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Office of Inspector General
United States Department of State

ISP-I-23-22

Office of Inspections

July 2023

Inspection of Embassy Lomé, Togo

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-23-22

What OIG Inspected

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

What OIG Recommends

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

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What OIG Found

- The Ambassador and the Deputy Chief of Mission emphasized clear communication, accessibility, inclusiveness, and work-life balance as they implemented an active agenda in support of the Integrated Country Strategy's goals and objectives.
- Embassy Lomé's operational tempo increased in 2022 with an uptick in violent extremism in Togo's north and an increase in foreign assistance designed to counteract the threats.
- The Political-Economic Section served as a de facto "secretariat" for a growing number of official visitors, which affected the section's capacity to carry out its advocacy and reporting responsibilities.
- Embassy Lomé's grant files did not comply with the Department of State's Federal Assistance Directive documentation requirements.
- Embassy Lomé's safety, health, environmental management, and fire protection programs did not fully comply with Department standards.
- Missing administrative policies and standard operating procedures hampered human resources operations.
- Embassy Lomé's records management program did not comply with Department standards for the oversight, organization, and retirement of embassy records.

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CONTEXT



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

Togo is a country of 8.5 million people approximately the size of West Virginia. Stretching 370 miles from north to south and averaging 56 miles in width, Togo is bordered on the west by Ghana, on the east by Benin, on the north by Burkina Faso, and in the south by the Bight of Benin on the Atlantic Ocean. The United States established diplomatic relations with Togo in 1960, following its independence from French-administered trusteeship. In 1963, Togo experienced Africa's first post-independence presidential assassination during a military-led coup that formally installed Eyadema Gnassingbe, one of the coup leaders, as president in 1967. On Eyadema's death in 2005, his son Faure came to power in what was considered a flawed election. However, the international community found subsequent presidential and parliamentary elections to be

generally free and fair. The country recently adopted constitutional reforms limiting presidential candidates to two terms, but these reforms were not retroactive, allowing President Faure Gnassingbe to stand for re-election in 2025.

Togo has a market-oriented economy, and the United States and Togo have a treaty on investment and economic relations. Togo is working with the United States and other development partners to improve the investment climate and commercial infrastructure. With West Africa's deepest natural port and its role as a regional aviation hub, Togo hopes to attract investment in its transportation infrastructure to become a major transportation and logistics hub.

Togo faces rising security threats from Al-Qaeda and ISIS affiliates in Mali and neighboring Burkina Faso. Attacks in Togo's northern-most province have grown more numerous, more sophisticated, and more violent since they began in November 2021. Togo's military and police force so far have prevented the violent extremists from holding Togolese territory. Togo also contributes troops to United Nations peacekeeping operations in other parts of Africa.

Embassy Lomé's FY 2022-FY 2026 Integrated Country Strategy (ICS), approved March 2022, defines the embassy's four strategic goals as:

- Advance peace, security, and stability.
- Promote trade and economic growth.
- Strengthen governance and democratic institutions.
- Support opportunity and development.

U.S.-provided foreign assistance to Togo focuses on health and food security, military and police education and training, and the promotion of economic growth. Although Embassy Lomé administers approximately \$1.3 million in small grants, most U.S. foreign assistance funds,

many of which are allocated to multi-year programs, are centrally managed by the Department of State (Department) or other U.S. government agencies. Centrally managed assistance programs include: a \$35 million Millennium Challenge Corporation (MCC)¹ Threshold Program grant to promote reforms that strengthen the market economy and build institutional capacity; a \$20 million, 5-year Department of Agriculture McGovern-Dole food assistance program that is expected to reach 66,600 students and 8,000 pregnant and lactating women over the next several years; \$11 million in U.S. Agency for International Development (USAID)-administered President's Emergency Plan for AIDS Relief² funding to help Togo achieve United Nations HIV/AIDS targets; and \$300,000 in Department of Defense-implemented International Military Education and Training³ funds that target professionalization of the military. In April 2022, the Biden Administration also identified part of coastal West Africa, including Togo, as a priority region pursuant to the 2019 Global Fragility Act (GFA), which focuses on stabilizing conflict-affected areas and preventing violence, with funding targets yet to be determined.⁴

At the time of the inspection, Embassy Lomé's authorized staff included 35 U.S. direct-hire staff, over 185 locally employed (LE) staff, and 5 eligible family members. Other agencies represented at the embassy included MCC, USAID, the Department of Defense, and the Peace Corps. The embassy also had 150 contract security guards. As a result of Togo's COVID-19 posture, Embassy Lomé remained on a remote work status and limited operations from April 2020 until March 2022, when it resumed full embassy functions.

OIG evaluated the embassy's executive direction, policy and program implementation, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980.⁵ A related classified inspection report discusses the embassy's security program and issues affecting the safety of mission personnel and facilities.

¹ Congress created the Millennium Challenge Corporation (MCC) in 2004 as an independent U.S. foreign assistance agency. The MCC Threshold Program assists select countries by awarding grants focused on policy and institutional reforms that come close to passing MCC's eligibility criteria and show a firm commitment to improving their policy performance.

² The Department's Office of the U.S. Global AIDS Coordinator and Health Diplomacy manages and leads the President's Emergency Fund for AIDS Relief (PEPFAR). Seven U.S. government departments and agencies implement the program. Implementing partners include nongovernmental organizations and government of Togo entities.

³ International Military Education and Training (IMET) is a Defense Security Cooperation Agency program. The Secretary of State determines which countries will have IMET programs while the Secretary of Defense executes the programs to advance U.S. defense and foreign policy interests by building the capacity of foreign partners to encourage and enable allies and partners to respond to shared challenges.

⁴ On May 20, 2019, Congress passed the Global Fragility Act "to establish the interagency Global Fragility Initiative to stabilize conflict-affected areas and prevent violence." The Department then selected priority countries and regions for implementation. Under this framework, President Biden announced in April 2022 the U.S. government's partnership with the coastal West African countries of Benin, Côte D'Ivoire, Ghana, Guinea, and Togo to advance the U.S. Strategy to Prevent Conflict and Promote Stability.

⁵ See Appendix A.

