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Office of Inspector General
United States Department of State

ISP-I-22-14

Office of Inspections

May 2022

Inspection of Embassy Athens and Constituent Post, Greece

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

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HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-22-14

What OIG Inspected

OIG inspected the executive direction, program and policy implementation, resource management, and information management operations of Embassy Athens. The inspection included Consulate General Thessaloniki.

What OIG Recommends

OIG made 14 recommendations to Embassy Athens.

In its comments on the draft report, Embassy Athens concurred with all 14 recommendations. OIG considers all 14 recommendations resolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal response is reprinted in its entirety in Appendix B.

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OFFICE OF INSPECTIONS

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What OIG Found

- Mission Greece's leadership team advanced the bilateral relationship between the governments of Greece and the United States.
- During the COVID-19 pandemic, the mission successfully shifted more than 300 staff members to telework and provided equipment and training for Department of State collaboration and cloud technologies.
- Public diplomacy grants administration did not meet Department standards for documenting grant monitoring and evaluation.
- Forty-seven percent of the mission's residences had not been assessed for seismic risk despite the Department rating the occurrence or frequency of earthquakes in Athens as "very high" and in Thessaloniki as "high."
- The embassy did not complete the required systems authorization process for 13 locally developed computer applications.
- Spotlight on Success: The embassy's initially small "CodeGirls" computer programming initiative, aimed at addressing Greece's tech sector gender gap, expanded nationwide due to strong support from local communities and the private sector.

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CONTEXT

Greece, a parliamentary democracy, occupies a strategic location where Southern Europe meets the Aegean, Ionian, and Mediterranean Seas. Greece borders Albania, Northern Macedonia, Bulgaria, and Turkey; its territory includes an archipelago of approximately 2,000 small islands. Athens is Europe's oldest capital city and home to a third of the country's 10.5 million people.

The United States appointed its first consul to Greece in 1837, following Greece's independence from the Ottoman Empire, and the two countries established diplomatic relations in 1868. After World War II, the United States contributed hundreds of millions of dollars to Greece as part of the Marshall Plan. Currently, an estimated three million Americans claim Greek descent and more than one million Americans visit Greece each year.



Greece joined the North Atlantic Treaty Organization (NATO) in 1952 and its membership in the European Community (now the European Union) dates to 1981. Greece is an important partner for the United States on regional peace and security initiatives. The two countries launched a bilateral strategic dialogue in December 2018 that focused on regional cooperation, defense and security, trade and investment, energy, law enforcement, counterterrorism, and people-to-people ties. A mutual defense cooperation agreement, updated in October 2021, supports U.S. naval operations in Crete and U.S. forces at several other locations in Greece. Greece contributed to NATO operations in Afghanistan and continues to support NATO operations in Kosovo.

Figure 1: Map of Greece. (Source: CIA World Factbook.)

Greece suffered a severe economic crisis beginning in late 2009 due to years of chronic overspending. The Greek government implemented successive bailout agreements with regional and global financial institutions totaling about \$300 billion, formally exiting the last one in August 2018.

Mission Greece's FY 2018-2022 Integrated Country Strategy's (ICS) three core policy goals are to:

- Strengthen and expand cooperation in areas of defense and security.
- Support Greece's economic recovery and its role in European energy security.

- Engage the Greek public in support of shared objectives to ensure that Greece continues to play a vital stabilizing role, while countering the growing influence of Russia and China.

The U.S. diplomatic mission to Greece consists of Embassy Athens and Consulate General Thessaloniki. At the time of the inspection, Mission Greece had 140 authorized U.S. direct-hire positions, 23 eligible family member positions, and 258 locally employed (LE) staff positions. Of the 140 U.S. positions, 104 worked for the Department of State (Department) and 36 worked for other U.S. Government agencies, including the Departments of Commerce, Defense, Homeland Security, and Justice. The chancery compound in Athens was undergoing a \$350 million renovation scheduled for completion in 2024. Construction was approximately 2 years behind schedule, with 1 year of the delay directly attributable to the COVID-19 pandemic. Because of the renovation, embassy operations were split between two locations.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.¹ Because of the COVID-19 pandemic, OIG conducted most of the inspection remotely, sending a limited number of inspectors to the embassy. A related classified inspection report discusses the embassy's security program and issues affecting the safety of embassy personnel and facilities.

EXECUTIVE DIRECTION

OIG assessed Mission Greece's leadership based on interviews, staff questionnaires, a review of documents, and observations of meetings.

Tone at the Top and Standards of Conduct

The Ambassador, a member of the Senior Foreign Service, arrived in September 2016. Previously, he served as Ambassador to Ukraine, Principal Deputy Assistant Secretary for the Bureau of South and Central Asian Affairs, and as the Deputy Chief of Mission (DCM) in India. The DCM arrived in August 2019. He previously served as Political Counselor in Afghanistan and DCM in Slovenia.

OIG found the Ambassador and the DCM led Mission Greece and demonstrated leadership in accordance with the leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214.² In response to the COVID-19 pandemic, the Ambassador communicated to mission employees through monthly virtual town halls and messages distributed through an internal emergency notification system. Staff told OIG the Ambassador and the DCM promoted collaboration and cooperation in meetings and working groups, describing both as approachable and accessible. Although the Ambassador focused much of his time on engaging

¹ See Appendix A.

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

with outside stakeholders, Country Team members told OIG that when they needed guidance quickly, he made himself available on short notice. To coordinate policy and operations, the DCM met internally on a regular basis with section and agency heads, LE staff members, and issue-oriented working groups. Staff told OIG the DCM exhibited the qualities in 3 FAM 1214b(8) and (9) to value and develop people and manage conflict, which helped him in dealing with personnel issues.

OIG found the Ambassador modeled integrity in accordance with 3 FAM 1214b(1). Mission employees told OIG the Ambassador conducted himself according to ethical standards and held staff accountable to the same standards. Mission records OIG reviewed showed the Ambassador emphasized the importance of ethical standards during town hall meetings. In addition, OIG determined the mission maintained its gift registry in accordance with Department guidance in 2 FAM 964 and 16 STATE 97388,³ with staff saying the Ambassador was scrupulous with respect to properly reporting gifts received by the Front Office.

