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Office of Inspector General
United States Department of State

ISP-I-23-02

Office of Inspections

October 2022

Targeted Inspection of the U.S. Mission to the International Civil Aviation Organization in Montreal, Canada

BUREAU OF INTERNATIONAL ORGANIZATION AFFAIRS

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HIGHLIGHTS

Office of Inspector General
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What OIG Inspected

OIG inspected the executive direction and policy and program implementation of the U.S. Mission to the International Civil Aviation Organization.

What OIG Recommends

OIG did not make any recommendations.¹

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What OIG Found

Staff at the U.S. Mission to the International Civil Aviation Organization advanced U.S. priorities in the areas of aviation safety, security, and environmental sustainability through advocacy, diplomatic engagement, and public diplomacy efforts.

¹ Although this report does not contain any recommendations, OIG provided a draft of this report to Department stakeholders for their review and comment on the findings. The Department provided technical comments that were incorporated into the report, as appropriate.

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CONTEXT

The 1944 Convention on International Civil Aviation created the International Civil Aviation Organization (ICAO) to promote the safe and orderly development of civil aviation around the world. Directed and funded by 193 national governments, the ICAO sets standards and recommended practices for aviation safety, security, efficiency and regularity, and environmental protection. Its core functions are to maintain administrative and technical expertise to support diplomatic interactions on civil aviation and to research new air transport policies and innovations as directed and endorsed by the ICAO Assembly or by the ICAO Council.¹ The ICAO is headquartered in Montreal, Canada, and has regional offices in Bangkok, Thailand; Beijing, China; Cairo, Egypt; Dakar, Senegal; Lima, Peru; Paris, France; Mexico City, Mexico; and Nairobi, Kenya.

The U.S. Mission to the ICAO (USICAO) focuses on improving the safety, security, and sustainability of civil aviation. USICAO coordinates with the Department of State (Department) and other U.S. government agencies that are part of the Interagency Group on International Aviation² in its work with the ICAO, its member states, and aviation sector stakeholders to set internationally applicable standards in civil aviation and promote their implementation. The U.S. government provides approximately 20.5 percent of the ICAO's budget,³ assigns U.S. government experts to work for the ICAO, and voluntarily contributes additional funding in other areas, including civil aviation security.

USICAO's top five priorities, as outlined in its FY 2023 Mission Resource Request (MRR), are to:

- Improve international civil aviation safety.
- Improve international civil aviation security.
- Improve the environmental sustainability of international civil aviation.
- Set international civil aviation standards that pose opportunities, and not discriminatory barriers, for American aviation industries and their employees.
- Improve the ICAO's managerial effectiveness, efficiency, and integrity and strengthen the council's oversight of ICAO programs, funds, and staff.

At the time of the inspection, USICAO had five authorized U.S. direct-hire positions—three from the Department and two from the Federal Aviation Administration. USICAO also had one locally employed staff member and one contractor. (See Figure 1, below.)

¹ The ICAO Assembly is composed of 193 member states and meets at least once every 3 years. The assembly elects the member states represented on the ICAO Council, examines and acts on reports of the council, and approves the budget. The ICAO Council is composed of 36 elected member states. It submits annual reports, carries out directions of the ICAO Assembly, discharges the duties and obligations of the ICAO, appoints and defines duties of various committees, and elects the ICAO Secretary General.

² These agencies include the Departments of Transportation and Homeland Security, the Federal Aviation Administration, the National Transportation Safety Board, and the Transportation Security Administration.

³ The U.S. assessed contribution to ICAO was \$18 million in 2022.

Figure 1: USICAO Organizational Chart (as of February 2022)

Source: OIG generated from information provided by the U.S. Mission to the International Civil Aviation Organization.

Mission Canada provides USICAO with resource management, information management, and security support and services. As a result, OIG limited this targeted inspection to an evaluation of USICAO’s executive direction and policy and program implementation consistent with Section 209 of the Foreign Service Act of 1980.⁴

EXECUTIVE DIRECTION

OIG assessed USICAO’s leadership based on interviews, staff questionnaires, review of documents, and OIG’s observations of meetings and activities during the inspection.

Tone at the Top and Standards of Conduct

The Chief of Mission, a non-career ambassador, arrived in February 2022, approximately one month before the start of the inspection. Previously, he had a career in civil aviation, as a pilot, author, and advocate for safety in global air travel. The International Relations Officer Generalist, who served as the de facto Deputy Chief of Mission (DCM),⁵ is a career member of the Foreign Service who arrived in July 2021. His previous assignments include tours as Deputy Assistant Secretary in the Bureau of Population, Refugees, and Migration and as a Senior

⁴ See Appendix A.