EXECUTIVE DIRECTION

OIG assessed leadership based on interviews, staff questionnaires, and OIG's review of documents and observations of embassy meetings and activities during the on-site portion of the inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived at Embassy Lomé in March 2022. Immediately prior to her appointment as Ambassador to Togo, she was the acting Principal Deputy Assistant Secretary for the Bureau of African Affairs. The Deputy Chief of Mission (DCM), a career member of the Foreign Service, arrived in June 2022. His previous assignment was as a student at the U.S. Army War College in Carlisle, Pennsylvania.

OIG found the Ambassador and the DCM exemplified the Department's leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214b.⁶ Staff told OIG that the Ambassador and the DCM were a "highly functional Front Office" team, complementing each other's skills, with the Ambassador as chief executive officer and the DCM as chief operating officer. Almost every U.S. direct-hire employee at the embassy at the time of the inspection was serving for the first time in their respective roles, including the Ambassador and the DCM. The Front Office supported first-time section leaders as they tried new approaches and learned from their mistakes. OIG observed that the Ambassador communicated clearly and decisively during meetings. She and the DCM paid particular attention to LE staff complaints about a longstanding compensation issue, hosting a listening session and committing to transparency in future situations affecting their equities. The Ambassador also circulated a "Prioritization Questionnaire" which allowed staff to rank embassy policy priorities for the next 12 to 18 months and to provide the Front Office with feedback on staffing and resource constraints that might prevent them from achieving related goals. Embassy staff described to OIG how the Ambassador fostered collaboration among agencies at the embassy. Interviewees described her as inclusive and equitable, inviting other agency personnel to accompany her on in-country travel and to official ceremonies.

Although Lomé could be a difficult place to live, staff characterized the Ambassador and the DCM as leaders who focused on and cared about morale. Both the Ambassador and the DCM participated in Community Liaison Office and Marine Security Guard Detachment events. They also regularly hosted gatherings at their residences such as lunches for the entire Marine Security Guard Detachment and a public diplomacy lunch for Togolese students of English. The DCM was available to both U.S. and LE staff for unscheduled meetings on Fridays to discuss any concerns that they might have.

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

Execution of Foreign Policy Goals and Objectives

OIG found that the Ambassador fulfilled her responsibilities under 2 FAM 113.1c to oversee the embassy's strategic activities. The Ambassador hosted an offsite meeting in October 2022 at which staff reviewed the embassy's ICS, which the Department approved before her arrival. In addition to monitoring the progress toward achieving ICS goals, the Ambassador helped shape the framework document for implementation of the 10-year Strategy to Prevent Conflict and Promote Stability, a regional initiative under GFA. Additionally, the Ambassador leveraged the increased assistance available to Togo through GFA, the Department of Defense, USAID's Office of Transition Initiatives, MCC, and the Ambassador's Self Help Fund to advance ICS goals. For example, staff credited the Ambassador with explaining to Togo's government what it needed to do to advance the \$35 million MCC Threshold Program grant to improve access by its citizens to communications technology. The Ambassador also provided the support and oversight USAID's Office of Transition Initiatives contractor needed to implement programs to counter violent extremism by promoting social cohesion and assistance to grassroots community groups under threat.

Adherence to Internal Controls

OIG determined that the Ambassador and the DCM prepared the FY 2022 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1), which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. The most recent Statement of Assurance, signed by the Ambassador and the DCM, identified two significant deficiencies related to ineffective physical space and insufficient staffing. The Ambassador and the DCM involved all embassy sections in multiple review sessions with the Management Officer before submitting the statement.

During interviews, staff told OIG that both the Ambassador and the DCM were attentive to management issues and that the DCM conducted weekly reviews of the Consular Section's nonimmigrant visa adjudications in accordance with 9 FAM 403.12-1 and 2.

Security and Emergency Planning

The Ambassador's leadership of the embassy's security and emergency preparedness programs fully complied with 12 Foreign Affairs Handbook (FAH)-1 H-721a requirements that the chief of mission take responsibility for the security of embassy personnel. Staff told OIG that the Ambassador and the DCM were knowledgeable about and focused on employee security. In addition to the DCM's weekly meetings with the Regional Security Officer, he and the Ambassador met with the Regional Security Officer every other week to discuss the embassy's long term "security architecture." The Front Office also took part in radio checks and security drills and helped design scenarios for a planned crisis management exercise.

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

OIG found that the Ambassador and the DCM supported Equal Employment Opportunity practices consistent with 3 FAM 1511.1a, 3 FAM 1514c(3)a and c, and cable 21 STATE 60514.⁷ The embassy named a First- and Second-Tour (FAST) specialist to be its new Equal Employment Opportunity counselor, but at the time of the inspection she was awaiting formal training before being able to assume the role.

Embassy staff described the Ambassador and the DCM as personally invested in making diversity, equity, inclusion, and accessibility (DEIA) principles central to their leadership, consistent with guidance in 22 STATE 13392.⁸ The Ambassador hosted a lunch with Togolese LGBTQ activists to discuss the country's repressive laws and discrimination. She also raised with Togo's President his government's discrimination against the country's Fulani minority. The DCM hosted a program celebrating Hispanic American contributions to the United States and planned events for Black History Month. In June 2022, the embassy established a DEIA council, chaired by the DCM, that reflected the embassy's diversity. OIG learned during a meeting with FAST employees that the DCM also incorporated discussion of DEIA principles into his monthly lunches as part of their professional development.

Developing and Mentoring Foreign Service Professionals

OIG found that the embassy had an active FAST mentoring and professional development program in accordance with 3 FAM 1214b(8) and 3 FAM 2242.5a and b. Staff told OIG the DCM was an outstanding mentor, especially with FAST employees. He sometimes invited outside speakers to his monthly lunches for FAST employees to expand their understanding of issues from diplomatic protocol to foreign assistance. In addition to his scheduled meetings with section chiefs, the DCM held "Mentoring Mondays" to allow both U.S. direct-hire and LE staff to discuss any issues with him without an appointment. The DCM viewed members of the Marine Security Guard Detachment as prospective Foreign Service employees and served as their informal mentor should they be interested in joining the Foreign Service in the future.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Lomé's coordination of foreign assistance programs and the policy and program implementation work performed by the Political-Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements for policy and program implementation but found issues in foreign assistance grants documentation and consular operations, as discussed below.

