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Office of Inspections

November 2018

Inspection of Embassy Banjul, The Gambia

BUREAU OF AFRICAN AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-19-04

What OIG Inspected

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

What OIG Recommended

This report includes 15 recommendations. OIG made 13 recommendations to Embassy Banjul, including 4 recommendations to improve management functions and 8 recommendations to improve information management operations. Additionally, OIG made 1 recommendation to the Bureau of Administration and 1 recommendation to the Bureau of Overseas Buildings Operations.

In its comments on the draft report, the Department concurred with all 15 recommendations. OIG considers all 15 recommendations resolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

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OFFICE OF INSPECTIONS
Bureau of African Affairs

Inspection of Embassy Banjul, The Gambia

What OIG Found

- The Ambassador established a generally positive relationship with the new government of The Gambia and emphasized U.S. interest in the promotion of economic, political, and social development, and outreach to the Gambian populace.
- A troubled relationship between the Ambassador and the recently departed Deputy Chief of Mission created morale problems and miscommunication within the embassy.
- Lengthy staffing gaps, curtailments of U.S. direct-hire staff, and the suspension and termination of locally employed staff for fraud adversely affected embassy operations.
- U.S. direct-hire vacancies in the Consular and Management Sections led to deficiencies in internal controls, including vulnerabilities in the procurement and financial management functions.
- The chancery's physical plant deficiencies, structural limitations, and poor external and internal appearance presented a negative image of the United States.
- The embassy did not comply with Department of State visa referral procedures.
- Information systems security and information management contingency training and planning needed to be strengthened.
- Spotlight on Success: By making effective use of existing resources, the Public Diplomacy Section created Competitive College Clubs to provide educational advising and leadership training for Gambian youth.

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CONTEXT

The Republic of The Gambia, a West African country slightly less than twice the size of Delaware, is surrounded on three sides by Senegal and has a short coastline on the Atlantic Ocean. The population of 2.1 million is concentrated in settlements along the Gambia River. The largest communities, including the capital, Banjul, and the country's largest city, Serekunda, are located on the coast, at the river's mouth.

Three-quarters of the population depends on agriculture for their livelihood. Small-scale manufacturing activity features the processing of cashews, groundnuts, fish, and hides. China has been The Gambia's largest trading partner for both exports and imports for several years. The Gambia relies heavily on remittances from workers overseas and from tourist receipts, and, in fact, remittance inflows to The Gambia equaled approximately one-fifth of the country's \$3.6 billion gross domestic product in 2017. The top receiving countries for Gambian emigrants are Spain, the United States, Nigeria, Senegal, and the United Kingdom. The Gambia's location on the ocean and proximity to Europe make it a popular tourist destination; tourism normally brings in about 20 percent of the country's gross domestic product. Economic progress depends on sustained bilateral and multilateral aid, responsible government economic management, and continued technical assistance from multilateral and bilateral donors.

The Gambia gained its independence from the United Kingdom in 1965. In December 2016, voters elected Adama Barrow president, who defeated Yahya Jammeh after 22 years of authoritarian rule. Following intense diplomatic pressure and military intervention by forces from the Economic Community of West African States, Jammeh departed in January 2017.¹ The new coalition government of eight political parties faces many challenges in completing the transition from Jammeh's administration, but it looks to do so with the help of the international community and particularly with U.S. guidance and assistance.

Embassy Banjul's Integrated Country Strategy (ICS) priority objective for The Gambia is assisting in the creation of a fully democratic Gambian state, where governmental institutions operate under the rule of law, act in the best interests of the citizenry, and respect human rights. U.S. foreign assistance to The Gambia, which had been significantly reduced since 2013, recently restarted following the change in government. It is focused on bolstering democracy and human rights, economic development, and health and social welfare. The Peace Corps maintains a large program with approximately 92 volunteers engaged in the environment, agriculture, public health, and education sectors.

At the time of the inspection, Embassy Banjul had 20 U.S. direct-hire positions and 89 locally employed (LE) staff. The Department of State (Department) is the only agency with staff physically located at the embassy. The U.S. Agency for International Development operates bilaterally in The Gambia from U.S. Embassy Dakar, Senegal, and implements regional programs in The Gambia from the Accra Regional Mission in Ghana. Embassy Banjul doubled in size over the past decade and this, in combination with the

¹ Following tensions generated by the December 2016 presidential election, the Commissioner for the Economic Community of West African States, along with members of the economic community's military force, led an international effort to ensure the peaceful transfer of power and reassure the Gambian Government and the Gambian people of the organization's commitment to sustainable peace, stability, and democracy.

growing responsibilities of the Political-Economic Section and the robust U.S. engagement strategy, led the embassy to request additional direct-hire positions and LE staff.

The poor condition of Embassy Banjul's chancery warrants special note and is well documented, particularly in the embassy's FY 2018 Mission Resource Request. The Bureau of African Affairs told OIG that the embassy, together with the Bureau of Overseas Buildings Operations (OBO), will continue prioritizing improvements to the chancery.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.² A companion classified report contains a discussion of the conduct of the security program and issues affecting the safety of mission personnel and facilities.

OPERATIONAL CHALLENGES

Staffing Gaps, Low Morale, and Chancery Physical Deficiencies Hampered Operations

As detailed below, OIG found that Embassy Banjul faced serious operational challenges due to lengthy staffing gaps affecting many embassy sections, low LE staff morale among the remaining personnel after terminations and suspensions, and physical deficiencies in the chancery. As described below and throughout this report, embassy operations were hampered as a result.

Lengthy staffing gaps and the curtailment of staff in key U.S. direct-hire positions directly impaired Consular and Management Sections operations as well as that of the Information Management Office. The vacancies indirectly affected the operations of other sections, such as the Political-Economic Section, where the section chief also assumed responsibility for public diplomacy and consular functions. At the time of the inspection, the Consular Section faced a 6-month period in which it had no full-time consular officer. In 2016 and 2017, the Management Section dealt with gaps in the management, general services and information systems officer positions due to curtailments. In total, from January 2017 through mid-May 2018, the embassy relied on 20 temporary and other non-permanent employees (excluding regularly scheduled regional support visits) to provide support and oversight of every unit in the Management Section.

The embassy also had significant gaps in LE staff positions due to the termination of 6 LE staff members and the suspension of 32 others —almost 40 percent of the embassy's total LE staff—for fraud associated with the medical claims reimbursement program, such as overstating claims and submitting claims for non-eligible family members. OIG found that the terminations and suspensions further exacerbated the embassy's operational challenges resulting from the lengthy staffing gaps in key U.S. direct-hire positions. The terminations and suspensions also affected morale, particularly among the remaining LE staff. OIG found that working relations between the U.S. direct-hire and LE staffs sometimes were characterized by mistrust, which negatively affected productivity and esprit de corps.

Finally, the chancery's physical and structural deficiencies presented a poor image of a U.S. diplomatic facility and made for unpleasant working conditions. Internally, these deficiencies included exposed

² See Appendix A.

pipes and wires in hallways and offices, missing and damaged ceiling tiles, overcrowded conditions, and lack of an elevator. Externally, the building was also in visibly poor physical repair, including windows that did not shut properly and visible cracks in the concrete. In addition, the chancery's physical and structural inadequacies contributed to significant deficiencies in the Consular Section, as described in the Consular Operations section of this report.

Despite these challenges, OIG found the embassy's U.S. direct-hire staff working to improve operations and address the physical and structural deficiencies to the extent possible. They also took advantage of the recent changes in the political environment that opened new opportunities for foreign policy engagement. The staff's professionalism will be an important resource as the embassy moves forward.

