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Office of Inspector General
United States Department of State

ISP-I-22-21

Office of Inspections

August 2022

Inspection of Embassy Tallinn, Estonia

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

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HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-22-21

What OIG Inspected

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

What OIG Recommends

OIG made 8 recommendations: 7 to Embassy Tallinn and 1 to the Bureau of Information Resource Management.

In its comments on the draft report, the Department concurred with 7 recommendations and disagreed with 1 recommendation. OIG considers 7 recommendations resolved and 1 recommendation unresolved. 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 responses are reprinted in their entirety in Appendix B.

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OFFICE OF INSPECTIONS

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Inspection of Embassy Tallinn, Estonia

What OIG Found

- The Chargé d'Affaires led Embassy Tallinn in a professional and collaborative manner consistent with Department of State leadership principles. He established an inclusive and supportive tone for the embassy.
- Department and other U.S. Government officials praised the embassy's role in achieving significant foreign policy objectives, in particular Estonian support for a global minimum tax on large corporations and an increase in the Estonian defense budget.
- The embassy did not consistently document public diplomacy grants in accordance with Department standards.
- Some management controls for human resources and general services did not meet Department standards.
- The embassy lacked proper controls on mail handling and did not perform some required information systems security duties.

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CONTEXT

After centuries of Danish, Swedish, and German rule, what is now modern-day Estonia came under Russian control in 1721 until it declared its independence in 1918 following the collapse of the Russian Empire. Twenty-two years later, Soviet troops occupied the country, and the Estonian Soviet Socialist Republic was formally incorporated into the Soviet Union on August 6, 1940. The United States never recognized the forcible annexation of Estonia and the other Baltic states and supported the restoration of Estonia's independence in 1991, when the Soviet Union broke apart. Since regaining its sovereignty, Estonia pursued numerous reforms and, with U.S. backing, formally joined both the North Atlantic Treaty Organization (NATO) and the European Union (EU) in 2004.



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

Estonia is the smallest and northernmost of the three Baltic states. Ethnic Estonians constitute approximately 69 percent of the population of 1.22 million and ethnic Russians comprise about 25 percent. While Estonian is the official language of Estonia, up to 90 percent of Estonians in some eastern regions speak Russian as their first language.

Estonia has a modern, market-based and export-oriented economy. Its main industries include electronics, telecommunications, information technology, and wood products. Estonia has pursued prudent macroeconomic policies and an agenda favorable to businesses. As a result, Estonians have enjoyed a significant increase in living standards since joining the EU, although gross domestic

product (GDP) per capita remains below the eurozone average. Following a modest decline in 2020, Estonia's economy grew by over eight percent in 2021. The country continues to have one of the lowest debt-to-GDP ratios in the EU.

Sharing democratic values and a common transatlantic vision, Estonia remains a steadfast partner of the United States on a broad range of regional and global issues. The U.S.-Estonia security relationship is central to bilateral ties, reflecting the strong U.S. interest in cooperating with the Baltic states to defend against Russian aggression on NATO's eastern flank and to counter hybrid threats.¹ Estonia spends more than two percent of GDP on defense and deploys its forces to NATO and multinational operations abroad. In FY 2021, the United States provided more than \$21 million in foreign assistance to Estonia, primarily for security and defense programs. Embassy Tallinn's top three strategic objectives, as outlined in the FY 2018 to 2023 Integrated Country Strategy (ICS), are to:

¹ According to NATO, "Hybrid threats combine military and non-military as well as covert and overt means, including disinformation, cyber attacks, economic pressure, deployment of irregular armed groups and use of regular forces. Hybrid methods are used to blur the lines between war and peace, and attempt to sow doubt in the minds of target populations. They aim to destabilise and undermine societies." "NATO's Response to Hybrid Threats," March 16, 2021, https://www.nato.int/cps/en/natohq/topics_156338.htm.

- Assist Estonia in strengthening its defense and security capabilities, and bolster Estonia's media independence and ability to identify and counter Russian malign influence.
- Obtain Estonian support for common positions that affect the U.S.-EU trade relationship, and increase bilateral economic cooperation across various sectors, including energy, science, technology, and innovation.
- Strengthen western values and democratic principles across communities, and support increased social cohesion.

At the time of the inspection, Embassy Tallinn's authorized staff included 52 U.S. direct-hire employees, 13 eligible family members, and 65 locally employed (LE) staff. In addition to Department of State (Department) employees, embassy staff included representatives from the Departments of Defense and Homeland Security, and the Federal Bureau of Investigation. The embassy occupied a building more than 100 years old. In 2020, the Department selected a site for a new embassy compound, but the project remains in the planning process.

OIG evaluated the embassy's executive direction, policy implementation, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980. Because of the COVID-19 pandemic, OIG conducted the inspection remotely and therefore could not review some areas.²

EXECUTIVE DIRECTION

OIG assessed leadership based on interviews, staff questionnaires, and OIG's review of documents and remote observation of embassy activities during the inspection.

Tone at the Top and Standards of Conduct

At the time of the inspection, the embassy had been without an ambassador since July 2018. The Chargé d'Affaires (Chargé) was assigned to the embassy as Deputy Chief of Mission and became Chargé upon his arrival in July 2019. Prior to his arrival, he served as Deputy Director of the Office of Eastern European Affairs in the Bureau of European and Eurasian Affairs.

In January 2021, the Chargé began rotating some acting deputy chief of mission responsibilities, such as coordination for special projects, for several months at a time, among the chiefs of the Political-Economic, Public Diplomacy, and Management sections.

² See Appendix A.

OIG found the Chargé fully modeled the leadership and management principles set forth in 3 Foreign Affairs Manual (FAM) 1214. In interviews and questionnaires, embassy employees consistently described him as accessible and collaborative. They told OIG the Chargé frequently walked through the embassy to speak with them, conducted town hall meetings, and sent email messages on specific topics. Staff also said he took care to solicit and listen to their views, formulated pragmatic and reasoned decisions, and clearly explained them. During a town hall meeting to discuss the Department's policy to require COVID-19 vaccines for LE staff members, which the Chargé thought might lead to resignations, OIG observed that he projected forthrightness and compassion in explaining the policy and responding to questions. Embassy staff also told OIG the Chargé showed concern for their welfare. They said he often inquired about their well-being and took the time to learn the names of spouses and children. In addition, he looked for ways to accommodate requests for activities that had been restricted due to the COVID-19 pandemic, such as staff use of the Chief of Mission residence swimming pool and supporting "COVID-friendly" activities organized by the Community Liaison Office.

Embassy employees told OIG the Chargé acted with integrity and adhered to ethical standards. For example, staff in the Management Section recalled that when he arrived in 2019, he met with them to understand what he could and could not request and encouraged them to inform him if any of his requests were inappropriate. They also said he consulted with them in advance to ensure he was acting in compliance with ethics requirements. OIG also determined that the embassy maintained its gift registry in accordance with Department guidance in 2 FAM 964.