⁷ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment 6-11-2021," June 11, 2021.

⁸ Cable 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices," February 22, 2022.

Foreign Assistance

U.S. assistance to Togo increased from approximately \$4.04 million in FY 2017 to \$6.25 million in FY 2021. The Millennium Challenge Corporation and non-resident agencies, including USAID and the Departments of Agriculture and Defense, administered most of this assistance. However, the Political-Economic Section directly managed some foreign assistance programming, including a \$250,000 grant from the Africa Regional Democracy Fund, a \$9,667 Bureau of Oceans and International Environmental and Scientific Affairs-funded grant for mangrove restoration, and 20 small grants supported by the Ambassador's \$75,000 Self-Help Fund. Overall, OIG found the embassy implemented required procedures for its foreign assistance grants in accordance with applicable laws and Department guidance. As discussed below, the embassy coordinated foreign assistance as required, but its capacity to manage expected growth in foreign assistance programs was a concern. Additionally, also as discussed below, OIG found Embassy Lomé did not comply with requirements for grant documentation.

Embassy Coordinated Foreign Assistance as Required, but Capacity Was Limited to Manage Expected Growth

OIG found that the Front Office coordinated foreign assistance in accordance with 1 FAM 013.2k(6) and 2 FAM 113.1c(3) and (4), but the embassy's capacity to manage additional funding was limited. Front Office and Political-Economic Section staff coordinated with interagency representatives in weekly Country Team meetings, during frequent informal interactions, and at critical decision points, which agencies told OIG they valued. Department officials commended the Ambassador's and Political-Economic Section's engagement with the Department and interagency community to obtain additional personnel and to shape the spend plan to allocate foreign assistance for the Strategy to Prevent Conflict and Promote Stability. In addition, the Political-Economic Section collaborated with USAID and MCC on economic reforms and human rights programming and advocacy. The section also kept embassy leadership informed about the equities of the Washington-managed assistance programs mentioned earlier. With the October 2022 arrival of a Bureau of International Narcotics and Law Enforcement Affairs Regional Coordinator based in Cotonou, Benin, after a 14-month gap in the position, the embassy looked forward to initiating in-country police and justice sector programming. Additionally, during the inspection, USAID was in the process of hiring a Global Fragility Act personal services contractor coordinator, whose arrival was anticipated by summer 2023.

Through interviews and observations OIG found that even with this staff augmentation, the Political-Economic Section had concerns about its capacity to manage expected growth in foreign assistance programs. For example, the lack of capacity led the embassy in 2022 to decline additional Department-proposed security assistance funding. In FY 2023, the embassy anticipated receiving additional GFA-related funding, as well as increased foreign assistance with a new MCC compact under development and potential new programming from the Bureau of International Narcotics and Law Enforcement Affairs and the Department of Agriculture. The Ambassador and the DCM acknowledged that the Front Office would need to play a more

active coordination and oversight role to manage the growing volume and complexity of foreign assistance and ensure adequate administrative support.

Embassy Did Not Comply With Federal Assistance Directive Requirements for Grant Documentation

OIG found that, although staff documented site visits, ongoing communication, and follow-up with grantees, the official award files did not include documentation supporting the issuance and management of awards in compliance with the Federal Assistance Directive (FAD).⁹ OIG reviewed 7 of the 20 Ambassador's Self Help Fund grants and the Africa Regional Democracy Fund grant with periods of performance, respectively, from October 1, 2021, to September 30, 2022, and from October 1, 2022, to September 30, 2023. All electronic files OIG reviewed in the State Assistance Management System online grants database were missing required performance, financial, and grants officer representative reporting. Although Political-Economic Section staff followed proper processes to award and monitor these grants, they did not upload all required grants documentation from paper files into the system as required by the FAD. Staff explained that compliance with FAD recordkeeping requirements decreased during the COVID-19 pandemic when staff had limited access to their offices. Failure to properly maintain grants files risks the misuse or waste of U.S. government funds.

Recommendation 1: Embassy Lomé should bring its grants program into compliance with Department standards. (Action: Embassy Lomé)

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, and Leahy vetting¹⁰ and found the section generally complied with Department standards. OIG determined that the embassy's reporting and diplomatic engagement supported ICS and Department goals. OIG reviewed 40 embassy cables sent from January 2022 through January 2023 and found reporting to be timely, relevant, and appropriately sourced. Washington end-users told OIG the section's reporting and advocacy were responsive to policy priorities, citing reporting on human rights and advocacy in shaping the GFA strategy. The section maintained a detailed activity tracker, which also functioned as a reporting plan and a log for cables, visits, and other work keyed to ICS goals.

⁹ The Federal Assistance Directive (FAD) establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts administering federal financial assistance and is updated annually by the Bureau of Administration, Office of the Procurement Executive. Grants reviewed by OIG were subject to FAD, Version 4.0, effective October 1, 2019, through October 20, 2020; FAD, Version 5.0, effective October 21, 2020, through October 7, 2021; and FAD, Version 6.0, which took effect on October 8, 2021.

¹⁰ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the United States from furnishing certain assistance to a unit of a foreign security force if the Department has credible information that the unit has committed a gross violation of human rights. 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. See 22 United States Code (U.S.C.) § 2378d and 9 FAM 303.8-5(B). The Department also 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.

Based on interviews with Washington stakeholders and interagency partners in Lomé, as well as observations of interagency meetings, OIG found the section fostered interagency cooperation, particularly with non-resident agencies implementing assistance programs in Togo. The embassy conducted 640 Leahy vetting searches in 2022, in compliance with Department standards. However, while preparing for the inspection, OIG and the Bureau of Democracy, Human Rights, and Labor advised the Political-Economic Section that its written 2018 Leahy vetting policy was out of date. Because the embassy issued an updated policy during the inspection, OIG did not make a recommendation to address this issue.

Political-Economic Section's Operational Tempo Surged While Capacity Remained Static

The Political-Economic Section's operational tempo increased in 2022 following a series of attacks and threats from violent extremist organizations in Togo's north. Responding to the threats generated a commensurate surge in the section's policy and resource advocacy, internal embassy and interagency coordination, program development, and support for official visits in 2022 and early 2023. Much of the additional work stemmed from the embassy's role in shaping the GFA and its Strategy to Prevent Conflict and Promote Stability, as mentioned earlier. At the same time, the Front Office and the Political-Economic Section enhanced their coordination with the United States Africa Command and the U.S. Special Operations Command Africa for the deployment of a training detachment to increase Togolese military capacity to counter threats from violent extremists.