EXECUTIVE DIRECTION

OIG assessed Embassy Banjul's leadership on the basis of 46 interviews in The Gambia and Washington that included comments on the performance of the Ambassador and the Deputy Chief of Mission (DCM), a review of questionnaires completed by U.S. and LE staff; 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 arrived at the post in November 2015. A career member of the Senior Foreign Service, she served as DCM in Embassy Banjul previously. The DCM, who arrived in August 2015, departed in April 2018, just 2 weeks before the on-site portion of the inspection. A temporary duty DCM arrived in mid-May, and a permanent DCM was scheduled to arrive in August 2018.

The Ambassador generally executed her responsibilities professionally, in accordance with Department's leadership principles in 3 Foreign Affairs Manual (FAM) 1214. American and LE staff, in OIG interviews, commented on the Ambassador's respectful manner with employees. In her communications to embassy staff and Department officials in Washington, the Ambassador emphasized the U.S. interest in engagement with the 2016 democratically elected government of The Gambia, promotion of economic, political and social development, and outreach to the Gambian populace.

OIG determined, however, that a troubled relationship between the Ambassador and the recently departed DCM created morale problems and miscommunication within the embassy. Nearly all embassy personnel reported to OIG—in their responses to OIG questionnaires, in interviews, or both—that the two did not work well as a team and that embassy personnel did not see the DCM as the Chief of Mission's alter ego, as outlined in 2 FAM 113.2. Rather, because the Ambassador and the DCM approached internal management issues differently, staff seeking direction from the Front Office often received varying guidance, which resulted in inconsistencies and miscommunication in implementing internal embassy policies and directives. For example, according to staff, the Front Office principals favored different resolutions of cases involving LE staff medical claims fraud. This caused confusion and morale problems because the resolution of these cases directly affected embassy personnel. The Ambassador, recognizing that the Front Office's discord harmed embassy operations, held off-site meetings in September and October 2017, along with focused meetings with LE and U.S. staff members, to air the problems and seek resolution. Staff told OIG that the meetings were helpful, but their perception of disharmony in the Front Office continued. With the recent departure of the DCM and a new DCM arriving in August 2018, OIG advised the Ambassador to set a new tone for the Front Office

and fully model the Department's leadership principles to regain the confidence of embassy personnel. The Ambassador assured OIG she would do so.

OIG found guidance detailing the gifts and ethics policy, as well as employee standards and expectations, prominently posted in the embassy and accessible to all employees. The Front Office also maintained an active gift registry in accordance with 2 FAM 960 and Department cable 16 STATE 97388.³

Some staff members told OIG that the Ambassador engaged them in discussions concerning specific visa adjudications and that they felt pressured to reconsider applications they had previously refused. This is contrary to extensive Department guidance that cautions against conduct that could be seen as imposing such pressure. Guidance in 7 Foreign Affairs Handbook (FAH)-1 H-643d states that consular supervisors must never order, or inappropriately pressure, a subordinate to reach a particular outcome when adjudicating a visa or citizenship application. This is confirmed in 9 FAM 601.8-1(A)a, which states the Immigration and Nationality Act confers upon a consular officer exclusive authority to issue nonimmigrant visas. In addition, guidance in 9 FAM 601.8-1(A)b states that advocacy for visa issuance is prohibited outside the formal referral process. Interference by supervisors in visa cases threatens the integrity of the visa process and creates the appearance of a violation of law or ethical standards. OIG discussed this issue with the Ambassador.

Equal Employment Opportunity Program Lacked a Counselor

The embassy posted Equal Employment Opportunity notices and references in prominent locations, and OIG did not encounter reports of related issues. However, Embassy Banjul had not nominated an Equal Employment Opportunity Counselor, as required by 3 FAM 1514.2, after the departure of the previous counselor in June 2017.

Recommendation 1: Embassy Banjul should nominate an Equal Employment Opportunity Counselor in accordance with Department guidance. (Action: Embassy Banjul)

Execution of Foreign Policy Goals and Objectives

Embassy Banjul prepared its most recent ICS in 2016. The Front Office led the section chiefs in reviewing and updating ICS goals at an offsite meeting in October 2016. Following President Barrow's assumption of office in January 2017, the embassy revised its ICS to include a priority objective of assisting in the creation of a fully democratic Gambian state.

OIG found that the Ambassador actively engaged the Barrow Government to help work toward the Gambian democratic state included as the ICS priority objective. She met with the president four times during his first year in office. She helped organize a lunch in February 2018 with President Barrow for representatives of key donor countries and organizations to exchange views on economic policy and development. The Ambassador also had close relationships with the vice president and the attorney general as well as good access to the other government ministers. Her calendar showed more than 20 meetings with Gambian officials between March 2017 and February 2018. The Ambassador participated in regular conference calls with the acting Assistant Secretary of the Bureau of African Affairs and with the chiefs of mission of other U.S. missions in Africa to coordinate on matters of regional importance.

³ Cable 16 STATE 97388, "Reporting Requirements for Official Donations and Gifts to the Department of State," September 1, 2016.

Adherence to Internal Controls

Embassy Banjul submitted its latest Annual Chief of Mission Management Control Statement of Assurance in September 2017. The Management Officer coordinated the process while the DCM, who was serving as Chargé d’Affaires due to the Ambassador’s temporary absence, reviewed and approved the final statement in accordance with 2 FAM 022.7. The statement reported that the embassy completed all required internal management control reviews and identified deficiencies with motor pool, procurement, warehouse, and financial management operations. OIG identified additional deficiencies and vulnerabilities, many of which were exacerbated by lengthy staffing gaps. These deficiencies are described in the Management Resources section of this report.

The DCM generally complied with 9 FAM 403.9-2(D)e and 9 FAM 403.10-3(D)(1)⁴ requirements to carry out regular reviews of the Consular Section officer’s visa adjudications until shortly before his departure. However, no one conducted these reviews between the DCM’s departure in April 2018 and the time of the inspection. OIG advised the temporary DCM, who arrived in mid-May 2018, of her responsibilities to conduct these reviews, and she agreed to do so.

Security of the Mission

The Ambassador conducted her security responsibilities in accordance with 2 FAM 112 and 2 FAM 113. The Ambassador and the Combatant Commander approved the required memorandum of understanding on security in December 2017. The Ambassador or the DCM chaired regular meetings of the Emergency Action Committee, which is responsible for the embassy’s response to security incidents or natural disasters. In addition, the DCM and the Regional Security Officer met weekly to coordinate on security-related matters. The companion classified report includes a full discussion of the embassy’s security program, including some deficiencies OIG found.

Developing and Mentoring Foreign Service Leadership

At the time of the inspection, the Information Management Specialist was the only first- and second-tour (FAST) employee assigned to the embassy. Although Embassy Banjul did not have a formal FAST program, the specialist’s supervisor mentored him weekly. OIG suggested that the specialist and his supervisor discuss possible additional mentoring activities with the incoming DCM.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Banjul’s policy and program implementation through a review of the Political-Economic Section’s advocacy and analysis work; the Public Diplomacy Section’s public diplomacy efforts; and the Consular Section’s provision of American citizen and visa services. Although the embassy’s political-economic and public diplomacy activities generally conformed to Department standards, OIG found deficiencies in Embassy Banjul’s consular programs, as described below.