OIG found the Chargé supported Equal Employment Opportunity (EEO) practices that were consistent with 3 FAM 1511.1a and 21 STATE 60514.³ Embassy staff told OIG he raised the importance of EEO practices at Country Team meetings, town halls, and in email messages, and that he collaborated with the embassy's Diversity and Inclusion Council to attract a more diversified pool of applicants for positions at the embassy. The embassy published a management notice on the EEO program on October 9, 2020, in accordance with 3 FAM 1514c(3)(c).

Execution of Foreign Policy Goals and Objectives

OIG found the embassy met requirements to monitor and review the ICS in accordance with 18 FAM 301.2-4(D)c. Embassy staff told OIG they used the ICS to guide their work and determine whether programs fell within its parameters. The embassy reviewed and updated the ICS in January 2020 and January 2021, and at the time of the inspection, another review was underway. During this most recent review, the embassy established four working groups which included Country Team and other staff members to evaluate the three existing goals in the ICS and propose a fourth goal to better reflect developments in the bilateral relationship between the U.S. and Estonia.

³ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

The Chargé fulfilled his responsibilities to oversee the embassy's strategic activities as defined in 2 FAM 113.1c. Washington officials praised the Chargé and embassy staff for their role in achieving significant foreign policy objectives, in particular in securing Estonia's support for the introduction of a global minimum tax, a key administration priority.⁴ In addition, according to interviews with Washington officials, the embassy's advocacy contributed to Estonia's decision in September 2021 to increase its defense budget at a time when it had initially planned to reduce future spending. Finally, Washington officials said embassy advocacy led the Government of Estonia in November 2021 to adopt regulations to protect national communications networks, which aligned with U.S. goals on technology security.

Although Washington officials and embassy staff reported that the absence of a presidentially appointed U.S. ambassador had been an ongoing concern to Estonian counterparts, OIG's review of the Chargé's calendar indicated he had broad and ready access to Estonian senior government officials, including at the ministerial level, and a wide range of engagements in the business, media, civil society, and diplomatic sectors. Washington interlocutors commented favorably on the Chargé's proactive and effective communication with key Estonian Government contacts to address negative commentary on U.S. foreign policy toward Russia.

Impact of COVID-19 Pandemic

OIG found the embassy Front Office's response to the COVID-19 pandemic was consistent with 2 FAM 031d and 2 FAM 032.6f guidance on risk management.⁵ The Chargé instituted telework and other health and safety practices, such as social distancing and restrictions on social events. He conveyed information to the embassy community regarding COVID-19-related developments and policies through town halls and emails, and embassy staff expressed satisfaction with his communications and decisions. At the time of the inspection, Estonia was experiencing its highest rate of new COVID-19 cases and as a result, there was an increased number of embassy staff teleworking.

Embassy staff told OIG the use of the Department's remote access capabilities and the embassy's procurement and provision of enterprise mobile device laptops to support telework enabled the embassy to advance ICS objectives during the pandemic. Embassy staff used virtual platforms for internal and external meetings, with some face-to-face meetings, depending on

⁴ The global minimum tax rate is a proposal advocated by the White House for all countries to establish a corporate tax rate of at least 15 percent for large multinational companies. The White House, "Statement by President Joe Biden on Today's Agreement of 130 Countries to Support a Global Minimum Tax for the World's Largest Corporations," July 1, 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/07/01/statement-by-president-joe-biden-on-todays-agreement-of-130-countries-to-support-a-global-minimum-tax-for-the-worlds-largest-corporations/>.

⁵ 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. Id. Guidelines in 2 FAM 032.6 f also state that the chief of mission sets the risk tolerance level at each overseas post and communicates it clearly to staff.

the content of the meeting and the state of the pandemic in Tallinn. The Front Office also gave section chiefs flexibility to determine in-office coverage, within Department guidelines.⁶

OIG determined that the COVID-19 pandemic affected embassy sections differently. Embassy staff in the Public Diplomacy Section and other sections told OIG that pandemic restrictions limited the embassy's ability to conduct in-person outreach, cultural events, and some exchange programs. In addition, the Public Diplomacy Section postponed or reprogrammed more than half of its grant funding, as partners were not able to consistently accomplish grant objectives. Although the Consular Section provided U.S. citizen services throughout the pandemic, it suspended immigrant and nonimmigrant visa services altogether during periods of high transmission in Estonia and offered limited services at other times. The Management Section reduced some services, such as cashiering and non-emergency facilities management requests, to allow it to better triage maintenance requests to ensure that health and safety issues took priority while still allowing limited onsite staffing. Additionally, restrictions on in-person presence made some training, such as that of drivers, impossible to carry out. Finally, embassy staff told OIG that COVID-19 travel restrictions hampered regional office in-person support for the Management Section, the Regional Security Office, the Consular Section, and Information Management operations.

Adherence to Internal Controls

OIG determined that the Front Office generally oversaw the embassy's adherence to internal controls in accordance with 2 FAM 022.7(1) and (5), which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. Although the embassy did not retain a file of the reviews it conducted to prepare the FY 2021 Annual Chief of Mission Management Control Statement of Assurance, embassy personnel who conducted the reviews told OIG the Chargé and the Management Control Coordinator examined the documents they submitted and contacted them with questions or requests for clarification. Embassy staff also told OIG the embassy conducted an additional assessment of internal controls in January 2021 using OIG questionnaires.

OIG found that although the Chargé reviewed nonimmigrant visa applications adjudicated by consular officers, he did not complete them on time in accordance with 9 FAM 403.12-1a. For example, from September 1, 2021, through November 30, 2021, the Chargé completed 279 adjudication reviews, but only 56 were conducted within the required timeframe. OIG determined this occurred because of demands on the Chargé's time while he performed the duties of both chief of mission and deputy chief of mission. Timely reviews of visa adjudications are an important management tool to maintain the highest professional standards of adjudication and ensure consistent and correct application of Department standards. Due to

⁶ Cable 21 STATE 99942, "Diplomacy Strong Replacement: COVID-19 Mitigation Process (CMP) for Domestic Facilities and Overseas Posts," September 28, 2021, introduced the Department's COVID-19 Mitigation Process, replacing the earlier Diplomacy Strong framework. The CMP provides guidance for Department domestic and overseas workplaces to determine onsite work posture and other mitigation actions.

the Chargé's commitment to working with the Consular Section chief to perform more timely reviews, OIG did not make a recommendation to address this issue.