The Political-Economic Section's three direct-hire staff and one eligible family member also served as the embassy's "secretariat" for Department and interagency visitor support. Staff told OIG they were challenged to keep up with the growing visitor workload. In addition, staff noted that inadequate administrative resources and an inefficient, ad hoc Front Office visitor clearance process meant that the Political-Economic Section coordinated virtually all aspects of visitor support, which limited the time that staff had available for core reporting and advocacy. The Ambassador recognized the concerns and desirability of a better visitor support structure. Despite the surge in visitor support, the double encumbrance of one of the two FAST officer positions since spring 2022 enabled the section to dedicate officer time to economic and commercial advocacy. However, the section's second FAST officer position will not be renewed when the incumbent transfers in summer 2023, and the eligible family member's departure at the same time with no guarantee of a similarly skilled replacement, will reduce cleared U.S. staff from four to two. However, the Front Office and the Political-Economic Section chief successfully advocated for two additional positions from other agencies to absorb some of the section's coordination and programmatic functions and expand the embassy's capacity to manage foreign assistance.¹¹

¹¹ The new positions are a National Guard Bilateral Affairs Officer, who arrived August 2022 to handle some security assistance matters, and an USAID GFA country coordinator, expected by summer 2023.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's leadership and management, strategic planning and reporting, American Spaces,¹² grants administration, educational and cultural programs, and media engagement. The Public Affairs Officer was the sole U.S. direct-hire employee in the section. In addition, the embassy filled three of the section's eight authorized LE staff positions in the month prior to the inspection. OIG found the staff, including the new employees, to be familiar with, and appropriately focused on, the embassy's strategic goals and how the Public Diplomacy Section contributed to them. The section also planned to expand its press efforts with one of its newly hired LE staff members focusing on press and social media issues. At the time of the inspection, a coordinator and educational advisor had just begun work at the embassy's new Emerging Voices Center,¹³ located on the compound. The section had yet to determine access controls to the new center, based on local security conditions, with other Department and embassy elements. Overall, OIG found the section met Department standards and guidance, with the exception discussed below.

Public Diplomacy Grants Did Not Comply With Federal Assistance Directive Requirements for Documentation

OIG reviewed nine (total value \$1.1 million) of 46 grants¹⁴ (total value \$1.6 million) from FY 2021 and FY 2022 and found grants supported embassy goals but did not always comply with the FAD. OIG's review included two new \$250,000 grants funded by the Department's Economic Support Fund through the GFA's Strategy to Prevent Conflict and Promote Stability. The staff discovered prior to the inspection that an FY 2021 grantee did not use all its funding due to COVID-19-related delays and other factors, and on February 10, 2023, the section formally notified the grantee to return \$21,000 to the U.S. government. Seven of the nine grants which OIG reviewed were missing some documentation required in the online grants database system, including grants officer representative designation memos. Acknowledging the difficulty of managing its large number of grants with limited staff, section employees told OIG they were planning to issue fewer grants in the future to facilitate closer oversight. Because the section addressed the problem with the delinquent grantee, complied with the FAD on its new grants, and uploaded all required documentation for other open grants at the time of the inspection, OIG did not make a recommendation to address this issue.

Consular Operations

OIG reviewed Embassy Lomé's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. During the inspection, Embassy Lomé debuted a refurbished outdoor applicant waiting area—a collaboration between the Consular and Facility

¹² American Spaces are Department-operated or -supported public diplomacy facilities that host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives. See 10 FAM 381 and 10 FAM 382a.

¹³ Embassy Lomé named its American Spaces facility "Emerging Voices Center."

¹⁴ The review included all grants valued at more than \$40,000.

Management staffs to clean and refurbish the space, repair walkways, and improve accessibility for visa applicants and U.S. citizens seeking services. Embassy Lomé experienced a surge in demand from Ghanaians and Nigerians seeking visa services in Togo due to the comparatively shorter wait time at Embassy Lomé. As the security situation in Togo grew more complicated, particularly in the north of the country, the Consular Section focused on reviving its American Liaison Network¹⁵ and improving outreach to U.S. citizens throughout the country.

During the inspection, the Consular Section corrected two issues identified by OIG. Specifically, Embassy Lomé:

- Updated required waiting room signage to include a current schedule of fees (7 FAH-1 H-713b) and the U.S. Government Fact Sheet on Female Genital Mutilation or Cutting (9 FAM 504.10-4(A)(1)).
- Instituted retention of panel physician inspection visit records (9 FAM 302.2-3(E)(3)).

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

Consular Information on Embassy Website Was Inaccurate and Out of Date

At the time of inspection, the consular services sections of Embassy Lomé's website contained inaccurate and out-of-date information on topics including legal and medical resources, the consular exchange rate, and the availability of visa appointments for non-Togolese citizens and residents. Guidance in 7 FAH-1 H-833a requires consular sections, in cooperation with public diplomacy sections, to maintain up-to-date public-facing websites. In addition, 7 FAM 337.1 and 7 FAM 991a require consular sections to update lists of medical and legal resources at least once every 3 years. Consular staff told OIG that website updates had been neglected for 3 years because of a long gap in consular chief leadership that coincided with the Department no longer offering support for website updates. Inaccurate and out-of-date consular information on the website can contribute to confusion among U.S. citizens and visa applicants seeking services and contribute to poor customer service.