⁴ The Department updated and moved the guidance to 9 FAM 403.12-1b in June 2018.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership, policy implementation, reporting and advocacy, commercial promotion, Leahy vetting, and grants management. At the time of the inspection, the section chief also had responsibility for the embassy's public diplomacy and consular functions, due to American officer vacancies. In addition, until a month before the inspection, the section's complement of LE staff had been short two positions for more than one year. Despite these challenges, policymakers in the Department and other agencies told OIG that they found the embassy's reporting and advocacy useful. In addition, OIG determined that the embassy's political-economic activities generally conformed to Department standards and that its reporting supported ICS goals.

Political-Economic Section Supported Integrated Country Strategy Goals

The Political-Economic Section's reporting and policy advocacy with the Department and other U.S. agencies advanced the embassy's ICS democracy and economic development goals for The Gambia. For example, OIG determined the section worked with the Bureau of Democracy, Human Rights, and Labor to create a grant to promote voter education and civil awareness. The section also requested U.S. technical advisors to increase the professionalism of Gambian Government institutions. In addition, at the time of the inspection, the section was coordinating with the U.S. Department of the Treasury to send a budget expert to advise the host nation Ministry of Finance. The Political-Economic Section also supported U.S. Government efforts to investigate misappropriation of government assets by the previous government and to improve the current democratically elected government's ability to investigate public corruption, money laundering, and other financial crimes. Following President Barrow's assumption of office in 2017, the section assisted the Ambassador in working with other Washington-based agencies to restore The Gambia's eligibility for preferential trade treatment under the Africa Growth and Opportunity Act⁵ and to select the country for a Millennium Corporation Challenge Threshold program.⁶ (The United States previously withdrew both of these benefits due to human rights abuses of the Jammeh government.) Anticipating that an expanded U.S.–The Gambia relationship would continue to increase the workload of the section, the embassy requested adding a U.S. direct-hire political officer to the one-officer Political-Economic Section in its FY 2018 Mission Resource Request.

Leahy Vetting Guidance Was Outdated

OIG found that Embassy Banjul's Leahy vetting⁷ standard operating procedures dated from 2014 and failed to reflect new standards contained in the Department's 2017 Leahy Vetting Guide. Nevertheless, the embassy vetted 95 individuals between August 2017 and May 2018 for potential gross human rights abuses in accordance with applicable laws and Department requirements. The embassy's Leahy Vetting

⁵ The African Growth and Opportunity Act is a United States Trade Act, enacted on May 18, 2000. The legislation significantly enhances market access to the United States for qualifying sub-Saharan African countries.

⁶ The Millennium Challenge Corporation (MCC), is an independent U.S. foreign assistance agency created by Congress in 2004. The MCC Threshold Program assists select countries by awarding small 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.

⁷ The Leahy Amendment to the Foreign Service Act of 1961 prohibits the Department from furnishing assistance to foreign security forces if the Department has credible information that such forces have committed gross violations of human rights. See 22 USC 2378d.

coordinator and her back-up completed the International Vetting and Security Tracking System⁸ training and worked closely with Embassy Dakar's Regional Security and Defense Attaché's Offices. An issue with late vetting submissions—which require requests for expedited clearance by Washington—had been nearly eliminated at the time of the inspection as a result of improved consultations with Gambian officials and more expeditious processing by the embassy. OIG advised the Leahy vetting coordinator to update Embassy Banjul's Leahy vetting standard operating procedure and submit it to the Bureau of Democracy, Human Rights, and Labor for approval, which she agreed to do. As a result, OIG did not make a recommendation to address this issue.

Grants Administration Complied with Department Requirements

OIG found that the three active and two closed-out grants administered by the Political-Economic section (totaling \$742,538) fully complied with Department requirements. The grants included a \$688,538 grant by the International Republican Institute for voter awareness and Julia Taft refugee grants.⁹

Public Diplomacy

OIG reviewed the full range of the Public Diplomacy Section's operations, including leadership, media outreach, exchanges, educational advising, social media platforms, and American Spaces.¹⁰ In collaboration with other embassy sections, the Public Diplomacy Section promoted U.S. foreign policy interests identified in the ICS, including democracy and human rights, economic development, and educational opportunity. The section reached a broad spectrum of the Gambian public, particularly young and emerging leaders in the country's growing civil society. Organizations led by alumni and other partners continued to provide opportunities for embassy officials and visiting Americans to promote bilateral cooperation. OIG found that the embassy's public diplomacy activities generally conformed to Department standards, although the embassy lacked a mission media policy, as described below.

Embassy Used Social Media to Support ICS Goals During 2016-2017 Political Crisis

OIG found that the section effectively deployed social media to reach Gambian activists and the general public. In 2015, the embassy had 53,000 Facebook followers and a newly launched Twitter account; at the time of the inspection, its following was 81,000 on Facebook and 5,200 on Twitter. These platforms were instrumental during the 2016-2017 political crisis surrounding the country's presidential election, as official U.S. statements were shared widely and reached a total audience of nearly 350,000. The section also created several online communities, including a group of civic activists who used the virtual platform as a springboard for organizing "For The Gambia First," a nongovernmental organization focused on democracy and social welfare.

⁸ The International Vetting and Security Tracking System, or INVEST, is an internal Department database that contains the names of individuals or units nominated for U.S. training or assistance and vets the individuals or units using governmental, nongovernmental, and media resources on human rights abuses in the relevant country.

⁹ Julia Taft grants fund small-scale projects that assist refugees, internally displaced persons, or vulnerable migrants.

¹⁰ 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.

Grants Managed in Accordance with Department Standards

The Public Diplomacy Section issued 18 grant awards totaling \$198,000 in 2017, approximately 30 percent higher than the FY 2016 total and nearly three times that of FY 2015. Before and after the December 2016 election, grant-supported projects promoted civic participation through activities such as candidate debates, journalist training, and voter education. Alumni of U.S. Government exchange programs, notably the Mandela Washington Fellowship and the International Visitors Leadership Program, designed many of these activities and conducted them at American Spaces. OIG found that the section generally managed the grants in accordance with Department standards.

Spotlight on Success: Competitive College Clubs Laid Foundation for Youth Engagement

The Public Diplomacy Section, as part of its educational advising services, established "Competitive College Clubs" in five rural high schools and a "Banjul Scholars Club" for high-performing students at five capital region high schools. Students practice making presentations and writing essays and research papers, organize community service projects, and learn critical thinking through debates on current topics. The section provided core EducationUSA services through the clubs and created activities to address barriers to educational advancement and create a centerpiece for youth engagement nationwide. For example, public diplomacy and consular officers conducted informational sessions on college admissions and visa requirements, and the Ambassador met with club members three times in the year prior to the inspection. In addition to creating a WhatsApp group to facilitate direct communications and youth networking, the embassy further supported the program by funding a summer camp focused on leadership skills and providing a small library of reference materials to each club. Through this approach, the clubs not only improved the participants' higher education prospects but also prepared the next generation of leaders to face the political, economic, and social challenges of The Gambia's future.

Embassy Lacked a Mission Media Policy

OIG found that the embassy did not have a policy to manage its communications with the media and the public. Guidance in 10 FAH-1 H-020 gives public affairs officers the responsibility of leading the mission's media relationship. In addition, the Under Secretary for Public Diplomacy and Public Affairs, through the public affairs officer handbook, "Working with the Media," instructs officers to establish media policies with ambassadors and DCMs. A media policy protects the embassy and its employees by clarifying the roles of official spokespersons, regulating contact with journalists, detailing procedures for setting up media events, and advising employees on the standards governing the posting of personal social media messages that may reflect on the embassy. Without guidance, embassy personnel may give unauthorized statements to the media, and they risk public disclosure of personal comments that may provoke negative reactions, damage the embassy's standing, and impair its ability to build public support for U.S. Government interests. OIG found that a draft policy was in the clearance process and was awaiting approval to be issued to embassy personnel. As a result, OIG did not make a recommendation to address this issue.

