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**Office of Inspector General  
United States Department of State**

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ISP-I-23-11

Office of Inspections

May 2023

**Inspection of Embassy Brussels, Belgium**

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

UNCLASSIFIED



# HIGHLIGHTS

## Office of Inspector General United States Department of State

ISP-I-23-11

### What OIG Inspected

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

### What OIG Recommends

OIG made 25 recommendations: 23 to Embassy Brussels and 2 to the U.S. Mission to the North Atlantic Treaty Organization. In its comments on the draft report, the Department concurred with 22 recommendations and disagreed with 3 recommendations. OIG considers 22 recommendations resolved and 3 recommendations 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.

May 2023

### OFFICE OF INSPECTIONS

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

### Inspection of Embassy Brussels, Belgium

#### What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Brussels in a professional and collaborative manner and acted with integrity. Embassy staff said the Ambassador was open to their views and concerned with staff morale.
- The Country Team, led by the Ambassador, achieved several policy goals, especially regarding Belgium's support for Ukraine and its announcement that it would increase its defense spending to 2 percent (from 1.1 percent) of gross domestic product.
- The Political-Economic Section produced high quality reporting and contributed to the mission's successes on the policy front.
- The Consular Section struggled to handle its workload with high demand for nonimmigrant visas after the United States lifted travel restrictions.
- The Joint Administrative Services Section, which supports the three U.S. missions in Brussels, had several management control issues. The Department of State concurred with the embassy that it needed more management staff to maintain service standards.
- The locally employed staff retirement fund was underfunded by approximately \$1 million.
- Spotlight on Success: The Public Diplomacy Section used its extensive local contacts, including exchange program alumni, in communities throughout Belgium to reach new at-risk populations to counter violent extremism.
- Spotlight on Success: The Consular Section, faced with a backlog of loss of nationality cases, developed a streamlined process to handle more cases while maintaining Department standards. This process is being considered for use by other consular sections.
- Spotlight on Success: Information Management staff developed an innovative solution that meets Department security standards to provide embassy personnel access to their mobile devices and mobile applications while working in controlled access areas.

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## CONTEXT

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Belgium is in northwestern Europe bordering the North Sea, the Netherlands, Germany, Luxembourg, and France. The country, approximately the size of Maryland, has a population of



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

11.8 million and is one of the most densely populated and highly urbanized countries in Europe. Belgium is a federal parliamentary democracy under a constitutional monarchy. Political divisions between the Dutch-speaking Flemish of the north and the French-speaking Walloons of the south have led to a complex division of responsibilities among three levels of government: the federal government; three communities based on the official languages (Dutch, French, and German); and three regions (Flanders, Wallonia, and Brussels-Capital). Belgium's diversified economy includes a broad mix of transportation, services, manufacturing, and technology industries. Belgium is the twelfth largest foreign investor in the United States; bilateral trade is approximately \$65 billion a year.

The United States established diplomatic relations with Belgium in 1832 following its declaration of independence from the Netherlands in 1830. Suffering under German occupation during World Wars I and II, the Belgian public holds goodwill and affection for Americans because of the liberation of Belgium by U.S., British, and Canadian forces in 1944. Belgium is a founding member of the European Union (EU) and the North Atlantic Treaty Organization (NATO). As the host country of the EU and NATO headquarters, Belgium plays an important role in European and transatlantic diplomacy. Terrorist attacks in 2016 on the Brussels airport and the city's metro system focused Belgium on improving its counterterrorism capabilities. Belgium was quick to respond to Russia's invasion of Ukraine with security and humanitarian assistance for Ukraine and sanctions against Russia. The country also has welcomed thousands of Ukrainian refugees.

Embassy Brussels' FY 2022-2027 Integrated Country Strategy (ICS), approved in June 2022, has four goals:

- Revitalize transatlantic alliances and partnerships, including improving Belgium's defense capabilities.
- Promote deeper U.S.-Belgian trade and investment ties, including seeking commercial opportunities in Belgium for U.S. companies.
- Leverage the U.S.-Belgian relationship to address global and regional threats and challenges, such as climate change, energy security, illicit narcotics, and human trafficking.
- Strengthen democracy and the rule of law to counter democratic backsliding and rising authoritarianism throughout the world.

At the time of the inspection, Embassy Brussels had 111 U.S. direct-hire authorized positions, 226 locally employed (LE) staff positions, and 9 eligible family member positions working for the Department of State (Department). Other U.S. government agencies represented at the embassy include the Departments of Defense, Homeland Security, and Justice, with 46 U.S. direct-hire authorized positions and 14 LE staff positions. The embassy's Joint Administrative Services Section provides management, including information management, support to the three U.S. missions in Brussels: Embassy Brussels; the U.S. Mission to the EU (USEU), located on the embassy compound; and the U.S. Mission to NATO (USNATO), located at NATO headquarters elsewhere in the city. The embassy's Regional Security Office also supports all three missions. The Department refers to the three missions as the Brussels Tri-Mission.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.<sup>1</sup> Concurrent with this inspection of Embassy Brussels, OIG also inspected USEU and USNATO.<sup>2</sup> A related classified inspection report on the Brussels Tri-Mission includes discussion of the security program for the three missions, issues affecting the safety of mission personnel and facilities, and certain aspects of the information management program.

## **EXECUTIVE DIRECTION**

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OIG assessed Embassy Brussels' leadership on the basis of interviews, staff questionnaires, a review of documents, and observations of embassy meetings during the on-site portion of the inspection.

### **Tone at the Top and Standards of Conduct**

The Ambassador arrived in Belgium in January 2022 with a private sector background in real estate and non-profit organizations. The Deputy Chief of Mission (DCM), a career member of the Senior Foreign Service, arrived at the embassy in July 2022. His prior overseas assignments included Minister-Counselor for Political Affairs at Embassy Moscow and Counselor for Political and Economic Affairs at Embassy Brussels.

OIG found that the Ambassador and the DCM generally led the embassy in a professional and collaborative manner consistent with the Department's leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214b.<sup>3</sup> Embassy personnel told OIG that they respected the Ambassador and found him open to their views and genuinely interested in staff morale. At the same time, staff members told OIG they looked for more communication from the Ambassador on his vision and priorities for the mission. OIG discussed this issue with the Ambassador, who

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<sup>1</sup> See Appendix A.

<sup>2</sup> OIG, *Inspection of the U.S. Mission to the European Union* (ISP-I-23-15, April 2023); OIG, *Inspection of the U.S. Mission to the North Atlantic Treaty Organization* (ISP-I-23-16, May 2023).

<sup>3</sup> 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.

expressed appreciation for the feedback. OIG's subsequent observations of embassy meetings found more active participation and feedback from the Ambassador. In an effort to improve communication, the DCM began sending a weekly email in August 2022 to all staff highlighting accomplishments and foreshadowing the week ahead. Embassy staff told OIG they appreciated the increased information from the DCM on embassy activities.

OIG also determined that the Ambassador and the DCM acted with integrity and encouraged staff to do likewise, in accordance with 3 FAM 1214b(1). The Ambassador, in his remarks upon arrival, touched upon values such as open communication, respect, and commitment. The DCM's weekly emails to staff also touched upon issues such as shared values, promoting diversity, and fostering a healthy workplace environment. During the inspection, the tri-mission issued an updated policy on ethical behavior after OIG learned that the previous policy was issued in 2016.

OIG also determined that the Ambassador consulted with the Joint Administrative Services office on gifts as required. However, OIG found issues in the embassy's gift registry, which lacked some of the information required by Department guidance in 2 FAM 964b on the value and disposition of gifts. OIG discussed the issue with the Front Office, which said the lack of a full-time protocol assistant had delayed amending the registry. During the inspection, the embassy updated the registry to include the missing information. OIG, therefore, did not make a recommendation to address this issue.

## **Execution of Foreign Policy Goals and Objectives**

OIG found that the Ambassador and the DCM led the Country Team in accordance with guidance in 2 FAM 113.1c(1) and (4) to represent the interests of the United States and to manage all Executive Branch resources. OIG interviews with Washington and embassy employees described the Ambassador as a good public speaker. OIG observed the Ambassador speak extemporaneously and effectively on democracy at a public diplomacy event, in line with the embassy's ICS goal to work with Belgium to strengthen democratic institutions. Country Team members also told OIG that the Ambassador was effective in his meetings with Belgian public and private sector counterparts.

OIG determined that the Country Team, led by the Ambassador, achieved several of the priority goals in the embassy's ICS during 2022, consistent with Department guidance in 2 FAM 113.1c(7) to secure support for specific U.S. policies or positions. For example, Belgium announced in 2022 its plans to fulfill its NATO pledge to increase defense spending from 1.1 percent of gross domestic product in 2022 to 2 percent by 2035, consistent with the embassy's ICS goal to revitalize transatlantic alliances and partnerships. The embassy also advocated in support of Belgium's decision to supply humanitarian and security aid to Ukraine following Russia's February 24, 2022, full-scale invasion of that country and to shelter more than 60,000 Ukrainian refugees. Additionally, interagency efforts, led by the Ambassador, arrived at a solution to allow a U.S. company to continue production in Belgium of products crucial to U.S. military readiness, advancing ICS goals to strengthen trade ties and to address regional threats and challenges. In another example, the embassy engaged regularly with contacts on a Belgian

initiative to begin screening proposed foreign investments in sensitive economic sectors. Belgium also maintained its ban on untrusted vendors for building out the nation’s 5G telecommunications network. Both the investment screening and vendor ban were consistent with the ICS goal to counter non-market and coercive economic practices.

Finally, embassy outreach efforts through a variety of channels, including public diplomacy activities, supported the preservation of kosher and halal procedures for animal slaughter in Brussels, consistent with the ICS objective to improve cultural, ethnic, religious, and linguistic acceptance in collaboration with Belgium. The Department’s Office of the Special Envoy to Combat Anti-Semitism described the embassy’s approach to advancing religious freedom objectives as “a model.” During the inspection, the embassy also held two reviews of individual ICS goals and scheduled an overall review of the ICS, consistent with Department guidance in 18 FAM 301.2-4(D)c to monitor and review the ICS.

## **Adherence to Internal Controls**

OIG found that the embassy completed the FY 2022 Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance in 2 FAM 022.7(1) and (5), 2 FAM 024d, and cable 22 STATE 85378<sup>4</sup> that directs posts to develop and maintain appropriate systems of management controls and to submit the annual Statement of Assurance. As part of the Statement of Assurance process, the newly arrived DCM asked for an extension to allow time to review the documentation and make adjustments as needed. The embassy also provided OIG with documentation that its Statement of Assurance included input from all sections, in accordance with guidance in cable 20 STATE 123846<sup>5</sup> to include all organizational units.

A July 2021 Department study of the tri-mission’s management platform found it understaffed to support the growing numbers of mission personnel.<sup>6</sup> To better control overall mission growth, the tri-mission in February 2022 instituted a twice-yearly “Open Season” for new NSDD-38<sup>7</sup> position requests to evaluate and prioritize such requests across the three missions rather than in isolation.

During the inspection, the DCM cleared his backlog on reviews of nonimmigrant visa adjudications in accordance with Department guidance in 9 FAM 403.12-3(A)a and 4a to review at least 10 percent of the Consular Section chief’s nonimmigrant visa refusals and issuances for each adjudicating day.

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<sup>4</sup> Cable 22 STATE 85378, “Instructions for Reporting Templates in Your FY 2022 Statement of Assurance,” August 2, 2022.

<sup>5</sup> Cable 20 STATE 123846, “Your Role in Assuring Strong Management Controls and Oversight Over Post Operations,” December 23, 2020.