Execution of Foreign Policy Goals and Objectives

OIG found the embassy carried out strategic planning responsibilities consistent with requirements in 18 FAM 301.2-4(D). For example, in January 2020 and again in March 2021, the Ambassador, the DCM, and embassy staff reviewed progress on the ICS to ensure that the mission's efforts remained on track. Parallel to this effort, the Ambassador and the Country Team collaborated with the Greek Government on initiatives under the United States-Greece Strategic Dialogue, a bilateral umbrella framework that encompasses matters such as regional cooperation, defense and security, law enforcement and counterterrorism, energy and the environment, humanitarian challenges and disaster preparedness, and people-to-people ties.

The Ambassador fulfilled his responsibility under 2 FAM 113.1b to oversee the mission's strategic activities. Staff told OIG that the Ambassador's detailed knowledge of bilateral issues was an important component of Mission Greece's success. For example, the Ambassador personally worked with the Washington interagency community to prepare the groundwork for the most recent high-level meeting of the Strategic Dialogue, which took place in Washington on October 14, 2021. At this session, the Greek Foreign Minister and the Secretary of State signed amendments to the Mutual Defense Cooperation Agreement, which expanded the scope of bilateral political-military relations and allowed the U.S. military greater access to military facilities in Greece. Additionally, Department officials told OIG the Ambassador coordinated with his regional embassy counterparts in Cyprus and Turkey to provide the Department with a better understanding of regional tensions. The DCM, in addition to his duties internal to the embassy, maintained contact with key host government and diplomatic interlocutors to enable him to function effectively when serving as Chargé d'Affaires in the Ambassador's absence.

³ Cable 16 STATE 97388, "NEW* Reporting Requirements for Official Donations and Gifts to the Department of State," September 1, 2016.

Embassy staff told OIG the Ambassador used his frequent media appearances to explain U.S. policies and promote U.S. values, thereby elevating the image of the United States in Greece. They also said he engaged with the highest levels of Greek Government, business, and civil society and leveraged these contacts to help his staff move the mission agenda forward at the working level. For example, members of the embassy's Law Enforcement Working Group told OIG the Ambassador and the DCM emphasized with high-level host country security officials the importance of bilateral security cooperation. OIG found frequent visits by U.S. policymakers and Members of Congress helped to foster what is now—but has not always been—a warm bilateral relationship focused on areas such as defense, investment, trade, and law enforcement cooperation.

Impact of COVID-19 Pandemic

OIG found that the Front Office's response to the COVID-19 pandemic was consistent with 2 FAM 031d and 2 FAM 032.6g guidance on risk management.⁴ The Ambassador told OIG that his priority was to keep the mission community safe. The mission issued more than 70 management notices, supplementing the top-line points the Ambassador delivered to mission staff via electronic messaging and at monthly virtual town halls. The mission adopted the Government of Greece's public health measures, such as placing the mission on a maximum telework status and confining staff to their residential neighborhoods. Even as the incidence of COVID-19 in Greece began to decline and the mission began to lift restrictions, the Health Unit continued its community outreach, focusing on the impact of months of isolation on dependent children.

Mission employees told OIG the COVID-19 shutdowns had a varied impact on their operations. Most employees continued their work via a combination of telephone, virtual outreach, or in appropriately distanced small in-person meetings. For instance, the Ambassador hosted on short notice at his residence an internal (appropriately distanced) embassy discussion of sensitive political-military issues that needed quick resolution. Separately, the Public Diplomacy Section took advantage of down-time to make progress in closing out grants for completed programs. However, some sections were unable to carry out work that required an on-site presence. For example, based on a recommendation from the mission's Emergency Action Committee, the Ambassador paused operations at the chancery reconstruction project. Separately, the Management Section was unable to conduct occupational safety inspections of residential properties, and the Consular Section could not make daily cash deposits for consular services to the embassy's principal cashier.

⁴ According to 2 FAM 031d, a key tenet of leadership at the Department is to lead teams to the best possible assessment of risk, implementation of mitigation measures, and an evaluation of the residual risk that still remains, through sound planning and management. The Department expects leaders to judge whether the benefits of an activity outweigh the residual risk potential and to act accordingly. Guidelines in 2 FAM 032.6f also state that chiefs of mission set the risk tolerance level at their mission and communicate it clearly to staff.

Adherence to Internal Controls

The Front Office oversaw the preparation of the FY 2021 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1) and (5), which require chiefs of mission to develop and maintain appropriate systems of management control for their organizations and submit statements of assurance detailing the evaluation of such controls. OIG reviewed the mission's documentation, which showed that mission sections reviewed internal controls as required and listed no significant deficiencies or weaknesses. As discussed later in this report, OIG identified internal control issues in information technology (IT) contingency planning, information systems security officer responsibilities, Post Occupational Health and Safety Officer certifications, motor vehicle safety, grants management, and records management.

OIG confirmed the DCM carried out regular reviews of the Consular Section chief's nonimmigrant visa adjudications, as required by 9 FAM 403.12-1b and 9 FAM 403.12-2a-b.

Security and Emergency Planning

OIG found that the Ambassador's leadership of the security and emergency preparedness programs generally was consistent with Department guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-762a. OIG determined the emergency action plan was up-to-date and, given COVID-19 restrictions on in-office presence, the mission targeted its ongoing series of drills at those security-related personnel who regularly had to be at the embassy. The Ambassador also participated in an April 2021 crisis management exercise, after which the mission submitted a "lessons learned" cable to the Department. OIG identified some security-related issues which are discussed further in the related classified report.

OIG confirmed the mission carried out an annual review of the security memorandum of agreement between the Chief of Mission and the Department of Defense geographic combatant commander in 2021, in accordance with 2 FAH-2 H-116.4b.

Equal Employment Opportunity

OIG found that the Mission's Equal Employment Opportunity (EEO) practices were consistent with 3 FAM 1514c(2) and 21 STATE 60514.⁵ Mission staff members told OIG the Ambassador and the DCM emphasized the importance of EEO programs, diversity, and inclusion. For example, the Ambassador made EEO a major talking point in his June 2020 town hall, and in September 2021, the DCM sent a message to the workforce reiterating that Mission Greece's leadership was strongly supportive of EEO principles and adherence to EEO laws and regulations. Additionally, in March 2021, the EEO counselors joined with the mission's Diversity and Inclusion Council and the Federal Women's Program Coordinator to release a flyer to the community on harassment and toxic behavior in the workplace. The DCM attended the

⁵ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

Diversity and Inclusion Council's meetings in an advisory capacity and, to facilitate increased communication, the Front Office invited a council representative to attend weekly Country Team meetings.