Consular Operations

OIG reviewed the Consular Section's visa operations, American citizen services, consular facilities, and internal controls. At the time of the inspection, staffing shortages limited the section's ability to fully perform its functions in accordance with Department guidance. As a result, OIG noted the deficiencies described below.

Staffing Shortages Limited Consular Operations

One mid-level American section chief, one FAST officer, three LE staff members, and one eligible family member normally staff Embassy Banjul's Consular Section. After the consular chief's departure in June 2017, the FAST officer headed the section until his departure in March 2018. The Department left the FAST position unfilled, and the consular chief's replacement was not due to arrive until September 2018. As a result, the embassy had no full-time American consular officer between March and September 2018.

Because of these staffing gaps, the Bureau of Consular Affairs in January 2018 provided guidance to the embassy on how to conduct consular operations under these circumstances and limited the number of services the embassy could perform without a full-time consular officer at post. For instance, the section referred most non-immigrant visa cases to the U.S. Embassy in Dakar, Senegal. At the time of the inspection, the Political-Economic Section chief, who had one previous consular tour, served as backup consular officer and handled consular emergencies and diplomatic and official visas. The bureau also arranged for a temporary duty consular officer to visit the embassy for approximately 1 week every month.

Absence of an American Consular Officer Resulted in Internal Control Weaknesses

The absence of a full-time consular officer resulted in several internal control deficiencies. As noted above, the backup consular officer occasionally processed diplomatic or official visas. However, due to competing demands, she visited the section only once a day and, as a result, the LE staff had little supervision. Guidance in 7 FAH-1,¹¹ however, makes clear the need for direct supervision of section operations by consular managers. OIG found that the absence of an American consular chief contributed to the following deficiencies:

- LE staff had possession of the keys to the cashier's booth and the locking cabinets that held sensitive information regarding American citizen services and visa cases. This is contrary to guidance in 7 FAH-1 H-644.1 and 7 FAH-1 H-644.3. OIG advised the embassy that consular files should be locked when not in use and that an American officer should control the keys to the cabinets.
- Between March 2018, when the last full-time consular officer left, and the time of the inspection, the embassy had collected DNA on two occasions to prove a blood relationship with a U.S. citizen, both times overseen by two employees from other sections. Neither employee, however, was familiar with the requirements of 9 FAM 601.11-1, which mandate careful documentation of the chain of custody of the samples. OIG advised embassy officials to cease DNA collections until the personnel involved reviewed and understood the FAM instructions. OIG also advised embassy officials to contact the Regional Consular Officer for additional guidance.
- During the inspection, the backup consular officer was absent for one week. Although another embassy officer had a consular commission, he did not have access to the consular systems and would not have been able to provide emergency services had that become necessary. OIG advised embassy officials to complete appropriate designations for any officer serving as

¹¹ 7 FAH-1 H-631, 7 FAH-1 H-635, 7 FAH-1 H-641, and 7 FAH-1 H-644.

backup, per 7 FAH-1 H-650, give that person necessary computer access, and ensure access to controlled consular items.

OIG found that the embassy's backup consular officer and acting DCM were unaware of the Bureau of Consular Affairs' guidance on how to operate the section in the absence of a full-time American consular officer. Embassy staff told OIG that this occurred because the departing consular officer did not share the guidelines with either the backup officer or the acting DCM. As a result, in some cases, section employees did not comply with bureau requirements. For example:

- Bureau guidance stated that the consular cashier should not hold a cash advance without a full-time consular officer. However, at the time of the inspection, both the consular cashier and the backup cashier still had their advances.
- The guidance also advised that on days that the backup consular officer performed consular functions, she should work in the section all day in order to monitor controlled items and complete the required reconciliations. OIG found this was not done.

The bureau confirmed to OIG that the new full-time consular officer was scheduled to arrive in September 2018. As a result OIG did not make a recommendation to address the deficiencies identified above. However, OIG advised the bureau and the embassy that they should communicate with each other about the procedures the bureau expects the embassy to follow. OIG also provided the embassy with copies of the bureau's January 2018 guidance.

Consular Facilities Did Not Meet Department Standards

Embassy Banjul's consular facilities did not meet Department standards for consular workspace. OIG found the following deficiencies:

- Line of sight deficiencies created vulnerabilities to consular operations by preventing officers from maintaining proper oversight of the consular workspace, contrary to 7 FAH-1 H-281e. The section did not have an "open and visible work environment" that would allow the American consular manager to observe operations. In addition, staff could not monitor applicants in the main visa waiting area without exiting the chancery and walking to the waiting room entrance.
- The section did not have a privacy booth for sensitive interviews as required by 7 FAH-1 H-282(4). Consular officers conducted interviews with American citizen services clients at an interview window only a few feet away from the main embassy entrance.
- The consular section did not have a queuing system, in accordance with 7 FAH-1 H-282(21). During visa interviews, OIG observed that LE staff or the interviewing officer called the applicants to the interview window using a loudspeaker system. A local guard stationed in the main waiting area would then loudly repeat the applicant's name. A queuing system allows more efficient and orderly movement of applicants and requires less involvement of the embassy guard force. OIG advised the embassy to work with the Bureau of Consular Affairs to identify and procure an appropriate system.

In addition to the deficiencies noted above, the visa waiting areas did not provide an efficient, comfortable, and attractive accommodation, as required by 7 FAH-1 H-281 and 7 FAH-1 H-282.

The walls and ceiling showed significant water damage, and ceiling tiles above the interview windows were missing, which exposed bare wires and beams. During the inspection, OIG noted that the one unisex toilet did not meet minimal standards of cleanliness, and the drinking water dispenser was inoperable.

OBO officials and consular employees told OIG there had been a plan to reconfigure the Consular Section to address these problems, but the embassy requested it be cancelled while OBO reviewed the feasibility of structural repairs to the chancery. In addition, the embassy told OIG it had anticipated the construction of a new embassy compound. However, at the time of the inspection, OBO had not scheduled a new embassy compound for Embassy Banjul.

Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Banjul and the Bureau of Consular Affairs, should renovate Embassy Banjul's Consular Section to comply with Department standards. (Action: OBO, in coordination with Embassy Banjul and CA)

RESOURCE MANAGEMENT

OIG reviewed Embassy Banjul's internal controls in the Human Resources, Financial Management, General Services, and Facilities Management Units. OIG found that staffing gaps and vacancies compromised internal controls and degraded operations and led to the deficiencies, as discussed below.

Staffing Gaps and Vacancies Compromised Internal Controls and Degraded Operations

Management Section operations and oversight suffered from staffing gaps in key U.S. direct-hire positions. The former Management Officer curtailed in February 2017, and her replacement did not arrive until August 2017. In addition, the General Services Officer curtailed her assignment in September 2016; the new officer, serving in her first general services assignment, arrived in August 2017. The Information Management Officer and temporary duty staff filled both positions during the gaps. In total, from January 2017 to May 2018, the embassy relied on 20 temporary and other non-permanent employees (excluding regularly scheduled regional support visits) to provide support and oversight in every unit in the Management Section.