Recommendation 2: Embassy Lomé should maintain the consular information on its website in accordance with Department standards. (Action: Embassy Lomé)

Embassy Did Not Resolve Fraud Referrals in a Timely Manner

At the time of the inspection, 21 of the 55 cases referred to the Consular Section's Fraud Prevention Unit in FY 2022 and the first 4 months of FY 2023 for review or action had been

¹⁵ An American Liaison Network, formerly known as the warden system, is a country-based network of volunteers composed of representatives from key U.S. citizen constituencies, including faith groups, business communities, retirees, and students. The program facilitates regular two-way communication between embassies and U.S. citizen constituencies abroad on topics such as security, health, voting, and travel. See 7 FAM 071a and b, 7 FAH-1 H-292.4, and 7 FAM 1812.1-2.

pending for more than 60 days, with the oldest case pending since July 2022. Guidance in 7 FAH-1 H-941.3b states that cases referred to fraud prevention units should be processed to conclusion within 60 days of receipt. The consular chief told OIG the section accumulated these backlogs due to the unanticipated prolonged absence of fraud staff and the inability to perform certain site visits due to COVID-19 travel restrictions. Failure to resolve referrals to the Fraud Prevention Unit in a timely manner delays the final adjudication of services for U.S. citizens applying for passports and other citizenship documentation and for foreign nationals applying for visas.

Recommendation 3: Embassy Lomé should resolve fraud referrals in accordance with Department standards. (Action: Embassy Lomé)

Alternate Accountable Consular Officer Did Not Complete Required Training

Embassy's Lomé's designated alternate Accountable Consular Officer (ACO)¹⁶ did not complete the required training courses for the position. Guidance in 7 FAH-1 H-632f requires ACOs and alternate ACOs to complete training on management controls and fee collection prior to assuming their roles. The consular chief told OIG that the alternate ACO, who is the chief of another embassy section, had not had time to complete the required training. Without the required training, the alternate ACO may be unfamiliar with the management controls required to oversee consular operations, elevating the risk of misfeasance or malfeasance in the Consular Section.

Recommendation 4: Embassy Lomé should require that all accountable consular officers complete required training. (Action: Embassy Lomé)

Consular Section Did Not Complete Namechecks for American Liaison Network Volunteers

OIG found that Embassy Lomé did not complete the required namechecks for the four volunteers recruited for its American Liaison Network. Guidance in 7 FAM 074c requires consular sections to perform namechecks on all prospective members of the American Liaison Network prior to having them sign memoranda of understanding to join the network, and annually thereafter. Consular staff told OIG they were unaware of the namecheck requirement. Failure to perform namechecks can leave consular sections unaware of potentially derogatory background information regarding their volunteers.

Recommendation 5: Embassy Lomé should conduct namechecks on members of the American Liaison Network in accordance with Department standards. (Action: Embassy Lomé)

¹⁶ The term "accountable consular officer" originally referred to accountability for consular fees but has been broadened to identify the officer(s) designated with daily oversight for internal controls.

RESOURCE MANAGEMENT

OIG reviewed operations and internal controls in human resources, facilities management, general services, and financial management. During the inspection, the embassy corrected several internal control issues identified by OIG. Specifically, the embassy:

- Reviewed \$343,000 worth of unliquidated obligations with no activity in the previous year and de-obligated invalid unliquidated obligations (4 FAM 225d).
- Conducted and submitted the 2022 housing rental benchmark survey to the Bureau of Overseas Buildings Operations (OBO) (15 FAM 212.6b).
- Prepared and updated the biennial housing guidelines (15 FAM 212.5).
- Updated and cleared policies related to embassy cashier services (Cashier User Guide 4.4.1.1) and cash movement (Cashier User Guide 4.4.1.3).
- Conducted the annual anti-nepotism review (3 FAM 8314).

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

Human Resources

Human Resources Unit's Lack of Standard Operating Procedures Hampered Key Operations

OIG found the lack of standard operating procedures in the Human Resources Unit hampered operations in key areas such as eligible family member employment, LE staff position management, recruitment, time and attendance, and conduct-related issues. For example, staff in several embassy sections told OIG that delays in posting vacancy announcements and responding to requests for employment information, combined with mistakes in hiring procedures, led to months-long LE staff and eligible family member vacancies. In some cases, positions remained unfilled for more than a year even when a qualified candidate had been identified. The Government Accountability Office's *Standards for Internal Control in the Federal Government*,¹⁷ Principle 3.10, states that effective documentation assists in promoting internal controls by establishing and communicating responsibilities to personnel and providing a means to retain organizational knowledge. Furthermore, 18 FAM 301.1-4 states that program management involves thoughtful planning and implementation of programs and processes in a manner that achieves intended goals and objectives. Staff told OIG that the lack of standard operating procedures was caused by competing priorities, staff turnover, long-standing vacancies during the COVID-19 pandemic, and a lack of LE staff cross-training. In addition, LE staff had COVID-imposed limitations on in-office presence and inadequate access to Department computer systems while teleworking. Finally, staff also told OIG the pandemic severely restricted support and training provided by the Regional Human Resources Officer, located at Embassy Abidjan, Cote d'Ivoire. The absence of standard operating procedures for

¹⁷ Government Accountability Office, *Standards for Internal Control in the Federal Government*, Principle 3.10, page 29 (GAO-14-704G, September 2014).

key business processes reduced the Human Resources Unit's efficiency and created risks that critical responsibilities such as hiring and position management would not be carried out effectively.

Recommendation 6: Embassy Lomé should implement standard operating procedures for key human resources processes, including eligible family member employment, locally employed staff position management, recruitment, time and attendance, and conduct-related issues. (Action: Embassy Lomé)

Facilities Management

Embassy Safety, Health, and Environmental Management Program Did Not Comply With Department Standards

OIG found Embassy Lomé's safety, health, and environmental management (SHEM) program did not fully comply with Department standards. Specifically, the embassy did not:

- Complete an annual written assessment of the SHEM program and submit it to OBO by December 31 each year (15 FAM 968d).
- Conduct required workplace safety training of management officials¹⁸ and supervisors to enable them to administer a proper SHEM program (15 FAM 965e and g) and maintain corresponding training records (15 FAM 965k).
- Coordinate with OBO's SHEM office to complete or enter safety certifications for three of the embassy's non-residential properties in the Department's POSHO Certification Application¹⁹ (15 FAM 971).
- Hold semiannual SHEM committee meetings and maintain and distribute meeting minutes (15 FAM 933.2a).

Embassy staff told OIG they were unaware of some requirements and that other factors, including staffing changes and restrictions on operations caused by the COVID-19 pandemic, contributed to their failure to follow Department standards. Failure to comply with the Department's safety, health, and environmental management standards increased the risk of injury and loss of life.

