



Office of Inspector General United States Department of State

ISP-I-22-18

Office of Inspections

May 2022

Inspection of Embassy Sofia, Bulgaria

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-22-18

What OIG Inspected

OIG inspected the executive direction, program and policy implementation, resource management, and information management operations of Embassy Sofia.

What OIG Recommends

OIG made 11 recommendations: 10 to Embassy Sofia and 1 to the Bureau of Administration.

In its comments on the draft report, the Department concurred with 9 recommendations, neither agreed nor disagreed with 1 recommendation, and disagreed with 1 recommendation. OIG considers all 11 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.

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Inspection of Embassy Sofia, Bulgaria

What OIG Found

- The Ambassador and Deputy Chief of Mission led Embassy Sofia in a professional and collaborative manner consistent with Department of State leadership and management principles.
- Embassy Sofia exceeded the maximum number of in-office personnel approved by the Ambassador as part of the Department's COVID-19 mitigation process.
- Washington end-users found embassy reporting on political, economic, and public diplomacy issues to be of high quality and relevance.
- The embassy did not conduct the required seismic safety assessments for all residences.
- Spotlight on Success: Proactive consular engagement allowed intercountry adoptions to continue during COVID-19-related restrictions.
- Spotlight on Success: Embassy Sofia developed an innovative solution to extend mobile phone service coverage for embassy-issued phones. The solution provided embassy users with worldwide phone coverage and eliminated roaming fees.

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CONTEXT



Figure 1: Map of Bulgaria.

(Source: CIA World Factbook.)

The United States established diplomatic relations with Bulgaria in 1903. Bulgaria allied with Germany in World War II and became a satellite of the Soviet Union at the war's end. As Bulgaria emerged from communism in the 1990s, the United States moved to encourage development of multi-party democracy and a market economy. The country joined the North Atlantic Treaty Organization (NATO) in 2004 and the European Union (EU) in 2007. Bulgaria's population is more than 6.9 million. It borders Greece, North Macedonia, Romania, Serbia, and Turkey, and is approximately the size of Virginia.

Bulgaria has an open economy that historically demonstrated strong growth, but its per capita income remains the lowest among EU members and its reliance on energy imports and foreign demand for its exports make its growth sensitive to external market conditions. Corruption in public administration, a weak judiciary, low productivity, lack of transparency in public procurements, and the presence of organized crime continue to hamper the country's investment climate and economic prospects. Bulgaria relies heavily on energy imports from Russia and participates in EU-backed efforts to diversify regional natural gas supplies.

Bulgaria is a reliable ally in a region of strategic importance to the United States. The United States and Bulgaria maintain shared use of several Bulgarian military facilities through the U.S.-Bulgarian Defense Cooperation Agreement, which came into force in 2006. In October 2020, the United States and Bulgaria signed a 10-year "Roadmap for Defense Cooperation," establishing a framework to strengthen their joint commitment to mutual defense. As a member of NATO, Bulgaria participated with the United States and other partners in military operations, including in Libya, Iraq, Afghanistan, Kosovo, and Bosnia. The United States works closely with the Government of Bulgaria in strengthening the rule of law, continuing strong law enforcement cooperation, and helping Bulgaria diversify its energy sources. In FY 2020, bilateral foreign assistance for Bulgaria totaled approximately \$7.3 million, the majority of which was for foreign military financing and international military assistance and training.

Embassy Sofia's 2018-2022 Integrated Country Strategy (ICS), approved in August 2018, focused on four goals:

- Strengthening governance, transparency, and rule of law to foster democratic norms, economic development, and security stability.
- Bulgaria, as a NATO ally, becoming a stronger provider of regional security.
- Promoting economic prosperity and energy independence to increase the country's security, competitiveness, and investment and trade opportunities for U.S. companies.
- Highlighting shared Euro-Atlantic values and building partnerships to maintain Bulgaria's western orientation.

At the time of the inspection, Embassy Sofia's authorized staff included 89 U.S. direct-hire staff, 326 locally employed (LE) staff, and 14 eligible family members, from the Department of State (Department), and the Departments of Commerce, Defense, Homeland Security, and Justice.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980. Because of the COVID-19 pandemic, OIG conducted the inspection remotely.¹

EXECUTIVE DIRECTION

OIG assessed Embassy Sofia's leadership based on remote interviews, staff questionnaires, and a review of documents.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived at Embassy Sofia in October 2019, after serving as Deputy Chief of Mission (DCM) and Chargé d'Affaires, ad interim at Embassy Lisbon. Her previous assignments included Political Minister-Counselor at Embassy New Delhi, Deputy Director of the Department's Afghanistan Office, and assignments in the Office of the Vice President and as a director at the National Security Council. The DCM, also a member of the Senior Foreign Service, arrived in June 2021 after serving as DCM at Embassy Ashgabat. Her previous assignments included Political-Economic Counselor at Embassy Dhaka and Deputy Political Counselor at Embassy Moscow.

OIG found the Ambassador and the DCM exhibited many of the leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214b by modeling integrity, encouraging interagency collaboration, and leading by example. Embassy staff described the Ambassador as optimistic, friendly, and down-to-earth, and told OIG that she asked for and took seriously their advice on policy issues. Several employees cited the Ambassador and the DCM as empowering Department and other agency employees to take on new leadership roles, including as acting DCM, that the employees believed could be career-enhancing. Employees described the DCM as approachable and engaged, while also being detail-oriented and direct when giving feedback. Embassy staff told OIG the Ambassador and the DCM appeared to have gotten off to a good start in forming an effective working team. Several section heads told OIG their working relationships with the Front Office were ideal while also emphasizing the close coordination they saw between the Ambassador and the DCM. Section chiefs and agency heads told OIG that interagency working groups were effective and reflected the Ambassador's and the DCM's leadership. One agency head told OIG the Ambassador led the embassy work force well; another said she provided good advice in an effective manner. A section head described the Law Enforcement Working Group, chaired by the DCM, as the "shining beacon" of working groups.

¹ See Appendix A.

The Ambassador highlighted the importance of ethics in her arrival remarks at post and while leading a mission-wide initiative to craft the embassy's mission statement. The embassy also held mandatory mission-wide ethics training in December 2020. The embassy issued a management policy on accepting gifts, in accordance with Department policy, and OIG's review of the Ambassador's and the DCM's gift logs found them to be consistent with that policy.

Embassy personnel told OIG the Ambassador's high energy and rapid pace of engagement yielded foreign policy successes but that she often appeared unaware of the extent of work demands she generated. For example, the Ambassador's rapid pace and volume of engagement limited the Public Diplomacy Section from completing some administrative requirements. In addition, although the Front Office asked sections to exercise caution, embassy staff in several sections told OIG they were still uneasy with the Front Office's handling of the COVID-19 pandemic. Additionally, staff reported that they felt pressure to work in the chancery despite embassy-set limits on in-person work during the pandemic. OIG brought self-awareness issues to the attention of the Ambassador, who expressed appreciation for the feedback and pledged to look for ways to improve.