LE staff turnover, terminations, and suspensions for fraud also disrupted operations. In August 2016, the embassy discovered fraud in the medical claims reimbursement program, which led to the termination of 6 LE staff members and suspension of 32 others; as noted previously, this represented almost 40 percent of the embassy's total LE staff. In October 2016, the procurement unit supervisor resigned and, in September 2017, the embassy dismissed one of the two remaining LE procurement staff for misuse of petty cash. For 4 months, the procurement unit operated with only one LE employee responsible for the processing and oversight of all embassy procurements. In addition, one of two LE voucher examiner positions in the Financial Management Unit had been vacant since January 2018. With only one accountant on staff, the supervisory financial specialist handled all of the International Cooperative Administrative Support Services¹² budgeting, leaving her little time to supervise the section. As a result of these challenges, some LE staff members performed work outside their regular duties for which they

¹² The International Cooperative Administrative Support Services (ICASS) is the principal means by which the U.S. Government provides and shares the cost of common administrative support at diplomatic and consular posts overseas.

had no formal training (such as purchase card reconciliations and alternate cashiering), which resulted in lengthy processing times.

OIG found that since their arrival in August 2017, the Management Officer and General Services Officer worked to impose or strengthen internal controls, update management policies, implement standard operating procedures, and fill vacant positions. The embassy revised the medical claims reimbursement program to include more oversight in the verification and approvals process. In addition, the embassy updated approval flows in the travel, financial, and procurement systems to route requests to the proper supervisor for approval, thereby enforcing separation of duties requirements. The embassy also updated management policies on overtime and employee standards. At the time of the inspection, the embassy was in the process of filling four of the six vacant LE staff positions. However, space constraints make adding additional staff beyond that number difficult, as discussed later in this report.

Human Resources Operations

No Formal Training Program for Locally Employed Staff

The embassy lacked a formal LE staff training program and accordingly could not effectively plan and budget for training. While the former DCM approved training requests, the embassy did not formally establish criteria for determining eligibility for training, as required by 3 FAM 7635.2. In addition, the lack of a training plan resulted in one section exceeding its training budget. In accordance with 3 FAM 7631a, the embassy is responsible for providing formal and informal training for LE staff and, per 3 FAM 7635.2, should administer a training program. The lack of a training program can lead to performance deficiencies and the inability of employees to increase their proficiency.

Recommendation 3: Embassy Banjul should implement a formal training program for its locally employed staff in accordance with Department standards. (Action: Embassy Banjul)

Former Locally Employed Staff Owed Outstanding Salary Advances; Embassy Lacked Criteria for Providing Advances

Embassy Banjul did not collect \$2,000 in salary advances owed by three former LE staff members, as required by 4 FAM 493.1-1. OIG also found that the embassy did not define the criteria for salary advances in its local compensation plan. According to the plan, LE staff members with a minimum of 1 year of service could request salary advances for personal or family emergencies. However, the embassy did not define what constituted an emergency, and it did not require supporting documentation of the emergency. OIG found that approximately 40 percent of the embassy's LE staff had open salary advances, some of which were for issues not clearly identified as emergencies. For example, employees received advances to pay a family member's tuition fees or to drill a water well. Failure to define the circumstances in which salary advances are permitted increases the embassy's risk of incurring an uncollectable debt. In addition, uncollected salary advances represent a loss of funds to the Department and, ultimately, to taxpayers.

Recommendation 4: Embassy Banjul should revise its local compensation plan to define specific criteria that would warrant a salary advance and outline requirements for supporting documentation. (Action: Embassy Banjul)

Recommendation 5: Embassy Banjul, in coordination with the Bureau of the Comptroller and Global Financial Services, should collect outstanding salary advances of \$2,000 due from former employees and put those funds to better use. (Action: Embassy Banjul, in coordination with CGFS)

Embassy Lacked a Health Insurance Plan for Locally Employed Staff

The embassy did not have an LE staff health insurance plan and instead provided health benefits through its medical claims reimbursement program. As noted previously, the embassy in 2016 found that LE staff submitted fraudulent claims for exaggerated amounts or for services and providers that were not covered under the program. The embassy planned to move from a medical claims reimbursement program to a health insurance plan but put those plans on hold due to staffing gaps in the Management and General Services Officer positions. Now that those two positions are filled, OIG advised embassy officials to request assistance from the Department's Office of Overseas Employment to develop an LE staff health insurance plan.

Financial Management Operations

Alternate Cashier Lacked Training

The embassy's alternate cashier lacked training in the Department's cashiering system, known as the Consolidated Overseas Accountability Support Toolbox, or COAST. The alternate cashier first attended training in 2012 when the Department was using a different system. However, due to staffing gaps, he did not attend the updated cashiering training or perform cashiering duties. Specifically, at the time of the inspection, he could not act as cashier because he was the embassy's sole voucher examiner and did not have the time to perform cashier duties. Additionally, he had not yet received COAST training and therefore was not comfortable with assuming cashier duties. The embassy was in the process of filling the other voucher examiner position. OIG advised the embassy to provide the alternate cashier with the COAST training once it fills the vacant voucher examiner position and then allow the alternate cashier to perform cashiering duties in order to maintain his skills.

Cashiering Hours Did Not Allow Sufficient Time for Other Duties

The cashier's hours of operation left little time for other cashiering duties, including performing daily reconciliations and making deposits at the local bank. According to the Department's 2017 Cashier User Guide, section 4.4.1.1, when considering office hours, cashiers and supervisors must allow sufficient time to perform all aspects of cashiering. Failure to properly carry out cashiering duties could result in a loss of U.S. Government funds and the employee could moreover be held personally liable for any loss. OIG advised the embassy to shorten the cashier's hours of operations to ensure sufficient time for all cashiering duties. During the inspection, the Management Officer began the process of doing so to bring those hours into compliance with Department guidelines. As a result, OIG did not make a recommendation to address this issue.

General Services Operations

Embassy Did Not Comply with Department Contract Administration Guidelines

OIG found that Embassy Banjul did not comply with Department contract administration guidelines. As a result, the embassy in 2016 and 2017 made six unauthorized commitments totaling \$16,000, stemming

mostly from obligations on expired contracts. OIG found that this occurred because the embassy relied almost exclusively on purchase orders valid for between 3 and 12 months for recurring services such as maintenance and utilities. Using purchase orders with short durations increases the administrative burden related to tracking expiration dates as well as the risk of unauthorized commitments. The Department's Office of the Procurement Executive ratified the unauthorized commitments. However, OIG determined that the combination of staffing gaps and lack of LE staff training and oversight contributed to several other contract administration deficiencies, as listed below.

- Employees other than a contracting officer initiated contracts, contrary to the Federal Acquisition Regulation, 48 C.F.R. § 1.601, and 14 FAM 215a.
- The embassy did not monitor and evaluate contractor performance, as required by 14 FAM 222b.
- Contracting Officer Representatives performed their duties without the training required in 14 FAH-2 H-143.1a.
- The embassy did not maintain contract files, some of which were missing or incomplete, in accordance with 14 FAH-2 H-517a.
- The embassy used purchase orders to acquire personal services, in violation of cable 01 STATE 140917.¹³
- Staff did not properly review invoices prior to payment, as required by 14 FAH-2 H-522.10a.

Inadequate oversight of contracts can result in excessive costs, misuse of U.S. Government resources, and substandard contractor performance. Because of the significance of these deficiencies, OIG determined that the embassy would benefit from a staff assistance visit by subject matter experts in the Bureau of Administration.