Security and Emergency Planning

The Chargé's oversight of the embassy's security and emergency preparedness programs was consistent with Department standards in 2 FAM 113.1c(5), which require chiefs of mission to develop policies and programs for the protection of embassy personnel. OIG found the embassy updated its Emergency Action Plan and security directives, regularly conducted drills and radio checks, and held crisis management exercises. In addition, the Chargé met with the Overseas Security Advisory Committee,⁷ as well as members of the American Liaison Network,⁸ which satisfied the requirements to assist and protect U.S. citizens set forth in 2 FAM 113.1c(13). The embassy also submitted its annual review of the security memorandum of agreement between the chief of mission and the geographic combatant commander as required by 2 Foreign Affairs Handbook (FAH)-2 H-116.4b.⁹

Developing and Mentoring Foreign Service Professionals

OIG found the Chargé oversaw the activities of the embassy's sole First- and Second-Tour employee in accordance with 3 FAM 2242.4. The Chargé mentored the employee on an informal basis, meeting on topics such as bidding on onward assignments. The Chargé agreed to consider a more structured approach to mentoring, for example, defining specific career-enhancing activities the employee could complete and which could be discussed on a regular basis.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Tallinn's policy and program implementation work performed by the Political-Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements. However, OIG found deficiencies in the Public Diplomacy and Consular Sections, as discussed below.

⁷ The Overseas Security Advisory Committee is a partnership between the Department and private-sector security community that supports the safe operations of U.S. organizations overseas through threat alerts, analysis, and peer networking groups.

⁸ American Liaison Networks are country-based networks of volunteers who facilitate communication between embassies and U.S. citizens on topics such as security, health, voting, and travel.

⁹ In December 1997, the Secretaries of Defense and State signed an agreement to address the security of Department of Defense personnel located overseas, in which the Secretary of State agreed, in accordance with 22 U.S.C. § 4805(a), to delegate operational control of security functions for certain Department of Defense personnel to the Secretary of Defense. This agreement is implemented through country-level memoranda of agreement between the chief of mission and relevant geographic combatant commander. See 2 FAH-2 H-116.4a, "COM Security Responsibility and the Department of Defense."

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, Leahy vetting,¹⁰ grants management, commercial promotion, and end-use monitoring functions. OIG found the section generally complied with Department standards. During the inspection, the Political-Economic Section took action to correct an issue identified by OIG by having an LE staff member certified as a Grants Officer Representative to support grants managed by the section.

In interviews with OIG, Department and interagency stakeholders praised the Political-Economic Section's reporting for its quality, timeliness, and relevance. They also commended the section's work to secure Estonian approval of the global minimum tax and to maintain the level of Estonian defense spending and close government coordination with the United States in addressing Russia's threat to Ukraine and NATO's eastern flank.

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 strengthening western values and democratic principles across communities, for which the section had primary responsibility. Washington stakeholders told OIG the Public Diplomacy Section was responsive to its requests and consistently produced high-quality reporting. OIG determined that the section took advantage of regional programming coordination, as well as a robust network of four American Spaces.¹¹ In addition, its outreach efforts remained active despite ongoing challenges, such as a long-term lack of an ambassador, pandemic-related restrictions, and Estonian virtual platform fatigue. Overall, OIG found the section met Department standards and guidance, with the exception noted below.

Grants Files Did Not Meet Department Standards for Documentation

OIG found that although the Public Diplomacy Section's grants supported relevant strategic objectives, grants file documentation did not consistently meet Department standards across the lifecycle of the grants administration process.¹² Specifically, of the 20 grant files reviewed

¹⁰ 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.

¹¹ American Spaces are Department operated or supported public diplomacy facilities that host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives.

¹² The Federal Assistance Directive, Chapter 2, Part I (October 2020 and later revision) designates the Grants Officer as "responsible for ensuring that documents from each stage of the award lifecycle are uploaded to the official file."

by OIG,¹³ all lacked required pre-award budget documentation, 18 lacked required monitoring and evaluation documentation, and 7 lacked the required Grants Officer or Grants Officer Representative closeout assessments.¹⁴ Section staff told OIG a lack of time, oversight, and familiarity with online documentation standards created this deficiency. During the inspection, the section began to add evidence of past monitoring and evaluation, providing sufficient information for OIG to determine that grant funds were used as intended. The section also designated a new Grants Officer Representative, increased oversight by U.S. direct-hire staff, and established section practices to ensure adherence to Federal Assistance Directive requirements. Despite these positive steps, additional attention was needed to improve grants management. Failure to document grants throughout the life cycle impairs the ability of grants officers to identify and mitigate risk, monitor program implementation, evaluate program results, and ensure accountability for public diplomacy resources.

Recommendation 1: Embassy Tallinn should comply with Department standards for grant file documentation. (Action: Embassy Tallinn)

Consular Operations

OIG reviewed the embassy's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. Due to the COVID-19 pandemic, the Consular Section suspended all services except for emergency U.S. citizen and passport services in March 2020. The section resumed limited visa processing for students and crew members in late summer 2020. In mid-October 2021, the section resumed providing full services.

During the inspection, the embassy corrected five internal control issues identified by OIG. Specifically, the embassy:

- Developed a fraud prevention strategy in accordance with Department standards in 7 FAH-1 H-941.1c and 7 FAH-1 H-943.7a.
- Developed written standard operating procedures for referring cases to the Fraud Prevention Unit, working with the Regional Security Officer, and conducting fraud interviews and site visits, as required by 7 FAH-1 H-743.7b.
- Renewed the yearly written agreement with the panel physician,¹⁵ as required by 9 FAM 302.2-3(E)(2)(a), and scheduled the annual Review of Performance evaluation of the panel physician and lab medical exam procedures, as required by 9 FAM 302.2-3(E)f(7).

¹³ OIG reviewed 20 out of 79 grants (25 percent) from FY 2020, FY 2021, and FY 2022 through January 6, 2022, including all grants in excess of \$19,000 and comprising \$720,838 out of a total amount of \$1,080,194 (67 percent).

¹⁴ Federal Assistance Directive, Chapter 2, Section G, Pre-Federal Award Requirements: Minimum Requirements; Chapter 4, Section D, Post Federal Award Requirements: Monitoring and Reporting; and Chapter 5, Section C, Closeout: Grant Officer Responsibilities (October 2021).

¹⁵ As defined in 9 FAM 302.2-3(E)(3)f(1), panel physicians, under agreements with consular sections, conduct the medical examinations of U.S.-bound immigrants and refugees.

- Started to monitor the Global Support Strategy Services¹⁶ program for Estonia as required by 7 FAH-1 H-263.3 and the Bureau of Consular Affairs' Global Support Strategy checklist.
- Submitted the Visas Viper¹⁷ monthly report within 10 days following the end of the previous month, as required by 9 FAM 304.4-4(C)b.

OIG determined Embassy Tallinn's consular operations complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exception noted below.