Impact of COVID-19 Pandemic

OIG found the COVID-19 pandemic affected embassy sections and agencies differently. Some embassy staff told OIG that COVID-19 restrictions on in-person meetings, combined with staffing changes within Bulgaria's government, constrained their ability to make contacts with these new host government counterparts and to conduct normal business. OIG found COVID-19 restrictions particularly hindered the work of some non-Department agencies with regional responsibilities because they could not travel to other countries to conduct trainings and to meet with counterparts and other contacts. However, some embassy staff told OIG the switch to virtual programming provided opportunities for broader U.S. Government participation than did in-person events. For example, staff in some sections, such as Public Diplomacy, told OIG they shifted effectively to remote programming in areas such as social media and outreach. The Consular Section also effectively moved to telework after delays in access to equipment and essential databases. However, restrictions on in-person work, imposed to reduce exposure to COVID-19, forced Facility Management staff to prioritize among preventive maintenance projects. These restrictions also created backlogs in other management areas, such as closing out procurement files, not conducive to telework.

Embassy Did Not Effectively Monitor Ceilings on In-Office Staff Presence During Pandemic

OIG found the embassy did not effectively monitor the ceilings on in-office presence put in place to protect employees from potential exposure to COVID-19. The embassy's Emergency Action Committee recommended, and the Ambassador approved, overall ceilings for in-person work in 2020 and 2021, ceilings that rose and fell according to local COVID-19 conditions.² The embassy deployed a desktop tracker to monitor in-person staffing levels. However, OIG found

² Overall ceilings for total embassy staff ranged from 20 percent to 75 percent for in-person work during the COVID-19 pandemic.

that in-office presence exceeded the ceilings set by the Front Office on 39 days³ between March and May 2021, when the ceiling was at 25 percent, and again for 3 days in November 2021, when the ceiling was at 35 percent.⁴

According to 12 Foreign Affairs Handbook (FAH)-1 H-121b, the Chief of Mission must develop policies to protect U.S. Government personnel and their dependents and take appropriate measures to reduce their exposure to risk. In addition, the Department's COVID-19 Mitigation Process directed the Emergency Action Committee to recommend, and the Chief of Mission to approve, an embassy's workforce posture and mitigating actions in line with local COVID-19 conditions, which the embassy did. In addition, the Front Office gave embassy section chiefs and heads of agencies the discretion to set ceilings for their own personnel above or below the overall embassy level. However, no one monitored the impact of this policy on the overall in-office ceiling, which led the embassy to repeatedly exceed the ceiling, particularly between March and May 2021. Exceeding the in-office ceilings recommended by the Emergency Action Committee and approved by the Ambassador increased the risk of exposure to COVID-19 for embassy employees.

Recommendation 1: Embassy Sofia should monitor the in-office presence of personnel to stay within the ceilings recommended by the Emergency Action Committee and approved by the Ambassador in accordance with the Department's COVID-19 Mitigation Process.
(Action: Embassy Sofia)

Execution of Foreign Policy Goals and Objectives

OIG determined the Ambassador advanced the embassy's strategic objectives using the ICS in accordance with Department guidance in 2 FAM 113.1b and 18 FAM 301.2-4(D)c. The Ambassador highlighted working together on ICS goals in her arrival remarks in October 2019, and the embassy integrated ICS goals into mission activities. The Ambassador led the Country Team in annual reviews of the ICS and the embassy incorporated ICS review results into its FY 2023 Mission Resource Request. OIG also found that most of the embassy's reporting addressed ICS issues. In addition, OIG found the Ambassador led successful interagency initiatives to advance ICS goals, as described below.

OIG found the Ambassador used her extensive contacts in Washington and in Bulgaria to make significant progress on all four ICS goals. Washington stakeholders highlighted that her direct lines to policymakers in their agencies elevated the bilateral agenda in areas such as defense, energy, and U.S. exports, and on fighting corruption. Washington agencies also underscored the importance of the Ambassador's high-level and extensive contacts in Bulgaria, contacts which OIG confirmed through calendar reviews and interviews. For example, Department and other

³ This information was provided to OIG at the time of the inspection. In Embassy Sofia's response to the draft report on April 11, 2022, it provided an updated calculation that showed that the in-office presence exceeded the ceilings set by the Front Office on 9 days between March and May 2021.

⁴ On the 39 days between March and May that the embassy exceeded the ceiling, the in-office presence ranged from 28 to 42 percent. For the 3 days in November, the in-office presence ranged from 36 to 38 percent.

agency stakeholders credited the Ambassador with leading the successful interagency effort to persuade Bulgaria's caretaker government to sign a letter of request to purchase U.S. F-16 fighter jets. They also cited her role in the first-ever U.S. sanctions of Bulgarian individuals and corporations for corruption under the Global Magnitsky Human Rights Accountability Act, the largest action taken on a single day under the Act.⁵ U.S. Government and private sector stakeholders also highlighted the Ambassador's role in successes in pursuing diversification of Bulgaria's energy sources and securing opportunities for U.S. energy sector exports.

Adherence to Internal Controls

OIG found that the embassy completed the FY 2021 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(5) and 2 FAM 024d, using the internal control checklists from the Bureau of the Comptroller and Global Financial Services. During the preparation of the Statement of Assurance, the Ambassador told Country Team members to review those checklists, to perform spot checks, and to use OIG checklists to identify and mitigate potential risks. Prior to signing the statement, the Ambassador and the DCM conducted spot checks on the draft statement and supporting documentation and reviewed the process with the Management Officer before giving their final approvals. The Ambassador also spot-checked the representational vouchers submitted for her approval for consistency with Department regulations and often checked with the Management Officer before signing. In addition, the DCM regularly reviewed the required percentage of nonimmigrant visa adjudications in accordance with Department guidance in 9 FAM 403.12-1 and 2.

Security and Emergency Planning

OIG found the Ambassador and the DCM fully supported the embassy's security program,⁶ consistent with the President's Letter of Instruction to Chiefs of Mission⁷ and with Department guidance in 2 FAM 113.1c(5) and (13) to develop policies and programs to protect U.S. officials abroad and their dependents, and to protect American citizens. The Ambassador spoke about the importance of good security practices in her arrival remarks to embassy staff in October 2019. The embassy resumed its normal schedule of security drills in June 2021 as COVID-19 conditions eased. The Ambassador and the DCM led by example by participating in the drills, which the Ambassador requested be held while she was in the office. During the inspection, the

⁵ Executive Order 13818, issued December 20, 2017, builds upon the Global Magnitsky Human Rights Accountability Act through sanctions that block property of persons designated under the Act and prohibit all transactions in the United States or by U.S. persons that involve the sanctioned persons and property. Through these sanctions, "[t]he United States seeks to impose tangible and significant consequences on those who commit serious human rights abuse or engage in corruption, as well as to protect the financial system of the United States from abuse by these same persons."