Recommendation 6: The Bureau of Administration, in coordination with Embassy Banjul, should conduct a staff assistance visit to address contract administration deficiencies. (Action: A, in coordination with Embassy Banjul)

Embassy Lacked an Acquisition Plan

Embassy Banjul did not have an annual acquisition plan, and management officials had not sought input from embassy sections to forecast contracting requirements for upcoming fiscal years. Furthermore, because the embassy did not have a plan for current and future contracting requirements, it had little knowledge of existing contracting requirements that were due to expire, ultimately resulting in several of the unauthorized commitments described above. Federal Acquisition Regulation 7.102(a) requires that acquisition planning be performed for all purchases. Without an annual acquisition plan, the embassy cannot determine optimal contracting methods, increase competition, or achieve potential cost savings.

Recommendation 7: Embassy Banjul should implement an annual acquisition plan, in accordance with the Federal Acquisition Regulation. (Action: Embassy Banjul)

¹³ Cable 01 STATE 140917, "Obtaining Personal Services Versus Nonpersonal Services A Review," August 14, 2001.

Facilities Management

Chancery Was Overcrowded and Required Structural Repairs

As described earlier in this report, the chancery was overcrowded and suffered from structural defects. The building presented a poor image of a U.S. diplomatic facility and made for unpleasant working conditions for the staff. The facility, which lacks sufficient space for the current staff, would be unable to accommodate any additional U.S. direct-hire positions. Although the embassy installed modular office furniture in 2017 to alleviate the issue somewhat, overcrowding remained a persistent issue because of the chancery's small size.

The building was constructed in the late 1970s as a hotel and leased to the U.S. Government for use as the chancery in 1982. Access to the two upper floors is by a single narrow stairwell with no alternate means of emergency egress. Embassy officials notified OBO of structural defects in the facility, including the strength of the building foundation, beginning in 2006. Following repairs in March 2016, the embassy found and reported additional structural defects to OBO. In April 2017, OBO determined that, although the building required some additional repairs, it was structurally sound. At the time of the inspection, OBO and the embassy were negotiating with the landlord to undertake the repairs, but the parties had yet to determine a start date.

Incidental Drivers Lacked Medical Certificates and Safety Training

None of Embassy Banjul's U.S. direct-hire incidental (self-drive) operators of official vehicles had the Department-required medical clearance, and one incidental driver had not completed the Department's motor vehicle safety management program for overseas posts. After OIG discussed these deficiencies with embassy staff, the embassy coordinated with the Regional Medical Officer in Dakar to meet the medical certificate requirement for its drivers. Additionally, at the time of the inspection, the motor pool supervisor was completing the training to be certified as an instructor for the Department's motor vehicle safety program, after which he would be able to train the incidental drivers. As a result, OIG did not make a recommendation to address this issue.

Fuel Program Complied with Department Requirements

OIG evaluated the embassy's internal controls for bulk fuel operations, fuel dispensing, and residential generator fueling. OIG found the embassy performed oversight of bulk fuel operations in accordance with guidelines in 14 FAH-1 H-815.4. American employees directly supervised the bulk fuel ordering and delivery. However, the embassy did not have a written standard operating procedure for fuel operations. Upon advice of OIG, the embassy issued a standard operating procedure during the inspection.

INFORMATION MANAGEMENT

OIG reviewed classified, unclassified, and dedicated internet network (DIN) operations; physical protection of information technology (IT) assets; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services. OIG determined that the Information Management Office faced challenges meeting the day-to-day computing and communications needs of the embassy because of aging infrastructure, long-term staffing shortages, and space limitations. OIG found deficiencies in the implementation of effective

information security and program management, as detailed below and in the companion classified report.

Information Systems Security Officers Did Not Perform All Duties

The embassy's unclassified and classified Information Systems Security Officers (ISSO) did not use the Department's ISSO checklist, as required by 5 FAH-11 H-116, and thus did not perform all information systems security duties. As a result, OIG found access control and configuration management issues in the unclassified and classified systems operations. These weaknesses included folders with unauthorized users, inactive user accounts, a DIN with an unauthorized wireless device, and network servers that were not configured to Bureau of Diplomatic Security standards. OIG determined that these problems occurred because embassy management did not allow ISSOs sufficient time to perform their duties. OIG has identified similar issues at other posts and issued a management assistance report in May 2017 that highlighted widespread failures to perform ISSO duties.¹⁴ In a subsequent Department cable,¹⁵ the Bureau of Information Resource Management requested that embassy management work with ISSOs to ensure performance of their duties by prioritizing resources to make sure that cyber-security needs were met and documented. A lack of staff, limited time, and the lack of prioritization for cybersecurity needs led to non-performance of these duties, which put the security of the Department's computer systems at risk.

Recommendation 8: Embassy Banjul should require that Information Systems Security Officers perform information systems security duties, in accordance with Department guidance. (Action: Embassy Banjul)

Dedicated Internet Networks Not Maintained in Accordance with Department Standards

The embassy did not effectively support and maintain its DINs, as required in 5 FAM 872.1a. For example, OIG found DIN workstations with outdated antivirus software and unauthorized wireless components. This deficiency occurred because the section did not have standard operating procedures and lacked management oversight. In addition, a 2016 Regional Computer Security Officer report noted that the DINs lacked firewalls to prevent unauthorized access to systems, which OIG found had yet to be installed. The embassy told OIG it had procured firewalls for all DINs and was awaiting delivery. The absence of proper DIN oversight created security vulnerabilities from unmonitored and unprotected systems.

Recommendation 9: Embassy Banjul should implement standard operating procedures for supporting and maintaining dedicated internet networks in accordance with Department standards. (Action: Embassy Banjul)

Telephone Call Accounting System Did Not Meet Standards

Embassy Banjul had neither a properly configured telephone call accounting system nor procedures to accurately bill for monthly telephone services, as outlined in 5 FAM 527a and c. Instead of reviewing monthly charges to determine the validity of outgoing calls, the embassy approved all charges and sent

¹⁴ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

¹⁵ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

them to the Financial Management Unit for payment. Information Management Section staff told OIG that the embassy upgraded its telephone system in December 2017 but had yet to configure the call accounting system to retrieve records for outgoing calls. The Information Management Officer configured the system during the inspection and retrieved telephone records for December 2017 through February 2018. These outgoing call records showed numerous excessive telephone charges ranging from \$100 to \$840 for a single call. The Ambassador told OIG the embassy had initiated a review of the telephone charges to determine if any were personal rather than official. However, the lack of established procedures to account for personal telephone charges limited the embassy's ability to maintain internal control over the Department's telephone expenses.

Recommendation 10: Embassy Banjul should implement procedures to accurately bill for monthly telephone services in accordance with Department standards. (Action: Embassy Banjul)

Pre-Paid Cell Phones Were Not Issued in Accordance with Department Standards

At the time of the inspection, almost 90 percent of the embassy's LE staff had embassy-issued, pre-paid SIM cards. By issuing pre-paid SIM cards, the embassy effectively provided staff with pre-paid cell phones. According to management officials, the embassy issued SIM cards to LE staff members due to the unreliability of the local telephone infrastructure and in case of an after-hours emergency. Embassy policy, however, limited cell phone issuance to employees requiring a phone for performing their daily work or requiring frequent after-hours access, the determination of which would be made by their section chiefs. Furthermore, guidance in 5 FAM 526.1d calls for cellular telephones to be provided only to those employees who can demonstrate a justifiable need or requirement in the normal performance of their assigned duties. Failure to limit cell phone and SIM card issuance to those with a justifiable, work-related need for a phone leaves Embassy Banjul vulnerable to wasteful spending.