<sup>6</sup> Office of Management Strategy and Solutions, *Overseas Presence Review U.S. Tri-Mission Brussels*, July 2021.

<sup>7</sup> National Security Decision Directive (NSDD) 38, dated June 2, 1982, gives chiefs of mission control of the size, composition, and mandate of overseas full-time mission staffing for all U.S. government agencies.

## **Security and Emergency Planning**

OIG interviews and reviews of documentation found that the Ambassador mostly supported the embassy's security program, consistent with Department guidance in 2 FAM 113.1c(5) and (13) to develop policies and programs to protect U.S. government personnel and their dependents and advise, protect, and assist U.S. citizens abroad. For instance, the Ambassador led by example by participating in embassy security drills and Marine Security Guard promotion ceremonies. During the inspection, the Regional Security Office took steps to revive the Overseas Security Advisory Council,<sup>8</sup> which had ceased activities during the height of the COVID-19 pandemic. The Regional Security Office also resumed in-person security briefings, which had been suspended during the pandemic. Additionally, during the inspection, the three missions jointly approved the annual review of the security memorandum of agreement between the chiefs of mission and the geographic combatant commander, which had been due in June 2022.

However, OIG determined that the Ambassador had yet to reach out to the broader U.S. citizen community in Belgium. For example, 7 Foreign Affairs Handbook (FAH)-1 H-834b describes the use of town hall meetings to address questions and concerns from U.S. citizens residing in country. OIG discussed the need for the Ambassador and Country Team members to improve outreach to the American community in accordance with 2 FAM 113.1c(13) and (14) to advise, protect, assist, and brief U.S. citizens abroad. During the inspection, the embassy prepared a plan for the Ambassador's outreach to U.S. citizens in Belgium. The embassy told OIG that the COVID-19 pandemic and competing consular priorities had delayed the required outreach. The lack of outreach meant there were missed opportunities to advise U.S. citizens on security and build strong, mutually beneficial relationships between the embassy and resident U.S. citizens.

**Recommendation 1:** Embassy Brussels should advise and brief U.S. citizens in Belgium in accordance with Department standards. (Action: Embassy Brussels)

## **Equal Employment Opportunity and Diversity, Equity, Inclusion, and Accessibility**

OIG determined that the embassy's Equal Employment Opportunity (EEO) program and commitment to diversity, equity, inclusion, and accessibility were consistent with Department standards in 3 FAM 1214b(6) and with the Secretary's guidance on diversity and inclusion in cable 21 STATE 60514.<sup>9</sup> OIG found EEO notices displayed in the embassy and annex buildings and on the tri-mission's intranet site. The EEO counselor conducted training for the LE staff EEO liaisons, and the LE staff employee handbook included information on the EEO program and the role of the EEO liaisons. The embassy had an active Inclusion, Diversity, Equity, and Accessibility

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<sup>8</sup> 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.

<sup>9</sup> Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

Council, composed of volunteers. The council sponsored activities, often in coordination with the embassy's Community Liaison Office, in which the Ambassador participated, consistent with Department best practices.<sup>10</sup>

## **Developing and Mentoring Foreign Service Professionals**

OIG found that the embassy, in conjunction with USEU, had an active mentoring and professional development program in accordance with 3 FAM 1214b(8) and 3 FAM 2242.4a and b.<sup>11</sup> First- and Second-Tour employees told OIG the formal program—based on a handout from the embassy's and USEU's DCMs listing skills they should acquire during their tour—allowed them to practice some of those skills.<sup>12</sup> First- and Second-Tour staff also said they found both DCMs to be approachable and that their program included monthly activities suggested by the DCMs and others they themselves requested, consistent with Department advice to DCMs to solicit input from the employees. In addition, the Ambassador told OIG he welcomed having different notetakers in his meetings to give experience to these employees.

## **POLICY AND PROGRAM IMPLEMENTATION**

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OIG assessed Embassy Brussels' policy and program implementation through a review of the work of the Political-Economic, Public Diplomacy, and Consular Sections. OIG found that the sections generally met Department requirements for policy and program implementation. However, OIG made two recommendations to address issues in the Consular Section, as discussed below.

### **Political-Economic Section**

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, commercial promotion, Leahy vetting,<sup>13</sup> and export control functions. OIG found the section generally complied with Department standards. Department stakeholders consistently told OIG that the section had a strong reputation for responsiveness and policy advocacy on a range of issues. Additionally, through interviews with Embassy Brussels staff, OIG determined that the Political-Economic Section collaborated

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<sup>10</sup> Cable 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices," February 11, 2022.

<sup>11</sup> This section of the FAM was updated in November 2022, after fieldwork for this inspection concluded. The new citation for this criteria is 3 FAM 2242.5a and b.

<sup>12</sup> USNATO personnel technically were included in the embassy's First- and Second-Tour program but the press of NATO business and distance of the USNATO offices from the other two missions precluded their participation.

<sup>13</sup> 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.

productively with other agencies and sections. During the inspection, the section obtained final clearances from the Department for the embassy's Leahy Vetting standard operating procedures.<sup>14</sup>

OIG found that the section's advocacy work supported ICS goals. The section contributed to U.S. government efforts that resulted in Belgium's decisions to increase defense spending, provide assistance to Ukraine, attribute cyber-attacks to actors associated with China, and reach political consensus on an investment screening law to protect against potential Chinese and Russian investments that would threaten Belgium's security. The section also collaborated within the embassy and with USEU to secure the release of food shipments for U.S. military forces that had been delayed in Antwerp because of alleged non-compliance with EU regulations. Additionally, after years of negotiations and embassy advocacy, the Belgian Parliament ratified in June 2022 an agreement to establish a U.S. Customs and Border Protection Preclearance operation at Brussels Airport to perform immigration, customs, and agriculture checks for U.S.-bound travelers.<sup>15</sup>

OIG's review of reporting produced by the section from January through mid-September 2022 found it to be relevant to ICS policy goals as well as more recent priorities related to sanctions against Russia and support for Ukraine. While Department stakeholders told OIG that they found the section's reporting to be of good quality, they also noted that staffing disruptions limited analytical reporting on issues such as defense spending, emerging technologies, Africa, and energy. By the time of the inspection, the section staffing was nearly at full strength, which section leadership told OIG would enable them to increase analytical reporting on issues related to ICS objectives.

## **Public Diplomacy**

OIG reviewed the Public Diplomacy Section's leadership, strategic planning and reporting, resource and knowledge management, grants administration, educational and cultural programs, media, social media, and strategic content development. Overall, OIG found the section met Department standards and guidance, as discussed below.

### ***Public Diplomacy Section Advanced Embassy Goals***

OIG found the Public Diplomacy Section advanced the embassy's ICS goals of increasing public awareness of the two countries' shared values and support for the transatlantic partnership. For example, the section linked its commemoration of World War I and II sites, where American and Belgian troops fought side-by-side, to Belgium's support of Ukraine following Russia's February 2022 invasion in the Ambassador's public speeches, event discussions, and social media postings. In addition, the section used outreach with the nation's sole Holocaust remembrance museum—using the Ambassador, Washington visitors, and high-level

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<sup>14</sup> Belgium is a Fast Track country for Leahy vetting, meaning that vetting is done by the embassy without referral to the Department. Fast Track countries are those with a record of respect for human rights and no serious systemic problems.

<sup>15</sup> According to embassy officials, it is expected to take several years to secure financing and construct the facility.

International Visitor Leadership Program alumni—to engage with youth, police, and other target populations in fighting discrimination. The section’s bilateral people-to-people relationship was exemplified by the active involvement in the Fulbright Commission of the King and the Prime Minister, both of whom are Fulbright alumni.

***Section Produced Effective and Timely Media and Social Media Products***

OIG found the section produced timely media and social media products for the embassy Front Office, USEU, USNATO, and Washington consumers. The Department communicated regularly with Public Diplomacy staff to follow up on embassy media reporting that generated attention and contributed to official press guidance. In addition, the section regularly provided media stories to the regional Media Hub<sup>16</sup> for its media reaction report, which Washington policymakers said was used regularly. OIG found that the embassy coordinated with the tri-mission’s two other Public Diplomacy Sections through twice-weekly coordination calls at the section head or deputy level and many informal exchanges at other levels. One of the regular weekly calls, moderated by the Media Hub, focused on the media and helped coordinate the three sections’ media efforts, given the many U.S. government high-level visitors to Brussels and the fast pace of U.S. government officials’ messaging on the war in Ukraine.

***Public Diplomacy Section Grants Strategically Focused but Some Files Lacked Closeout Reports***

OIG found the section’s grants program strategically focused on outreach to diverse communities throughout Belgium, including Muslims and Jews, people of color, and immigrants. OIG reviewed 9 (total value \$762,022) of the section’s 36 grants (total value \$1.9 million)<sup>17</sup> from FY 2021 and FY 2022. OIG found the grants focused on ICS goals, especially in the areas of countering violent extremism, highlighting sites and messaging from the U.S.-Belgian shared World War I and II history, and reaching out to new and diverse populations. During the inspection, the Public Affairs Officer agreed to invite other sections to join the grants committee and participate in its twice-yearly grants application review, a Department best practice. However, OIG determined that five of the six grants that had ended lacked the Grant Officer Representative’s closeout reports, a requirement of the Federal Assistance Directive.<sup>18</sup> Section staff uploaded these reports during the inspection. Due to the section’s action on this issue, which included an adjustment to its procedures to ensure required documents are uploaded to the online system going forward, OIG did not make a recommendation to address this issue.

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<sup>16</sup> The regional Media Hub, located in Brussels, is under the Bureau of Global Public Affairs’ International Media Engagement Division. It serves as a regional press office engaging on specific issues with regionally focused media outlets and journalists. It also serves as the office of the Department’s Russian-language spokesperson.

<sup>17</sup> OIG reviewed all grants over \$100,000 and two small grants with diverse grantee recipients. At the time of the inspection, six of the nine grants had ended in FY 2021 and FY 2022; the other three grants were active.

<sup>18</sup> Department of State, Federal Assistance Directive, Version 6.0, October 2021, Chapter 5, Section C.

## **Spotlight on Success: Outreach Programs to At-Risk Communities Helped Prevent and Respond to Violent Extremism**

Embassy Brussels' Public Diplomacy Section used its extensive local contacts, including exchange program alumni, in communities throughout Belgium to reach new at-risk populations to counter violent extremism. Through a series of grants, two funded by the Bureau of Counterterrorism, the section paired U.S. municipal leaders with city leaders in Belgium, the Netherlands, and Germany for a 2-day workshop to exchange best practices on rooting out extremism, reassessing threats, and promoting collaboration. Follow-on events brought new city pairs together in a series of hands-on workshops and created "Father and Mother Schools" to teach parents to recognize the warning signs of radicalization. The embassy adapted the program to incorporate newly developed ICS goals related to countering Russia's influence. A Bureau of Counterterrorism report noted that the section's efforts "led to new or updated policies, strategies, and programs that respect the civil rights and liberties of all Belgian residents and have improved Belgium's ability to prevent and respond to acts of terrorism."

## **Consular Operations**

OIG reviewed Embassy Brussels' consular operations, including U.S. citizens services, crisis preparedness, management controls, visa services and processing, and fraud prevention programs. OIG concluded that Embassy Brussels' consular programs generally complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions described below.