Recommendation 7: Embassy Lomé, in coordination with the Bureau of Overseas Buildings Operations, should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

¹⁸ According to 15 FAM 965e, the term "management officials" includes DCMs, management counselors and officers, general services officers, and others.

¹⁹ The POSHO Certification Application generates and documents the form used by post occupational safety and health officers to certify that a residential property meets the requirements of 15 FAM 312.6-2. The form lists the safety requirements that must be certified prior to occupancy. The application allows relevant documentation to be electronically attached to the form.

Embassy Fire Protection Program Did Not Fully Comply With Department Standards

OIG found Embassy Lomé's fire protection program did not fully comply with Department standards. Specifically, the embassy did not:

- Have adequate storage for flammable and hazardous commodities. OIG found that the embassy stored flammable materials on open shelves in the warehouse near other supplies and equipment and in unsecured locations on the embassy compound. According to 14 FAH-1 H 313.1-2e, flammable material stored in a warehouse should be in a fire-resistant enclosure and separated from other supplies. Additionally, 15 FAM 833a requires that combustible and flammable materials be properly secured and stored to prevent their use as weapons of opportunity.
- Correct all deficiencies identified in the latest OBO Fire and Life Safety Inspection Report. OIG found multiple open recommendations remained from the 2019 OBO report. According to 15 FAM 813.3c and d, embassy personnel must correct discrepancies on a priority basis and submit all results to OBO's Office of Fire Protection not later than 1 year from the date of the inspection.
- Visually inspect its fire extinguishers monthly and record dates on the inspection tags. OIG checked the inspection tags on all fire extinguishers at the embassy and found none showed evidence of the monthly inspection required in 15 FAM 843c; some extinguishers had not been checked since 2019. Additionally, OIG examined fire extinguishers at 33 percent of the embassy's residences and found no evidence that residential occupants conducted the monthly visual inspection required in 15 FAM 843d.

Embassy staff told OIG they were unaware of some requirements and that other factors, including a lack of qualified experts in the region to perform fire equipment inspections and delays in procuring protective storage equipment, contributed to these issues. The lack of inspections, failure to properly store flammable materials, and failure to correct all reported fire prevention deficiencies increased the risk of injury and loss of life.

Recommendation 8: Embassy Lomé, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

General Services

Embassy Property Controls Did Not Comply With Department Standards

OIG found the embassy did not conduct quarterly spot checks of its expendable and nonexpendable property in accordance with Department standards. The embassy last performed an unannounced spot check of expendable property in September 2019 and nonexpendable property in July 2022. According to 14 FAM 411.2-2b(8), the accountable property officer must conduct quarterly unannounced spot counts of personal property stored in warehouses to verify the accuracy of property records. The embassy accountable property officer told OIG he was unaware of the requirement for quarterly unannounced spot checks for

both expendable and nonexpendable property. Failure to conduct and document regular spot checks leaves the embassy vulnerable to theft and can impact the accuracy of property inventories.

Recommendation 9: Embassy Lomé should conduct spot checks of its expendable and nonexpendable property in accordance with Department standards. (Action: Embassy Lomé)

Forklift Operators Lacked Required Refresher Training

OIG found that embassy forklift operators did not take refresher training in operating, maintaining, and storing powered industrial trucks, such as forklifts. OIG confirmed that seven forklift operators last took training in 2017. In accordance with 14 FAH-1 H-313.6-2c and d and 14 FAH-1 H-313.4a(2), forklift operators must be properly trained in operating, maintaining, and storing forklifts or other powered industrial trucks and take refresher training at least every 3 years. Embassy staff told OIG they were unaware of this requirement. Failure to ensure proper employee training in the use of powered industrial trucks creates a potential workplace safety hazard.

Recommendation 10: Embassy Lomé should comply with Department training standards on the use of powered industrial trucks, such as forklifts. (Action: Embassy Lomé)

Unauthorized Use of Shipping Containers on Embassy Compound

OIG found Embassy Lomé used four shipping containers on the embassy compound as permanent storage space without OBO authorization. The embassy used the shipping containers to store property such as appliances, patio chairs, and leftover contractor supplies originally scheduled to be auctioned off in October 2022. The auction was delayed, and the embassy continued to store the property until the next planned auction. The Department issued guidance in September 2018 and October 2021²⁰ stating that it did not support using shipping containers as occupied structures or to accommodate functional space needs. According to 15 FAM 641b(10),²¹ embassies must obtain prior approval from OBO to procure, place, or construct nonpermanent structures, including modular or prefabricated units. Embassy staff told OIG they were unaware of these requirements. Using unapproved shipping containers that do not meet the required building and fire codes for permanent storage and functional space needs increases the risk of damage to U.S. government property and puts employees' safety at risk.

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

²¹ This section of the FAM was updated in April 2023, after fieldwork for this inspection concluded. The new citation for this criteria is 15 FAM 643e and 15 FAM 644c(11).

Recommendation 11: Embassy Lomé should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage or remove them in accordance with Department standards. (Action: Embassy Lomé)

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. At the time of the inspection, the embassy had eight CORs who oversaw 13 contracts valued at nearly \$2 million. OIG reviewed the contracts and found that only one COR had a current certification issued by the Department's Office of the Procurement Executive, as required by 14 FAH-2 H-143a. In addition, seven CORs had not completed the mandatory training required by 14 FAH-2 H-143.1. Embassy staff told OIG the failure to meet COR program requirements occurred due to unfamiliarity with certification and training standards. Despite these issues, OIG found through staff interviews and reviews of other documentation that the embassy monitored the contracts, received the goods and services for which it had contracted, and addressed contractors' performance when problems arose. However, a non-compliant COR program increases the risk of poor contract administration and contract mismanagement.

Recommendation 12: Embassy Lomé should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Lomé)

INFORMATION MANAGEMENT

OIG reviewed information management operations, including classified, unclassified, and dedicated internet network²² computer operations; physical protection of IT resources; classified communications and information systems security; emergency communications preparedness; telephone programs; records management; and mail services. Embassy Lomé's Information Management Section experienced long-term U.S. direct-hire employee staffing gaps, including the lack of an Information Management Officer from September 2021 to August 2022 and an Information Management Specialist from February to June 2022. This negatively affected records management oversight and delayed correcting vulnerabilities cited in a 2019 Bureau of Diplomatic Security Cybersecurity Assessment.²³ However, OIG determined the embassy implemented most required information management and security controls in accordance with Department standards and applicable laws, except as described below.