⁶ OIG did not conduct a comprehensive review of the embassy's security program because it conducted the inspection remotely due to the COVID-19 pandemic. See Appendix A.

⁷ Cable 19 STATE 27839, "President's Letter of Instruction to Chiefs of Mission," dated June 14, 2019. The final paragraph of the letter states that chiefs of mission should "discharge your responsibilities with professional excellence and in full conformance with the law and the highest standards of ethical conduct."

Ambassador also led the Country Team in a familiarization session at the embassy's new alternate command center.

During the inspection, the embassy also updated the security memorandum of agreement between the Chief of Mission and the Department of Defense geographic combatant commander, in accordance with 2 FAH-2 H-116.4a and b. The updated memorandum shifted responsibility for the Bilateral Affairs Office located in Bulgaria's Ministry of Defense from the Chief of Mission to the combatant commander. The embassy also updated its security directive on walk-ins and asylum seekers in accordance with 12 FAM 424.1a(8).

Equal Employment Opportunity

OIG determined the embassy's Equal Employment Opportunity (EEO) program was consistent with Department standards in 3 FAM 1514. The Ambassador led the embassy in developing a mission statement that included respect for diversity, and the embassy held mandatory EEO training for all employees in December 2020. The embassy's Diversity and Inclusion Council sponsored 10 events in the first half of 2021, with frequent participation from the Ambassador, and invited the embassy community to participate virtually in 16 other activities focused on diversity hosted regionally or in the Department. In April 2021, the Ambassador held an open conversation on racism, xenophobia, and discrimination with the embassy community. At the DCM's direction, the council, the EEO counselor, and the Federal Women's Program Coordinator worked together on a planned year of women's program activities.

The embassy had an EEO counselor and four LE staff EEO liaisons at the time of the inspection. However, LE staff members told OIG that although they were familiar with the EEO process, they lacked confidence in its efficacy for LE staff. They also told OIG that worries over job security during the economic recession brought on by the COVID-19 pandemic made them hesitant to use the EEO process. In addition, LE staff members said that recent firings of several long-time LE staff made employees hesitant to raise potential EEO or workplace bullying concerns. These firings were not EEO related, but LE staff members reached this conclusion because information was not shared regarding the circumstances of the firings. During the inspection, the Ambassador sent a message to all employees on the importance of EEO principles and issued a management notice to recruit new LE staff EEO liaison volunteers.

Developing and Mentoring Foreign Service Professionals

OIG found the embassy's mentoring program for First- and Second-Tour (FAST) employees was consistent with Department guidance in 3 FAM 2242.4. The embassy held FAST events in April, May, and June 2021, and then combined its FAST and mid-level programs when summer transfers left the embassy with one FAST employee. The DCM took over the program after her arrival in June 2021 and hosted a dinner for mid-level employees that focused on the resources available in the Department if difficulties arise with a supervisor. The DCM told OIG she met with three incoming FAST employees while in Bulgarian language classes at the Foreign Service Institute and planned to include them in the FAST program once they arrived. In addition, the Ambassador offered one-on-one mentoring to mid-level employees and held 18 such sessions

in the first nine months of 2021. Employees interviewed by OIG generally found the sessions to be useful.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Sofia's policy and program implementation through a review of advocacy and analysis work performed by the Political-Economic and Public Diplomacy Sections, and the U.S. citizen and visa services provided by the Consular Section. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions noted below.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, Leahy vetting,⁸ commercial promotion, and end-use monitoring functions. Through interviews with Washington and interagency offices, OIG determined the section regularly engaged with Washington and collaborated well with other agencies. OIG also found the mission's reporting and advocacy work supported ICS goals and U.S. commercial interests.

OIG's review of 215 embassy cables from mid-March to mid-September 2021 found the reporting to be relevant to mission strategic objectives, with coverage across a range of pertinent issues. In addition, Department and other agency officials widely praised the Political-Economic Section's reporting for its quality, relevance, and usefulness, highlighting reporting on domestic politics and energy issues. As an example, interagency partners and Department officials praised the embassy's policy engagement in support of Department of the Treasury's Global Magnitsky sanctions designations and sanctions under Section 7031(C) of the Department of State, Foreign Operations, and Related Programs Appropriations Act of 2021. Finally, Department officials and interagency partners also highlighted the Political-Economic Section's actions on energy issues, preparation, and support for the sixth Three Seas Initiative Summit⁹ and coordination on third-country activities of interest to U.S. foreign policy.

Some Political-Economic Section personnel reported internal communication issues, such as an insufficient number of section meetings during periods of COVID-19-related restrictions, adding

⁸ 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.

⁹ The Three Seas Initiative is a cooperation platform aimed at increasing connectivity in the fields of transport, energy, and digitalization, especially along the North-South axis in Central and Eastern Europe, to strengthen cohesion and convergence within the EU. Twelve EU countries are members. The United States, a partner of the initiative, attended the Three Seas Initiative summit in Sofia on July 8 and 9, 2021.

communication improved once staff returned to the office. Section leaders were aware of these concerns and took steps to increase information sharing. The section chief also agreed on the need to continue to work to maintain communication channels.

OIG found the embassy updated its Leahy vetting standard operating procedures as required and that it implemented the program in accordance with Department standards.¹⁰ The embassy vetted 342 cases in FY 2021.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's leadership, strategic planning, reporting, resource and knowledge management, Federal assistance awards, educational and cultural programs, and media engagement. OIG determined the section's efforts were linked with the embassy's ICS goals, in particular, the goal of highlighting shared Euro-Atlantic values and building partnerships to maintain Bulgaria's western orientation, for which the section had primary responsibility. Additionally, the Bureau of European and Eurasian Affairs praised the section as a top cable producer in central Europe in terms of both quality and quantity of reporting. OIG found the section's collaboration with the Fulbright Commission and the America for Bulgaria Foundation were key drivers of section success. Front Office-driven public diplomacy outreach and efforts also enhanced the section's programmatic achievements, although the prioritization of Front Office interests reduced section capacity to comply with some grants documentation and digital media strategic planning requirements, as described below. Overall, the section met Department standards and guidance, with the following exceptions.

Grants Files Did Not Meet Department Standards for Documentation

OIG found that although the Public Diplomacy Section's grants generally supported relevant strategic objectives, grant file documentation did not consistently meet the Department's Federal Assistance Directive standards. Specifically, 22 of the 23 grants files reviewed by OIG¹¹ lacked required documentation of grant monitoring and evaluation to track and assess the recipient's programmatic performance and financial management.¹² Section staff told OIG that although monitoring and evaluation efforts were ongoing, prioritization of Front Office interests over administrative responsibilities, COVID-19-related disruptions, and staff uncertainty about grants documentation standards created this issue. During the inspection, the section began to add evidence of past monitoring and evaluation to the files and provided sufficient information for OIG to determine that grant funds were used as intended. Staff also instituted a new section-wide grants administration standard operating procedure that reflected Federal Assistance Directive requirements. However, failure to fully document grants and their activities impairs the ability of grants officers to identify and mitigate risk, monitor program

¹⁰ Bureau of Democracy, Human Rights, and Labor, 2017 Leahy Vetting Guide.