During the inspection, the Consular Section corrected five issues identified by OIG. Specifically, the section:

- Completed a written fraud strategy (7 FAH-1 H-941a(1) and 7 FAH-1 H-941.1c) and fraud prevention operating procedures (7 FAH-1 H-943.7b).
- Completed a crisis preparedness tabletop exercise (7 FAH-1 H-292.2d(8)) on October 28, 2022, fulfilling the Department requirement that the consular staff plan and prepare in order to have the skills and resources to deal with a crisis effectively (7 FAH-1 H-292.3 and 7 FAM 1811c).
- Moved an officer's work cubicle to comply with the requirement that officers' cubicles be located throughout the section to provide overlapping lines of sight (7 FAH-1 H-281e).
- Adjusted an officer's work schedule to ensure that LE staff are not present outside of work hours without a cleared American presence (7 FAH-1 H-644.1c).
- Reactivated the electronic sign outside the Consular Section entrance with information about consular services, such as normal operating hours, the emergency after-hours phone number, the embassy's internet address, and U.S. and local holidays (7-FAH-1 H-263.8b).

### ***Consular Section Staff Struggled to Meet Workload Demands***

Consular Section staff struggled to meet a surge in workload demands in 2022. The section reduced services at the beginning of the pandemic in 2020, providing only emergency U.S. citizens and visa services. In June 2021, the section mostly returned to normal operations, with full onsite staffing. The final step in resuming full operations came after travel restrictions to the United States were lifted on November 8, 2021,<sup>19</sup> at which point the section returned to scheduling regular nonimmigrant visa interviews. However, the departure of two LE staff members between March 2022 and the time of the inspection, combined with COVID-19 quarantines and infections among staff, reduced the number of employees available to meet the workload demands.

In addition, staff told OIG that an increase in nonimmigrant visa appointment requests from residents of neighboring countries, where U.S. consular sections had even longer wait times for appointments, exacerbated the workload problem. To improve the situation, consular managers created separate nonimmigrant visa appointment lists for Belgium residents and non-residents. At the time of the inspection, the wait time for nonimmigrant visa appointments for Belgium residents was 37 days but was more than 1 year for non-residents. By comparison, the Bureau of Consular Affairs reported in September 2022 that 51 percent of U.S. consular operations around the world had wait times for nonimmigrant visa appointments of more than 120 days.

When the Consular Section chief arrived at Embassy Brussels in June 2022, he prioritized filling the two vacant LE staff positions and obtained approval from the Bureau of Consular Affairs to add two temporary positions to assist with the workload. The two new LE staff members began work during the inspection. Nonetheless, even with the additional resources, consular staff told OIG that they were unable to keep up with the workload and that backlogs in certain tasks—such as completing the back-office processing of nonimmigrant visa applications—made for a stressful work environment. In addition, staff told OIG they believed consular managers did not fully comprehend the effect the heavy workload, including extra duties assigned to them, had on their morale and ability to complete their work.

Guidance in 7 FAH-1 H-261 states that a key aspect of consular management is to manage existing resources to deal effectively with consular workloads. According to 7 FAH-1 H-242c(2), consular managers should involve all section staff in collaborative discussions and decisions affecting their work. OIG discussed with the Consular Section chief the requirement in 7 FAH-1 H-242c(1) that he spend time handling daily tasks such as interviewing visa applicants who apply in person. The section chief, who already adjudicated a sizeable number of official visa cases that did not require interviews, agreed to spend time conducting visa interviews. He also

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<sup>19</sup> On October 21, 2021, the White House released “A Proclamation on Advancing the Safe Resumption of Global Travel During the COVID-19 Pandemic” announcing the resumption of international travel to the United States, effective November 8, 2021. Based on the availability of the vaccine and rates of vaccination greater than 70 percent in many countries, the President determined that it was in the best interests of the United States to move away from the country-by-country restrictions previously applied during the pandemic to adopt an air travel policy that relied primarily on vaccination to advance the safe resumption of international air travel to the United States.

said he would hold discussions with his staff to better understand their concerns and to involve them in workload decisions. As a result of the section chief's commitments, OIG did not make a recommendation to address these issues.

***Consular Officers Did Not Have Line-of-Sight Control Over the Work Areas***

Consular officers could not visually monitor the work at the intake and interview windows, visa and passport printing areas, and LE staff work cubicles. OIG observed that shelving behind the intake and window areas blocked line of sight from the consular workspace to the intake or interview windows. In addition, workspace partitions were higher than the 42-inch limit specified in 7 FAH-1 H-282(2)(b), preventing line of sight to staff cubicles. Guidance in 7 FAH-1 H-281e describes line of sight as a design that allows officers and supervisors to easily monitor operations. Consular staff were unaware of the height limit on workspace partitions. Without proper line of sight, consular officers could not perform a basic internal control of visually observing work areas and activities of consular staff.

**Recommendation 2:** Embassy Brussels, in coordination with the Bureau of Consular Affairs, should replace existing partitions in the consular workspace with partitions that comply with Department standards. (Action: Embassy Brussels, in coordination with CA)

***Consular Section Lacked Accessible Public Restrooms***



**Figure 2:** Steps leading to the Consular Section public restrooms. (Source: OIG)

The Consular Section's public restrooms were located up five steps in a narrow hallway, making them inaccessible to customers using wheelchairs. (See Figure 2.) Guidance in 7 FAH-1 H-282(1)(h) and (m) states accessible public restrooms are a factor in evaluating consular space. In response to a worldwide survey by the Bureau of Consular Affairs, Embassy Brussels submitted documentation to the Department in January 2022 showing the consular public restrooms did not meet these standards. Without accessible restrooms, customers in wheelchairs do not have equal access to the Consular Section.

**Recommendation 3:** Embassy Brussels, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide a wheelchair-accessible restroom option for consular customers. (Action: Embassy Brussels, in coordination with CA and OBO)

***Consular Section Did Not Terminate Inactive Immigrant Visa Cases as Required***

At the time of the inspection, Embassy Brussels had approximately 300 open immigrant visa cases from the 1990s through 2009 that had yet to be terminated as required. Guidance in 9

FAM 504.13-2(A) requires consular staff to terminate immigrant visa cases for any individual who fails to apply for a visa within 1 year of being notified of the availability of a visa. Section files did not contain paper records regarding these cases, and consular staff did not know why they remained in the electronic immigrant visa system. During the inspection, section staff began to work with the National Visa Center to terminate these cases. Accordingly, OIG did not make a recommendation to address this issue.

### **Spotlight on Success: Embassy Brussels Developed Streamlined Process for Loss of Nationality Cases**

Embassy Brussels' Consular Section, faced with a backlog of more than 200 Certificate of Loss of Nationality cases, developed a streamlined process to handle these cases. Requests to renounce citizenship are time-consuming because consular officers must determine that the requests are voluntary and intentional and that the applicant is fully aware that the action is irrevocable. Embassy Brussels saw a nearly 300 percent increase in Certificate of Loss of Nationality requests beginning in 2017 due to the implementation of the Foreign Account Tax Compliance Act (codified at 26 U.S. Code §§1471–1474). The act requires foreign banks and U.S. citizens holding financial assets outside the United States to report those assets to the Internal Revenue Service. Despite continued processing of these cases throughout the COVID-19 pandemic, Embassy Brussels' backlog continued to grow, and a major American newspaper published complaints about the long wait times to complete the loss of nationality process at the embassy. To address the problem, Embassy Brussels created a streamlined process that included guidance to applicants instructing them to prepare and send the required documents electronically. The LE staff reviewed the documents to confirm that everything was in order prior to scheduling an appointment for the applicant. This process eliminated one of two interviews, helped ensure applicants were prepared, and allowed the section to schedule more appointments without compromising consular officers' ability to assess whether a renunciation was voluntary and intentional. Embassy Brussels' streamlined, innovative process received approval from the Bureau of Consular Affairs' legal team. According to the bureau, other U.S. missions were looking at Embassy Brussels' approach as a model to allow them to handle more cases with existing resources while maintaining Department standards.

## **RESOURCE MANAGEMENT**

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

- Reviewed and reissued its motor vehicle policy (14 FAM 435.1a).
- Reviewed and reissued its residential commissioning policy<sup>20</sup> (6 FAH-5 H-521d).

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<sup>20</sup> Residential commissioning is the process of preparing new residential property for occupancy by the U.S. government.

- Conducted the annual review of its 74 blanket purchase agreements<sup>21</sup> (Department of State Acquisition Regulation, Section 613.303-6).
- inventoried the tri-mission's confined spaces and established entry permit requirements (Confined Space Program Procedures).<sup>22</sup>
- Issued a work de-energized policy<sup>23</sup> and related standard operating procedures (15 FAM 957.7b(1) and (2)).
- Conducted Post Occupational Safety and Health Officer safety inspections of workplaces and implemented a system for training supervisors and tracking their workplace safety inspections (15 FAM 962a-b, d, and g).
- Reviewed and de-obligated approximately \$4 million of invalid unliquidated obligations (4 FAM 225d).
- Closed post-funded travel advances for individual temporary duty travel (TDY) that had been open for more than 30 days, including ones from 2010 and 2014 (4 FAM 495d, 4 FAM 495.2a, and 4 FAM 033.5-1(1)).

Overall, OIG found the embassy's Joint Administrative Services Section, which provides services to the embassy, USEU, and USNATO,<sup>24</sup> generally implemented required processes and procedures in accordance with applicable laws and Department standards, with the exceptions noted below. Section leadership attributed some of the shortcomings to inadequate staffing. They told OIG that the tri-mission's customer base grew by approximately 13 percent since 2015, but section staffing has not kept pace with that growth. As stated earlier in the report, a July 2021 Department study of the tri-mission's management platform found it was understaffed to support the growing numbers of mission personnel.<sup>25</sup> In its FY 2024 Mission Resource Request, the embassy requested 3 additional U.S. direct hire positions and 27 additional LE staff positions. The embassy reported that, without the additional positions, the Joint Administrative Services Section would be unable to support the tri-mission staff required to meet Department objectives. However, section leadership told OIG that budget constraints, including multiple host-government-mandated LE staff salary increases and budget reprioritization by the Bureau of European and Eurasian Affairs, precluded the embassy from funding the additional positions.

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<sup>21</sup> 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.

<sup>22</sup> Office of Safety, Health, and Environmental Management, Confined Space Program Procedures, 2002.

<sup>23</sup> A work de-energized policy provides guidance on how to ensure that electrical power is turned off and remains off when working on electrical equipment.

<sup>24</sup> The section also provides limited management services to Embassy Luxembourg.

<sup>25</sup> According to the embassy's post profile, the Joint Administrative Services Section had a total of 209 positions, including 174 LE staff positions, who provided support services to approximately 1,500 Brussels Tri-Mission and Embassy Luxembourg staff.

## Facility Management

### ***Fire Protection Program Did Not Comply With Department Standards***

The tri-mission's fire protection program did not comply with Department standards. Specifically, OIG found that:

- Of the tri-mission's 628 portable fire extinguishers, more than half (355 of 628) had expired and required hydrostatic testing and service for continued use or needed to be replaced. Department guidance states that portable fire extinguishers that are 12 years past the manufacturer's date must be disposed of or hydrostatically tested prior to being recharged and placed back into service (15 FAM 843e).
- Tri-mission residential occupants did not consistently inspect their residential portable fire extinguishers and smoke alarms. Department guidance requires that every portable fire extinguisher be inspected monthly, and the date of the inspection recorded on the extinguisher inspection tag (15 FAM 843d). Additionally, residential occupants are required to test each installed battery-operated smoke alarm monthly (15 FAM 842b).

Facility management staff told OIG these issues occurred because of competing priorities and a lack of policies and procedures. Failure to comply with fire protection standards increases the risk of injury, loss of life, and damage to property.