Developing and Mentoring Foreign Service Professionals

OIG found the Front Office oversaw the mission's First- and Second-Tour (FAST) employee program, as required in 3 FAM 2242.4. The Ambassador and the DCM met individually with incoming FAST personnel to ensure they quickly integrated into life at the mission and regularly met with FAST personnel as a group on issues pertaining to career development. Additionally, the Front Office participated in three of the seven FAST program events held between November 2020 and August 2021. The Front Office also participated in two of the three events for the mid-level employee professional development program conducted between February and August 2021.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Mission Greece's policy and program implementation through a review of the advocacy and analysis work of the Political, Economic, and Public Diplomacy Sections, and the U.S. citizen and visa services provided by the Consular Section. OIG found the Political and Economic sections met Department requirements for policy and program implementation. The Public Diplomacy and Consular Sections also generally met Department requirements, with the exceptions discussed below.

Political and Economic Sections

OIG reviewed the Political and Economic Sections' leadership and management, policy implementation, reporting and advocacy, Leahy vetting,⁶ grants, commercial promotion, and end-use monitoring functions. OIG found that these functions complied with Department standards. During the inspection, the Political Section updated its Leahy vetting standard operating procedure.

Department offices and interagency stakeholders commended Mission Greece's political and economic reporting, which generally reflected ICS goals and mission priorities, for its quality and relevance. Department officials told OIG the annual reports on human rights, anti-trafficking and religious freedom were of a high standard and reporting on energy issues was particularly strong. The Economic Section played a leading role in the successful negotiation of a new bilateral Science and Technology Agreement to expand cooperation between the United

⁶ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the United States from furnishing certain assistance to a unit of a foreign security force if the Department has credible information that the unit has committed a gross violation of human rights. See 22 U.S.C. § 2378d and 9 FAM 303.8-5(B). Leahy vetting is the process of determining if the Department has credible information that units or individuals proposed to benefit from certain assistance have committed a gross violation of human rights. The Department helps implement a similar law applicable to "amounts made available to the Department of Defense" for assistance to foreign security forces. See 10 U.S.C. § 362.

States and Greece in this area. Officials from the Department and the Department of Commerce attributed the removal of Greece from the Special 301 Report watch list⁷ to the mission's sustained efforts to encourage the Government of Greece to reform its intellectual property legislation.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning and reporting, resource and knowledge management, media engagement, policy programming and exchanges, and grants administration.⁸ Section staff uniformly praised the Public Affairs Officer for helping them manage a high operational tempo that remained focused on ICS goals and the bilateral strategic dialogue, especially the "people-to-people" pillar for which the section had lead responsibility. OIG found that the section displayed strong team cohesion and collaboration with other mission elements, despite the challenge of having to split time between the chancery and an annex located about 2 miles away. Washington stakeholders praised the section for its internal reporting on public diplomacy activities as well its substantive cables on topics such as disinformation, women's issues, and the education sector.

The section began competing its public diplomacy grants in FY 2020, correcting an earlier over-reliance on sole sourced awards, and successfully leveraged local partner resources to extend the effect of each project. For example, in FY 2021 the section invested approximately \$500,000 from its own budget in grants while garnering almost \$675,000 in cost share resources from grantee partners. Overall, OIG found the mission's public diplomacy activities met Department standards and guidance, with the exceptions noted below.

Public Diplomacy Grants Did Not Meet Department Standards for Monitoring, Evaluation and File Documentation

OIG found that public diplomacy grants files were missing documentation required by the Department's Federal Assistance Directive,⁹ most notably in the areas of monitoring and evaluation. OIG reviewed 22 grants from FY 2020 and FY 2021 totaling \$1.2 million (including all grants of \$25,000 and greater), out of a universe of 100 grants totaling \$2.3 million. None of the reviewed grant files included the required documentation of the merit review process

⁷ The Office of the U.S. Trade Representative annually releases a Special 301 Report on the adequacy and effectiveness of U.S. trading partners' protection and enforcement of intellectual property rights. Countries judged to have insufficient intellectual property protection and/or enforcement are placed on a "watch list" and may be subject to sanctions. The U.S. Trade Representative conducts this review pursuant to Section 182 of the Trade Act of 1974, as amended (see 19 U.S.C. § 2242).

⁸ Because of the pandemic-related travel restrictions, OIG was limited in its ability to review operations at the section's American Corners, a network of embassy-supported public diplomacy facilities located at libraries and educational institutions in six locations throughout the country.

⁹ The Department of State Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts administering Federal financial assistance. It is updated annually by the Department's Bureau of Administration, Office of the Procurement Executive.

conducted by the mission for grant selection,¹⁰ and 17 of 22 files lacked the required grants officer representative designation memo.¹¹ The section addressed these lapses during the inspection. In addition, only 1 of the 22 grant files reviewed included documentation of monitoring and evaluation of programmatic performance. The Federal Assistance Directive requires documented monitoring of all grants to track and assess the recipient's programmatic performance and financial management.¹² The section documented the financial management of each grant, but generally failed to document any monitoring or evaluation of programmatic performance. Section staff told OIG that they lacked the time to fulfill and document these monitoring duties due to the press of more urgent daily tasks. Without documented performance monitoring and evaluation, the section cannot determine whether the intended activities, goals, and objectives of each grant are accomplished.

Recommendation 1: Embassy Athens should monitor and evaluate the programmatic performance of its grant recipients and document its findings, in accordance with Department standards. (Action: Embassy Athens)

Ambassador's Use of a Personal Twitter Account for Official Messaging Contravened Department Policy

The Ambassador's use of a personal Twitter account for official messaging contravened Department policy. The account was the mission's most active communication platform for official content, with almost 150,000 followers, three times more than the mission's next largest social media account. As outlined in 10 FAM 182a(1) and (2), senior officials who engage in official communication on behalf of the Department over social media must use official rather than personal social media accounts. The Ambassador's account predated the Department's FAM policy cited above, which became effective in August 2017; he created the account during his 2013 to 2016 tenure as U.S. Ambassador to Ukraine and retained it when he became Ambassador to Greece in 2016. The policy requiring institutional rather than personal accounts is intended to ensure that staff time and resources invested in building audiences for social media accounts are not forfeited when an ambassador leaves post. Additionally, the use of a personal account for official content can put at risk compliance with Federal record-

¹⁰ Federal Assistance Directive, Chapter 2, Section H, "Conduct a Merit Review of Proposals and Recipient Selection" (October 2019, and later revisions), states that "for a competition to qualify as full and open, applications received from the [Notice of Opportunity to Fund (NOFO)] must be subject to an impartial merit evaluation by a review panel." Additionally, a "summary of the review panel's discussion and copies of written reviews are maintained in the official Federal award file."