¹¹ OIG reviewed 23 grants (total value of \$922,610) of the 90 public diplomacy grants (total value of \$1.43 million) awarded in FY 2020 and FY 2021. The grants selected for review included all grants valued at more than \$15,000.

¹² Federal Assistance Directive, Chapter 4 Section D (October 2020, and later revision) mandates monitoring of all Department assistance and identifies the Grants Officer and Grants Officer Representative as "responsible for ensuring that monitoring is conducted and documented for every award."

implementation, evaluate program results, and ensure accountability for public diplomacy resources.

Recommendation 2: Embassy Sofia should comply with Department standards for grant file documentation. (Action: Embassy Sofia)

Digital Engagement Lacked Required Planning and Evaluation

While the section prioritized digital outreach as the focus of the embassy's strategic communications, OIG found the digital efforts lacked required strategic planning, follow-up, and evaluation as described in 10 FAH-1 H-063.1 and 2 and in the Department's Digital Campaign Toolkit Planning Guide.¹³ Specifically, OIG was unable to identify campaign strategies, related goals, or performance metrics for digital outreach efforts. Heavy section workloads caused by competing Front Office interests contributed to the lack of strategic planning for, and evaluation of, these efforts. During the inspection, the section took steps to bring its digital engagement effort into line with Department standards, including hosting strategic planning offsites and drafting campaign-level strategies. However, failure to identify goals, evaluate results against those goals, and measure a program's impact limited the embassy's ability to measure the effectiveness of its digital outreach efforts.

Recommendation 3: Embassy Sofia should incorporate strategic planning principles, including evaluation, as part of digital outreach efforts, in accordance with Department standards. (Action: Embassy Sofia)

Embassy Did Not Coordinate Responses to American Citizen Inquiries Through Social Media Direct Messaging Platforms

OIG found the Public Diplomacy and Consular Sections did not consistently coordinate and monitor U.S. citizen requests received via direct messaging¹⁴ on the embassy's social media platforms. Public Diplomacy staff told OIG pandemic-related challenges disrupted the section's coordination with the Consular Section on responses through the direct messaging systems. Department guidance in 7 FAH-1 H-449b¹⁵ describes the importance of monitoring and responding to U.S. citizen inquiries through all post-managed platforms. Failure to appropriately respond to U.S. citizens' requests risks undermining the Department's credibility in a crisis. During the inspection, the Public Diplomacy and Consular Sections developed an automatic response for Facebook direct messages, which gave specific guidance for U.S. citizen

¹³ The Department's Social Media Hub's Digital Campaign Toolkit Planning Guide describes the importance of planning to address strategic goals and evaluation: "When the campaign is complete, you should evaluate the results against the goals you set to inform future campaigns."

¹⁴ A direct message is a private form of communication between social media users that is only visible to the sender and recipient(s).

¹⁵ Guidance in 7 FAH-1 H-449b states, "Because most travelers carry mobile telephones and increasingly turn to social media as the primary source of information, it is essential to post regular updates and answer public inquiries via all post-managed social media platforms in order to ensure responsiveness to Americans in distress and shape a positive public perception of post's and the Department's response."

requests, as well as a standard operating procedure for coordinating official responses to direct messages across all public diplomacy-managed social media platforms. As a result of the embassy's actions, OIG did not make a recommendation to address this issue.

Consular Operations

OIG reviewed Embassy Sofia's consular operations, including U.S. citizen services, fraud prevention programs, nonimmigrant and immigrant visa services, training, management controls, communications and outreach, anti-fraud programs, and consular crisis preparedness. During the inspection, the Consular Section corrected OIG-identified issues by updating the consular portions of the duty officer handbook and posting an updated management notice on the special immigrant visa program. With the exception noted below, OIG concluded that consular programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies.

Processing of Nonimmigrant Visa Referral and Priority Appointment Requests Did Not Adhere to Department Standards

OIG reviewed all 27 nonimmigrant visa referral cases from March 1 to September 1, 2021, and found that all contained procedural errors. These included cases recorded in the nonimmigrant visa computer system under the incorrect referral category, incorrectly scanned copies of referral forms and associated documents, referral forms missing required signatures, and a refused referral case that lacked the required DS-5500 form.¹⁶ Guidance in 9 FAM 601.8-3(E)a states that Consular Section chiefs must ensure that referrals be properly entered into the nonimmigrant visa computer system and that scanned documents associated with the referral be properly identified. In addition, 9 FAM 601.8-3(F)a, b, and c require the Consular Section chief to provide timely feedback on the DS-5500 form to referring and approving officials when a visa referral has been refused and include the form in the visa record. Consular staff told OIG they did not know how to input data for visa referral cases into the recently updated nonimmigrant visa computer system. Improper data entry of nonimmigrant visa referral cases puts the integrity of the visa referral process at risk. The Consular Section chief updated the referral policy during the inspection and trained consular staff on proper referral case handling. As a result of the embassy's actions, OIG did not make a recommendation regarding this issue.

Spotlight on Success: Proactive Consular Engagement Allowed Intercountry Adoptions to Continue During COVID-19-Related Restrictions

When strict COVID-related entry restrictions for non-citizens were enacted in 2020 and threatened to disrupt dozens of adoptions by prospective adopting parents from the United States, Embassy Sofia's Consular Section proactively engaged with Bulgaria's Ministry of Justice, which oversees its intercountry adoption process, to ensure that incomplete adoptions could be finalized. The embassy obtained travel pre-clearance for adoptive parents and negotiated a way to complete adoption proceedings for adoptive parents who could not travel to Bulgaria.

¹⁶ Form DS-5500, "Referral Rejection/Refusal."

The embassy successfully facilitated 39 adoptions between June and September 2020 despite COVID-19 restrictions, providing vital family reunification services.

RESOURCE MANAGEMENT

OIG reviewed Embassy Sofia's internal control systems and processes in human resources, general services, financial management, facility management, and the employee association. During the inspection, the embassy corrected two internal control issues identified by OIG. Specifically, the embassy:

- Submitted a request for Departmental approval of dual authority for one of the embassy's accountants to perform an overlapping role as an alternate cashier (4 FAM 042d).
- Completed the required refresher training in forklift operations for 10 embassy employees who operated forklifts (14 FAH-1 H-313.4a(2)).

Although the embassy's Human Resources Office and Financial Management Office generally implemented required processes and procedures in accordance with applicable laws and Department guidance, OIG found deficiencies in general services and facility management operations, as described below.

General Services

Embassy Did Not Properly Store Furniture From the Ambassador's Residence

OIG found Embassy Sofia did not store furniture, furnishings, and equipment, including antique objects, from the Ambassador's residence, a designated representational residence, in a climate-controlled warehouse as required in 15 FAM 735c. Embassy management told OIG the Bureau of Overseas Building Operations (OBO), Office of Residential Design and Furnishings, approved and funded the removal of the furniture from the Ambassador's residence to a warehouse for temporary storage before auction. However, OIG found the embassy stored the furniture in shipping containers rather than in a climate-controlled warehouse. Management Section staff told OIG this occurred due to the lack of space at the embassy warehouse and the limited climate-controlled warehouse options in Sofia. Improper storage of such items increases the risk of damage to Department property.

