programs and activities.

**Recommendation 7:** (U) Mission to the Dutch Caribbean should update its fraud prevention strategy and establish standard operating procedures to implement that strategy, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of December 15, 2021.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean updated its fraud prevention strategy and established standard operating procedures to implement that strategy, in accordance with Department standards.

**Recommendation 8:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the Consular Section's physical space into compliance with Department standards. (Action: Mission to the Dutch Caribbean, in coordination with OBO and CA)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean neither agreed nor disagreed with the recommendation, but it concurred that the Consular Section's physical space does not meet Department standards. The mission noted that the physical space in the new consulate building will be built in full compliance with Department standards. Furthermore, the mission clarified that after consultations with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, plans for a partition around the cashier's booth in the existing building were abandoned during the installation of the cashier's window in 2017 and 2018 due to space, electrical, and ventilation constraints. Additionally, the mission noted that the current size of the consular space combined with limited staffing provides proper oversight of the consular booth. The mission plans to formalize a procedure for giving applicants with sensitive cases access to the waiting room when there are no other applicants and minimal staff at the office.

**OIG Reply:** (U) OIG considers the recommendation resolved. OIG accepts the mission's plan to formalize a procedure to ensure the privacy of applicants with sensitive cases. However, as noted in the report, although OIG acknowledges that a new consulate building would address the consular physical space deficiencies, including the need to enclose the consular cashier booth with a lockable door, the timeline of the move, currently scheduled for 2026, could result in the deficiencies not being addressed for several years. Furthermore, OIG identified a third area in which the Consular Section's physical space did not meet Department standards: the section did not have an interview window at the appropriate height for wheelchair access, in accordance with 7 Foreign Affairs Handbook (FAH)-1 H-282(1)(I). The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean either brought the Consular Section's physical space into compliance with Department standards or implemented a mitigation plan to address the identified deficiencies.

**Recommendation 9:** (U) Mission to the Dutch Caribbean should bring its cashier operations, including management oversight of those operations, into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean brought its cashier operations, including management oversight of those operations, into compliance with Department standards.

**Recommendation 10:** (U) Mission to the Dutch Caribbean should review and de-obligate all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so funds of up to \$400,000 can be put to better use. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean reviewed and de-obligated all invalid unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so funds of up to \$400,000 can be put to better use.

**Recommendation 11:** (U) Mission to the Dutch Caribbean should submit reports for its outdated foreign per diem rates and living quarters allowance rates to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of December 31, 2021.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean submitted reports for its outdated foreign per diem rates and living quarters allowance rates to the Bureau of Administration's Office of Allowances in accordance with Department guidelines.

**Recommendation 12:** (U) Mission to the Dutch Caribbean should implement personal property management internal controls in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean

implemented personal property management internal controls in accordance with Department standards.

**Recommendation 13:** (U) Mission to the Dutch Caribbean should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean complied with all Department Overseas Motor Vehicle Safety Management Program requirements.

**Recommendation 14:** (U) Mission to the Dutch Caribbean should comply with Department standards on training employees in the use of powered industrial trucks, such as forklifts. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean complied with Department standards on training employees in the use of powered industrial trucks, such as forklifts.

**Recommendation 15:** (U) Mission to the Dutch Caribbean should update the Real Property Application, and complete safety certifications for all its real property in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean updated the Real Property Application and completed safety certifications for all its real property in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards.

**Recommendation 16:** (U) Mission to the Dutch Caribbean should form a standing Safety, Health and Environment Management committee, as required by Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean formed a standing Safety, Health and Environment Management committee, as required by Department standards.

**Recommendation 17:** (U) Mission to the Dutch Caribbean should prepare standard operating procedures for key human resources processes, including position management, time and attendance, and training. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean prepared standard operating procedures for key human resources processes, including position management, time and attendance, and training.

**Recommendation 18:** (U) Mission to the Dutch Caribbean should implement a formal training program for its LE staff in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean implemented a formal training program for its LE staff in accordance with Department standards.

**Recommendation 19:** (U) Mission to the Dutch Caribbean should comply with Department standards for the designation of officers for specific mission responsibilities. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of November 30, 2021.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean complied with Department standards for the designation of officers for specific mission responsibilities.

**Recommendation 20:** (U) Mission to the Dutch Caribbean should compile a duty officer guide. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation. The mission noted an estimated completion date of December 15, 2021.