¹¹ Federal Assistance Directive, Chapter 2, Section P, "Grants Officer Designates Grants Officer Representative (GOR)" (October 2019, and later revisions), states a grants officer representative "must be designated in writing" and the designation memo is to be "included as a formal document in the official Federal award file."

¹² Federal Assistance Directive, Chapter 4, Section D, "Monitoring and Reporting" (October 2019, and later revisions), states that monitoring is mandatory "to ensure that programmatic and financial management performance has been adhered to and that the intended activities, goals, and objectives are being accomplished." The grants officer and grants officer representative are responsible for ensuring that monitoring is conducted and documented.

keeping requirements, as outlined in 10 FAM 182c.¹³ During the inspection, the mission developed an account transition plan to a properly named new account, which the Ambassador agreed to identify and encourage his audience to follow when he prepares his final pre-departure messages. The mission also began archiving the account's official content. Given these actions, and the expectation that a new ambassador would be in place shortly (an announced nominee was awaiting Senate confirmation at the time of the inspection), OIG did not make a recommendation on this issue.

Spotlight on Success: CodeGirls Program Helped Address Tech Sector Gender Gap

To help close Greece's gender gap in the technology sector, the Public Diplomacy Section partnered with a Greek nongovernmental organization to launch CodeGirls, a computer programming course intended to educate, inspire, and equip 10-16-year-old girls with job skills. What started in 2015 as a \$24,000 pilot project has become one of the mission's most prominent programs, with steady requests from schools and local governments to expand the program to their communities. As of October 2021, CodeGirls trained more than 500 girls across eight Greek cities. During the inspection, the mission expanded the program to the Greek island of Syros and broadened the initiative with a new "CodeMoms" set of courses, thanks to a \$200,000 contribution from a major U.S. technology company.

Consular Operations

OIG reviewed Embassy Athens' consular operations, including U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. OIG also inspected notarial services procedures at Consulate General Thessaloniki.¹⁴ Due to the COVID-19 pandemic, the Consular Section limited in-person staffing and reduced services on March 16, 2020. At the time of the inspection, the Consular Section had resumed most U.S. citizen and immigrant visa services but continued to offer only limited nonimmigrant visa services while working in half the section's normal space due to the multi-year renovation of the section's building. The Consular Section also faced other operational challenges related to the construction, including working with significant noise and dust, and moving twice in the 3 years prior to the inspection. Overall, OIG found the mission's consular operations generally complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, except for crisis preparedness, as described below.

Consular Crisis Preparedness Did Not Comply With Department Standards

The Consular Section's crisis preparedness did not comply with Department guidance. The section did not conduct consular crisis management discussed in 7 FAM 1812.1-9 and did not

¹³ 10 FAM 182c, "Official Communication using Social Media," states, "All accounts that have been used for official communications are considered Department accounts and are either retained by the Department for use by the next incumbent or retired in accordance with applicable records disposition schedules, as appropriate. The content of such accounts is also retired in accordance with applicable records disposition schedules."

¹⁴ Notarial services are the only type of consular services offered at Consulate General Thessaloniki.

formally test its American Liaison Network¹⁵ as called for in 7 FAM 1812.1-2a. Furthermore, 13 of the section's 15 LE staff members did not take crisis task force refresher training, as encouraged by 7 FAH-1 H-292.7a. Consular managers told OIG they focused on maintaining operations during the COVID-19 pandemic, which prevented full engagement on crisis preparedness activities. Failure to comply with Department standards could put U.S. citizens at risk during future crises.

Recommendation 2: Embassy Athens should comply with Department standards for consular crisis preparedness. (Action: Embassy Athens)

RESOURCE MANAGEMENT

OIG reviewed operations and internal controls in facility management, general services, financial management, human resource management, the health unit, and the Community Liaison Office. During the inspection, the mission corrected several internal control issues identified by OIG. Specifically, the mission:

- Completed designation letters for all 10 mission subcashiers (4 FAM 061.13-1a-c and 4 FAH-2 H-813).
- Issued an updated management instruction on the mission's cashier services policy to reflect the change in the weekly limit for accommodation exchange services (4 FAM 399.4-2a).
- Adjusted permissions in the time and attendance system so the main timekeeper no longer had access to record or revise their own records (4 FAH-3 H-525.3-4).
- Reviewed the inventory of confined spaces¹⁶ and ensured each had appropriate signage (Departmental Safety, Occupational Health, and Environmental Management Resource Guide).
- Conducted a second site survey of the mailroom and mail screening facility (14 FAH-4 H-123).
- Secured previously unsecured and unused materials in the chancery parking garage and construction site to prevent the items from being used as weapons of opportunity (15 FAM 962).

OIG found the mission's Management Section generally implemented processes and procedures in accordance with Department guidance, with the exceptions noted below.

¹⁵ 7 FAM 071 states the American Liaison Network is made up of citizen liaison volunteers who serve as liaisons between consular sections and U.S. citizen communities overseas.

¹⁶ A confined space is a work location that is large enough and configured so that an employee can enter and perform assigned work, has limited or restricted openings for entry, and is not designed for continuous occupancy.

Facility Management

Mission Safety Program Did Not Fully Meet Department Safety Standards

OIG found that Mission Greece had not completed all required Post Occupational Health and Safety Officer (POSHO) certifications in the POSHO Certification Application.¹⁷ The Bureau of Overseas Buildings Operations' (OBO) Post Compliance Report from October 27, 2021, showed the mission did not complete residential certifications for 8.4 percent of the residences in Athens. In addition, the mission did not complete non-residential certifications for 30 percent of properties in Athens or any of those in Thessaloniki. Department standards in 15 FAM 971 require the POSHO to complete a certification in the POSHO Certification Application for each post property. OIG determined that this issue was primarily the result of the embassy failing to complete the safety certifications before occupancy, as required in 15 FAM 312.6-1. Consulate General Thessaloniki did not have a designated and trained POSHO, and travel restrictions related to the COVID-19 pandemic prevented the embassy's POSHO from traveling to Thessaloniki to complete the certifications. Failure to conduct safety certifications and correct identified safety issues could expose occupants to serious safety hazards, such as electrocution, falls, carbon monoxide poisoning, and accidental fires.