Consular Section Physical Space Did Not Comply with Department Standards

OIG assessed the Consular Section's physical space during a remote video walkthrough and found it did not meet Department standards in the following areas:

- The consular cashier work area was not enclosed with a lockable door, leaving consular monetary collections and cashier equipment accessible to anyone in the section, contrary to the requirements in 7 FAH-1 H-742a and 4 FAM 317.2-2.
- None of the interview windows were accessible to persons in wheelchairs, as required by 7 FAH-1 H-282(1)(m).

The lack of an enclosed, controlled access cashier space increased the risk of fraud, mismanagement, or abuse in consular cashiering operations. Additionally, the lack of an interview window at a height suitable for clients using wheelchairs inhibited their ability to access consular services.

Recommendation 2: Embassy Tallinn, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the Consular Section's physical space into compliance with Department standards. (Action: Embassy Tallinn, in coordination with OBO and CA)

RESOURCE MANAGEMENT

OIG reviewed Embassy Tallinn's internal control systems in general services operations, human resources management, facility management, and financial management. During the inspection, the embassy corrected five internal control issues identified by OIG. Specifically, the embassy:

¹⁶ The Global Support Strategy Services program is a worldwide consular program created in 2010 to bring greater global standardization, accountability, and transparency to the delivery of visa applicant support functions. The program provides support services for non-immigrant and immigrant visa operations at approximately 175 U.S. consulates and embassies for public inquiry services, appointment services, fee collection, document delivery, and greeters through a multiple-awardee indefinite duration/indefinite quantity contract.

¹⁷ The Visas Viper program is a mechanism for overseas missions to provide information on foreign nationals with possible terrorist connections.

- Reviewed and reissued its motor vehicle policy, in accordance with 14 FAM 435.1a.
- Conducted an annual review of its 13 blanket purchase agreements,¹⁸ in accordance with Department of State Acquisition Regulations, Section 613.303-6.
- Completed a mandatory performance review for a contract in the Contractor Performance Assessment Reporting System,¹⁹ as required by 14 FAH-2 H-572 and 48 Code of Federal Regulations 42.1502a.
- Certified its non-residential properties in the Post Occupational Safety and Health Officer Certification Application,²⁰ in accordance with 15 FAM 971.
- Reviewed its list of confined spaces and established entry permit requirements, as required by the Department's Confined Space Program Procedures.²¹

Overall, OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exceptions noted below.

General Services Operations

Embassy Did Not Fully Comply with Department's Motor Vehicle Safety Management Program Standards

Embassy Tallinn did not comply with elements of the Department's Motor Vehicle Safety Management Program standards. Specifically, OIG found:

- One chauffeur and 15 incidental (self-drive) drivers did not receive driver safety retraining, as required in 14 FAM 433.5a-b.
- Seven incidental (self-drive) drivers held expired medical clearances, contrary to guidance in 14 FAM 433.4a.
- The embassy did not track all chauffeurs' and incidental (self-drive) drivers' compliance with medical clearance and driver safety training requirements using the Department's Fleet Management Information System,²² as required by 14 FAM 433.4e and 14 FAM 433.5d. According to records provided to OIG by the embassy, 8 chauffeurs and 41 incidental (self-drive) drivers were authorized to operate Government-owned vehicles. However, the embassy only tracked three chauffeurs and seven incidental drivers in the system.

¹⁸ A blanket purchase agreement is a simplified method of filling anticipated repetitive needs for supplies or services by establishing "charge accounts" with qualified sources of supply.

¹⁹ The Contractor Performance Assessment Reporting System, or CPARS, is the government-wide evaluation reporting tool for all past performance reports on contracts and orders. A performance assessment must be done in the system, annually, for each contract over the simplified acquisition threshold of \$250,000.

²⁰ The Post Occupational Safety and Health Officer Certification Application is the Bureau of Overseas Buildings Operations' system of record used to document and record safety certifications of residential and non-residential properties.

²¹ Office of Safety, Health, and Environmental Management, *Confined Space Program Procedures*, 2002.

²² The Fleet Management Information System is the Department's enterprise system for the management of all fleet operations.

- Chauffeurs exceeded the 10-hour per day limit on driving shifts, contrary to 14 FAM 433.8a. OIG's review of time and attendance records over 12 weeks, from October 24, 2021, to January 15, 2022, showed chauffeurs exceeded the limit on 50 occasions.
- The embassy did not implement an alternate workday schedule for Marine Security Guard chauffeurs, as required in 14 FAM 433.8e(1).²³

Management Section staff told OIG in-person driver safety training could not be conducted due to COVID-19 pandemic restrictions, including social distancing and restrictions on in-office presence. OIG determined the insufficient tracking of medical clearances and driver safety training requirements, chauffeurs exceeding the 10-hour per day limit on driving shifts, and the lack of an alternate workday schedule for Marine Security Guard chauffeurs occurred because of staff's unfamiliarity with Department motor vehicle safety standards. 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 3: Embassy Tallinn should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Tallinn)

Some Furniture and Appliance Pool Assets Were Misclassified in the Integrated Logistics Management System

OIG found some of the embassy's furniture and appliance pool (FAP)²⁴ assets were misclassified in the Integrated Logistics Management System (ILMS).²⁵ According to ILMS data, approximately \$312,000 of the embassy's \$944,000 worth of FAP assets were flagged as potentially misclassified in the system. For example, OIG's review of the data showed the embassy incorrectly classified television sets, vacuum cleaners, and gardening equipment as FAP assets in the system, contrary to guidance in 6 FAH-5 H-514d, note 1, and 6 FAH-5 H-513.2-2c. OIG's review also showed some residential furniture assets, which should have been classified as FAP, were classified under different agency codes.²⁶ Management staff told OIG this occurred because the embassy did not directly receive and create assets in ILMS; instead,

²³ Department standards in 14 FAM 433.8e provides an exception to the 10-hour limit on driving shifts for Marine Security Guard chauffeurs and local guard mobile patrol drivers, allowing them to operate on 12-hour shifts. However, when allowing 12-hour shifts, the embassy must implement an alternate workday schedule, with one day on duty followed by one day off duty.

²⁴ The primary goal of the furniture and appliance pool is to ensure the equitable and cost-effective provision of adequate furniture, furnishings, and appliances and equipment to all subscribing agencies at post.

²⁵ The Integrated Logistics Management System is an integrated web-based system that encompasses all Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

²⁶ Agency codes identify ownership of assets in the system. According to 6 FAH-5 H-512.3a, all residential inventory assets must be identified in ILMS with the agency code "FAP."

these functions were performed by another embassy located in a neighboring country.²⁷ However, the Department issued a cable²⁸ stating overseas posts must take responsibility for their ILMS data and general services officers must ensure the data is accurate and up to date. Failure to properly classify FAP assets in ILMS increases the risk of mismanagement of the embassy's FAP holdings and could result in unnecessary expenditures.