Information Systems Security Officers Did Not Review Dedicated Internet Networks

Embassy Lomé's Information Systems Security Officers did not review and analyze audit logs on the seven separate dedicated internet networks, as required in 12 FAH-10 H-122.5-2. None of the networks had the equipment or software required to review the audit logs; consequently,

²² 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.

²³ Engineering Services Center Pretoria, *Cybersecurity Assessment, U.S. Embassy Lomé* (2019-006).

the Information Systems Security Officers could not check the logs as required. During the inspection, the embassy implemented a project plan, secured funding, and ordered equipment to consolidate the separate embassy compound dedicated internet networks into a central system to meet Department standards, accommodate future enterprise wireless access, and enable the officers to perform daily checks for potential unauthorized access and malicious activity. Because the section had taken steps to meet these review requirements, OIG did not make a recommendation to address this issue.

Records Management Program Did Not Comply With Department Standards

OIG found Embassy Lomé's records management program did not comply with Department standards for records lifecycle processes, including oversight, organization, and retirement.²⁴ OIG reviewed a sample of electronic files on the embassy's SharePoint sites and found sections did not organize program and administrative records to allow for quick retrieval or deletion as required by 5 FAM 418.9b(4)(c)ii. In addition, according to the Department's Records Service Center, the embassy did not retire paper or transfer electronic records in accordance with applicable records disposition schedules, as required by 5 FAM 418.9b(5). For example, some of the previous ambassador and DCM records had not been retired, Public Diplomacy Section records had never been retired, and Political-Economic Section records had not been retired since 2002. The Department issued cables to remind posts of the requirement that ambassador and DCM records be retired at the end of their tenure.²⁵ Furthermore, OIG found the embassy's failure to delegate records management responsibility and provide guidance to an assigned employee in each section, as required in 5 FAH-4 H-215.3-2b, led to the lack of proper records oversight. OIG issued management assistance reports in September 2020 and June 2022²⁶ that highlighted deficiencies in records management, including records retirement, across the Department. Without a records management program that follows Department requirements for organization, records retirement disposition, and oversight, the embassy is vulnerable to inefficient information retrieval and loss of critical documentation.

Recommendation 13: Embassy Lomé should implement a records management program that complies with Department standards. (Action: Embassy Lomé)

²⁴ As defined in 44 U.S.C. Section 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."

²⁵ Cable 21 STATE 1816, "Message from Undersecretary for Management Brian Bulatao Regarding Records Management Responsibilities Related to Department Officials and Separating Employees," January 8, 2021.

²⁶ OIG, *Management Assistance Report: Deficiencies in Overseas Records Management* (ISP-20-25, September 2020); and OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

Mission Did Not Archive Diplomatic Notes

OIG found that Embassy Lomé did not archive diplomatic notes to the State Messaging and Archiving Retrieval Toolset,²⁷ as required by 5 FAH-1 H-621e and cable 18 STATE 50952.²⁸ Staff told OIG they were unaware of this requirement. The failure to archive diplomatic notes can result in the loss of important data for insight into policy analysis, decision-making, and archival research.

Recommendation 14: Embassy Lomé should archive diplomatic notes in accordance with Department standards. (Action: Embassy Lomé)

²⁷ State Messaging and Archive Retrieval Toolset (SMART) is the Department's cable and record email application. SMART enables users to send and receive organizational authority messages and other messages with long term value using Microsoft Outlook on the Department's Sensitive But Unclassified and classified networks. These messages are stored and searchable in the SMART Archive.

²⁸ Cable 18 STATE 50952, "Updated Archival Procedures for Diplomatic Notes," May 23, 2018.

RECOMMENDATIONS

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

Recommendation 1: Embassy Lomé should bring its grants program into compliance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé's grants program complies with Department standards.

Recommendation 2: Embassy Lomé should maintain the consular information on its website in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé maintained the consular information on its website in accordance with Department standards.

Recommendation 3: Embassy Lomé should resolve fraud referrals in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé resolved fraud referrals in accordance with Department standards.

Recommendation 4: Embassy Lomé should require that all accountable consular officers complete required training. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all of Embassy Lomé's accountable consular officers completed required training.

Recommendation 5: Embassy Lomé should conduct namechecks on members of the American Liaison Network in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé conducted namechecks on members of the American Liaison Network in accordance with Department standards.

Recommendation 6: Embassy Lomé should implement standard operating procedures for key human resources processes, including eligible family member employment, locally employed staff position management, recruitment, time and attendance, and conduct-related issues. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé implemented standard operating procedures for key human resources processes, including eligible family member employment, locally employed staff position management, recruitment, time and attendance, and conduct-related issues.

Recommendation 7: Embassy Lomé, in coordination with the Bureau of Overseas Buildings Operations, should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé's safety, health, and environmental management program complies with Department standards.

Recommendation 8: Embassy Lomé, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

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

Recommendation 9: Embassy Lomé should conduct spot checks of its expendable and nonexpendable property in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé conducted spot checks of its expendable and nonexpendable property in accordance with Department standards.

Recommendation 10: Embassy Lomé should comply with Department training standards on the use of powered industrial trucks, such as forklifts. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé complies with Department training standards on the use of powered industrial trucks, such as forklifts.

Recommendation 11: Embassy Lomé should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage or remove them in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation. The embassy noted it is in the process of removing the shipping containers.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé removed the shipping containers that were being used for storage in accordance with Department standards.