Recommendation 3: Embassy Athens should require that safety certifications for all mission properties are conducted and documented in the Post Occupational Health and Safety Officer Certification Application and that any identified safety issues be corrected prior to occupancy, in accordance with Department standards. (Action: Embassy Athens)

Mission Did Not Evaluate the Seismic Safety of All Residential Properties

Data in the Real Property Application¹⁸ indicated the mission did not assess the seismic risk for 51 of its 108 residences (47 percent). According to 15 FAM 252.6f(3), missions in high-seismic areas are required to evaluate the seismic safety of their residential buildings using OBO-approved methods. OBO rates the occurrence or frequency of earthquakes in Athens as Zone 4 ("very high") and Thessaloniki as Zone 3 ("high"). Most of the properties yet to be assessed were leased prior to 2020. Section staff told OIG seismic assessments were not completed due to lack of funds to contract the services of a local structural engineer. Failure to conduct seismic

¹⁷ The POSHO manages the embassy's safety, health, and environmental management program, which must meet 15 FAM 960 and other related Department requirements. The POSHO develops the administrative procedures and budget necessary to meet program requirements, goals, and objectives. The POSHO Certification Application generates and documents the form used to certify that Government-owned or newly purchased or leased residences meet 15 FAM 970 requirements for POSHO certification. The form contains the safety requirements that must be certified prior to occupancy and allows for the attachment of relevant documentation for a given property.

¹⁸ The Real Property Application system was designed to meet the requirements of Executive Order 13327 Federal Real Property Asset Management, February 4, 2004, which defines Federal real property as "any real property owned, leased, or otherwise managed by the Federal Government, both within and outside the United States." This system provides users with the ability to effectively manage all aspects of their real property holdings in an automated, web-based environment that is centrally managed in Washington, D.C.

evaluations and mitigate identified issues risks the life safety of residential occupants and could result in fatalities or serious injuries in an earthquake.

Recommendation 4: Embassy Athens, in coordination with Bureau of Overseas Buildings Operations, should evaluate all mission residential properties for seismic risk in accordance with Department standards. (Action: Embassy Athens, in coordination with OBO)

General Services

Mission Driver Shifts Exceeded Operator Duty Limits

OIG reviewed time and attendance records in 2021 for 21 of the mission's 25 drivers and found mission drivers exceeded the 10-hour daily duty shift maximum in 20 of the 21 pay periods reviewed.¹⁹ According to 14 FAM 433.8a, drivers should normally not be required to perform more than 10 hours on duty, and then only after a minimum 8-hour sleep period. OIG determined that mission drivers regularly exceeded the duty limit because of a lack of management oversight and because the mission failed to follow Department guidelines and its own motor vehicle policy. 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 5: Embassy Athens should enforce driver duty limits for mission drivers in accordance with Department guidelines. (Action: Embassy Athens)

Forklift Operators Lacked Required Training

OIG found that the mission's four forklift operators had not taken training in operating, maintaining, and storing of powered industrial trucks, such as forklifts, within the 3 years prior to the inspection. In accordance with 14 FAH-1 H-313.6-2c and d and 14 FAH-1 H-313.4a(1), (2), and (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. Section staff told OIG they were unaware of the requirement. Failure to ensure that employees are properly trained in the use of powered industrial trucks creates a potential workplace safety hazard.

Recommendation 6: Embassy Athens should comply with Department standards on training employees in the use of powered industrial trucks. (Action: Embassy Athens)

Mission Lacked Current Per Diem Rates

OIG found that Mission Greece last updated its foreign per diem rates in 2011. Department of State Standardized Regulations Section 074.2 states that embassies should submit a hotel and restaurant report, used to review and establish foreign travel per diem rates, every 2 years. Section staff told OIG they were unaware of the requirement. Failure to submit reports in a

¹⁹ According to OIG's review of the time and attendance records, all 21 drivers exceeded the 10-hour daily duty shift maximum at least once in the 20 pay periods.

timely manner could result in overpayment or underpayment of travel expenses to U.S. Government employees.

Recommendation 7: Embassy Athens should submit its foreign per diem reports in accordance with Department standards. (Action: Embassy Athens)

Mission Used Shipping Containers for Permanent Storage

OIG found the mission used eight shipping containers located on the warehouse compound to store equipment for multiple offices, contrary to Department standards. Guidance issued in September 2018 and October 2021²⁰ stated the Department does not support the use of shipping containers as occupied structures or to accommodate functional space needs. In accordance with 15 FAM 641b(10), missions must obtain prior approval from OBO for the procurement, placement, or construction of nonpermanent structures, including modular or prefabricated units, or dispose of the containers. Section employees told OIG that they were unaware of the Department's guidance. The use of uncertified shipping containers is not an adequate method of permanent storage and increases the risk of damage to Department property.

Recommendation 8: Embassy Athens should dismantle and remove its shipping containers and portable structures in accordance with Department requirements or obtain authorization from the Bureau of Overseas Buildings Operations to use them as permanent storage. (Action: Embassy Athens)

Financial Management

Accommodation Exchange Transactions Did Not Comply With Department Guidelines

Between January and July 2021, the mission processed 37 accommodation exchange²¹ transactions above the mission's policy limit of \$2,000 per week, totaling \$118,222. The Department's Cashier User Guide, section 8.4(1)(a), requires advance approval of any request exceeding the limit set by the Financial Management Officer or other authorized approving officials. In addition, email authorization must be retained by the cashier as supporting documentation for the accommodation exchange transaction. OIG reviewed 16 of the 37 transactions and found that the mission was unable to provide approval documentation for 5 of the transactions. Section staff told OIG they believed they retained the proper documentation, but OIG found it did not meet the requirement of either the embassy policy or Department standards. Inadequate internal controls over accommodation exchange services

²⁰ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018; cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

²¹ Accommodation exchange is the authorized exchange of equivalent monetary values in different forms to authorized persons, including the exchange of U.S. dollar for local currency, check cashing, and the conversion or exchange of local currency into U.S. dollars.

increases the risk of the mission having insufficient cash on hand for necessary operational expenditures.

Recommendation 9: Embassy Athens should follow Department guidance for accommodation exchange services. (Action: Embassy Athens)

INFORMATION MANAGEMENT

OIG reviewed information management operations in Embassy Athens and Consulate General Thessaloniki, including unclassified and dedicated internet network (DIN) computer operations, emergency communications preparedness, telephone operations, and mail and pouch service. OIG also conducted a limited review, through remote video walkthroughs, of physical and environmental controls protecting IT assets.