⁵ The de facto DCM position is formally designated as an International Relations Officer Generalist position. However, the person holding this position functions by default as the second in command, and, in practice, is unofficially referred to as the DCM and, in the absence of the Ambassador, as the Chargé. The person holding this position also supervises the Office Management Specialist and indirectly supervises the locally employed staff member. Officers who encumber the position do not qualify for the Department’s DCM course.

Director on the National Security Council. From July 2021 to February 2022, a succession of three Department officials served as Chargé until the arrival of the Ambassador.

OIG found the Ambassador and de facto DCM generally demonstrated the Department's leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214b.⁶ In interviews, USICAO staff told OIG the Ambassador was professional, approachable, engaged, and provided clear direction. Additionally, staff told OIG the de facto DCM was professional, approachable, and knowledgeable about U.S. policy.

Although the Ambassador and the de facto DCM had a professional relationship, they did not always adhere to 3 FAM 1214b principles for communication, collaboration, and managing conflict. OIG determined that their relationship suffered during the first 2 months of the Ambassador's tenure because of different interpretations of COVID-19 protocols regarding onsite work. For example, when he first arrived, the Ambassador wanted to hold in-person staff meetings to become familiar with operations whereas the de facto DCM believed the mission's operating posture meant staff meetings should be held virtually.⁷ This conflict continued until the mission transitioned to an "all functions" work posture in April 2022, which allowed staff to work onsite. Overall, OIG found USICAO's response to the COVID-19 pandemic was consistent with 2 FAM 031d and 2 FAM 032.6f guidance on risk management.⁸

OIG found the Ambassador communicated and coordinated with mission staff. For example, the Ambassador held weekly all-hands meetings and had daily meetings with the Office Management Specialist, the Senior Advisor, and both Federal Aviation Administration representatives. OIG observed the Ambassador and the de facto DCM generally met during the weekly all-hands meetings, which potentially limited communication and coordination between them. However, because the Ambassador resigned in June 2022, OIG did not raise this issue with him.

Security and Emergency Planning

The Front Office implemented the mission's security and emergency preparedness programs consistent with Department guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-762a. Mission Canada provided security services and support for USICAO, including training and notices. The ICAO, as landlord of the facility where USICAO was located, also provided security, including

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

⁷ From March 2020 to March 2022, Mission Canada and USICAO operated on a maximum telework posture. As USICAO served as a member of Consulate General Montreal's Emergency Action Committee, USICAO adopted the consulate general's operating posture.

⁸ According to 2 FAM 031d, a key Department leadership tenet is to lead teams to the best possible assessment of risk, implementation of mitigation measures, and an evaluation of the residual risk that still remains, through sound planning and management. The Department expects leaders to judge whether the benefits of an activity outweigh the residual risk potential and to act accordingly. Guidelines in 2 FAM 032.6f also state that chiefs of mission set the risk tolerance level at their mission and communicate it clearly to staff.

controlled access to the building. In support of those programs, USICAO participated in Consulate General Montreal's Emergency Action Committee and in required radio checks. Additionally, the de facto DCM had emergency action planning responsibilities.

Adherence to Internal Controls

USICAO prepared the FY 2021 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1) and (5), which requires chiefs of mission to develop and maintain appropriate systems of management control of their organizations. OIG reviewed USICAO's supporting documentation for the FY 2021 Statement of Assurance, which showed that the mission had reviewed its internal controls and identified no significant deficiencies or material weaknesses.

Equal Employment Opportunity

OIG found the USICAO's Equal Employment Opportunity (EEO) practices were consistent with 3 FAM 1514. USICAO participated in Mission Canada's EEO program, which appointed USICAO's sole locally employed staff member as an EEO liaison. The locally employed staff member also participated in Consulate General Montreal's Diversity and Inclusion Council.

Execution of Foreign Policy Goals and Objectives

USICAO identified policy goals and objectives based on input from the Interagency Group on International Aviation and the Department's Bureaus of International Organization Affairs and Economic and Business Affairs. According to USICAO and Bureau of International Organization Affairs officials, the Department did not require USICAO to prepare an Integrated Country Strategy.⁹ Instead, USICAO outlined its goals and objectives through the annual Mission Resource Request process.¹⁰ In its FY 2023 MRR, USICAO highlighted its actions on the COVID-19 pandemic, aviation security, aviation safety, air navigation, ICAO governance and reform, environmental and economic sustainability, and political issues. Some of these topics are discussed in greater detail in the Policy and Program Implementation section of this report.