**Recommendation 4:** Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Brussels, in coordination with OBO)

### ***Embassy Did Not Conduct Safety Inspections on Living Quarters Allowance Residences***

The embassy's Post Occupational Safety and Health Officer (POSHO) did not inspect any of the 35 living quarters allowance<sup>26</sup> residences occupied by Department of Defense staff under USNATO chief of mission authority<sup>27</sup> or certify them in the POSHO Certification Application<sup>28</sup> as

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<sup>26</sup> A living quarters allowance is granted to an employee to help defray the annual cost of suitable, adequate living quarters for the employee and their family at a foreign post where government-leased or -owned housing is not provided. At the time of the inspection, the tri-mission had 35 living quarters allowance residences occupied by staff under USNATO chief of mission authority.

<sup>27</sup> The Department of State and the Department of Defense (DoD) have a memorandum of agreement (MOA) that details the security responsibilities for certain DoD elements and personnel in foreign areas. In their responses to the draft report, Embassy Brussels and USNATO noted that, as indicated in Annex B of the MOA for Tri-Mission Brussels and the European Command, the DoD personnel who occupy living quarters allowance residences are under combatant command responsibility for security. However, Annex B of the October 2022 MOA also states, "Residences must still adhere to Department of State Bureau of Overseas Buildings Operations (OBO) residential safety standards." Such residential safety standards include the requirement for the POSHO to inspect and certify all living quarters allowance residences.

<sup>28</sup> The POSHO Certification Application generates and documents the form used to certify that a residence meets the requirements of 15 FAM 252.5. The form lists the safety requirements that must be certified prior to occupancy, and the application allows relevant documentation to be electronically attached to the form.

required. According to 15 FAM 252.5a, the POSHO must inspect all residences, including living quarters allowance residences, occupied by staff under chief of mission authority. Additionally, 15 FAM 252.5c requires that the inspections be completed and documented in the POSHO Certification Application. Embassy staff told OIG they did not meet these requirements because they did not obtain the information from USNATO needed to perform the inspections. Failure to conduct safety inspections and certifications could lead the tri-mission to allow employees and their families to be placed in unsafe residences and increase the risk of injury or property damage.

**Recommendation 5:** The U.S. Mission to the North Atlantic Treaty Organization, in coordination with Embassy Brussels, should require that all residences are inspected and certified in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards. (Action: USNATO, in coordination with Embassy Brussels)

#### ***Swimming Pool Safety Program Did Not Comply With Department Standards***

The tri-mission's swimming pool safety program did not comply with Department standards. Specifically, the swimming pools located at the USEU chief of mission residence, the USNATO DCM residence, and a community pool located in an apartment complex where the embassy leased a dozen residences lacked permanent barriers required in 15 FAM 957.4(1). Furthermore, the embassy did not inform residents of the apartment complex that the community pool did not meet Department safety standards, contrary to guidance found in the Bureau of Overseas Buildings Operations (OBO) swimming pool safety program.<sup>29</sup> Facility management staff told OIG these issues were not addressed due to staff's heavy workload and competing priorities. Failure to adhere to Department safety and health standards and mitigate vulnerabilities puts the lives and safety of employees and their families at risk.

**Recommendation 6:** Embassy Brussels should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brussels)

#### ***Embassy Did Not Address Unresolved Residential Fire and Life Safety Issue***

The embassy had yet to address a fire and life safety issue identified by OBO's Office of Fire Protection during a January 2018 inspection. Specifically, stairs located at the Marine Security Guard residence had risers and treads that did not comply with standards found in National Fire Protection Association Code 101, requirement 7.2.2.2.1 and Table 7.2.2.2.1.1(b). Facility management staff told OIG this issue had yet to be addressed because of a lack of funding from OBO. However, staff also acknowledged that they had not discussed possible alternative solutions with OBO to mitigate the hazard to the bureau's satisfaction, such as posting warning

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<sup>29</sup> The swimming pool safety program "Frequently Asked Questions (FAQs)" state that even if a pool is not under embassy control and therefore not covered by the Department's swimming pool safety standards, the embassy should exert as much influence as possible with the landlord or owners' association to lobby for safeguards. If the deficiencies cannot be addressed, the embassy should inform employees assigned to these residences about the swimming pool hazard and provide them with copies of the Department's swimming pool safety brochure.

signs to call attention to the risk. Failure to address this fire and life safety issue puts occupants at an increased risk of injury.

**Recommendation 7:** Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should address the outstanding life and safety issue regarding stairs at the Marine Security Guard residence. (Action: Embassy Brussels, in coordination with OBO)

***Chief of Mission Residence Did Not Comply With Department Safety Standards***

The railings on balconies, stairs, and around a patio at the USEU chief of mission residence did not comply with Department standards. The openings between the railings exceeded the 4-inch maximum in 15 FAM 971.1(7) and 15 FAM Exhibit 971.1. Facility management staff told OIG the previous resident ordered that the plexiglass that had been installed on the patio railings be removed. Additionally, staff told OIG they were unaware the railings on balconies and stairs were not compliant. Failure to implement a fully compliant residential safety program increases the risk of injury to residents and visitors.

**Recommendation 8:** Embassy Brussels should bring the railings on the balconies, stairs, and around a patio at the residence of the chief of mission to the U.S. Mission to the European Union into compliance with Department residential safety standards. (Action: Embassy Brussels)

***Unauthorized Use of Shipping Containers at Embassy Warehouse***

The embassy used five shipping containers for permanent storage without authorization from OBO. The Department issued guidance in September 2018 and again in October 2021<sup>30</sup> stating that it does not support using shipping containers as occupied structures or to accommodate functional space needs, such as permanent storage. Embassies must request approval for the use of such shipping containers or dispose of them. Embassy staff told OIG they did not request authorization from OBO to use the containers because of more pressing priorities. OIG also noted that the new senior facility manager arrived at the embassy shortly before the inspection and was unaware of the containers. Using unapproved shipping containers for permanent storage increases the risk of damage to U.S. government property.

**Recommendation 9:** Embassy Brussels should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them, in accordance with Department standards. (Action: Embassy Brussels)

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<sup>30</sup> Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018; cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

## General Services Operations

### ***Tri-Mission Did Not Comply With Department's Motor Vehicle Safety Standards***

OIG found the tri-mission did not fully comply with the Department's Motor Vehicle Safety Management Program standards. Specifically, OIG found that:

- Twelve incidental (self-drive) drivers did not receive medical clearances or held expired medical clearances (14 FAM 433.4a).
- The embassy did not track all incidental drivers' compliance with driver safety training and medical clearance requirements using the Department's Fleet Management Information System<sup>31</sup> (14 FAM 433.5e and 14 FAM 433.4e).
- Some chauffeurs regularly exceeded the 10-hour per day limit on duty shifts (14 FAM 433.8a). OIG reviewed time and attendance records for 12 weeks (from July 3 to September 24, 2022) for 10 of the 16 tri-mission's chauffeurs and found they exceeded the limit on 72 occasions.

Embassy staff told OIG the issues related to medical clearances occurred due to pandemic-related restrictions that limited access to medical examinations. The lack of complete records in the Fleet Management Information System and excessive duty shifts resulted from insufficient management oversight. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers and the public, as well as damage to U.S. government property.

**Recommendation 10:** Embassy Brussels should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Brussels)

### ***Property Management Did Not Comply With Department Standards***

OIG found the embassy's property management practices did not comply with Department standards. Specifically, OIG identified two issues:

- The embassy did not account for all expendable property,<sup>32</sup> such as ceiling tiles, pipes, and small hardware supplies, in the Integrated Logistics Management System's (ILMS)<sup>33</sup> Expendable Management System (14 FAM 414.2-1a(2)).

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<sup>31</sup> The Fleet Management Information System, a module within the Integrated Logistics Management System, is the Department's enterprise system for managing all fleet operations. It is designed to capture key operational data on vehicle dispatch, maintenance, and fuel.

<sup>32</sup> Expendable property is property which, when put in use, is consumed, loses its identity, or becomes an integral part of another item of property. Examples are office supplies, automobile tires, and machine parts.

<sup>33</sup> ILMS is a unified web-based information system designed to integrate the Department's supply chain by improving processing in such areas as purchasing, procurement, warehousing, transportation, receiving, property management, personal effects, and diplomatic pouch and mail. ILMS is the only Department-approved system for property management accountability and consists of several modules.

- The embassy did not use ILMS' Loanable Property System to account for and track Department-owned and -leased cellular phones (14 FAM 414.2-1a(3)).

Management staff told OIG they were aware of these issues and were in the process of developing a plan to address them. However, the timeline for implementation remained unclear at the time of the inspection. Failure to account for property in the Department's approved system of record increases the risk of mismanagement and theft of embassy property.

**Recommendation 11:** Embassy Brussels should bring its property management program into compliance with Department standards. (Action: Embassy Brussels)

***Embassy Did Not Close Out Procurement Files Within Required Timeframes***

Embassy Brussels did not close out tri-mission procurement files in ILMS within required timeframes. Specifically, the embassy did not close out 4,791 procurement files from FY 2015 to FY 2022; an additional 6,826 files could not be closed out until procurement staff completed all required steps. Guidance in 14 FAH-2 H-573.2b<sup>34</sup> states that contracts under simplified acquisitions procedures should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Embassy staff told OIG this issue occurred because staffing and workload issues limited the amount of time available to perform contract closeout processes. Failure to close out procurement files within the required timeframe increases the risk of inaccuracies in procurement records and of internal control issues in procurement operations.

**Recommendation 12:** Embassy Brussels should close out procurement files in accordance with Department standards. (Action: Embassy Brussels)

***Contracting Officer's Representative Program Did Not Comply With Department Standards***

The embassy's contracting officer's representative (COR) program did not comply with Department standards. The embassy's 15 CORs oversaw 35 contracts worth approximately \$26.7 million. OIG reviewed the files for seven contracts (total value \$14.4 million) handled by six CORs and found that:

- Two CORs did not have current certifications issued by the Department's Office of the Procurement Executive (14 FAH-2 H-143a).
- Two CORs did not maintain files on the contracts they oversaw (14 FAH-2 H-517a). The remaining four CORs maintained files electronically but did not use the required ILMS e-Filing module to do so (14 FAH-2 H-142b(16)(b)).

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<sup>34</sup> Guidance in 14 FAH-2 H-573.2b also cites 48 C.F.R. § 4.804-1.

- Neither the CORs nor the contracting officer completed a mandatory contractor's performance review in the Contractor Performance Assessment Reporting System<sup>35</sup> for four of the embassy's contracts (14 FAH-2 H-572a, c, d<sup>36</sup> and 48 Code of Federal Regulations 42.1502a).

Despite these issues, OIG's interviews with embassy staff and reviews of other documentation showed the embassy monitored contracts, received goods and services for which it had contracted, and addressed contractor's performance when issues arose. Embassy staff told OIG the issues in the COR program occurred because of heavy workload, unfamiliarity with standards, and a lack of sufficient training on ILMS. A non-compliant COR program increases the risk of contract mismanagement.

**Recommendation 13:** Embassy Brussels should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Brussels)

***Contracting Officer Did Not Review Locally Employed Staff Contracting Officer's Transactions***

OIG found that the embassy's U.S. direct-hire contracting officer did not review the LE staff contracting officer's transactions as required.<sup>37</sup> Guidance in 14 FAH-3 H-342.1a states the U.S. direct-hire contracting officer supervisor serves as the approving official for transactions completed by the LE staff contracting officer by reviewing and signing a monthly transaction log. The same guidance also states the Department will hold the U.S. direct-hire contracting officer supervisor responsible, from an administrative standpoint, for any contractual documents erroneously issued by the LE staff contracting officer. Embassy staff told OIG this issue occurred because the U.S. direct-hire contracting officer's workload did not allow for adequate oversight of the LE staff contracting officer's daily activities. Failure of the U.S. direct-hire contracting officer supervisor to regularly review the procurement transactions of the LE staff contracting officer increases the risk of waste, fraud, and mismanagement.