Recommendation 11: Embassy Banjul should issue cell phones to locally employed staff members in accordance with Department standards. (Action: Embassy Banjul)

Cell Phone Policy Did Not Meet Standards

The embassy had neither an adequate cell phone policy nor a mechanism to identify personal use of its pre-paid cell phones or SIM cards. Embassy Banjul's cell phone policy, dated October 2017, did not include guidance for personal use of pre-paid cell phones or SIM cards. Office of Management and Budget guidance¹⁶ requires agencies to take steps to reduce unnecessary mobile device services and, through usage reports, to optimize the level of service acquired by analyzing over- and under-usage. However, section staff told OIG that it was impossible to identify the personal use of pre-paid cell phone credits. In addition, determining usage by examining the balance of those credits was a laborious and inefficient task, due to the vendor's billing method. OIG found that section staff and the General Services Officer had begun the process to consolidate pre-paid and non-pre-paid phone lines under one contract but had yet to complete it at the time of the inspection. This consolidation would provide a mechanism to identify personal use of all embassy-issued cell phones and SIM cards. The lack of an adequate cell phone policy left Embassy Banjul vulnerable to wasteful spending.

¹⁶ Office of Management and Budget memorandum M-16-20, "Category Management Policy 16-3: Improving the Acquisition and Management of Common Information Technology: Mobile Devices and Services," August 4, 2016.

Recommendation 12: Embassy Banjul should implement a cell phone policy that complies with Department standards (Action: Embassy Banjul)

Knowledge Management Process for Documenting Operations Lacking

Embassy Banjul lacked knowledge management procedures to ensure reliable documentation and historical information for managing section programs. According to 5 FAM 867, managers must maintain documentation for all aspects of computer support and operations to ensure continuity and consistency. OIG found instances where managers were unable to explain the conditions of operations for which they were responsible. For example, section managers could not readily access historical information on the destruction of IT equipment or the condition of the DINs at the American Corner locations. OIG also found inconsistent systems maintenance record keeping. The Information Management Officer began to address some of these deficiencies prior to the inspection. However, longstanding staffing shortages and the resulting impact on IT operations left limited time for the staff to complete this process. The absence of reliable information affects internal control and diminishes the effectiveness of information management programs.

Recommendation 13: Embassy Banjul should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its information management programs. (Action: Embassy Banjul)

Information Technology Contingency Planning Did Not Meet Standards

Section managers did not update the embassy's classified IT contingency plan or test its unclassified and classified IT contingency plans, as required by 12 FAH-10 H-232.3-1b(1-3), due to competing priorities. Department guidelines require management to develop and test IT contingency plans annually for effectiveness and to determine the mission's readiness to execute them during unplanned system outages or disruptions. Inadequate contingency planning and testing prevents managers from mitigating the risk of system and service disruptions.

Recommendation 14: Embassy Banjul should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: Embassy Banjul)

Information Technology Contingency Plan Training Not Conducted

The embassy did not conduct initial and annual refresher IT contingency training for employees with responsibilities in these areas. According to 12 FAH-10 H-232.2-1, management must ensure that initial and annual refresher IT contingency training is delivered to employees based on their roles and responsibilities, as defined in the IT contingency plans. Section managers did not conduct this training because they did not have current IT contingency plans and were unaware of the requirement. Failure to complete initial and annual refresher IT contingency plan training impedes the embassy's ability to effectively and appropriately respond to unplanned systems outages or disruptions.

RECOMMENDATION 15: Embassy Banjul should implement a plan for conducting information technology contingency training for appropriate employees, in accordance with Department standards. (Action: Embassy Banjul)

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 Banjul, the Bureau of Administration, and the Bureau of Overseas Buildings Operations. 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 Banjul should nominate an Equal Employment Opportunity Counselor in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul nominated an Equal Employment Opportunity Counselor in accordance with Department guidance.

Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Banjul and the Bureau of Consular Affairs, should renovate Embassy Banjul's Consular Section to comply with Department standards. (Action: OBO, in coordination with Embassy Banjul and CA)

Management Response: In its November 6, 2018, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul's Consular Section has been renovated to comply with Department standards.

Recommendation 3: Embassy Banjul should implement a formal training program for its locally employed staff in accordance with Department standards. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul implemented a formal training program for its locally employed staff that complies with Department standards.

Recommendation 4: Embassy Banjul should revise its local compensation plan to define specific criteria that would warrant a salary advance and outline requirements for supporting documentation. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the revised local compensation plan.

Recommendation 5: Embassy Banjul, in coordination with the Bureau of the Comptroller and Global Financial Services, should collect outstanding salary advances of \$2,000 due from former employees and put those funds to better use. (Action: Embassy Banjul, in coordination with CGFS)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul collected the outstanding salary advances and put the funds to better use.

Recommendation 6: The Bureau of Administration, in coordination with Embassy Banjul, should conduct a staff assistance visit to address contract administration deficiencies. (Action: A, in coordination with Embassy Banjul)

Management Response: In its November 1, 2018, response, the Bureau of Administration concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Bureau of Administration's staff assistance visit to address contract administration deficiencies.

Recommendation 7: Embassy Banjul should implement an annual acquisition plan, in accordance with the Federal Acquisition Regulation. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation. The embassy noted a target compliance date of November 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul implemented an annual acquisition plan in accordance with Federal acquisition regulations.

Recommendation 8: Embassy Banjul should require that Information Systems Security Officers perform information systems security duties, in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Information Systems Security Officers perform information systems security duties in accordance with Department guidance.

Recommendation 9: Embassy Banjul should implement standard operating procedures for supporting and maintaining dedicated internet networks in accordance with Department standards. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of implemented standard operating procedures for supporting and maintaining dedicated internet networks in accordance with Department standards.

Recommendation 10: Embassy Banjul should implement procedures to accurately bill for monthly telephone services in accordance with Department standards. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of implemented procedures to accurately bill for monthly telephone services in accordance with Department standards.

Recommendation 11: Embassy Banjul should issue cell phones to locally employed staff members in accordance with Department standards. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul issued cell phones to locally employed staff members in accordance with Department standards.

Recommendation 12: Embassy Banjul should implement a cell phone policy that complies with Department standards (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a cell phone policy that complies with Department standards.

Recommendation 13: Embassy Banjul should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its information management programs. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of knowledge management procedures for Embassy Banjul's information management programs.

Recommendation 14: Embassy Banjul should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Banjul tested the information technology contingency plans for unclassified and classified networks in accordance with Department guidance.

Recommendation 15: Embassy Banjul should implement a plan for conducting information technology contingency training for appropriate employees, in accordance with Department standards. (Action: Embassy Banjul)

Management Response: In its November 6, 2018, response, Embassy Banjul concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a plan for conducting information technology contingency training for appropriate employees in accordance with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	C. Patricia Alsup	11/2015
Deputy Chief of Mission ¹	Marc Shaw	08/2015
Chiefs of Sections:		
Management	Erik Hall	08/2017
Consular	Vacant	
Political-Economic	Youliana Sadowski	06/2017
Public Affairs ²	Janel Heird	05/2015
Regional Security	Robert Tillman	07/2016
Other Agencies:		
Peace Corps	Vacant	

Source: Embassy Banjul

¹ The DCM completed his assignment and departed Banjul during the inspection (April 2018).

² The Public Affairs Officer completed her assignment and departed Banjul during the inspection (May 2018).