Department officials highlighted to OIG the Ambassador's expertise in aviation. Other agency staff described the Ambassador's leadership as effective and collaborative. OIG found the Ambassador met and communicated frequently with ICAO officials to advance U.S. policy, fulfilling his responsibilities under 2 FAM 113.1c(1) to represent the interests of the United States.

⁹ According to 18 FAM 301.2-2, the Integrated Country Strategy is a "[4-year] strategic plan that articulates whole-of-government priorities in a given country and incorporates higher level planning priorities."

¹⁰ According to 4 FAH-3 H-114.2-2b, the MRR is the first step in the Department's budget formulation process. Missions use the MRR to describe the operations and foreign assistance resources required from the Department to make progress on its foreign policy, and where applicable, development and management objectives.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed USICAO's advocacy, policy analysis, and public diplomacy work performed by mission staff. OIG found the mission generally met Department requirements for policy implementation.

Mission Advanced U.S. Priorities in Aviation Safety, Security, and Environmental Sustainability

OIG found USICAO mission staff advanced U.S. priorities in the areas of aviation safety, security, and environmental sustainability through advocacy, diplomatic engagement, and public diplomacy efforts.

In interviews with OIG, Department and interagency officials praised the mission's advocacy and diplomatic engagement efforts. The mission worked with ICAO member states to implement institutional reforms¹¹ and preserve U.S. leadership on the Air Navigation Commission.¹² Officials also told OIG the mission provided timely updates to the Interagency Group on International Aviation on high priority issues, including post-pandemic recovery measures for air travel, the investigation of Belarus' diversion of a Ryanair flight contrary to international law, and the effect of Russia's invasion of Ukraine on civil aviation airspace. Furthermore, Department officials noted the close cooperation between USICAO and the Special Presidential Envoy for Climate to advance initiatives to reduce aviation emissions in preparation for the ICAO's triennial general assembly meeting in fall 2022. The mission also engaged with the ICAO on political issues, including Democratic People's Republic of Korea missile launches in international airspace and the attempt by the People's Republic of China to establish an air defense information zone in the South China Sea.

According to Department and interagency officials, the ICAO expanded its work during the 10 years prior to the inspection from a largely technical focus to also engage on political issues, such as climate change and the reduction of aviation emissions, Taiwan airspace, and the Gulf States' blockade of Qatar airspace. The officials told OIG that this expansion increased the ICAO's prominence and visibility as a multilateral organization. As a result, OIG found the mission increased its use of some public diplomacy tools—specifically, the Ambassador's official Twitter account and its website—to advance U.S. messaging. Mission, Department, and interagency officials told OIG they supported further expanding the mission's public diplomacy tools, including social media and ambassadorial public speaking engagements in targeted regions, to broaden U.S. messaging on key U.S. priorities. During the inspection, the Department was working with the mission on public diplomacy platforms, including expanding its social media and website capacity.

¹¹ These included electing a new ICAO President and Secretary General to address fraud, mismanagement, and security lapses under the previous ICAO leadership.

¹² The Air Navigation Commission is composed of 19 members with expertise in civil aviation. It considers and recommends standards, practices, and procedures for air navigation services to the ICAO Council for adoption or approval.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	C.B. Sullenberger, III ^a	2/2022
International Relations Officer Generalist (de facto Deputy Chief of Mission)	Andrew M. Veprek ^b	7/2021
Other Agencies:		
Federal Aviation Administration—Air Navigation Commissioner	Don Ward	1/2019
Federal Aviation Administration—Senior Representative	Michael Brown	10/2019

^a The Ambassador resigned effective July 1, 2022.

^b The de facto Deputy Chief of Mission became Chargé effective June 25, 2022.

Source: Generated by OIG from data provided by the U.S. Mission to the International Civil Aviation Organization.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This targeted inspection was conducted from March 14, 2022, to August 2, 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 the U.S. Mission to the International Civil Aviation Organization's (USICAO) 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 targeted inspection. OIG reviewed pertinent records; circulated surveys and compiled the results; conducted interviews with Department and on-site personnel; observed daily operations; 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.

Mission Canada provides USICAO with resource management, information management, and security support and services.¹ As a result, OIG limited its targeted inspection to an evaluation of USICAO's executive direction and policy and program implementation.

¹ See OIG, *Inspection of Embassy Ottawa and Constituent Posts, Canada* (ISP-I-23-04, report not yet released), for OIG's review of resource management, information management, and security operations of Mission Canada.

ABBREVIATIONS

DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICAO	International Civil Aviation Organization
MRR	Mission Resource Request
USICAO	U.S. Mission to the ICAO

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