**Recommendation 14:** Embassy Brussels should perform regular reviews of the locally employed staff contracting officer's transactions, in accordance with Department standards. (Action: Embassy Brussels)

***Living Quarters Allowance Expenditure Reports Were Overdue***

The tri-mission's living quarters expenditure reports for two locations in Belgium were overdue. OIG reviewed survey information available on the Bureau of Administration's Office of Allowances website and found that the embassy last submitted living quarters expenditure

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<sup>35</sup> The Contractor Performance Assessment Reporting System is the government-wide evaluation reporting tool for all past performance reports on contracts and orders. An annual performance assessment must be done in the system for each contract above the simplified acquisition threshold of \$250,000, according to 48 CFR § 42.1502(b) and 48 CFR § 2.101.

<sup>36</sup> The contracting officer is responsible for ensuring the evaluation takes place, but the COR may be tasked with evaluating contractor performance. See 14 FAH-2 H572e, "Final Evaluation."

<sup>37</sup> The embassy's LE staff contracting officer had a warrant allowing transactions up to \$25,000.

reports for Antwerp in 2010 and for Brussels in 2019.<sup>38</sup> However, according to the reporting schedule published by the Office of Allowances, the tri-mission's living quarters expenditure reports are due annually in October. Embassy staff told OIG they were unaware the reports were overdue. Failure to submit reports annually to the Department could result in overpayment or underpayment to tri-mission staff housed in living quarters allowance residences.

**Recommendation 15:** The U.S. Mission to the North Atlantic Treaty Organization, in coordination with Embassy Brussels, should submit its living quarters expenditure reports in accordance with Department standards. (Action: USNATO, in coordination with Embassy Brussels)

#### ***Foreign Per Diem Rates Were Out of Date***

Per diem rates for nine locations in Belgium were out of date. According to the Bureau of Administration's Office of Allowances, the embassy last submitted hotel and restaurant surveys for Brussels, Diegem, and Zaventam in April 2020. For the remaining six locations,<sup>39</sup> the Office of Allowances told OIG the information was not readily available in its eAllowances<sup>40</sup> system because the embassy likely had not submitted hotel and restaurant surveys since the system was deployed in 2008. Department of State Standardized Regulation 074.2 states that the parties responsible for preparing and submitting reports must provide complete, accurate, and supportable information in their biennial hotel and restaurant reports. Embassy staff told OIG they were unaware these reports were overdue. Failure to submit reports on a timely basis could result in overpayment or underpayment of travel expenses to U.S. government personnel.

**Recommendation 16:** Embassy Brussels should submit its hotel and restaurant surveys to the Bureau of Administration's Office of Allowances in accordance with Department standards. (Action: Embassy Brussels)

## **Human Resources**

### ***Tri-Mission Supplemental Retirement Plan for Locally Employed Staff Was Underfunded***

The Brussels Tri-Mission's defined benefit plan<sup>41</sup> for LE staff, established in 1987, was underfunded. In July 2022, the private insurance company that manages the supplemental retirement plan notified the Brussels Tri-Mission that, as of January 1, 2022, the plan was

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<sup>38</sup> Personnel under Embassy Brussels chief of mission authority also reside in Antwerp.

<sup>39</sup> The remaining six locations were Antwerp, Brugge, Kleine Brogel, Liege, SHAPE/Chievres, and "Other."

<sup>40</sup> eAllowances is the Department's system of record for the submission of allowances surveys and reports.

<sup>41</sup> A defined benefit plan provides a specific amount of benefit to the employee at normal retirement age. The formula to determine the benefit typically is based on the employee's earning average over a number of years of service. For Brussels Tri-Mission, the employee's contributions were fixed, and the U.S. government paid the balance of the costs.

underfunded by approximately \$1 million and that Belgian law<sup>42</sup> required the tri-mission to pay the unfunded liabilities within 6 months of the notification date. Management Section staff told OIG they were concerned that the amount of unfunded liabilities would increase and requested the insurer calculate projected liabilities through the end of October 2022. The financial projection, provided in November 2022, showed projected unfunded liabilities had increased to approximately \$1.9 million. Embassy staff told OIG they had contacted the Bureau of European and Eurasian Affairs' Office of the Executive Director and the Bureau of Global Talent Management's Office of Overseas Employment to request assistance; however, it was unclear how and when this issue would be addressed.

As noted above, Belgian law requires an employer make up for unfunded liabilities within 6 months of being notified of the issue. Furthermore, it is the U.S. government's policy that all agencies under chief of mission authority follow host country labor laws as long as those labor laws do not violate U.S. law or are inconsistent with U.S. public interest.<sup>43</sup> Embassy staff told OIG this issue occurred because of successive pay raises and underperforming financial markets. Failure to fully fund the LE staff pension plan puts the Department at risk of non-compliance with Belgium's labor laws and incurring additional interest and fees imposed by the insurer who manages the plan.

**Recommendation 17:** Embassy Brussels, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, European and Eurasian Affairs, and Global Talent Management, should implement a plan to fully fund the locally employed staff defined benefit pension plan to comply with Belgium's labor laws and address long-term funding concerns. (Action: Embassy Brussels, in coordination with BP, CGFS, EUR, and GTM)

## **Financial Management**

### ***Only One of 15 Information Management Positions Programmed to International Cooperative Administrative Support Services***

OIG found that International Cooperative Administrative Support Services (ICASS)<sup>44</sup> funded only 1 of the embassy's 15 information management U.S. direct-hire positions even though the section provided support to other agencies. The Department paid for the remaining 14 positions through its Department funding, even though the embassy estimated that some positions allocated more than 50 percent of their time to ICASS services. According to 6 FAH-5 H-013.2, an operating principle of the ICASS system is that agencies pay their share of mission

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<sup>42</sup> The insurance company's notification letter cited Article 50 of the Royal Decree of Life, November 14, 2003.

<sup>43</sup> See 3 FAM 7113.3, "Host Country Law."

<sup>44</sup> ICASS, established in 1997, is the principal means by which the U.S. government agencies share the most common administrative support services at more than 250 diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions. See 6 FAM 911 and 6 FAH-5 H-013.2.

administrative costs based on usage. Additionally, 6 FAH-5 H-341.9<sup>45</sup> states that ICASS should include salaries and benefits of all U.S. direct-hire and LE staff who allocate time to the respective cost centers, overhead costs associated with those staff members, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at overseas missions with multiple U.S. direct-hire information management officers and specialists, the Department pays for the first position, while the second one is always paid through ICASS. Where there are more than two such employees, the embassy should determine an appropriate mix of -Department-funded and ICASS-funded positions. The embassy's failure to determine whether additional positions should be reprogrammed to ICASS means the Department will continue to subsidize most of the costs for information management services to other agencies. OIG estimated the Department could recover funds of up to \$243,993 over 3 years per position by converting additional positions to ICASS.<sup>46</sup>

**Recommendation 18:** Embassy Brussels, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, and European and Eurasian Affairs, should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Brussels, in coordination with BP, CGFS, and EUR)

***Alternate Cashiers Did Not Regularly Assume Principal Cashier's Duties***

Two of the tri-mission's three alternate cashiers never assumed principal cashier's duties, even though one had been designated as an alternate cashier since 2018 and the other one for more than 6 months. According to the Department's Cashier User Guide, Chapter 3.3.5, alternate cashiers should act as the principal cashier a minimum of two to three times per quarter to gain and retain the required knowledge and proficiency to sustain cashiering operations in the absence of the principal cashier. Embassy staff told OIG the alternate cashiers did not assume principal cashier's duties because they needed additional training and experience and that they needed to rebalance the principal cashier's workload to allow her to provide the necessary training to the alternate cashiers. Failure to implement this internal control increases the risk of disruptions to cashiering operations.

**Recommendation 19:** Embassy Brussels should implement a schedule to require alternate cashiers to serve as principal cashier, in accordance with Department guidelines. (Action: Embassy Brussels)

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<sup>45</sup> See 6 FAH-5 H-341.9-1(B), 6 FAH-5 H-341.9-2(B), and 6 FAH-5 H-341.9-3(B).

<sup>46</sup> Relying on Department-provided figures, OIG estimated the Department could annually recover \$81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of \$268,419 and the worldwide average percentage of time U.S. direct-hire Information Management staff support other agencies of 30.3 percent (\$268,419 x .303 = \$81,331). Because Brussels is a 3-year tour, the total funds put to better use is calculated as 3 x \$81,331 for a total of \$243,993 per position reprogrammed to ICASS.

### ***Embassy Improperly Paid for Residential Internet for Vacant Residences***

Contrary to Department guidance, the embassy paid for residential internet for unoccupied residences. According to embassy staff, the annual expenditures amounted to approximately \$10,000. With few exceptions,<sup>47</sup> the Department considers residential internet to be a personal expense, as detailed in 15 FAM 723a. Embassy staff told OIG this occurred because the tri-mission wanted staff to have internet service upon moving into an embassy residence, but newly arrived staff could not order internet service until they received their diplomatic identification, which took an average of 4 weeks. Furthermore, embassy staff told OIG that, at the time of the inspection, approximately one-third of the tri-mission residences' alarm systems were connected to the internet and, therefore, the embassy needed to maintain internet service even when a residence was vacant. Embassy staff began discussing alternative solutions to address this issue prior to the inspection; however, the timeline for implementation of a solution was unclear. Maintaining residential internet service between occupants for residences that do not have an alarm system connected to the internet is a waste of government funds.

**Recommendation 20:** Embassy Brussels should cease paying for residential internet for vacant residences that do not have an alarm system connected to internet, in accordance with Department standards. (Action: Embassy Brussels)

## **INFORMATION MANAGEMENT**

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The Embassy Brussels Information Management Unit is part of the Joint Administrative Services Section that provides management support to the Brussels Tri-Mission. OIG reviewed the unit's operations, including classified, unclassified, and dedicated internet network<sup>48</sup> computer operations; physical protection of information technology (IT) resources; classified communications security; emergency communications preparedness; telephone programs; and mail services. OIG determined the unit implemented most required information management controls in accordance with Department standards and applicable laws, except as described below and in the companion classified report.

### ***Embassy Did Not Categorize, Assess, and Authorize Locally Developed Applications***

Embassy Brussels operated 36 locally developed applications that had never been categorized, assessed, and authorized as required. Guidance in 12 FAH-10 H-311b requires application owners (in this case the embassy) to categorize applications as either low, moderate, or high

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<sup>47</sup> According to 3 FAM 3255.4, official residence expenses funding can be used to pay for basic internet service for principal representatives' official residences. Typically, the term "official residence" refers to the building and grounds purchased or leased by the U.S. government and assigned to a principal representative, usually the chief of mission and deputy chief of mission (see 3 FAM 3251.3 and 3 FAM 3252.1b(1)).

<sup>48</sup> 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.

and implement required security controls based on the categorization.<sup>49</sup> In addition, guidance in 12 FAM 623.14a(1) and (3) requires application owners to assess the security controls implemented to determine whether they are effective and to authorize the operation of Department information systems and any associated information system connections. Unit staff with historical knowledge of the applications did not know why the embassy never initiated the process to assess and authorize the applications. Applications that are not properly categorized, assessed, and authorized are at an increased risk of their confidentiality, integrity, and availability being compromised due to inadequate security controls.