Several circumstances affected information management operations prior to the OIG inspection. At the beginning of the COVID-19 pandemic, the office transitioned more than 300 Mission Greece computer users to telework by providing equipment and training for Department collaboration and cloud technologies. Furthermore, the chancery compound renovation placed an additional burden on staff due to multiple moves and unforeseen consequences of the complex construction project. To maintain continuity of operations, the Information Management Officer estimated he often spent half of his workweek coordinating and resolving unanticipated problems between the Department and the building contractors. For example, plans to move the medical unit to temporary trailers did not anticipate IT infrastructure needs, which required information management staff attention to resolve.

During the inspection, section staff corrected issues related to access controls and identity and authentication controls. Staff members also updated the IT contingency plan for Mission Greece during the inspection. OIG found the section's leadership and staff performed most required information management and security responsibilities in accordance with Department standards, with the exceptions noted below.

Embassy Records Management Program Did Not Comply With Department Standards

OIG found that Embassy Athens records management program did not comply with Department standards. OIG's review of files on shared drives and SharePoint sites found that most embassy section electronic records contained files beyond their retention date. In addition, the Consular Section did not maintain its electronic files and records in a systematic and organized manner to allow efficient retrieval as required in 5 FAH-4 H-218.3. Records in the Public Diplomacy Section, especially from social media, and the Regional Security Office were not archived in compliance with Department guidelines in 5 FAM 433. Finally, diplomatic notes drafted by the Political and Economic Sections were not archived, as required by both mission

policy²² and cable 18 STATE 50952.²³ OIG determined this problem was caused by a lack of management oversight. The absence of an effective records management program increases the risk of loss of important data and historical records that could affect the Department's and the mission's ability to conduct policy analysis, decision-making, and archival research.

Recommendation 10: Embassy Athens should comply with Department standards for records management. (Action: Embassy Athens)

Embassy Did Not Complete the System Authorization Process for Locally Developed Computer Applications

OIG found the embassy did not complete the required systems authorization process for its 13 locally developed computer applications. These applications facilitate process and information flow for the embassy's Front Office, the Management Section, and the Regional Security Office. Guidance in 5 FAM 1066.1-3c and d states system owners must complete the Department's authorization process before a Federal Information Security Modernization Act reportable system²⁴ is permitted to operate. As part of the process, system owners must establish the categorization of the information in the system, determine the system's impact level in terms of data loss, and determine the baseline security controls needed to protect the data and information residing on the system.²⁵ Because 6 of the 13 applications contained personally identifiable information, the authorization process was particularly critical. Section staff told OIG they did not pursue the authorization process because they were confused by the regulations and they considered the applications to fall under the security controls of OpenNet, which already had an authorization to operate. Without completing the systems authorization process for locally developed applications, the confidentiality, integrity, and availability of information residing on locally developed applications is at risk of loss or compromise.

Recommendation 11: Embassy Athens, in coordination with the Bureau of Information Resource Management, should complete the systems authorization process for its locally developed applications. (Action: Embassy Athens, in coordination with IRM)

Information Systems Security Officers Did Not Perform All Required Duties

Mission Greece's Information Systems Security Officers (ISSO) did not perform all required systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing security policies and procedures for information systems, of which the minimum requirements are detailed in the ISSO checklist. OIG found ISSOs did not perform routine ISSO duties included in the ISSO checklist. In addition, three of the four

²² U.S. Mission Athens - Thessaloniki Management Instruction MI-D26-21, "Records Management Policy and Procedures," October 8, 2021.

²³ Cable 18 STATE 50952, "Updated Archival Procedures for Diplomatic Notes," May 23, 2018.

²⁴ A FISMA-reportable system is an information system that supports the operations and assets of the agency, and FISMA requires the agency to implement an agency-wide program for information security for those systems. See Federal Information Security Modernization Act of 2014, 44 U.S. Code Chapter 35, Subchapter II.

²⁵ 5 FAM 1066.1-3d through h.

designated ISSOs did not receive role-based cybersecurity training required by 12 FAH-10 H-212.2-3 due to COVID-19 travel restrictions. Finally, the Information Management Officer did not designate an ISSO for the mission's DINs, as required in 12 FAM 632.1-2a. OIG issued a management assistance report in December 2020 that highlighted continued widespread Department failures to perform information systems security officer duties.²⁶ Section leadership told OIG the elimination of one information management specialist position and insufficient training for one ISSO resulted in these issues. Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 12: Embassy Athens should require that all Information Systems Security Officer duties be performed in accordance with Department standards. (Action: Embassy Athens)

Mission Greece Did Not Register Dedicated Internet Networks as Required

OIG found that none of the three DINs at Embassy Athens nor the DIN at Consulate General Thessaloniki were registered and authorized on the Department's IT Configuration Control Board DIN registration site, as required in 5 FAM 872.1b. This issue occurred because the site that manages DIN registration for the Department does not send renewal reminders when registrations near expiration. The Information Management Officer attempted to update the registration but was unable to complete the process due to technical issues. Failure to inventory and register DINs decreases the Department's ability to identify, track, and mitigate potential risks to Department IT information and assets.

Recommendation 13: Embassy Athens should register and authorize Mission Greece's dedicated internet networks on the Department's Information Technology Configuration Control Board Dedicated Internet Network registration site. (Action: Embassy Athens)

Embassy Printer Management Did Not Comply With Department Standards

The embassy's printer management did not comply with Department standards. Specifically, the embassy maintained an inventory of 249 printers, or approximately three printers for every four desk positions. Of the 249 printers, 60 were past their retirement date by more than 8 years. The inventory included an additional 81 printers that were not in service. Guidance in 5 FAM 314a and c requires that obsolete and underutilized printers be removed, and network-based shared printers be used for all overseas operations. OIG estimated the embassy could save almost \$150,000 in replacement costs alone by limiting the number of devices to one printer for every three desks, funds which could be put to better use. Embassy personnel were unaware that the Department's printer policy had been updated in 2020. The use of individual personal printers increases the cost for expendable supplies, maintenance, and vendor-related services as well as electricity consumption.

²⁶ OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

Recommendation 14: Embassy Athens should reduce its printer inventory to comply with Department standards for printer management, so that funds of up to \$150,000 can be put to better use. (Action: Embassy Athens)

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Athens. The embassy's complete response can be found in Appendix B.¹ The embassy also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Athens should monitor and evaluate the programmatic performance of its grant recipients and document its findings, in accordance with Department standards. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens monitored and evaluated the programmatic performance of its grant recipients and documented its findings, in accordance with Department standards.