**OIG Reply:** (U) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean compiled a duty officer guide.

**Recommendation 21:** (U) Mission to the Dutch Caribbean should test the information technology contingency plan for the unclassified network in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean tested the information technology contingency plan for the unclassified network in accordance with Department standards.

**Recommendation 22:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management, (b) (7)(F) [REDACTED]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation.

**OIG Reply:** ~~(SBU)~~ OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean (b) (7)(F) [REDACTED].

**Recommendation 23:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management, (b) (7)(F) [REDACTED]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation.

**OIG Reply:** ~~(SBU)~~ (SBU) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean  
(b) (7)(F)

**Recommendation 24:** ~~(SBU)~~ (SBU) Mission to the Dutch Caribbean (b) (7)(F)  
(b) (7)(F). (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean concurred with this recommendation.

**OIG Reply:** ~~(SBU)~~ (SBU) OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Mission to the Dutch Caribbean  
(b) (7)(F)

**Recommendation 25:** (U) Mission to the Dutch Caribbean should implement a records management program that complies with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean implemented a records management program that complies with Department standards.

**Recommendation 26:** (U) Mission to the Dutch Caribbean should implement use of record email to document official business and to archive Diplomatic Notes, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) In its October 27, 2021, response, the Mission to the Dutch Caribbean 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 Mission to the Dutch Caribbean implemented use of record email to document official business and to archive Diplomatic Notes, in accordance with Department standards.

## (U) PRINCIPAL OFFICIALS

---

Title	Name	Arrival Date
<b>Chief of Mission:</b>		
Consul General	Allen Greenberg	6/2019
<b>Chiefs of Sections:</b>		
Management	Robert Wolf	8/2019
Consular	Derek Kolb	8/2018
Political/Economic	Christian Olsen	6/2018
Public Affairs	Christian Olsen	6/2018
Regional Security	Kraig Kanahale	7/2020
<b>Other Agencies:</b>		
U.S. Customs and Border Protection	Timothy Pflug	10/2018
Drug Enforcement Administration	Brendan O'Meara	8/2019

(U) Source: Generated by OIG from data provided by Mission to the Dutch Caribbean.

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

---

(U) This inspection was conducted from March 15 to July 5, 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 and Scope**

(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) Methodology**

(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. 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) Because the inspection was conducted remotely, OIG could not complete some elements of a standard, on-site inspection. Specifically, OIG did not review Mission to the Dutch Caribbean's classified computer and communications security operations, or security program. Additionally, during the inspection, OIG could not assess certain areas due to the need to confirm information on-site. These areas included observing motor pool operations and fleet management, conducting spot checks of expendable and non-expendable property, observing

unannounced cash verifications, and verifying compliance in residential housing safety certifications, conducting a full of review records management, controls over consular accountable items, and consular cashiering functions.

## (U) APPENDIX B: MANAGEMENT RESPONSES

---



United States Department of State

Washington, D.C. 20520

October 26, 2021

UNCLASSIFIED

THRU: WHA – Ricardo Zúniga

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

FROM: WHA/EX – Carla Fleharty

SUBJECT: Response to Draft OIG Report – Inspection of the U.S. Mission to the Dutch Caribbean, IP-I-22-XX, September 2021

WHA/EX reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG:

### **OIG Recommendation 1:**

(U) The Bureau of Western Hemisphere Affairs, in coordination with the Bureau of European and Eurasian Affairs, the Office of Management Strategy and Solutions, and the Office of the Legal Adviser, should formally clarify and deconflict, if necessary, the delineation of authorities between the Chiefs of Mission to the Dutch Caribbean and the Netherlands. (Action: WHA, in coordination with EUR, M/SS, and L)

### **Management Response:**

(U) WHA concurs with the recommendation. WHA/EX, in coordination with WHA/CAR, EUR/WE, EUR/EX, L, and M/SS, created a Working Group to determine the best method to delineate responsibilities between the two Chiefs of Mission (COMs). The Working Group initially met October 13 to discuss the current division of responsibilities and potential methods to formalize these, including potential options to include an SOP attached to Mission Curacao's Emergency Action Plan, a best practices document, or an MOU between the two posts. The Working Group is currently collecting these best practices, looking at examples of cooperation during previous emergency situations. The Working Group will also look at the documentation

that exists for Missions China and Hong Kong, which also has a designated COM, as well as territories of other European countries in the WHA region, such as Bermuda. Emergency relief and assistance efforts, currently managed by SOUTHCOM and not EUCOM, should reflect any documentation regarding COM coordination responsibilities. Post responsibilities for Congressional Reports that are cleared by the COM should also be clarified as part of the documentation exercise.