**Recommendation 21:** Embassy Brussels should categorize, assess, and authorize its locally developed applications in accordance with Department standards. (Action: Embassy Brussels)

#### ***Unapproved Wireless Access Points Operating in Department Facilities***

The embassy operated two unapproved, non-enterprise wireless networks in its facilities. OIG found that the embassy's Counterintelligence Working Group had not approved the two access points, which were operated by other U.S. government agencies in embassy facilities. The Department's Wireless Local Area Network Security Standard for Dedicated Internet Networks<sup>50</sup> requires that the post obtain working group approval in such cases and provide written confirmation of the approval to the Department's Wi-Fi Program Office. Unit staff told OIG the agencies set up the wireless access points without informing the required personnel or requesting Counterintelligence Working Group approval. During the inspection, information management personnel were in the process of replacing unapproved wireless access points with ones approved by the Department, but the timeline for completing the installation was unclear. Unapproved wireless networks operating within Department facilities increases the risk of unauthorized disclosure of sensitive information.

**Recommendation 22:** Embassy Brussels should replace the unauthorized wireless access points operating within its facilities with an approved wireless network. (Action: Embassy Brussels)

#### ***Embassy Brussels Did Not Properly Configure Dedicated Internet Network***

All users of the Embassy Brussels dedicated internet network used the same visitor account and password when accessing the network, contrary to Department standards. Guidelines for non-sensitive unclassified information systems in 12 FAH-10 H-112.1-2d and g state that system administrators must not create group or "guest" accounts but instead provide a unique account and password for each user. System administrators told OIG the server that established the capability to create unique user accounts was outdated and had been removed and never

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<sup>49</sup> The security categories (low, moderate, or high) are defined in the Federal Information Processing Standard Publication 199 and are based on the potential impact on an organization if the security of the application is breached.

<sup>50</sup> The Wireless Local Area Network Standard for Dedicated Internet Networks security standard document provides an outline of security principles for the Department's implementation of these networks.

replaced. The use of generic shared accounts on networks creates a vulnerability because end-user activity cannot be properly monitored and audited.

**Recommendation 23:** Embassy Brussels should establish the capability for dedicated internet network end users to access the network with unique accounts in accordance with Department standards. (Action: Embassy Brussels)

***The U.S. Mission to the North Atlantic Treaty Organization Operated an Unapproved Video Conferencing System on Its Dedicated Internet Network***

The USNATO dedicated internet network included a video conferencing system that was not approved by the Department's enterprise Information Technology Configuration Control Board or the Local Configuration Control Board.<sup>51</sup> Department standards in 5 FAM 872.3c state that all dedicated internet network hardware and software must be approved by either the local or the enterprise IT Configuration Control Board. Personnel responsible for ensuring the approval of network hardware and software told OIG they were exploring the option of approving the video conferencing system through the enterprise IT control board instead of the local board so that it could potentially be used on the Department's enterprise Sensitive but Unclassified network, but they had yet to make a decision. Using hardware and software that has not been reviewed and approved can introduce vulnerabilities into Department networks.

**Recommendation 24:** Embassy Brussels, in coordination with the U.S. Mission to the North Atlantic Treaty Organization, should obtain proper approval for its video conferencing system in accordance with Department standards. (Action: Embassy Brussels, in coordination with USNATO)

***Records Management Program Did Not Comply With Department Standards***

The records management program for the Brussels Tri-Mission did not comply with Department standards for records lifecycle processes, including organization, archiving, retirement, and oversight.<sup>52</sup> OIG reviews during the inspection found that analog and electronic records were not retired in accordance with foreign records disposition schedules (5 FAM 451b); diplomatic notes were not archived using the State Messaging and Archive Retrieval Toolset<sup>53</sup> (5 FAH-1 H-621e); sensitive analog records stored at the warehouse were not protected to prevent spillage or unauthorized access (5 FAM 418.9-3c(7)); and digital records repositories and filing systems

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<sup>51</sup> A Local Configuration Control Board is a formally constituted group of stakeholders responsible for maintaining control of their own hardware and software change processes.

<sup>52</sup> As defined in 44 U.S.C. § 3301, official records include “all recorded information, regardless of form or characteristics, made or received by a federal agency under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them.” Official records do not include “library and museum material made or acquired and preserved solely for reference or exhibition purposes; or duplicate copies.”

<sup>53</sup> The State Messaging and Archive Retrieval Toolset is the Department’s primary application for sending, receiving, and searching for cables and record emails.

were not organized and managed to allow for continuous accountability and quick retrieval of Department records (5 FAM 418.9b(4)(c)).

OIG also reviewed the tri-mission's use of non-government electronic messaging applications<sup>54</sup> to conduct official business. However, because the Department did not centrally manage the applications, OIG was unable to determine whether staff used the applications for official business, thus generating records that needed to be archived. OIG was able to determine that not all users of non-government electronic messaging applications understood the process for capturing these records on Department systems, as required by 5 FAM 435d.

OIG found that these issues occurred because the records management program for the three missions, managed by the Information Management Unit, did not include internal policies and procedures that assign responsibilities to a person in each office to manage records management operations and liaise with the post records coordinator, as required by 5 FAM 418.9b(4)(a). In addition, the coordinator did not regularly review the embassy's records systems and records management practices or analyze its records management needs and coordinate appropriate follow-on action, as required by 5 FAM 418.9-3c(2-3). Without a records management program that follows Department requirements for records organization, archiving, retirement, and oversight, the embassy is vulnerable to inefficient information retrieval and loss of critical documentation.

**Recommendation 25:** Embassy Brussels, in coordination with the U.S. Mission to the European Union and the U.S. Mission to the North Atlantic Treaty Organization, should implement a records management program that complies with Department standards.  
(Action: Embassy Brussels, in coordination with USEU and USNATO)

#### **Spotlight on Success: Access to Mobile Devices in Controlled Access Areas**

Embassy Brussels' information management staff developed an innovative solution that meets Department security standards to provide embassy personnel access to their mobile devices and mobile applications while working in controlled access areas. Embassy personnel, including Front Office leadership, increasingly require access to non-government electronic messaging applications and mobile technologies to communicate with local contacts and counterparts as part of their daily duties. Due to Department restrictions, this requires personnel to exit controlled access areas on a regular basis to check their mobile devices for updates and to exchange messages. Using a combination of networking technologies, cables, and keyboards, mice, and computer monitors, the Information Management Unit developed a solution that allows staff to access mobile devices and applications while in controlled access areas, providing more efficient communication with local contacts and counterparts. End users told OIG how helpful a solution like this was, as previously they often had to step outside the controlled access areas to check their phones for messages from contacts. The

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<sup>54</sup> As defined in 5 FAM 415, electronic messaging is “[i]nformation sent or received between individuals over a communications platform or device. Electronic messages apply to text messaging, chat/instant messaging, and other forms of electronic messaging applications available through social media or mobile devices. They can reside on agency networks and devices, on personal devices, or hosted by third party providers.”

embassy's solution also has the potential to reduce operating costs through increased use of managed internet devices and to align embassy operations with the Department's strategy of adopting technologies that allow more mobility for end users.

## RECOMMENDATIONS

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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 Brussels and the U.S. Mission to the North Atlantic Treaty Organization. The Department's complete responses can be found in Appendix B. The Department also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** Embassy Brussels should advise and brief U.S. citizens in Belgium in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels advised and briefed U.S. citizens in Belgium in accordance with Department standards.

**Recommendation 2:** Embassy Brussels, in coordination with the Bureau of Consular Affairs, should replace existing partitions in the consular workspace with partitions that comply with Department standards. (Action: Embassy Brussels, in coordination with CA)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels replaced existing partitions in the consular workspace with partitions that comply with Department standards.

**Recommendation 3:** Embassy Brussels, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide a wheelchair-accessible restroom option for consular customers. (Action: Embassy Brussels, in coordination with CA and OBO)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels provided a wheelchair-accessible restroom option for consular customers.

**Recommendation 4:** Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Brussels, in coordination with OBO)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels' fire protection program complied with Department standards.

**Recommendation 5:** The U.S. Mission to the North Atlantic Treaty Organization, in coordination with Embassy Brussels, should require that all residences are inspected and certified in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards. (Action: USNATO, in coordination with Embassy Brussels)

**Management Response:** In its April 26, 2023, response, the U.S. Mission to the North Atlantic Treaty Organization (USNATO) disagreed with this recommendation. The mission noted that all residences in Tri-Mission Brussels' Joint Administrative Services Section-managed housing pool are inspected and certified in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards, and this covers housing for all USNATO personnel from the Departments of State and Homeland Security, as well as some Department of Defense (DoD) personnel. Other DoD personnel at USNATO, however, who receive DoD-administered living quarters allowance or overseas housing allowance, obtain their housing support from the U.S. Army Garrison in Belgium and therefore follow DoD procedures for inspections. The mission noted that there are approximately 38 civilians and 46 military members under USNATO chief of mission authority who currently receive living quarters allowance or overseas housing allowance from DoD. The Department of the Army serves as the Executive Agent for those DoD civilian employees at USNATO, who are subject to the policies and procedures established by DoD and the Department of the Army. Likewise, allowances for military members are administered by DoD and the military departments. Furthermore, as indicated in the Department of State-DoD memorandum of agreement, Annex B, DoD personnel who receive living quarters allowances are under the responsibility of the combatant command for residential security.

**OIG Reply:** OIG considers the recommendation unresolved. OIG acknowledges that, as indicated in Annex B of the Department of State-DoD memorandum of agreement between the chiefs of mission and the geographic combatant commander, DoD personnel who occupy living quarters allowance residences are under combatant command responsibility for security. However, Annex B of the October 2022 memorandum of agreement also states, "Residences must still adhere to Department of State Bureau of Overseas Buildings Operations (OBO) residential safety standards." Such standards include standards for Post Occupational Safety and Health Officer inspection and certification. The recommendation can be closed when OIG receives and accepts documentation that the U.S. Mission to the North Atlantic Treaty Organization inspected and certified all residences in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards.

**Recommendation 6:** Embassy Brussels should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels' swimming pool safety program complied with Department standards.

**Recommendation 7:** Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should address the outstanding life and safety issue regarding stairs at the Marine Security Guard residence. (Action: Embassy Brussels, in coordination with OBO)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels addressed the outstanding life and safety issue regarding stairs at the Marine Security Guard residence.

**Recommendation 8:** Embassy Brussels should bring the railings on the balconies, stairs, and around a patio at the residence of the chief of mission to the U.S. Mission to the European Union into compliance with Department residential safety standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels brought the railings on the balconies, stairs, and around a patio at the residence of the chief of mission to the U.S. Mission to the European Union into compliance with Department residential safety standards.

**Recommendation 9:** Embassy Brussels should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them, in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation. The embassy noted it emptied and sold the shipping containers that were used as storage.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels dismantled and removed the shipping containers that were used for permanent storage.

**Recommendation 10:** Embassy Brussels should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels complied with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority.

**Recommendation 11:** Embassy Brussels should bring its property management program into compliance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels' property management program complied with Department standards.

**Recommendation 12:** Embassy Brussels should close out procurement files in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels closed out procurement files in accordance with Department standards.

**Recommendation 13:** Embassy Brussels should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels' contracting officer's representative program complied with Department standards.

**Recommendation 14:** Embassy Brussels should perform regular reviews of the locally employed staff contracting officer's transactions, in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels performed regular reviews of the locally employed staff contracting officer's transactions, in accordance with Department standards.