Recommendation 2: Embassy Athens should comply with Department standards for consular crisis preparedness. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens complied with Department standards for consular crisis preparedness.

Recommendation 3: Embassy Athens should require that safety certifications for all mission properties are conducted and documented in the Post Occupational Health and Safety Officer Certification Application and that any identified safety issues be corrected prior to occupancy, in accordance with Department standards. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens completed and documented safety certifications for all mission properties in the Post Occupational Health and

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

Safety Officer Certification Application and corrected any identified safety issues prior to occupancy, in accordance with Department standards.

Recommendation 4: Embassy Athens, in coordination with Bureau of Overseas Buildings Operations, should evaluate all mission residential properties for seismic risk in accordance with Department standards. (Action: Embassy Athens, in coordination with OBO)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens evaluated all mission residential properties for seismic risk in accordance with Department standards.

Recommendation 5: Embassy Athens should enforce driver duty limits for mission drivers in accordance with Department guidelines. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation. The embassy noted an estimated completion date of July 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens enforced driver duty limits for mission drivers in accordance with Department guidelines.

Recommendation 6: Embassy Athens should comply with Department standards on training employees in the use of powered industrial trucks. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens complied with Department standards on training employees in the use of powered industrial trucks.

Recommendation 7: Embassy Athens should submit its foreign per diem reports in accordance with Department standards. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens submitted its foreign per diem reports in accordance with Department standards.

Recommendation 8: Embassy Athens should dismantle and remove its shipping containers and portable structures in accordance with Department requirements or obtain authorization from the Bureau of Overseas Buildings Operations to use them as permanent storage. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation. The embassy noted an estimated completion date of September 2022.

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

Recommendation 9: Embassy Athens should follow Department guidance for accommodation exchange services. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens followed Department guidance for accommodation exchange services.

Recommendation 10: Embassy Athens should comply with Department standards for records management. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation. The embassy noted an estimated completion date of July 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens complied with Department standards for records management.

Recommendation 11: Embassy Athens, in coordination with the Bureau of Information Resource Management, should complete the systems authorization process for its locally developed applications. (Action: Embassy Athens, in coordination with IRM)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens completed the systems authorization process for its locally developed applications.

Recommendation 12: Embassy Athens should require that all Information Systems Security Officer duties be performed in accordance with Department standards. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens required that all Information Systems Security Officer duties be performed in accordance with Department standards.

Recommendation 13: Embassy Athens should register and authorize Mission Greece's dedicated internet networks on the Department's Information Technology Configuration Control Board Dedicated Internet Network registration site. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens registered and authorized Mission Greece's dedicated internet networks on the Department's Information Technology Configuration Control Board Dedicated Internet Network registration site.

Recommendation 14: Embassy Athens should reduce its printer inventory to comply with Department standards for printer management, so that funds of up to \$150,000 can be put to better use. (Action: Embassy Athens)

Management Response: In its April 26, 2022, response, Embassy Athens concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Athens reduced its printer inventory to comply with Department standards for printer management, so that funds of up to \$150,000 can be put to better use.

PRINCIPAL OFFICIALS

| Title | Name | Arrival Date |
|---|------------------------|--------------|
| Chiefs of Mission: | | |
| Ambassador | Geoffrey R. Pyatt | 9/2016 |
| Deputy Chief of Mission | David Burger | 8/2019 |
| Constituent Post(s): | | |
| Consulate General Thessaloniki, Principal Officer | Elizabeth K. Lee | 8/2020 |
| Chiefs of Sections: | | |
| Management | Misty Knotts | 8/2019 |
| Consular | Cathleen Carothers | 6/2019 |
| Political | Michele Siders | 8/2019 |
| Economic | Erik Holmgren | 7/2020 |
| Public Affairs | Cynthia Harvey | 9/2019 |
| Regional Security | Maureen McGeough | 10/2020 |
| Other Agencies: | | |
| Drug Enforcement Agency | John Livanis | 9/2017 |
| Federal Bureau of Investigation | Daniel Choldin | 6/2019 |
| Department of Homeland Security | Mark Stewart | 11/2018 |
| Defense Attaché/Senior Defense Officer | Capt. Michael E. Biery | 6/2021 |
| U.S. Commercial Service | Yuri Arthur | 8/2021 |

Source: Generated by OIG from data provided by Embassy Athens.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from August 30, 2021, to January 25, 2022, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved and U.S. interests are accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy; and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; and whether instances of fraud, waste, or abuse exist and whether adequate steps for detection, correction, and prevention have been taken.

In addition to these three broad areas, OIG had these additional specific objectives to determine whether:

- COVID-19 affected Mission Greece's operations and internal controls, and if so, to what extent.
- COVID-19 related telework affected mission accomplishment, customer service to the public, and employee performance.

Methodology

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 portions of the inspection remotely and relied on audio- and video-conferencing tools in addition to in-person interviews with Department and other personnel. Additionally, mission staff conducted video walkthroughs so OIG could see mission facilities relevant to the inspection. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations

affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

OIG inspected executive direction and the security program onsite at Embassy Athens. Inspection of the other functional areas covered in this report—Political, Economic, Public Diplomacy, Consular, Resource Management, and Information Management—was done remotely. Because these areas were inspected remotely, OIG was unable to fully assess motor pool operations and fleet management, consular cashiering functions, and controls over consular accountable items. OIG also did not conduct spot checks of expendable and non-expendable property, verify that residential housing complied with safety requirements, or conduct a full review of hard-copy records management. Finally, OIG did not review the embassy’s classified computer and communications security operations, neither of which could be done remotely.

APPENDIX B: MANAGEMENT RESPONSE



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

April 26, 2022

THRU: Bureau of European and Eurasian Affairs – Karen Donfried,
Assistant Secretary

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

FROM: Embassy Athens – Geoffrey Pyatt, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy
Athens and Constituent Post, Greece

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

OIG Recommendation 1: Embassy Athens should monitor and evaluate the programmatic performance of its grant recipients and document its findings, in accordance with Department standards.

Response: Embassy Athens concurs with the recommendation that it thoroughly documents the findings of its routine grant monitoring and evaluation efforts that are ongoing throughout every grant. The embassy includes a monitoring plan in each file as a matter of practice. It will update this plan over the grant duration to capture its monitoring efforts.