Recommendation 4: Embassy Tallinn, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with A)

Human Resources

Embassy Offered Compensation Benefits Not Authorized in Its Local Compensation Plan

OIG found the embassy offered LE staff compensation benefits not authorized by the Department and the embassy's local compensation plan (LCP). Specifically, the embassy:

- Provided night differential pay to LE staff not regularly scheduled to work at night for overtime work performed after 10 pm. The embassy paid these staff members both overtime pay and night differential²⁹ pay. However, according to the embassy's LCP, only LE staff regularly scheduled to work at night—between 10 p.m. and 6 a.m.—were entitled to night differential pay.
- Paid LE staff 2 hours of overtime pay while in on-call status.³⁰ In 2014, the Bureau of Global Talent Management authorized the embassy to compensate LE staff at a rate of 10 percent of their hourly rate for each hour in on-call status. However, the embassy decided not to implement the authorization because it did not meet local labor law requirements; instead, it began offering the lump sum payment of two hours of overtime pay without seeking Department authorization.

According to 3 FAM 7521, the LCP forms the legal basis for all compensation payments. Additionally, guidance in 3 FAM 7554.1 states the Bureau of Global Talent Management establishes the maximum possible changes to the premium pay plan³¹ based on locally prevailing practice and local labor laws, and authorizes revisions, subject to approval by the

²⁷ In 2015, Embassy Tallinn entered into a regional warehousing agreement with Embassy Riga, Latvia, whereby Embassy Riga would provide property management services, including receiving, inventorying, and storage for property belonging to Embassy Tallinn.

²⁸ Cable 17 STATE 58544, "Furniture and Appliance Pool (FAP) and Budget Realities," June 8, 2017.

²⁹ Night differential is paid for regularly scheduled nighttime work during specified hours in addition to regular pay. According to 3 FAM 7557.1c, night differential will not be paid for overtime work at night outside of the employee's basic workweek – instead, the overtime will be paid in accordance with the overtime rates stated in the embassy's premium pay plan.

³⁰ On-call status is a requirement to be available to return to duty on short notice during off duty hours. While in on-call status, an employee may move about as long as the employee can be reached by telephone, beeper, or similar device and, if so ordered, can return to the duty station within one hour to perform urgent work.

³¹ Each mission's local compensation plan must include a Department authorized premium pay plan that describes mission-specific premium pay rates for work performed outside of the regular workweek schedule.

appropriate regional bureau's executive office and the Washington headquarters of the foreign affairs agencies present at the mission and signatory to the LCP. Management Section staff could not provide evidence the embassy requested revisions to its LCP. Staff told OIG the benefits were implemented based on legal opinions received from the embassy's local legal counsel; however, staff could not confirm the benefits were authorized by the Department. The embassy's compensation practices are inconsistent with Department standards and could result in overpayments or underpayments to LE staff.

Recommendation 5: Embassy Tallinn, in coordination with the Bureau of Global Talent Management, should request authorization to implement changes to its local compensation plan, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with GTM)

INFORMATION MANAGEMENT

OIG reviewed information management (IM) operations in Embassy Tallinn, including unclassified and dedicated internet network³² 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.

The section is authorized two U.S. direct-hire positions, one of which, the Information Management Specialist, has been vacant since July 2021. Despite the vacancy, embassy staff reported to OIG³³ the IM section provided excellent customer service. During the inspection, the embassy corrected several deficiencies identified by OIG including:

- Removed a service account with elevated privileges³⁴ as required by 12 FAH-10 H-112.5.
- Updated the Embassy IT contingency plan as required by 12 FAM 623.7, 5 FAM 852.9g and 12 FAH-10 H-230.
- Updated incident response procedures as required by 12 FAH-10 H-242.5-2.
- Approved remote network access through the embassy's Counterintelligence Working Group for embassy teleworkers as required by 12 FAH-10 H-174.1a.³⁵
- Reestablished the local IT configuration control board³⁶ as required by 5 FAM 862.1.

³² A dedicated internet network is dedicated internet access from an internet service provider on a Department-owned and-operated discrete non-sensitive unclassified local area network that is not connected to any other Department system. See 5 FAM 872, "Dedicated Internet Networks (DIN)."

³³ Based on OIG's review of an annual customer satisfaction survey and responses to OIG questionnaires.

³⁴ According to 5 FAH-12 H-114, elevated privileges are escalated privileges that typically grant access to perform administrative functions.

³⁵ Cable 19 STATE 126438, "Overseas Telework Policy for Department of State Employees," December 9, 2019, requires embassy Counterintelligence Working Groups to approve telework arrangements.

³⁶ The Department's IT Configuration Control Board (CCB) manages standardization of the Department's global IT environment that consists of classified and unclassified upgrades and addresses issues of configuration tracking, change control, and network planning and operations. A local CCB reviews changes affecting systems or

- Handled a classified spillage incident as required by 12 FAH-10 H-242.8.
- Updated the embassy Information Systems Security Officer (ISSO) designation to include an alternate ISSO as required by 12 FAH-10 H-352.1 and designated ISSO oversight of the embassy dedicated internet network as required by 12 FAM 632.1-2.a.

OIG determined the staff implemented most required information management and security controls in accordance with Department policies and applicable laws, with the exceptions noted below.

Mail Delivery Procedures Did Not Comply with U.S. Postal Service Regulations and Department Standards

OIG found Embassy Tallinn's mail delivery procedures did not comply with U.S. Postal Service regulations and Department standards. Specifically, the embassy did not require customers to sign for their packages and present identification before delivering mail, as required by 39 United States Code (U.S.C.) § 3004 and 14 FAH-5 H-423.2. In addition, the embassy did not register the actual pickup date of tracked mail into ILMS, as required by 14 FAH-4 H-255.2c. OIG attributed these deficiencies partly to an embassy decision to provide "contactless" package delivery during the COVID-19 pandemic and a misunderstanding of Department requirements. Noncompliance with U.S. Postal Service regulations and Department standards increases the risk of loss or theft of mail and could incur indemnity claims costs³⁷ to the Department.

Recommendation 6: Embassy Tallinn, in coordination with the Bureau of Administration, should bring its mail delivery procedures into compliance with U.S. Postal Service and Department standards. (Action: Embassy Tallinn, in coordination with A)

Bureau of Information Resource Management SharePoint Configuration Granted General User Accounts Privileged Access to Shared Files

OIG found Embassy Tallinn's IM staff administered the embassy SharePoint site using general user accounts³⁸ with elevated privileges. In addition, SharePoint security settings, configured by the Bureau of Information Resource Management, allowed Washington general user accounts to have administrative access to the embassy's shared files. This configuration also gave Embassy Tallinn IM staff access to all embassy section files when performing non-administrative functions, contrary to Department and industry standards. Guidance from the National Institute

applications for which the bureaus or posts are responsible. See 5 FAM 115.6-1, "Department's Information Technology Configuration Control Board (IT CCB)," and 5 FAM 115.6-2, "Local Configuration Control Board (CCB)."