**Recommendation 15:** The U.S. Mission to the North Atlantic Treaty Organization, in coordination with Embassy Brussels, should submit its living quarters expenditure reports in accordance with Department standards. (Action: USNATO, in coordination with Embassy Brussels)

**Management Response:** In its April 26, 2023, response, the U.S. Mission to the North Atlantic Treaty Organization disagreed with this recommendation. The mission noted that the recommendation applies to DoD personnel receiving DoD-administered living quarters allowances. The Civilian Human Resources Agency's Overseas Entitlement Division is the Army's responsible office for the administration and payment of living quarters allowances covering USNATO DoD civilian employees and for reporting on the allowances. The division captures the living quarters allowances expenditures and sends the information to Headquarters, Department of the Army, Assistant G-1 for Civilian Personnel, who in turn submits the information to the Department of State.

**OIG Reply:** OIG considers the recommendation unresolved. Although the Department of Defense management platform may provide the data on living quarters expenditures for DoD civilians assigned to Brussels, the Department, through the Joint Administrative Services Section, is responsible for the submission of the living quarters allowances data to the Bureau of Administration, Office of Allowances. Additionally, the Joint Administrative Services Section is responsible for the submission of the data for those employees under Embassy Brussels chief of mission authority who reside in Antwerp. The recommendation can be closed when OIG receives and accepts documentation that the living quarters expenditure reports were submitted in accordance with Department standards.

**Recommendation 16:** Embassy Brussels should submit its hotel and restaurant surveys to the Bureau of Administration's Office of Allowances in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels submitted its hotel and restaurant surveys to the Bureau of Administration's Office of Allowances in accordance with Department standards.

**Recommendation 17:** Embassy Brussels, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, European and Eurasian Affairs, and Global Talent Management, should implement a plan to fully fund the locally employed staff defined benefit pension plan to comply with Belgium's labor laws and address long-term funding concerns. (Action: Embassy Brussels, in coordination with BP, CGFS, EUR, and GTM)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels implemented a plan to fully fund the locally employed staff defined benefit pension plan to comply with Belgium's labor laws and address long-term funding concerns.

**Recommendation 18:** Embassy Brussels, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, and European and Eurasian Affairs, should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Brussels, in coordination with BP, CGFS, and EUR)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels reprogrammed additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use.

**Recommendation 19:** Embassy Brussels should implement a schedule to require alternate cashiers to serve as principal cashier, in accordance with Department guidelines. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels implemented a schedule to require alternate cashiers to serve as principal cashier, in accordance with Department guidelines.

**Recommendation 20:** Embassy Brussels should cease paying for residential internet for vacant residences that do not have an alarm system connected to internet, in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels disagreed with this recommendation. The embassy acknowledged the intent of the recommendation and is analyzing options for minimizing the overall cost to the U.S. government. However, as noted during the inspection, the embassy is only bridging coverage to ensure residence-based internet services remain in place to protect U.S. government property for the one-third of the housing pool that currently has internet-based alarms, something that will soon be the case for all residences in the interagency housing pool. The embassy noted it never covers the costs of employee home internet.

**OIG Reply:** OIG considers the recommendation unresolved. OIG acknowledges that the embassy installed residential alarms that required internet service to function. However, according to embassy staff, only one-third of the embassy's residences were equipped with such alarm systems. The remaining two-thirds of the embassy's residences did not need to meet this security requirement and, therefore, did not require internet service while vacant. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels ceased paying for residential internet for vacant residences that do not have an alarm system connected to internet, in accordance with Department standards.

**Recommendation 21:** Embassy Brussels should categorize, assess, and authorize its locally developed applications in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels categorized, assessed, and authorized its locally developed applications in accordance with Department standards.

**Recommendation 22:** Embassy Brussels should replace the unauthorized wireless access points operating within its facilities with an approved wireless network. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels replaced the unauthorized wireless access points operating within its facilities with an approved wireless network.

**Recommendation 23:** Embassy Brussels should establish the capability for dedicated internet network end users to access the network with unique accounts in accordance with Department standards. (Action: Embassy Brussels)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels established the capability for dedicated internet network end users to access the network with unique accounts in accordance with Department standards.

**Recommendation 24:** Embassy Brussels, in coordination with the U.S. Mission to the North Atlantic Treaty Organization, should obtain proper approval for its video conferencing system in accordance with Department standards. (Action: Embassy Brussels, in coordination with USNATO)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels obtained proper approval for its video conferencing system in accordance with Department standards.

**Recommendation 25:** Embassy Brussels, in coordination with the U.S. Mission to the European Union and the U.S. Mission to the North Atlantic Treaty Organization, should implement a records management program that complies with Department standards. (Action: Embassy Brussels, in coordination with USEU and USNATO)

**Management Response:** In its April 17, 2023, response, Embassy Brussels concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brussels implemented a records management program that complies with Department standards.

## PRINCIPAL OFFICIALS

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Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Michael M. Adler	1/2022
Deputy Chief of Mission	Timothy M. Richardson	7/2022
<b>Chiefs of Sections:</b>		
Management	Steven P. Adams-Smith	7/2021
Consular	Christopher Breding	6/2022
Political-Economic	Shawn Gray	7/2020
Public Affairs	Amy Grier	7/2020
Regional Security	Julia E. Power Sweeney	8/2022
<b>Other Agencies:</b>		
Department of Defense		
Senior Defense Official/Defense Attaché	Col. Edward Dupont	8/2020
Office of Defense Cooperation	Wesley R. Hales	8/2022
Department of Justice		
Legal Attaché	Alan W. Reiner	6/2022
Drug Enforcement Administration	Robert J. Subach II	8/2021
Department of Homeland Security	Christopher Chancy	1/2022
U.S. Commercial Service	Gary Rand	10/2022

**Source:** Generated by OIG from data provided by Embassy Brussels.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from August 29, 2022, to January 4, 2023, 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.

### **Methodology**

OIG used a risk-based approach to prepare for this inspection. OIG conducted portions of the inspection remotely and relied on audio- and video-conferencing tools in addition to in-person interviews with Department and other personnel. 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.

## APPENDIX B: MANAGEMENT RESPONSES

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*Embassy of the United States of America  
Brussels, Belgium*

17 April 2023

### UNCLASSIFIED

THRU: Bureau of European and Eurasian Affairs – Dereck Hogan, Acting Assistant Secretary

TO: OIG – Arne Baker, Acting Assistant Inspector General for Inspections

FROM: Embassy Brussels – Michael Adler, Ambassador

SUBJECT: Response to Revised Draft OIG Report – Inspection of Embassy Brussels, Belgium

Embassy Brussels has reviewed the revised draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG. Note that Post's responses for the revised report are unchanged except for recommendations 5 and 15:

**OIG Recommendation 1: Embassy Brussels should advise and brief U.S. citizens in Belgium in accordance with Department standards.**

**Management Response:** Post concurs with the recommendation. On February 22, 2023, the Consular Section coordinated a two-hour town hall for U.S. citizens, with discussion led by the Ambassador. This was the first such town hall in Embassy memory. The Consular Section used its Citizen Liaison Volunteers, Foreign Commercial Service contacts, and local knowledge to reach the largest possible audience. Over 70 U.S. citizen guests attended, representing a broad array of the business, religious, and educational community in Belgium. The Ambassador and leadership of our Consular, Political and Economic, and Public Affairs sections led the discussion that ranged from political and economic topics to topics relating to safety and security of U.S. citizens. Post is currently planning two additional outreach events for U.S. citizens.

**OIG Recommendation 2: Embassy Brussels, in coordination with the Bureau of Consular Affairs, should replace existing partitions in the consular workspace with partitions that comply with Department standards. (Action: Embassy Brussels, in coordination with CA)**

**Management Response:** Post concurs with the recommendation. In the first half of FY 2023, post sought funding support to address this specific issue and was approved. Also, CA/EX working with OBO Interior design provided post furniture layout options for post selection.

**OIG Recommendation 3: Embassy Brussels, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide a wheelchair accessible restroom option for consular customers. (Action: Embassy Brussels, in coordination with CA and OBO)**

**Management Response:** Post concurs with the recommendation. OBO/PDCS is currently working with post and CA on the requirements and execution of a project to construct an accessible restroom for consular applicants. The restroom design shall comply with ADA accessibility code requirements and be subject to OBO review and approval. Post, OBO, and CA will coordinate on project execution. Post is examining the feasibility of this recommendation. If it is determined there is no feasible solution, this will be addressed when Post moves to a new facility.

**OIG Recommendation 4: Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Brussels, in coordination with OBO)**

**Management Response:** Post concurs with the recommendation. Post is working with OBO/FIRE to ensure we are fully compliant with the Department's fire protection standards.

**OIG Recommendation 5: Embassy Brussels, in coordination with the U.S. Mission to the North Atlantic Treaty Organization, should require that all residences are inspected and certified in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards. (Action: Embassy Brussels, in coordination with USNATO)**

**REVISED Management Response:** Embassy Brussels and USNATO do not concur with this recommendation and request this recommendation is transferred exclusively to USNATO's Inspection Report. Approximately 38 civilians and 46 military members under USNATO COM authority receive living quarters allowance (LQA) or overseas housing allowance (OHA) and are not assigned to government housing. The Department of Defense (DoD) establishes policy and requirements for housing safety and security inspections and for allowances. The Department of the Army (DA) serves as the Executive Agent for most DoD civilian employees at USNATO who are subject to the policies and procedures established by DoD and DA. Likewise, allowances for military members are administered by DoD and the military departments. While all residences in Tri-Mission Brussels' JAS managed housing pool are inspected and certified in the POSHO application in accordance with Department of State standards, the DoD personnel at USNATO who receive DOD-administered LQA or OHA obtain housing safety and security support from the US Army Garrison and follow DoD procedures for inspections. Further, the DOD personnel in LQA are outside of the Bilateral COM's security responsibility as indicated in the Department of State/Department of Defense Memorandum of Agreement, Annex B.

**OIG Recommendation 6: Embassy Brussels should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation and has brought all pools within the portfolio into compliance with Department Standards. Following the OIG inspection, the Facility Manager addressed all outstanding issues identified in the OIG's inspection. Of note there is one apartment complex in our housing pool where we lease units and that has a non-compliant pool. Post instructs residents in those units that the pool is not compliant with SHEMA regulations and the residents sign an acknowledgement that use of the pool is at their own risk. The pool is not accessible without a special access key.

**OIG Recommendation 7: Embassy Brussels, in coordination with the Bureau of Overseas Buildings Operations, should address the outstanding life and safety issue regarding stairs at the Marine Security Guard residence. (Action: Embassy Brussels, in coordination with OBO)**

**Management Response:** Post concurs with this recommendation and has contacted OBO/FIRE for assistance in resolving the issue. OBO/FIRE will assist post with non-structural risk management strategies to mitigate the risks inherent with the stairways in the interim period before the Marine Security Guards are eventually relocated as part of the New Embassy Compound project.

**OIG Recommendation 8: Embassy Brussels should bring the railings on the balconies, stairs, and around a patio at the residence of the chief of mission to the U.S. Mission to the European Union into compliance with Department residential safety standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. The Facility Manager will re-install barriers on the railings that have openings greater than 4 inches by May 2023.

**OIG Recommendation 9: Embassy Brussels should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them, in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation and is now compliant. The warehouse team emptied and sold the shipping containers that were used as storage. Embassy Brussels' ESO has one empty container that is used as needed to facilitate decertification processes. The only other containers are related to temporary projects and are not permanent.

**OIG Recommendation 10: Embassy Brussels should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. All Motorpool drivers and incidental drivers from the Department of State comply with the established medical and training guidelines. Several other agencies do not currently comply and Post is working with

the Legal Advisor's Office in Washington to clarify whether other agency compliance is mandatory or whether other agencies may submit their own medical and training certifications to Post. As with many embassies around the world, the Brussels Tri-Mission tries to balance the imperatives of Ambassadors' schedules with budget and staffing realities and is focused on improving scheduling to avoid going over the 10-hour limit on driver duty.