Recommendation 4: Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should store furniture, furnishings, and equipment removed from its designated representational residences in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Unauthorized Use of Shipping Containers for Storage of Embassy Property

The embassy used four shipping containers, located at a third-party facility, to store embassy property. Some of these containers stored the furniture from the designated representational

residence, while the others stored various other types of embassy property. The Department issued guidance in September 2018¹⁷ stating that it did not support the use of shipping containers as structures to accommodate functional space needs, including for permanent storage. In an October 2021 cable,¹⁸ OBO said posts must return shipping containers received by posts and not retain them to use as ongoing overflow storage or warehouse space. Section staff told OIG they used the containers for property storage because the small compound warehouse was at full capacity, and the embassy had no other location on the compound to house the property. The use of shipping containers is not an adequate method of storage and increases the risk of damage to Department property.

Recommendation 5: Embassy Sofia 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 Sofia)

Embassy Did Not Properly Account for and Control Uniforms and Personal Protective Equipment

The embassy did not account for and control uniforms and personal protective equipment issued to its staff as required. Guidance in 14 FAM 446.1a requires that uniforms and personal protective equipment and clothing be accounted for and controlled in either in the Integrated Logistics Management System (ILMS) expendables management system or the ILMS loanable property module.¹⁹ Section staff told OIG this issue occurred because of staffing gaps and lack of training on the loanable property module. Failure to account for expendable property in the Department's approved property record system increases the risk of mismanagement and theft of embassy property.

Recommendation 6: Embassy Sofia should use the Integrated Logistics Management System to track all uniforms and personal protective equipment in accordance with Department standards. (Action: Embassy Sofia)

Facility Management

Embassy Did Not Conduct Seismic Evaluations for All Residences

Embassy Sofia, located in a high-seismic area, did not conduct seismic safety assessments for all residences, as required by 15 FAM 252.6f(3).²⁰ OBO conducted a residential seismic survey of

¹⁷ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018.

¹⁸ Cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

¹⁹ The ILMS loanable property module provides a uniform way to track the loan or issuance and return of property and offers comprehensive reporting capabilities for both non-accountable and accountable assets.

²⁰ According to 15 FAM 252.6f(3), seismic safety must be evaluated for residential buildings by engaging the services of a local structural engineer, requesting municipality assistance in obtaining design or construction

15 embassy properties in June 2016. However, OIG's review of the embassy's housing pool found an additional 50 residences had yet to be assessed. Embassy facilities management staff were unaware of requirements to assess the seismic safety of residential units. Leasing properties without performing seismic safety assessments poses significant risk to the safety of occupants, who could face injury or death in the event of an earthquake.

Recommendation 7: Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic safety evaluations of its residential properties in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Administration of Facility Management Expendable Supplies Did Not Meet Department Standards

The embassy did not adequately administer its facility management expendable supplies. Specifically, OIG found the embassy did not account for or inventory all its facility expendable supplies (spare parts, building materials, and tools) in the ILMS expendable management system, the Department's system of record. In addition, the embassy did not inventory its facility expendables supplies or record their use. According to 14 FAM 414.1, embassies must maintain accountable property records for all expendable supplies while 14 FAM 414.4(2) requires embassies institute inventory controls and establish adequate safeguards to ensure supplies are issued for official use. Staff told OIG that as the embassy's on-site warehouse was at capacity and that there was no other adequate storage space on the compound, they stored facility supplies in various locations throughout the compound, making it difficult to implement access controls. Failure to account for expendable property in the Department-approved property record system and safeguard property increases the risk of mismanagement and theft of embassy property.

Recommendation 8: Embassy Sofia should administer facility management expendable supplies in accordance with Department standards. (Action: Embassy Sofia)

INFORMATION MANAGEMENT

OIG reviewed information management (IM) operations in Embassy Sofia, including unclassified and dedicated internet network computer operations, emergency communications preparedness, telephone and radio programs, and mail and pouch service. Throughout the COVID-19 pandemic, section staff provided continuous information technology (IT) support to embassy users, including support for laptops deployed to enable telework. OIG found the section's leadership and staff effectively performed most required IM and security responsibilities in accordance with Department standards, with the exceptions noted below.

documents, or requesting services of OBO professional engineers or seismic consultants. OBO's April 4, 2020, report "Level of Seismicity at Foreign Service Posts and Consular Agencies," identifies Sofia in Zone 3, which is considered a high-level zone of seismicity.

Information Systems Security Officers Did Not Perform All Required Duties

Embassy Sofia's information systems security officers (ISSO) did not perform all required information systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing cybersecurity policies and procedures for information systems, as well as the other minimum requirements and procedures outlined in the ISSO checklist. Specifically, OIG found the ISSOs did not use the checklist and review network logs monthly. The ISSOs told OIG these were areas they wanted to prioritize, and they had been developing a scheduled process for completing the ISSO duties. OIG issued two management assistance reports, in May 2017 and December 2020,²¹ that highlighted widespread Department failures to perform ISSO duties. Failure to perform the required ISSO duties leaves the Department's networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 9: Embassy Sofia should complete information systems security officer duties in accordance with Department standards. (Action: Embassy Sofia)

Embassy Lacked a Records Management Program

Embassy Sofia did not have an established records management program as required by Department standards. Specifically, the embassy lacked guidance or procedures to instruct staff on the creation, maintenance and use, and disposition of records, or standards and procedures for classifying, indexing, and filing records as required in 5 FAM 413a(2) and (3).²² In addition, the Department's Records Retirement Tracker Dashboard showed that for the past 5 years, the embassy had not retired annual program records for the Public Diplomacy and Political and Economic Sections, as required by 5 FAM 433b.²³ Without an established records management program, the embassy was vulnerable to the potential loss of data important for historical insight into policy analysis, decision-making, and archival research.

Recommendation 10: Embassy Sofia should establish a records management program in accordance with Department standards. (Action: Embassy Sofia)

²¹ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017); OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

²² According to 5 FAM 413a(2) and (3), the records and information life cycle program applies standards, procedures, and techniques designed to: (2) Establish effective management controls over the creation, maintenance and use, and disposition of records in the conduct of current business (44 U.S.C. § 3102); and (3) Establish and implement standards and procedures for classifying, indexing, and filing records; and publish these standards and instructions in a form designed for easy reference and revision.

²³ According to 5 FAM 433b, offices and posts must retire records (except official personnel records) to the Records Service Center in accordance with the records disposition schedules issued by Bureau of Administration and approved by National Archives and Records Administration, pending ultimate transfer to the National Archives or a Federal Records Center. Program records are required to be retired annually.