The point of contact for this memorandum is WHA/EX/PMO Scott R. Fagan, cell: 202-304-6904, [FaganSR@state.gov](mailto:FaganSR@state.gov).



*Consulate General of the United States of America  
Curaçao, Aruba, St. Maarten and B.E.S Islands*

October 27, 2021

~~SENSITIVE BUT UNCLASSIFIED~~

THROUGH: WHA – Principal Deputy Assistant Secretary Ricardo Zúniga  
TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections  
FROM: U.S. Mission to the Dutch Caribbean – CDA Robin Matthewman  
SUBJECT: Response to Draft OIG Report – Inspection of the U.S. Mission to the Dutch Caribbean, ISP-I-22-XX, September 2021

U.S. Mission to the Dutch Caribbean has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG:

**OIG Recommendation 1:** (U) The Bureau of Western Hemisphere Affairs, in coordination with the Bureau of European and Eurasian Affairs, the Office of Management Strategy and Solutions, and the Office of the Legal Adviser, should formally clarify and deconflict, if necessary, the delineation of authorities between the Chiefs of Mission to the Dutch Caribbean and the Netherlands. (Action: WHA, in coordination with EUR, M/SS, and L)

**Management Response:** (U) Mission to the Dutch Caribbean understands the Bureau of Western Hemisphere Affairs will provide their response to this recommendation separately.

**OIG Recommendation 2:** (U) Mission to the Dutch Caribbean should conduct formal, annual reviews of its Integrated Country Strategy in accordance with Department guidelines. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. An annual (and final) review of the 2018 Integrated Country Strategy will be completed by November 15, 2021. Reviews of the current ICS will continue to occur annually. POC: CDA Robin Matthewman and Pol/Econ/PD Officer Kristen Lundberg.

**OIG Recommendation 3:** (U) Mission to the Dutch Caribbean should prepare the Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The Mission will use the 2021 Management Controls Checklist to review management controls procedures in Mission to the Dutch Caribbean. This checklist will be disseminated to the appropriate offices to complete outstanding items by March 31, 2022. This will allow the 2022 Annual Chief of Mission Management Control Statement of Assurance to be completed in accordance with Department guidance. POC: Management Officer Chris Wolf.

**OIG Recommendation 4:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Democracy, Human Rights, and Labor, should draft and implement approved Leahy vetting standard operating procedures. (Action: Mission to the Dutch Caribbean, in coordination with DRL)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The Mission will draft and implement the operating procedures by January 31, 2022, in coordination with the DRL bureau. POC: Kristin Lundberg, Pol/Econ/PD Officer.

**OIG Recommendation 5:** (U) Mission to the Dutch Caribbean should bring its management of foreign assistance grants into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this request. The Grants Officer Representative will take the 2-day PY261 Grants Officer Representative Training by June 30, 2022. In the meantime, the office will work with WHA offices to identify and fill documentation gaps in FY 2021 grants and any new ones. POC: Kristin Lundberg, Pol/Econ/PD Officer.

**OIG Recommendation 6:** (U) Mission to the Dutch Caribbean should use PD Tools to report on public diplomacy programs and activities. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission of the Dutch Caribbean concurs with this recommendation and will incorporate reporting on its public diplomacy efforts into its reporting plan and social media strategy, with the goal of reporting on its activities on at least a quarterly basis. The first report will occur in January 2022. POC: Kristin Lundberg, Pol/Econ Officer.

**OIG Recommendation 7:** (U) Mission to the Dutch Caribbean should update its fraud prevention strategy and establish standard operating procedures to implement that strategy, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The Consular Officer, working with the Regional Security Officer, will develop and implement a fraud prevention strategy along with standard operating procedures by December 15, 2021. POC: Anthony Brosnan, Consular Officer.

**OIG Recommendation 8:** (U) Mission to the Dutch Caribbean, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the consular

section's physical space into compliance with Department standards. (Action: Mission to the Dutch Caribbean, in coordination with OBO and CA)

**Management Response:** (U) Mission to the Dutch Caribbean, in consultation with the Bureau of Consular Affairs and the Bureau of Overseas Building Operations, concurs that the consular section's physical space does not meet Department standards. The physical space in the new consulate building will be built in full compliance with Department standards. Post notes, after consultations with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, that plans for a partition around the cashier's booth in the existing building were abandoned during the installation of the cashier's window in 2017 and 2018. Due to space, electrical, and ventilation constraints, it was determined that an enclosed cashier's booth would be unfeasible. Additionally, the current size of the consular space combined with limited staffing provides proper oversight of the consular booth. With respect to the lack of a privacy booth in the section, the consular section will formalize a procedure for giving applicants with sensitive cases access to the waiting room when there are no other applicants and minimal staff at the office. POC: Anthony Brosnan, Consular Officer, and Chris Wolf, Management Officer.