³⁷ The Postal Service offers up to \$5,000 of insurance coverage as protection against the loss of or damage to a customer's package. When an insured item is lost or damaged, the customer may request compensation by filing an indemnity claim. See 14 FAH-5 H-800, "DPO USPS Indemnity Claims Process"

³⁸ The Department defines general user access as "access to applications and data files based on supervisor-defined user profiles." Additionally, "[this] level of access must not permit ISSO, system administrator or programmer [or] developer privileges." See 12 FAH-10 H-112.1-2a, "Account Management – System Administrator Responsibilities." This category of access is referred to as non-privileged.

of Standards and Technology Special Publication 800-53, section AC-6(2),³⁹ states general user accounts (non-privileged) should not be used for security functions. Furthermore, 12 FAH-10 H-112.1-2a(5) prohibits granting a general user account administrator, programmer, or developer privileges. These permissions are unnecessary for staff to perform their normal duties and are contrary to 12 FAH-10 H-112.5, which outlines the concept of “least privilege.”⁴⁰ When information was stored in shared folders according to embassy section, Tallinn IM staff managed the permissions to those folders with a secondary system administrator account. After the shared folders were migrated to the SharePoint cloud, IM staff could manage SharePoint permissions from their general user accounts. The difference between network system administration policy and SharePoint administration practice led to this deficiency. A general user account with elevated privileges increases the risk for unintentional, unwanted, or improper use of privilege and could be used by internal or external actors to gain unauthorized access to Department information.

Recommendation 7: The Bureau of Information Resource Management, in coordination with Embassy Tallinn, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Tallinn)

Routine Information Systems Security Officer Duties Not Performed

Embassy Tallinn’s ISSOs did not perform all required systems security duties. Specifically, OIG found ISSOs did not:

- Review and analyze audit logs on the DIN as required by 12 FAH-10 H-122.5-2.
- Verify the software and hardware on the DIN was approved by the Department or the embassy local IT Configuration Control Board as required by 12 FAH-10 H-222.1-3(1).
- Conduct all required keyword searches to ensure Sensitive But Unclassified (SBU)⁴¹ information systems (e.g., OpenNet) are used for processing SBU and non-sensitive unclassified information only, as required by 12 FAH-10 H-112.8-3.

³⁹ National Institute of Standards and Technology (NIST) Special Publication 800-53 provides a catalog of security and privacy controls for information systems and organizations to protect organizational operations and assets, individuals, other organizations, and the nation from a diverse set of threats and risks, including hostile attacks, human errors, natural disasters, structural failures, foreign intelligence entities, and privacy risks. See NIST Special Publication 800-53, Rev. 5, “Security and Privacy Controls for Information Systems and Organizations,” (September 2020).

⁴⁰ NIST Special Publication 800-53 states, “The principle of least privilege is allowing only authorized accesses for users (or processes acting on behalf of users) which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions.” See NIST Special Publication 800-53, Section AC-6, “Least Privilege,” at 36.

⁴¹ Sensitive But Unclassified information is information that is not classified for national security reasons but that warrants/requires administrative control and protection from public or other unauthorized disclosure for other reasons. See 12 FAM 541a, “Scope.”

OIG issued a management assistance report in December 2020⁴² that highlighted continued widespread Department failures to perform ISSO duties. The Information Management Officer told OIG he had limited time to perform these duties because of the vacancy in the Information Management Specialist position. Failure to perform these duties could put security of the Department's computer systems and information at risk of compromise.

Recommendation 8: Embassy Tallinn should require Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Tallinn)

⁴² OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts*, ISP-21-07, December 2020.

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 Tallinn and the Bureau of Information Resource Management. 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 Tallinn should comply with Department standards for grant file documentation. (Action: Embassy Tallinn)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation.

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

Recommendation 2: Embassy Tallinn, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the Consular Section's physical space into compliance with Department standards. (Action: Embassy Tallinn, in coordination with OBO and CA)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Tallinn brought the Consular Section's physical space into compliance with Department standards.

Recommendation 3: Embassy Tallinn should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Tallinn)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Tallinn complied with all

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.

Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority.

Recommendation 4: Embassy Tallinn, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with A)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation. The embassy noted an expected completion date of September 30, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Tallinn reviewed and updated furniture and appliance pool assets records in the Integrated Logistics Management System, in accordance with Department standards.

Recommendation 5: Embassy Tallinn, in coordination with the Bureau of Global Talent Management, should request authorization to implement changes to its local compensation plan, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with GTM)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Tallinn requested authorization to implement changes to its local compensation plan, in accordance with Department standards.

Recommendation 6: Embassy Tallinn, in coordination with the Bureau of Administration, should bring its mail delivery procedures into compliance with U.S. Postal Service and Department standards. (Action: Embassy Tallinn, in coordination with A)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation. The embassy noted an expected completion date of August 16, 2022.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Tallinn brought its mail delivery procedures into compliance with U.S. Postal Service and Department standards.

Recommendation 7: The Bureau of Information Resource Management, in coordination with Embassy Tallinn, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Tallinn)

Management Response: In its July 13, 2022, response, the Bureau of Information Resource Management (IRM) disagreed with this recommendation. The bureau noted that the

SharePoint site collection administrator (SCA) role does not serve the same function or have similar responsibilities that network or systems administrators do. Additionally, the SCA role does not align with the definition of privileged user accounts. According to 5 Foreign Affairs Handbook (FAH)-12 H-114,

Examples of personnel that may utilize these types of accounts are system administrators, [information systems security officers], [organizational unit] administrators, workstation administrators, server administrators, domain administrators, and enterprise administrators. Administrator accounts are made to be members of domain-specific security groups, thus giving them access to files, folders, and systems that normal end-users do not have access to.

IRM also noted that the SCA role does not reflect 12 FAH-10 H-112.1-2a(2) and (3), which categorizes administrative accounts as having full or limited “access to operating system related devices, programs, and resources.” Additionally, 12 FAH-10 H-112.1-2a(5) “allows access to applications and data files based on supervisor-defined user profiles.” The designation of the SCA role to individuals, and if they may use their user account or must use a separate account, is at the discretion of the supervisor. The bureau stated that its Systems Integration Office technical team uses separate administrative accounts and cards when performing the administrative functions needed to manage the platform, in accordance with 12 FAH-10 H-112.1-2a(2) and (3). IRM concluded that platforms are now designed in a way that supports every user’s ability to develop new capabilities in a constrained ecosystem of tools (e.g., Power Apps, Power Automate, Power BI), manage folder and file level permissions in order to collaborate with colleagues more effectively (e.g., OneDrive), and manage the permissions to collections of information (e.g., Teams site ownership and SharePoint site collection and site owner administrator roles).