Diplomatic Post Office Mail Misrouted

Packages and other mail addressed to Embassy Sofia's Diplomatic Post Office were repeatedly misrouted and then lost during transit. Embassy personnel told OIG they believed the packages and mail were misrouted due to ongoing staffing deficiencies, processing errors, and sorting challenges at the U.S. Postal Service central processing center in Chicago, Illinois. However, they said they did not know this for certain. According to guidance in 1 FAM 215.2-4a(4), the Bureau of Administration's Diplomatic Pouch and Mail Division is the Department's liaison with other Federal agencies for routing and accountability issues regarding the Department's Diplomatic Post Office mail. Division leadership told OIG they were aware of this issue and planned to coordinate with the U.S. Postal Service to identify a solution to the misrouted mail. Misrouted mail incurs additional fees and expenses to the Department for mail to be rerouted to the correct destination.

Recommendation 11: The Bureau of Administration, in coordination with Embassy Sofia, should work with the U.S. Postal Service to resolve the problem of misrouted Diplomatic Post Office mail. (Action: A, in coordination with Embassy Sofia)

Spotlight on Success: Embassy Extended Mobile Phone Coverage

Embassy Sofia developed an innovative solution to extend mobile phone service coverage for embassy-issued phones. Previously, the embassy's mobile phones only had service coverage in the European Union, and staff would incur roaming fees when using the mobile phones on temporary duty trips outside of the service coverage area. To eliminate roaming fees, Information Management staff installed an electronic subscriber identification module (e-SIM) card capability on embassy mobile phones, which allowed the phones to have dual service coverage in the European Union and with a U.S. company during use outside the local service coverage area. The solution provided embassy users with worldwide phone coverage and eliminated roaming fees. As just one example of the savings, charges for an employee's mobile phone were \$1,934.00 in April 2019, which included a trip to the United States. Charges for the same phone in July 2020, which also included a trip to the United States, were just \$62.29.

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 Sofia and the Bureau of Administration. The Department's complete responses can be found in Appendix B.¹ The Department also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Sofia should monitor the in-office presence of personnel to stay within the ceilings recommended by the Emergency Action Committee and approved by the Ambassador in accordance with the Department's COVID-19 Mitigation Process. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia disagreed with this recommendation. The embassy noted that it provided inspectors with multiple management notices and other memoranda documenting its anti-COVID-19 protocols, as well as information on the embassy's attendance tracker. Furthermore, the embassy noted that the Department did not provide specific guidance on how to track numbers of employees within the building. The embassy's attendance tracker did not account for Marine Security Guard and local guard force shift changes and other anomalies in the aggregated staffing numbers, such as individuals logging on more than once because of computer glitches or working partial, staggered shifts in the office to process classified information. When corrected, the attendance numbers show the embassy was above its internally set limits less than a handful of times during the period cited, and then by only two or three. The embassy also stated that attendance tracking and staffing percentages were only part of its management of the COVID-19 crisis. The embassy's Regional Medical Officer noted that the embassy's actions were in keeping with Department and the Bureau of Medical Services guidance on staffing percentages and that there were no cases of community spread within Embassy Sofia. Additionally, Department guidance at the time specified a staffing range of between 20% to 40% in Diplomacy Strong Phase One operations. The embassy decided on 25% and 35% during different intervals, and the Emergency Action Committee's guidance and instructions to agency and section heads provided for some flexibility in staffing numbers based on mission critical requirements. At no point during the time in question did the embassy exceed Department or Bureau of Medical Services guidance on staffing percentages, as evidenced by the embassy's Emergency Action Committee cables.

OIG Reply: OIG considers the recommendation resolved. OIG reports are based on information provided at the time of the inspection. Additionally, OIG acknowledges the updated calculations provided by Embassy Sofia in its response to the draft report. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia monitored the in-office presence of personnel to stay within the ceilings recommended by the Emergency Action

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.

Committee and approved by the Ambassador in accordance with the Department's COVID-19 Mitigation Process.

Recommendation 2: Embassy Sofia should comply with Department standards for grant file documentation. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

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

Recommendation 3: Embassy Sofia should incorporate strategic planning principles, including evaluation, as part of digital outreach efforts, in accordance with Department standards. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia incorporated strategic planning principles, including evaluation, as part of digital outreach efforts, in accordance with Department standards.

Recommendation 4: Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should store furniture, furnishings, and equipment removed from its designated representational residences in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia stored furniture, furnishings, and equipment removed from its designated representational residences in accordance with Department standards.

Recommendation 5: Embassy Sofia 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 Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia 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 as them permanent storage.

Recommendation 6: Embassy Sofia should use the Integrated Logistics Management System to track all uniforms and personal protective equipment in accordance with Department standards. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation. The embassy noted an estimated completion date of summer 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia used the Integrated Logistics Management System to track all uniforms and personal protective equipment in accordance with Department standards.

Recommendation 7: Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic safety evaluations of its residential properties in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation. The embassy estimated completion in 2028.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia performed seismic safety evaluations of its residential properties in accordance with Department standards.

Recommendation 8: Embassy Sofia should administer facility management expendable supplies in accordance with Department standards. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation. However, the embassy noted it has insufficient warehouse space and separated high value storage areas to accommodate facilities expendable property operations. The embassy requested Bureau of Overseas Buildings Operations guidance and support to design suitable spaces for this function to commence.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia administered facility management expendable supplies in accordance with Department standards.

Recommendation 9: Embassy Sofia should complete information systems security officer duties in accordance with Department standards. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia completed information systems security officer duties in accordance with Department standards.

Recommendation 10: Embassy Sofia should establish a records management program in accordance with Department standards. (Action: Embassy Sofia)

Management Response: In its April 11, 2022, response, Embassy Sofia concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Sofia established a records management program in accordance with Department standards.

Recommendation 11: The Bureau of Administration, in coordination with Embassy Sofia, should work with the U.S. Postal Service to resolve the problem of misrouted Diplomatic Post Office mail. (Action: A, in coordination with Embassy Sofia)

Management Response: In its April 11, 2022, response, the Bureau of Administration neither agreed nor disagreed with this recommendation. The bureau noted that the issue raised by OIG is valid, longstanding, and not specific to Embassy Sofia. The Diplomatic Pouch and Mail Division of the Bureau of Administration has worked diligently over the years, in close cooperation with Department of Defense postal elements experiencing the same issues, to raise concerns with U.S. Postal Service management. These efforts have been both at the processing facility level in which Diplomatic Mail and Pouch Division personnel are embedded and at the leadership level in Washington, D.C. Department complaints have been conveyed to three successive Postmasters General, but, to date, none have been successful in completely remedying the problem on misrouted Diplomatic Post Office mail. The bureau summarized recent efforts to engage with the U.S. Postal Service and noted it is focused on persuading the U.S. Postal Service to provide a separate, dedicated facility to process Diplomatic Post Office mail.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration worked with the U.S. Postal Service to resolve the problem of misrouted Diplomatic Post Office mail.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Herro K. Mustafa	10/2019
Deputy Chief of Mission	Andrea Brouillette-Rodriguez	6/2021
Chiefs of Sections:		
Management	Gary L. Anderson	7/2019
Consular	Michael Greer	8/2021
Political-Economic	Marc Nordberg	8/2019
Public Affairs	Jeffrey Weinshenker	8/2021
Regional Security	Christopher Belmonti	7/2021
Other Agencies:		
Department of Defense	Colonel Paul Sebold	7/2021
U.S. Commercial Service	Miguel Hernandez	8/2018
Department of Justice Overseas Prosecutorial Development, Assistance and Training	Jessica Kim	1/2020
Drug Enforcement Agency	Daniel Figueroa	12/2020
Federal Bureau of Investigation	T.J. Holland	8/2019
Customs and Border Protection	Jared Gast	9/2021
U.S. Secret Service	Christopher McIntire	7/2021