Recommendation 12: Embassy Lomé should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

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

Recommendation 13: Embassy Lomé should implement a records management program that complies with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

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

Recommendation 14: Embassy Lomé should archive diplomatic notes in accordance with Department standards. (Action: Embassy Lomé)

Management Response: In its June 20, 2023, response, Embassy Lomé concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lomé archived diplomatic notes in accordance with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Elizabeth A.N. Fitzsimmons	3/2022
Deputy Chief of Mission	Ronald E. Hawkins, Jr.	6/2022
Chiefs of Sections:		
Management	CW Malinak	6/2021
Consular	Michael Ritchie	6/2022
Political-Economic	Hannah Eagleton	8/2020
Public Affairs	Shannon Ritchie	6/2022
Regional Security	Stephen Roberts	4/2020
Other Agencies:		
Peace Corps	Maureen Cunningham	11/2020
Department of Defense	Jeremiah Colbert	8/2022
Millennium Challenge Corporation	Janet Trucker Miawotoe	10/2019

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from January 3 to March 23, 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 reviewed pertinent records; circulated surveys and compiled the results; conducted interviews with Department and on-site personnel; observed daily operations; and reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE

Embassy of the United States of America

Lomé, Togo



June 20, 2023

UNCLASSIFIED

THRU: AF – Assistant Secretary Molly Phee

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

FROM: Embassy Lomé – Ambassador Elizabeth A.N. Fitzsimmons

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Lomé, Togo

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

OIG Recommendation 1: Embassy Lomé should bring its grants program into compliance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The embassy has uploaded the documentation noted in the report.

OIG Recommendation 2: Embassy Lomé should maintain the consular information on its website in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The embassy has updated the consular information on its website in accordance with Department standards and continues to make improvements. A newly arrived officer in the section has a background in website management and is planning to hold trainings for other section members to ensure the website remains updated.

OIG Recommendation 3: Embassy Lomé should resolve fraud referrals in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The Consular Chief has established a plan to incrementally reduce fraud referrals in ECAS by scheduling three fraud investigations per week for the rest of the year. These efforts will continue to be constrained however by lack of time and resources given unrelenting demand for adjudications across all consular services. Lomé remains a high-fraud post without an ARSO-I or a full-time Fraud Prevention Unit. Post renews its request for the assignment of an ARSO-I to the position established at Embassy Lomé but never filled.

OIG Recommendation 4: Embassy Lomé should require that all accountable consular officers complete required training. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. All accountable officers have completed required training.

OIG Recommendation 5: Embassy Lomé should conduct namechecks on members of the American Liaison Network in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. Namechecks will be completed on members of the American Liaison Network in accordance with Department standards.

OIG Recommendation 6: Embassy Lomé should implement standard operating procedures for key human resources processes, including eligible family member employment, locally employed staff position management, recruitment, time and attendance, and conduct-related issues. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The HR team has been re-structured according to GTM/OE Standard Job Descriptions, and this along with the addition of an EFM HR Assistant have permitted fuller accountability and transparency in operations, including work on documenting and implementing standard operating procedures across the section's activities. Embassy Lomé has requested the establishment of a resident HRO position in recent MRRs to address a lack of full-time oversight of HRO operations.

OIG Recommendation 7: Embassy Lomé, in coordination with the Bureau of Overseas Buildings Operations, should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

Management Response: Embassy Lomé concurs with the recommendation. The POSHO team is planning to train newly arrived management officials as required by 15 FAM 965e and g. The embassy is working with OBO SHEMA and the GSO to remove the gendarmes' booths (non-residential properties listed in the report) from SHEMA's application. The embassy will maintain and distribute semiannual SHEMA committee meetings minutes.

OIG Recommendation 8: Embassy Lomé should bring its fire protection program into compliance with Department standards. (Action: Embassy Lomé, in coordination with OBO)

Management Response: Embassy Lomé concurs with the recommendation. The embassy is updating the housing handbook with the requirement listed in 15 FAM 843d. The POSHO team is updating its SOPs to include monthly inspection of fire extinguishers on the embassy compound. The FAC team has corrected all the deficiencies from the 2019 OBO Fire Report, pending OBO approval. We are working to procure additional fire-resistant enclosures to separate and store flammable materials.

OIG Recommendation 9: Embassy Lomé should conduct spot checks of its expendable and nonexpendable property in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The embassy Management section instructed the GSO to conduct and document quarterly spot checks as part of the reinforcement of property management controls.

OIG Recommendation 10: Embassy Lomé should comply with Department training standards on the use of powered industrial trucks, such as forklifts. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The embassy will submit a request to OBO for an instructor to train forklift drivers.

OIG Recommendation 11: Embassy Lomé should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage or remove them in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The Embassy has already disposed of previously used shipping containers via auction. Existing shipping containers are being transferred by OBO Contractors to Algiers and container shipping formalities are in progress.

OIG Recommendation 12: Embassy Lomé should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. All CORs have now completed the required training.

OIG Recommendation 13: Embassy Lomé should implement a records management program that complies with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. IRM Lomé is in contact with Archive Technicians from the Records and Archives Management Division. Utilizing their support, the embassy will begin building a records management program by collaborating directly with the Public Affairs Office to establish an internal records management POC per 5 FAH-4 H-215.3-2b, review records per disposition schedules, and file, store, destroy,

and retire records. This process will be documented and utilized to refine standard operating procedures for mission-wide implementation.

OIG Recommendation 14: Embassy Lomé should archive diplomatic notes in accordance with Department standards. (Action: Embassy Lomé)

Management Response: Embassy Lomé concurs with the recommendation. The IMO has reviewed documentation and records to confirm Post is presently archiving diplomatic notes in accordance with Department standards. Furthermore, historical diplomatic notes have been archived as far back as is practicable based on records retention.

The point of contact for this memorandum is CW Malinak, Management Officer.

ABBREVIATIONS

FAM	Foreign Affairs Manual
ACO	Accountable Consular Officer
COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DEIA	Diversity, Equity, Inclusion, and Accessibility
FAD	Foreign Assistance Directive
FAH	Foreign Affairs Handbook
FAST	First- and Second-Tour
GFA	Global Fragility Act
ICS	Integrated Country Strategy
LE	Locally Employed
MCC	Millennium Challenge Corporation
OBO	Bureau of Overseas Buildings Operations
SHEM	Safety, Health, and Environmental Management
USAID	U.S. Agency for International Development

OIG INSPECTION TEAM MEMBERS

Mark Asquino, Team Leader
Sharon Umber, Team Manager
Richard Albright
Robert David
Darren Felsburg
Matthew Lunn
Kristin Kane
James Norton
Daniel Pak
Kathryn Schlieper

Other Contributors

Dolores Adams
Leslie Gerson
Caroline Mangelsdorf



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WPEAOmbuds@stateoig.gov