OIG Reply: OIG considers the recommendation unresolved. The issue identified by OIG is not whether the SCA role serves the same function as network or system administrators, but rather, whether the use of general user accounts with privileged access to resources was appropriate. OIG found that, due to IRM’s SharePoint configuration, Embassy Tallinn administered its SharePoint sites using general user accounts that had privileged access to files, folders, and other resources. That is, these general user accounts had greater access than what was required for day-to-day work, contrary to Department standards in 12 FAH-10 H-112.5, which defines the concept of least privilege. Furthermore, as noted in the report, 12 FAH-10 H-112.1-2a(5) prohibits granting a general user account administrator, programmer, or developer privileges.

OIG asserts that, although the SCA role may not equate to a network or system administrator role, the SCA role does have access to the files, folders, and other resources that normal end-users would not. The bureau posits that the SCA role does not meet the Department’s definition of the types of roles warranting a secondary privileged account. However, in 5 FAH-12 H-114, the Department defines a secondary privileged user account as an “account utilized by an individual to perform specialized tasks that require elevated privileges.” Moreover, as IRM cited, 5 FAH-12 H-114 includes examples of the roles that may use a secondary privileged

account; inherently, such a list of examples is not exhaustive. Furthermore, 5 FAH-12 pertains to active directory management, not SharePoint management. Additionally, IRM cited 12 FAH-10 H-112.1-2a(2) and (3), which describes administrator accounts as having full or limited “access to operating system related devices, programs, and resources.” The SCA role administers resources such as SharePoint document libraries.

Lastly, although 12 FAH-10 H-112.1-2a(5) “allows access to applications and data files based on supervisor-defined user profiles,” this does not mean there is supervisory discretion in defining privileged accounts. The National Institute of Standards and Technology defines a privileged user as “[a] user that is authorized (and therefore, trusted) to perform security-relevant functions that ordinary users are not authorized to perform.”² Even though tools such as OneDrive enable the owner to grant access to an individual document to other users, managing permissions for shared documents in SharePoint—as an organizational resource—requires the use of a privileged account. Adhering to the principle of least privilege and using the appropriate role-based account is critical to assuring information security. The use of general user accounts, which allows users to have access to email and the internet, to administer SharePoint sites containing sensitive Department information could potentially introduce security vulnerabilities. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Information Resource Management configured SharePoint permissions to comply with Department standards.

Recommendation 8: Embassy Tallinn should require Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Tallinn)

Management Response: In its June 23, 2022, response, Embassy Tallinn concurred with this recommendation.

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

² National Institute of Standards and Technology (NIST) Special Publication 800-53, Rev. 5, Appendix A, page 412 (September 2020).

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Vacant	
Deputy Chief of Mission	Brian Roraff ^a	7/2019
Chiefs of Sections:		
Management	Kate Riche ^b	10/2020
Consular	Sarah Stewart	8/2020
Political/Economic	Jamie Shufflebarger	7/2020
Public Affairs	Mark Naylor	7/2020
Regional Security	Nathan Bauers	7/2020
Regional Affairs	Neal Smiley	9/2021
Other Agencies:		
Department of Defense	LTC Christian Bjornson	8/2020
Office of Defense Cooperation	LTC Robert Padgett	7/2019
Department of Justice	Greg Schnakenberg	7/2020
Department of Homeland Security	Rich Ricciardi	8/2020

^a Brian Roraff became Chargé d'Affaires in July 2019, upon arrival at Embassy Tallinn.

^b At the time of the inspection, Kate Riche was supporting deputy chief of mission responsibilities.

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from January 3 to March 22, 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 of State 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 Embassy Tallinn operations and internal controls.
- 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 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, onsite OIG inspection could not be completed. Specifically, OIG did not review Embassy Tallinn's classified computer and communications security operations, or its security program. Additionally, during the inspection, OIG found 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 onsite. 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

June 23, 2022

UNCLASSIFIED

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

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

FROM: Embassy Tallinn – Brian Roraff, Chargé d’Affaires

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Tallinn, Estonia

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

OIG Recommendation 1: Embassy Tallinn should comply with Department standards for grant file documentation. (Action: Embassy Tallinn)

Management Response: Embassy Tallinn concurs with the recommendation. The embassy has taken steps to bring all open grants in compliance with Department standards and has also put new procedures in place to ensure that new grants are administered in accordance with Department standards.

OIG Recommendation 2: Embassy Tallinn, in coordination with the Bureau of Overseas Buildings Operations and the Bureau of Consular Affairs, should bring the Consular Section’s physical space into compliance with Department standards. (Action: Embassy Tallinn, in coordination with OBO and CA)

Management Response: Embassy Tallinn concurs with the recommendation to improve accessibility in the Consular Section. The embassy is in communication with OBO/PDCS/DE/AD regarding modifications to the consular window to meet all applicable requirements. A funding request has been added and a project architect reviewed the physical space during a recent TDY to Post. Regarding the need for a lockable door to control the cashier work area, the Embassy has implemented the recommendation by providing a lock in line with 7 FAH-1 H-742a and 4 FAM 317.2-2.

OIG Recommendation 3: Embassy Tallinn should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Tallinn)

Management Response: Embassy Tallinn concurs with the recommendation. The embassy is currently taking the following steps to improve compliance with applicable Motor Vehicle Program Safety Standards:

- Under the supervision of Post's Motor Vehicle Accountable Officer, the Motor Pool Supervisor is currently consolidating all official and incidental driver information in the Fleet Management Information System. This will be completed by July 29, 2022.
- Post advertised and hired a replacement chauffeur filling a vacancy in its two-person Motor Pool section. This enables the Motor Pool Supervisor to dedicate more time to records keeping and driver training as Post's SMITH Systems instructor. It also enables backup coverage for Chief of Mission driver.
- Post management is implementing an additional check on time and attendance for chauffeurs outside of the ICASS motor pool including Marine Security Guard Detachment drivers and the Chief of Mission Chauffeur. Extra review of time and attendance by the Motor Vehicle Accountable Officer, will add oversight to scheduling and overtime for these chauffeurs, even if they fall outside of his/her supervisory chain. This internal control to address ten-hour limits and scheduling will be in place by July 8, 2022.
- Post will consult with the regional support center for recommendations regarding the Marine Security Guard chauffeurs' schedule.
- Post will send its newly hired ICASS chauffeur for Armored Vehicle Training. This will be completed by July 29. Post will continue to work with the trainers for additional openings to address other training needs.