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from August 30, 2021, to January 24, 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 also determined whether:

- COVID-19 affected Embassy Sofia's operations and internal controls, and if so, to what extent.
- COVID-19 related telework affected mission accomplishments, 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 the inspection remotely and relied on audio- and video-conferencing tools in lieu of in-person interviews with Department and other personnel. Additionally, embassy staff conducted video walkthroughs so OIG could see embassy facilities relevant to the inspection. OIG also reviewed pertinent records; circulated surveys and compiled the results; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

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

APPENDIX B: MANAGEMENT RESPONSES



*Embassy of the United States of America
Sofia, Bulgaria*

April 11, 2022

UNCLASSIFIED

THRU: EUR - Assistant Secretary Karen Donfried

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

FROM: Embassy Sofia – Ambassador Herro K. Mustafa

SUBJECT: Response to Draft OIG Report – Embassy Sofia OIG Inspection

Embassy Sofia has reviewed the draft OIG inspection report and thanks the inspection team for all its great efforts during this process. We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: Embassy Sofia should monitor the in-office presence of personnel to stay within the ceilings recommended by the Emergency Action Committee and approved by the Ambassador in accordance with the Department's COVID-19 Mitigation Process.

Management Response: Embassy Sofia disagrees with Recommendation 1.

The report notes that “according to 12 Foreign Affairs Handbook (FAH)-1 H-121b, the Chief of Mission must develop policies to protect U.S. Government personnel and their dependents and take appropriate measures to reduce their exposure to risk” and the draft report determines that the Embassy did not fulfill this requirement based on an internal tracker that the Embassy developed.

During the inspection, Embassy Sofia Management provided inspectors with multiple Management Notices and other memoranda documenting Post’s anti-COVID-19 protocols. (Tabs A and B) illustrate examples of Embassy Sofia being ahead of the curve on COVID measures and appreciation from the embassy LES and USDH for these efforts to protect the community.

There was no specific guidance from the department on how to track numbers of employees within the building. Many posts left it to supervisors to manage in-office presence and gave supervisors the flexibility to determine when presence in the office or work-related travel would be necessary due to strategic policy or national security demands. As one additional tool to monitor in-person contact, the Embassy developed an attendance tracker to help supervisors and management monitor staff in the building. Post provided the inspection team with one year of Post's attendance tracker (Tab C). We kindly request OIG to reconsider penalizing post on not achieving perfection in what was not a department fielded standardized tracking system, but never-the-less was effective under the circumstances.

Post also provided OIG inspectors additional information concerning the 39 days the draft report alleges Embassy Sofia was over the staffing percentage of 25% and 35%. Post Management highlighted that the Mission's attendance tracker, the information used by OIG, does not account for MSG (Marine Security Guard), LGF (Local Guard Force) shift changes, and other anomalies, i.e., individuals logging on more than once because of computer glitches or working partial, staggered shifts in the office to process classified information, in the aggregate staffing numbers. (Tab C1)

When corrected, the attendance numbers show post was above its internally set limits less than a handful of times during the period cited, and then by only two or three. Unless an individual is standing at the gate counting people entering the building, it would have been impossible to maintain 100% accountability during the last two years.

Moreover, attendance tracking and staffing percentages were only part of the package of Post's extensive management of the COVID crisis. Post's RMO (Regional Medical Officer) confirms that Mission Sofia's actions were in keeping with Department and M/Med guidance and that there were no cases of community spread within Embassy Sofia. The RMO notes that Post's actions during the Pandemic were as effective, if not more effective, than any other Embassy he covers. (Tab D)

Department guidance at the time specified a range of between 20% to 40% in Diplomacy Strong Phase One operations. Post decided on 25% and 35% during different intervals and the EAC's guidance and instructions to Agency/Section Heads were that there was some flexibility in staffing numbers based on Mission Critical requirements. At no point during the time in question did Post exceed Department or M/Med guidance on staffing percentages.

Moreover, Post's EAC (Emergency Action Committee) cables concerning Post's staffing decisions pointed out that Post was operating within the Diplomacy Strong Phase One operations guidance, 20-40% overall with Agency/Section head flexibility for Mission Critical work. (Tab E)

Gary L. Anderson, Embassy Sofia Management Counselor, is the Point of Contact for this recommendation.

OIG Recommendation 2: Embassy Sofia should comply with Department standards for grant file documentation. (Action: Embassy Sofia)

Management Response: Embassy Sofia agrees with the recommendation. The Embassy has implemented the necessary actions to close the recommendation by enforcing new section-wide grants standard operating procedures, including mandatory use of the Office of Procurement Executive's awards file checklist by Grants Officers and Grant Officer's Representatives at all stages of the award cycle, as well as continuing spot checks by Grants Officers.

The point of contact for this recommendation is Jeff Weinshenker.

OIG Recommendation 3: Embassy Sofia should incorporate strategic planning principles, including evaluation, as part of digital outreach efforts, in accordance with Department standards. (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. The Embassy implemented the necessary steps to clear the recommendation by developing and deploying planning and evaluation templates for sustained social media campaigns – to include targeted engagement outcomes and qualitative/quantitative metrics – and through the establishment of an interagency strategic communications working group that identifies and coordinates opportunities for social media engagement one month (or more) in advance.

The point of contact for this recommendation is Jeff Weinshenker.

OIG Recommendation 4:

Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should store furniture, furnishings, and equipment removed from its designated representational residences in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Management Response: Embassy Sofia concurs with the recommendation. The Embassy has implemented the recommendation and is planning to auction the remaining replaced representational property from the former CMR (Chief of Mission Residence) by Autumn, 2022. Embassy Sofia points out that its warehouse facility is not adequate to store this replaced furniture and said items will remain stored as they are until the auction(s) is completed and the furniture is disposed of. All shipping containers used for this purpose will be returned or sold locally.

The Embassy will seek permission to retain any required containers from the Office of Overseas Buildings if this situation reoccurs.

The point of contact for this recommendation is Kathryn Porch.