Also, it includes a grantee report and Grants Officer Representative (GOR) assessment report as a matter of practice. Mission Greece will ensure these documents form an adequate evaluation of the program. In response to this recommendation, the GORs will upload documentation to capture routine monitoring and evaluation over the course of the grant in the form of e-mails with grantees, photos, and highlights reports that it writes for each event associated with every grant.

OIG Recommendation 2: Embassy Athens should comply with Department standards for consular crisis preparedness.

Response: Embassy Athens concurs with the recommendation. The Consular Section has restarted its on-going crisis preparedness-related training and activities, using 1CA's Crisis Preparedness Scorecard as a guide.

OIG Recommendation 3: The Embassy should require that safety certifications for all mission properties are conducted and documented in the Post Occupational Health and Safety Officer Certification Application and that any identified safety issues be corrected prior to occupancy, in accordance with Department standards.

Response: Embassy Athens concurs with the recommendation. The Facility Management Section has completed over 96% of the new online POSHO certifications and will complete the remaining four residential certifications by the end of June 2022. There is only one non-residential certification remaining for an unoccupied GO warehouse that OBO is currently selling or donating.

OIG Recommendation 4: Embassy Athens, in coordination with Bureau of Overseas Buildings Operations, should evaluate all mission residential properties for seismic risk in accordance with Department standards.

Response: Embassy Athens concurs with the recommendation. The Facility Management Section requested \$111 K from OBO to complete the task. In lieu of funding, OBO has agreed to send a survey team to Post around September or October of 2022 to complete the remaining surveys.

OIG Recommendation 5: Embassy Athens should enforce driver duty limits for mission drivers in accordance with Department guidelines.

Response: Embassy Athens concurs with the recommendation. We will implement the recommendation by having the Front Office clear on the next Mission Vehicle Policy to convey the importance of driver duty limits for all Mission Chauffeurs, not simply GSO Motor Pool chauffeurs, by July 2022.

OIG Recommendation 6: Embassy Athens should comply with Department standards on training employees in the use of powered industrial trucks.

Response: Embassy Athens concurs with the recommendation. We have implemented the recommendation by scheduling forklift operational training. Six GSO Property employees attended training on April 20, 2022, with the remainder of the forklift users to be scheduled at a later date within FY2022.

OIG Recommendation 7: Embassy Athens should submit its foreign per diem reports in accordance with Department standards.

Response: Embassy Athens concurs with the recommendation. We submitted foreign per diem reports on January 24, 2022.

OIG Recommendation 8: Embassy Athens should dismantle and remove its shipping containers and portable structures in accordance with Department requirements or obtain authorization from the Bureau of Overseas Buildings Operations to use them as permanent storage.

Response: Embassy Athens concurs with the recommendation. We have implemented the recommendation by informing stakeholders of the Department's requirement for storage. GSO has emptied its three storage containers and plans to auction them following a conversation with the Government of Greece customs authorities on taxation. The expected completion date is September 2022.

OIG Recommendation 9: Embassy Athens should follow Department guidance for accommodation exchange services.

Response: Embassy Athens concurs with the recommendation. The Embassy has implemented the recommendation by updating and publishing the cashier services policy and a written approval process for exceptions to accommodation exchange weekly limits.

OIG Recommendation 10: Embassy Athens should comply with Department standards for records management.

Response: Embassy Athens concurs with the recommendation. The embassy will publish an annual management notice reminding all staff of their record management responsibilities. The IMO will conduct yearly reviews of centralized electronic files to ensure they comply with 5 FAM 414.5.b 1 – 7. The embassy anticipates completing the first notice and reviews by July 2022. DipNotes sent within the last 30 days are compliant with current Department guidelines.

OIG Recommendation 11: Embassy Athens, in coordination with the Bureau of Information Resource Management, should complete the systems authorization process for its locally developed applications.

Response: Embassy Athens concurs with the recommendation. The embassy will submit all applications requiring ATO to IRM before the end of the calendar year 2023. Post will continue to migrate as many locally developed solutions as possible to authorized solutions as time permits.

OIG Recommendation 12: Embassy Athens should require that all Information Systems Security Officer duties be performed in accordance with Department standards.

Response: Embassy Athens concurs with the recommendation. Regarding the ISSO being designated for Mission Greece’s DINs, the embassy will send out a new ISSO designation cable before the end of July 2022. Regarding the training, all IM staff with outdated training certificates were scheduled for training, but COVID travel restrictions curtailed those aspirations. IM staff transferring out of Post this summer will be attending training during their PCS transfers. Finally, with regards to the embassy “not perform(ing) all required systems security duties” in accordance with 12 FAM 613.4 and 5 FAH-11 H-116a(1),

IMO highlights all requests by IRM/IA and DS/CIRT were quickly acted upon and completed. Mitigating factors were staffing gaps, competing priorities, and a lack of remote access ISSO tools.

OIG Recommendation 13: Embassy Athens should register and authorize Mission Greece's dedicated internet networks on the Department's Information Technology Configuration Control Board Dedicated Internet Network registration site.

Response: Embassy Athens concurs with the recommendation. The embassy has registered all DINs on the Department's Information Technology Configuration Control Board's Dedicated Internet Network registration site.

OIG Recommendation 14: Embassy Athens should reduce its printer inventory to comply with Department standards for printer management and put up to \$150,000 to better use.

Response: Embassy Athens concurs with the recommendation. The embassy anticipates shedding most of its current printer stock during all future transitions related to the ongoing OBO project. As offices are moved out of the older, single room/desk areas, IM staff will remove individual printers and use the OBO designated shared printer work areas. The first significant transition will occur in November 2022, with compliance planned approximately 18 months later.

The point of contact for this memorandum is Management Counselor Misty Knotts.

ABBREVIATIONS

| | |
|-------|---|
| DCM | Deputy Chief of Mission |
| DIN | Dedicated Internet Network |
| EEO | Equal Employment Opportunity |
| FAH | Foreign Affairs Handbook |
| FAM | Foreign Affairs Manual |
| FAST | First- and Second Tour |
| ICS | Integrated Country Strategy |
| ISSO | Information Systems Security Officers |
| LE | Locally Employed |
| NATO | North Atlantic Treaty Organization |
| OBO | Bureau of Overseas Buildings Operations |
| POSHO | Post Occupational Health and Safety Officer |

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