**OIG Recommendation 9:** (U) Mission to the Dutch Caribbean should bring its cashier operations, including management oversight of those operations, into compliance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The Management Officer designated the Information Programs Officer as an Alternate FMO in September 2021. Monthly cashier verifications are now up to date and oversight is strengthened. In addition, a training program for the cashier supervisor, the Class B Cashier and the alternate cashier has been developed, including online training and classroom training when available. POC: Chris Wolf, Management Officer.

**OIG Recommendation 10:** (U) Mission to the Dutch Caribbean should review all unliquidated obligations with no activity in over 1 year, de-obligate those which are no longer valid in accordance with Department standards, and put up to \$400,000 to better use. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Post has reviewed all unliquidated obligations (ULOs) with no activity for over 1 year and has begun deobligating, working with AQM to move each of these deobligation processes along as quickly as possible. POC: Chris Wolf, Management Officer.

**OIG Recommendation 11:** (U) Mission to the Dutch Caribbean should submit reports for its outdated foreign per diem rates and living quarters allowance rates to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The Community Liaison Officers will be tasked with completing the per diem

rates and/or LQA rates for all locations in the mission, and updating the information in the Allowances application. Action will be completed by December 31, 2021. POC: Chris Wolf, Management Officer.

**OIG Recommendation 12:** (U) Mission to the Dutch Caribbean should implement personal property management internal controls in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Through position reclassifications, post has separated the duties of receiving from those of property management, thus ensuring proper separation of duties. To correct the other property management deficiencies, the previous incumbent was separated, and a new employee was hired into the position, and is currently being trained. In addition, the Mission is looking at other hiring mechanisms which will provide the Management Officer with additional flexibilities in workload distribution. Post aims to have all PM deficiencies corrected before submission of FY 2022 Annual Inventory. POC is Chris Wolf, Management Officer.

**OIG Recommendation 13:** (U) Mission to the Dutch Caribbean should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. For medical certifications, the Mission is in process of hiring a local nurse to create a first-ever Health Unit in Curacao. The local nurse position will be responsible for ensuring medical certifications are received and kept up to date for all GOV operators. To improve timeliness of driver training, the Mission is also working to get the Motor Pool/Receiving Clerk trained as a Smith System trainer, so that we do not have to rely on trainers from other posts. The MP/Receiving clerk began in this role via a newly classified position in June 2021. Incumbent is working on 1) an update to the MVSMP policy and 2) updating medical and Smith training records for post. POC: Chris Wolf, Management Officer.

**OIG Recommendation 14:** (U) Mission to the Dutch Caribbean should comply with Department standards on training employees in the use of powered industrial trucks, such as forklifts. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Forklift training for all consulate operators was completed on October 14, 2021, and post will ensure refresher training occurs every three years. POC: Chris Wolf, Management Officer.

**OIG Recommendation 15:** (U) Mission to the Dutch Caribbean should update the Real Property Application, and complete safety certifications for all its real property in the Post Occupational Safety and Health Officer Certification Application, as required by Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. As of August 2021, post has completed certification for all properties in Curacao, and the majority of LQA properties in Aruba, thus bringing our completion rate to 82%. We are looking at options for completing certifications for LQA properties in Aruba on a timely basis. POC: Chris Wolf, Management Officer.

**OIG Recommendation 16:** (U) Mission to the Dutch Caribbean should form a standing Safety, Health and Environment Management committee, as required by Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. A standing SHEM Committee has been established; it includes Chief of Mission, Management Officer (POSHO), and LE staff Facility Manager (POSHO Assistant), RSO, HR LE staff, GSO LE staff. The nurse will be included when hired. The first semi-annual meeting was held on October 13, 2021. POC: Chris Wolf, Management Officer.

**OIG Recommendation 17:** (U) Mission to the Dutch Caribbean should prepare standard operating procedures for key human resources processes, including position management, time and attendance, and training. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Post will request assistance from WHA/FRC's regional HRO assigned to the Mission in writing and implementing these SOPs. POC: Chris Wolf, Management Officer and Tabrese Venson, FRC/RHRO.