OIG Recommendation 5:

Embassy Sofia 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 as them permanent storage (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. The Embassy has implemented the recommendation and is planning to auction the remaining replaced representational property from the former CMR (Chief of Mission Residence) by Autumn, 2022. Embassy Sofia points out that its warehouse facility is not adequate to store this replaced furniture and said items will remain stored as they are until the auction(s) is completed and the furniture is disposed of. All shipping containers used for this purpose will be returned or sold locally.

The Embassy will seek permission to retain any required containers from the Office of Overseas Buildings if this situation reoccurs.

The point of contact for this recommendation is Kathryn Porch.

OIG Recommendation 6: Embassy Sofia should use the Integrated Logistics Management System to track all uniforms and personal protective equipment in accordance with Department standards. (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. The embassy is currently fielding the AIM inventory module as mandated by A/LM (Administration/Logistics Management). Once the module is completely installed and Post has conducted its current annual inventory, Post will commence tracking uniforms and PPE (Personal Protective Equipment) under loanable property in ILMS (Integrated Logistics Management System). Scheduled date for completion, Summer 2023.

The point of contact for this recommendation is Kathryn Porch.

OIG Recommendation 7:

Embassy Sofia, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic safety evaluations of its residential properties in accordance with Department standards. (Action: Embassy Sofia, in coordination with OBO)

Management Response: Embassy Sofia concurs with the recommendation. Embassy Sofia, in conjunction with OBO (Overseas Buildings Operations) is starting a seismic certification program for all Embassy Sofia real properties. This recertification will be funded by the Natural Hazards Program and will consist of post contracting with a locally qualified engineering firm to survey residences based on the Natural Hazards Program's requirements. The Natural Hazards Program only has funding to perform up to 10 surveys a year. Completion no sooner than 2028.

The point of contact for this recommendation is Duane Lambert or Herbert Hundt (7/22).

OIG Recommendation 8: Embassy Sofia should administer facility management expendable supplies in accordance with Department standards. (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. The Embassy points out again that it has insufficient warehouse space and separated high value storage areas to accommodate facilities expendable property operations. Post requests Bureau of Overseas Building Operations guidance and support to design suitable spaces for this function to commence. Post has no completion date until such consultations take place.

The point of contact for this recommendation is Duane Lambert or Herbert Hundt (7/22).

OIG Recommendation 9:

Embassy Sofia should complete information systems security officer duties in accordance with Department standards. (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. Embassy Sofia has prioritized ISSO activity with a renewed sense of urgency and leadership support that is well communicated across the IMO team. The IMO has also established a centralized management system for reoccurring tasks and logging. The system provides a consolidated point for documentation, tracking on-going activities, and historic logging of completed activities. Additionally, the repository provides a portal for leadership to view progress of on-going issues or view task completion details. Lastly, we have re-engaged with cyber security stakeholders from across the Department to assist in the completion of our ISSO functions.

New Sofia ISSO Channel (MS Teams)

ISSO Recurring Tasks

Documentation

The point of contact for this recommendation is Mauricio Lopez, Christopher Fink or Jeffrey Krolikowski.

OIG Recommendation 10:

Embassy Sofia should establish a records management program in accordance with Department standards. (Action: Embassy Sofia)

Management Response: Embassy Sofia concurs with the recommendation. A Management Policy was established in November 2021 defining the importance and responsibilities of records management. All State sections have confirmed compliance by designating a records management custodian and performing the necessary retirement activities as of the date of this memorandum.

The point of contact for this recommendation is Mauricio Lopez.



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

April 11, 2022

TO: OIG/ISP – Sandra J. Lewis

FROM: A/LM – John Dinkelman 

SUBJECT: (U) Response to OIG Report-Inspection of Embassy Sofia, Bulgaria ISP-I-22-18

(U) The Office of Logistics Management, Office of Program Management and Policy, (A/LM/PMP) has reviewed the OIG Report – Inspection of Embassy Sofia, Bulgaria. A/LM provides the following comments in response to the recommendation made by OIG.

(U) OIG Recommendation 10: The Bureau of Administration, in coordination with Embassy Sofia, should work with the U.S. Postal Service to resolve the problem of misrouted Diplomatic Post Office mail. (Action: A, in coordination with Embassy Budapest)

(U) Management Response (4/11/22): The issue raised by the OIG in this recommendation, i.e. misrouted Diplomatic Post Office (DPO) mail, is valid and longstanding. It is important to note, however, that it is not specific to Embassy Sofia. Indeed, it affects every DPO post worldwide. The problem is deeply rooted in the U.S. Postal Service's (USPS) operational challenges and shortcomings. The Diplomatic Pouch and Mail (DPM) Division of A/LM has worked diligently over the years, in close cooperation with DoD postal elements experiencing the same issues, to raise concerns with USPS management. These efforts have been both at the processing facility level in which DPM personnel are embedded, and at the leadership level in Washington, DC. DOS/DoD complaints have been conveyed to three successive Postmasters General, two of whom personally visited the primary APO/DPO processing facility at the Chicago USPS International Service Center (ISC), to witness the problems firsthand. To date, none have been successful in completely remedying the problem on misrouted DPO mail. A summary account of recent efforts to engage USPS is provided below:

- In June 2020, the Managing Director of A/LM/PMP met with USPS Area VPs and agreed to begin meticulously tracking and reporting the volume of damaged and misrouted mail, and lack of ICAIR support.
- In September 2020, PMP met with USPS Networks VP as a follow-up to the June 2020 meeting; no improvements reported. DOS, USPS HQ, and Chicago ISC began a weekly working group session from September to December 2020, which was abruptly cancelled by USPS with no explanation.
- In October 2020, DPM created an ILMS enhancement that produced a uniquely tailored automated report on misrouted mail. This information is transmitted daily to USPS HQ Operations staff and Chicago ISC Plant Management staff that outlines when mail was misrouted and where/how the problems occurred. Despite detailed reports that identify

those errors, USPS continues to fail to adjust or implement an effective training program, and/or to increase quality assurance practices to fix the longstanding systemic problems.

(U) DOS and DoD continue to engage USPS, both “on the ground” and at the leadership level. In recent weeks DoD’s General with oversight responsibilities for APO/FPO mail met with the USPS Executive Vice President to complain about lost, missent and damaged mail. Additionally, the DOS A/LM DAS is planning a trip to the Chicago ISC in the summer of 2022. In recent engagements, A/LM has focused on persuading USPS to provide a separate, dedicated facility for APO and DPO mail. The Chicago ISC is beset with serious operational and personnel challenges that extend much deeper than the APO/DPO mail stream. A dedicated processing facility would allow for improved equipment, better trained staff, focused quality assurance and a less chaotic operating environment.

(U) The point of contact for this memorandum is Jeffrey B. Meyer, Director of the Diplomatic Pouch and Mail Division (A/LM/PMP/DPM).

ABBREVIATIONS

DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
EU	European Union
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
IM	Information Management
ISSO	Information Systems Security Officer
LE	Locally Employed
NATO	North Atlantic Treaty Organization
OBO	Bureau of Overseas Buildings Operations

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