OIG Recommendation 4: Embassy Tallinn, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with A)

Management Response: Embassy Tallinn concurs with the recommendation. The embassy is currently updating records to address and correct asset misclassifications within ILMS. Post's GSO consulted with a supply management specialist from A/LM/PMP/PM in May 2022. Post will continue to update records to meet applicable Department standards. Updates will be completed by September 30, 2022.

OIG Recommendation 5: Embassy Tallinn, in coordination with the Bureau of Global Talent Management, should request authorization to implement changes to its local compensation plan, in accordance with Department standards. (Action: Embassy Tallinn, in coordination with GTM)

Management Response: Embassy Tallinn concurs with the recommendation and will request a full review of the Local Compensation Plan by GTM and the local labor attorney on retainer.

OIG Recommendation 6: Embassy Tallinn, in coordination with the Bureau of Administration, should bring its mail delivery procedures into compliance with U.S. Postal Service and Department standards. (Action: Embassy Tallinn, in coordination with A)

Management Response: Embassy Tallinn concurs with the recommendation. The mailroom will be setting up the DPO/Pouch digital signature pad for all customers to sign and receive their items. Since the mailroom is only staffed by one employee and 30% of the mailroom position requires the clerk to be out of the building, the options for Employees to pick up their mail will be reduced to a 3-hour window. To make up for this reduce customer pickup/drop off window, Tallinn's mailroom will offer employees the opportunity to designate additional people to sign for their mail. Expected roll out date for this service is August 16, 2022. The late rollout is due to a current vacancy in the mailroom clerk position and training time for the new employee filling this open position.

OIG Recommendation 7: The Bureau of Information Resource Management, in coordination with Embassy Tallinn, should configure SharePoint permissions to comply with Department standards. (Action: IRM, in coordination with Embassy Tallinn)

Management Response: Embassy Tallinn concurs with the recommendation. The IRM section is working with the Department's HQ IRM section on a solution to the SharePoint permissions issue. Post's elevated administration accounts are not authorized to have an email address associated with them for security purposes. Since the Department has moved to Microsoft O365, the SharePoint sites have been moved to a cloud environment that is authenticated by a user's email account. It is impossible to access SharePoint with our administrative account because they do not have email accounts. We are in talks with IRM HQ in Washington to try and find a solution. A solution has not been found yet. Estimated time for solution unknown.

OIG Recommendation 8: Embassy Tallinn should require Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Tallinn)

Management Response: Embassy Tallinn concurs with the recommendation. The embassy has implemented the recommendation by committing 10% of the IMO's time to the sole ISSO duties and responsibilities. These duties are outlined in 12 FAM 600 ISSO Checklist. These duties include Post's DIN, OpenNet, and ClassNet networks.

NB: The Embassy would draw OIG's attention to the PDS bullet on page two. It reads, "**The embassy did not administer public diplomacy grants in accordance with Department standards.**" The embassy believes this would imply that our grants were out of compliance in multiple ways. In reality, it was only the documentation that was flagged. In the PDS section it reads "**grants file documentation did not consistently meet Department standards across the lifecycle of the grants administration process.**" The word "consistently" and the phrase "across

the lifecycle” are key because we had a few grants in full compliance, and a number of grants in partial compliance.

Embassy Tallinn would suggest that page two read “The embassy did not **consistently document** ~~administer~~ public diplomacy grants in accordance with Department standards.”

The point of contact for this memorandum is Kate Riche, Management Officer, Embassy Tallinn.



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

July 13, 2022

Read by _____

**NOTE FOR ASSISTANT INSPECTOR GENERAL FOR
INSPECTIONS LEWIS**

FROM: IRM – Glenn W. Miller (Acting) (Signed)

SUBJECT: Draft Report Inspection of Embassy Tallinn, Estonia (ISP-I-22-21)

The Bureau of Information Resource Management provides the following response to recommendation 7 of the Draft Report Inspection of Embassy Tallinn, Estonia (ISP-I-22-21).

Recommendation 7: The Bureau of Information Resource Management, in coordination with Embassy Tallinn, should configure SharePoint permissions to comply with Department standards. (Action: IRM, and Embassy Tallinn).

Management Response (July 2022): IRM does not concur. Collection Admins (SCAs) do not serve the same function or have similar responsibilities that network or system administrators do. The SCA role also does not align to the definition of privileged accounts per 5 FAH-12 H-114 which states that “Examples of personnel that may utilize these types of accounts are system administrators, ISSOs, OU administrators, workstation administrators, server administrators, domain administrators, and enterprise administrators. Administrator accounts are made to be members of domain-specific security groups, thus giving them access to files, folders, and systems that normal end-users do not

have access to.” The SCA role also does not reflect 12 FAH-10 H-112.1-2 (2) and 12 FAH-10 H-112.1-2 (3) which categorizes administrative accounts as having full or limited “access to operating system related devices, programs, and resources.”

Additionally, 12 FAH-10 H112.1-2a (5) “allows access to applications and data files based on supervisor-defined user profiles”. The designation of the Site Collection Administrator (SCA) role to individuals, and if they may use their standard user account or must use a separate account, is at the discretion of the supervisor. Practices in this area vary considerably as the ‘site collection administrator’ role, contrary to its name, is a mid-level role within the M365 platform. It is not considered a true ‘administrative’ role. Each SharePoint site collection has specific personnel that hold the SCA role that differ across the platform. In some cases, a headquarters based regional bureau team acts as the SCA’s for posts in their region. In other cases, posts designate only cleared USDH personnel to operate as SCA’s for their post. For comparison purposes, every owner of every M365 Team site in the environment also holds the same ‘Site Collection Administrator’ role as it relates to the M365 Team they manage. The SIO technical team leverages separate administrative accounts and cards when performing the true administrative functions needed to manage the platform per the requirements of 12 FAH-10 H112.1-2 92) and (3).

Today’s modern cloud-based platforms blur the once very distinct lines between administrative functions and those of a general user. Platforms are now designed in a way that supports every user’s ability to develop new capabilities in a constrained eco-system of tools (reference Power Apps, Power Automate, Power BI), manage folder and file level permissions in order to collaborate with colleagues more effectively (reference OneDrive), and manage the permissions to collections of information (reference Team Site ownership and SharePoint site collection and site owner administrator roles).

If you have any questions or concerns, please contact Craig Hootselle at: HootselleCS@state.gov (202) 615-6557 or Robin Flemming at: flemmingr@state.gov (202) 634 3746.

ABBREVIATIONS

EEO	Equal Employment Opportunity
EU	European Union
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAP	Furniture and Appliance Pool
GDP	Gross Domestic Product
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
LCP	Local Compensation Plan
LE	Locally Employed
NATO	North Atlantic Treaty Organization

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