**OIG Recommendation 11: Embassy Brussels should bring its property management program into compliance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. The GSO and Facilities teams have identified and secured an area to house the Facilities section's expendable supplies. We will transition these expendables to this new secure area as soon as the necessary shelving is available. Post anticipates having this completed by the end of the calendar year 2023. The IMO has instituted the use of the loanable property module to track the issuance of mobile phones and other mobile devices. The loanable property module for BRUIT complies with the OIG recommendation.

**OIG Recommendation 12: Embassy Brussels should close out procurement files in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. The GSO Procurement Section has already made strides to close files in a timelier manner and address the backlog. We will incorporate close-out actions as part of the annual Merit Based Compensation evaluation process to ensure agents take the required time to complete the closeouts. We are also hiring a temporary employee to manage the administrative backlog of closing e-files. The GSOs will also focus additional time on this as a labor-intensive process for which current resources do not meet the demand. Post appreciates OIG's acknowledgement during the inspection that close-out of procurement actions is a worldwide problem for the Department and due in large part to the inadequacy of Department-mandated procurement software.

**OIG Recommendation 13: Embassy Brussels should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. Post has established new procedures to increase oversight of CORs and GSO has identified training programs for all CORs related to documentation and correspondence with contractors. Work allocation changes in the Procurement Section should allow the Supervisor to spend more time on COR oversight.

**OIG Recommendation 14: Embassy Brussels should perform regular reviews of the locally employed staff contracting officer's transactions, in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation and is now compliant. The GSO contracting supervisor conducts a review of the LE Staff contracting officer approvals. The

electronic records of these reviews are sent to the S/GSO on a quarterly basis. Post has requested ILMS support to establish an automated system to complete these reviews. Currently, this is not an option. Therefore, the review is a more labor-intensive, manual process.

**OIG Recommendation 15: Embassy Brussels should submit its living quarters expenditure reports in accordance with Department standards. (Action: Embassy Brussels)**

**REVISED Management Response** Embassy Brussels and USNATO do not concur with this recommendation and request this recommendation is transferred exclusively to USNATO's Inspection Report. As noted in the response to Recommendation # 5, approximately 38 DOD personnel under USNATO COM authority receive DOD-administered LQA. The Department of the Army (DA) serves as the Executive Agent for most DoD civilian employees at USNATO; therefore, they are subject to the policies and procedures established by DoD and DA. The Civilian Human Resources Agency (CHRA) Overseas Entitlement Division (OED) is the Army's responsible office for the administration and payment of LQA covering USNATO DoD civilian employees and for reporting on the allowances. CHRA-Europe (CHRA-E), OED captures LQA expenditures for the previous year at the beginning of the new year through an electronic database then sends the information to Headquarters, Department of the Army, Assistant G-1 for Civilian Personnel, who in turn submits the information to the Department of State.

**OIG Recommendation 16: Embassy Brussels should submit its hotel and restaurant surveys to the Bureau of Administration's Office of Allowances in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. Updated foreign per diem rate surveys were conducted and submitted to A/OPR/Allowances on December 10, 2022, for hotels and restaurants in Brussels, Antwerp, SHAPE, and six other locations. The new rates were published in eAllowances on February 1, 2023. In the future, GSO/TVC will conduct and submit foreign per diem rate surveys to A/OPR in accordance with Department standards.

**OIG Recommendation 17: Embassy Brussels, in coordination with the Bureaus of the Comptroller and Global Financial Services, Global Talent Management, and European and Eurasian Affairs, should implement a plan to fully fund the locally employed staff defined benefit pension plan to comply with Belgium's labor laws and address long-term funding concerns. (Action: Embassy Brussels, in coordination with CGFS, GTM, and EUR)**

**Management Response:** Post concurs with this recommendation. FMO and HRO teams proactively review the funding needs for the local staff defined benefits plan to meet the minimum funding level of 25% funded and to comply with local law. An independent audit of the plan will take place in FY23. Above-the-target budget needs for the current and following fiscal years are communicated to the EUR bureau budget office as soon as identified. Post also requested GTM/OE conduct an urgent review of the current plan, but GTM/OE has indicated that competing priorities preclude a review at this time. EUR has funded any over-the-target funding requests related to the plan to ensure the plan is funded in accordance with local law.

JAS Management will continue to urge the Department to review the plan with the goal of closing it to new entrants and replacing it with a defined contribution plan.

**OIG Recommendation 18:** **Embassy Brussels, in coordination with the Bureaus of European and Eurasian Affairs and the Comptroller and Global Financial Services, should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions, in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Brussels, in coordination with EUR and CGFS)**

**Management Response:** Post concurs with this recommendation. FMO will review all JAS IT USDH positions with IMO to identify the appropriate number of positions to be transferred from State Program funding to ICASS funding. We plan to present our analysis and proposal to the ICASS Council for approval in May 2023. Once approved, we will work with EUR on the budget transfer related to these positions.

**OIG Recommendation 19:** **Embassy Brussels should implement a schedule to require alternate cashiers to serve as principal cashier, in accordance with Department guidelines. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. In November 2022, we started a regular on-the-job training program to rotate two more alternate cashiers to serve as principal cashier.

**OIG Recommendation 20:** **Embassy Brussels should cease paying for residential internet for vacant residences that do not have an alarm system connected to internet, in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post does not concur with this recommendation. Post acknowledges its intent and is analyzing options for minimizing the overall cost to the USG. However, as noted during the inspection, post is only bridging coverage to ensure residence-based internet services remain in place to protect USG property for the one third of the housing pool that currently has internet-based alarms, something that will soon be the case for all residences in the interagency housing pool. Post never covers the costs of employee home internet.

**OIG Recommendation 21:** **Embassy Brussels should categorize, assess, and authorize its locally developed applications in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. Prior to OIG's arrival, Post started working on retiring locally-developed applications and getting ATO approval for the remaining applications. This process is ongoing. Post will adhere to all Department standards with new applications.

**OIG Recommendation 22: Embassy Brussels should replace the unauthorized wireless access points operating within its facilities with an approved wireless network. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. Post is preparing to go live with Enterprise Wi-Fi in the late March 2023. Once Enterprise Wi-Fi is live and fully cleared for use by Diplomatic Security, all unauthorized wireless access points will be decommissioned.

**OIG Recommendation 23: Embassy Brussels should establish the capability for dedicated internet network end users to access the network with unique accounts in accordance with Department standards. (Action: Embassy Brussels)**

**Management Response:** Post concurs with this recommendation. Post is removing all DIN/NEN networks and moving workloads and business functions to MID and our new enterprise Wi-Fi system with guest isolation and security governance.

**OIG Recommendation 24: Embassy Brussels, in coordination with the U.S. Mission to the North Atlantic Treaty Organization, should obtain proper approval for its video conferencing system in accordance with Department standards. (Action: Embassy Brussels, in coordination with USNATO)**

**Management Response:** Post concurs with this recommendation. Post expects to obtain CCB approval for this video conferencing equipment by May 2023.

**OIG Recommendation 25: Embassy Brussels, in coordination with the U.S. Mission to the European Union and the U.S. Mission to the North Atlantic Treaty Organization, should implement a records management program that complies with Department standards. (Action: Embassy Brussels, in coordination with USEU and USNATO)**

**Management Response:** Post concurs with this recommendation. The Tri-Mission has issued a management notice reiterating records management requirements and will continue to work with all relevant sections to retire records on schedule. Regarding archiving of messages sent and received using non-government electronic messaging systems such as WhatsApp, this is a global issue and the Brussels Tri-Mission is helping lead Department efforts to archive these systems. Post has worked with users to reinforce Department standards on archiving such messages and will continue to do so, but Post also notes this will continue to be an issue for all missions until it is addressed at the Departmental level.



UNITED STATES PERMANENT REPRESENTATIVE  
ON THE  
NORTH ATLANTIC COUNCIL

DATE: April 26, 2023

FROM: Ambassador Julianne Smith, Chief of Mission, USNATO

TO: OIG – Arne Baker, Acting Assistant Inspector General for Inspections

SUBJECT: Response to All Recommendations from ***Draft OIG Report: Inspection of the U.S. Mission to the North Atlantic Treaty Organization*** (originally transmitted March 23, 2023); and Response to Recommendations 5 and 15 from ***Draft OIG Report: Inspection of Embassy Brussels, Belgium*** (originally transmitted March 10, 2023; and revised with Recommendations transferred to action for USNATO on April 3, 2023)

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The U.S. Mission to NATO has also reviewed Recommendations 5 and 15 from the draft OIG inspection report ***Inspection of Embassy Brussels, Belgium*** which were transferred for action to the U.S. Mission to NATO. We provide the following comments in response.

**OIG Recommendation 5 (Transferred from Embassy Brussels, Belgium to USNATO):**

**Recommendation 5:** Embassy Brussels, in coordination with the U.S. Mission to the North Atlantic Treaty Organization, should require that all residences are inspected and certified in the Post Occupational Safety and Health Officer Certification Application in accordance with Department standards. (Action transferred from Embassy Brussels to USNATO)

**Management Response:** USNATO does not concur with this recommendation. All residences in Tri-Mission Brussels' JAS-managed housing pool are inspected and certified in the POSHO application in accordance with Department of State standards, and this covers housing for all USNATO personnel from the Departments of State and Homeland Security, as well as some DoD personnel.

Other DoD personnel at USNATO, however, who receive DOD-administered LQA or OHA, obtain their housing support from the US Army Garrison in Belgium and therefore follow DoD procedures for inspections. There are approximately 38 civilians and 46 military members under USNATO COM authority who currently receive living quarters allowance (LQA) or overseas housing allowance (OHA) from the Department of Defense and are not assigned to government housing. The Department of Defense (DoD) establishes policy and requirements for housing safety inspections and for allowances. The Department of the Army (DA) serves as the Executive Agent for those DoD civilian employees at USNATO, who are subject to the policies and procedures established by DoD and DA. Likewise, allowances for military members are administered by DoD and the military departments. Mission notes that, as indicated in the Department of State/Department of Defense Memorandum of Agreement Annex B, DOD personnel in LQA are under COCOM responsibility for residential security.

**OIG Recommendation 15 (Transferred from Embassy Brussels, Belgium to USNATO):**

**Recommendation 15:** Embassy Brussels should submit its living quarters expenditure reports in accordance with Department standards. (Action transferred from Embassy Brussels to USNATO)

**Management Response:** USNATO does not concur with this recommendation as it applies to DoD personnel receiving DOD-administered LQA. As noted in the response to Recommendation # 5, approximately 38 DOD civilian personnel under USNATO COM authority receive DOD-administered LQA. The Department of the Army (DA) serves as the Executive Agent for most DoD civilian employees at USNATO; therefore, they are subject to the policies and procedures established by DoD and DA. The Civilian Human Resources Agency (CHRA) Overseas Entitlement Division (OED) is the Army's responsible office for the administration and payment of LQA covering USNATO DoD civilian employees and for reporting on the allowances. CHRA-Europe (CHRA-E), OED captures LQA expenditures for the previous year at the beginning of the new year through an electronic database and then sends the information to Headquarters, Department of the Army, Assistant G-1 for Civilian Personnel, who in turn submits the information to the Department of State.

## ABBREVIATIONS

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COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
EU	European Union
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
LE	Locally Employed
NATO	North Atlantic Treaty Organization
OBO	Bureau of Overseas Buildings Operations
POSHO	Post Occupational Safety and Health Officer
USEU	U.S. Mission to the EU
USNATO	U.S. Mission to NATO

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