**OIG Recommendation 18:** (U) Mission to the Dutch Caribbean should implement a formal training program for its LE staff in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Post will request assistance from WHA/FRC's regional HRO assigned to the Mission in establishing an appropriate training program for the Mission. POC: Chris Wolf, Management Officer and Tabrese Venson, FRC/RHRO.

**OIG Recommendation 19:** (U) Mission to the Dutch Caribbean should comply with Department standards for the designation of Officers for specific mission responsibilities. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Designations list outlining specific position responsibilities will be developed and issued by November 30, 2021. POC: Chris Wolf, Management Officer.

**OIG Recommendation 20:** (U) Mission to the Dutch Caribbean should compile a duty Officer guide. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean agrees with this recommendation. The duty Officer guide will be finalized by December 15, 2021. POC: Anthony Brosnan, Consular Officer, and Chris Wolf, Management Officer.

**OIG Recommendation 21:** (U) Mission to the Dutch Caribbean should test the information technology contingency plan for the unclassified network in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. The information technology contingency plan will be updated and tested as soon as is possible. In addition, a schedule for testing will be established and shared appropriately within the Mission. POC: Zach Archie, Information Management Officer and Chris Wolf, Management Officer.

**OIG Recommendation 22:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management, (b) (7)(F) [REDACTED]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

**Management Response:** ~~(SBU)~~ Mission to the Dutch Caribbean concurs with this recommendation and is working closely with WHA/FRC/RIMC. (b) (7)(F) [REDACTED]. POC: Zach Archie, Information Management Officer and Chris Wolf, Management Officer.

**OIG Recommendation 23:** ~~(SBU)~~ Mission to the Dutch Caribbean, in coordination with the Bureau of Information Resource Management (b) (7)(F) [REDACTED]. (Action: Mission to the Dutch Caribbean, in coordination with IRM)

**Management Response:** ~~(SBU)~~ Mission to the Dutch Caribbean concurs with this recommendation. (b) (7)(F) [REDACTED]. POC: Zach Archie, Information Management Officer, and Chris Wolf, Management Officer.

**OIG Recommendation 24:** ~~(SBU)~~ Mission to the Dutch Caribbean (b) (7)(F) [REDACTED]. (Action: Mission to the Dutch Caribbean)

**Management Response:** ~~(SBU)~~ Mission to the Dutch Caribbean concurs with this recommendation. (b) (7)(F) [REDACTED]. POC: Zach Archie, Information Management Officer, and Chris Wolf, Management Officer

**OIG Recommendation 25:** (U) Mission to the Dutch Caribbean should implement a records management program that complies with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Post will designate IPO as Records Officer and pursue available options to ensure a records management program is put in place. Outdated records will be retired or destroyed per records management procedures. POC: Zach Archie, Information Management Officer, and Chris Wolf, Management Officer.

**OIG Recommendation 26:** (U) Mission to the Dutch Caribbean should implement use of record email to document official business and to archive Diplomatic Notes, in accordance with Department standards. (Action: Mission to the Dutch Caribbean)

**Management Response:** (U) Mission to the Dutch Caribbean concurs with this recommendation. Post will begin to archive Diplomatic Notes using record/archive email in SMART. POC: Zach Archie, Information Management Officer and Chris Wolf, Management Officer.

The main points of contact for this memorandum are Charge d’Affaires Robin Matthewman and Management Officer Chris Wolf.

## (U) ABBREVIATIONS

---

CBP	U.S. Customs and Border Protection
COLA	Cost-of-Living Allowance
DEA	Drug Enforcement Administration
DSSR	Department of State Standardized Regulations
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
IM	Information Management
IMO	Information Management Officer
LE	Locally Employed
POSHO	Post Occupational Safety and Health Officer
SHEM	Safety, Health, and Environmental Management
USDH	U.S. Direct Hire

## **(U) OIG INSPECTION TEAM MEMBERS**

---

Joseph R. Donovan Jr, Team Leader

Thea Calder, Team Manager

Matthew Conger

Paul Gilmer

Gina Horn

Christine Kagarise

Thomas Leary

James Norton

Gregory Winstead

### **(U) Other Contributors**

Diana McCormick

Rebecca Sawyer



## **HELP FIGHT**

### FRAUD, WASTE, AND ABUSE

1-800-409-9926

[www.stateoig.gov/HOTLINE](http://www.stateoig.gov/HOTLINE)

If you fear reprisal, contact the  
OIG Whistleblower Coordinator to learn more about your rights.

[WPEAOmbuds@stateoig.gov](mailto:WPEAOmbuds@stateoig.gov)