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 19 to September 10, 2018, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by OIG for the Department of State and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of the USAGM, and Congress with systematic and independent evaluations of the operations of the Department and the 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; whether U.S. interests are being 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; whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

Methodology

In conducting inspections, OIG uses a risk-based approach to prepare for each inspection; reviews pertinent records, circulates, and compiles the results of survey instruments, as appropriate; conducts interviews with Department and on-site personnel; observes daily operations; and reviews the substance of the report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG uses professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

In the course of this inspection, OIG interviewed more than 80 Department and other agency employees and officials in Washington and Embassy Banjul, and reviewed 63 responses from American and locally employed staff at Embassy Banjul.

APPENDIX B: MANAGEMENT RESPONSES

November 6, 2018

UNCLASSIFIED

THRU: AF – Assistant Secretary Nagy

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

FROM: Embassy Banjul – Chargé d’Affaires, a.i. Shelly A. Seaver

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Banjul

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

OIG Recommendation 1: Embassy Banjul should nominate an Equal Employment Opportunity Counselor in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation. Embassy Banjul nominated an O3 section head for training in Summer 2018, but the training was not approved by S/OCR. As funding is limited, we will aim to train an officer arriving in the Summer 2019 transfer season, should the nomination be approved by S/OCR. However, post had previously understood from S/OCR that missions of the size of Embassy Banjul do not need to have an EEO Counselor present at post, therefore, post believes we are in compliance with Department guidance.

OIG Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Banjul and the Bureau of Consular Affairs, should renovate Embassy Banjul’s Consular Section to comply with Department standards. (Action: OBO, in coordination with Embassy Banjul and CA)

Management Response: Post understands that OBO will coordinate with CA and Post to determine what elements of the previous Consular Upgrade project planned at post would best serve post’s current needs, considering structural limitations.

OIG Recommendation 3: Embassy Banjul should implement a formal training program for its locally employed staff in accordance with Department standards. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and considers the recommendation fully addressed. Post has implemented a formal training plan for locally employed staff in accordance with Department standards. At the beginning of the fiscal year, section supervisors reviewed and submitted training plans and travel budgets for review and approval by the Management Officer.

OIG Recommendation 4: Embassy Banjul should revise its local compensation plan to define specific criteria that would warrant a salary advance and outline requirements for supporting documentation. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and considers the recommendation fully addressed. Post has defined specific criteria that would warrant a salary advance and has outlined requirements for supporting documentation in a June 2018 Mission Policy.

OIG Recommendation 5: Embassy Banjul, in coordination with the Bureau of the Comptroller and Global Financial Services, should collect outstanding salary advances of \$2,000 due from former employees and put those funds to better use. (Action: Embassy Banjul, in coordination with CGFS)

Management Response: Embassy Banjul accepts the recommendation and is coordinating with CGFS to collect the outstanding funds.

OIG Recommendation 6: The Bureau of Administration, in coordination with Embassy Banjul, should conduct a staff assistance visit to address contract administration deficiencies. (Action: A, in coordination with Embassy Banjul)

Management Response: Embassy Banjul agrees with the recommendation and we understand the Bureau of Administration, Office of the Procurement Executive also agrees with this recommendation. Post understands that A has a plan to address this recommendation.

OIG Recommendation 7:

Embassy Banjul should implement an annual acquisition plan, in accordance with Federal acquisition regulations. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and will implement an annual acquisition plan during fiscal year 2019 budget preparations in November 2018.

OIG Recommendation 8: Embassy Banjul should require that Information Systems Security Officers perform information systems security duties, in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and considers the recommendation fully addressed. Embassy Banjul has established a monthly ISSO Mandatory task checklist. The ISSO now, on a monthly basis, conducts the following:

- User Account Access Reviews
- User Account Request History
- Stale Account Remediation
- Visitor Log reviews
- Random Email Reviews
- Random User Data Reviews
- Network Shared Data Reviews
- Remote Processing Reviews

OIG Recommendation 9: Embassy Banjul should implement standard operating procedures for supporting and maintaining dedicated internet networks in accordance with Department standards.

Management Response: Embassy Banjul accepts the recommendation. Post has received and installed firewall devices updated antivirus software on all DINs. A schedule has been established to update the definitions each quarter. Post is establishing standard operating procedures for DIN oversight.

OIG Recommendation 10: Embassy Banjul should implement procedures to accurately bill for monthly telephone services in accordance with Department standards.

Management Response: Embassy Banjul accepts the recommendation considers the recommendation fully addressed. Post has implemented procedures to accurately bill for monthly telephone services in accordance with Department standards. Each month, the IMO and MO review phone bills and send charges to employees for review and reimbursement, if necessary, to the Budget & Fiscal office via Pay.gov. Post is also working to implement post-paid cell phone plans for all Embassy-issued cell phones and has eliminated issuance of pre-paid SIM cards.

OIG Recommendation 11: Embassy Banjul should issue cell phones to locally employed staff members in accordance with Department standards.

Management Response: Embassy Banjul accepts the recommendation and considers it completed. Post updated the policy that governs the issuance of cell phones to locally employed staff, in accordance with 5 FAM 526.1.

OIG Recommendation 12: Embassy Banjul should implement a cell phone policy that complies with Department standards.

Management Response: Embassy Banjul accepts the recommendation and considers the recommendation fully implemented. Post has updated the policy that governs the issuance of cell phones to locally employed staff, in accordance with 5 FAM 526.1. Per policy, only LE Staff with a demonstrated business need receive Embassy-issued cell phones.

OIG Recommendation 13: Embassy Banjul should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its information management programs. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and considers it completed. Post has implemented knowledge management procedures for capturing, sharing, transferring, and retaining information related to its information management programs. Post also conducts monthly training and will issue management notices to provide additional information to the Mission community regarding these procedures on a consistent basis.

OIG Recommendation 14: Embassy Banjul should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and considers it completed. Post has tested the information technology contingency plans for unclassified and classified networks in accordance with Department guidance.

OIG Recommendation 15: Embassy Banjul should implement a plan for conducting information technology contingency training for appropriate employees, in accordance with Department standards. (Action: Embassy Banjul)

Management Response: Embassy Banjul accepts the recommendation and is implementing a plan for conducting information technology contingency training for appropriate employees, in accordance with Department standards, beginning in early November 2018.

The point of contact for this memorandum is Embassy Banjul Chargé d’Affaires, a.i., Shelly Seaver.

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United States Department of State

Washington, D.C. 20520

NOV 6 2018

UNCLASSIFIED MEMORANDUM

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

FROM: OBO/RM – Jürg E. Hochuli, Deputy Director *JH*

SUBJECT: Response to OIG Draft Report - Inspection of Embassy Banjul, The Gambia, Report No. ISP-I-19-04

OBO has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendation provided by OIG.

Recommendation 2: (U) The Bureau of Overseas Buildings Operations, in coordination with Embassy Banjul and the Bureau of Consular Affairs, should renovate Embassy Banjul's Consular Section to comply with Department standards. (Action: OBO, in coordination with Embassy Banjul and CA)

OBO Response: (U) OBO agrees with the recommendation and will work with Embassy Banjul and Consular Affairs on how best to address the issues with the consular workspace in order to comply with Department standards.

The point of contact for this memorandum is Amy Gertsch.

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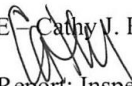
United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

November 1, 2018

MEMORANDUM

TO: OIG/ISP – Sandra Lewis
FROM: A/OPE –  Cathy V. Read
SUBJECT: Draft Report: Inspection of Embassy Banjul, The Gambia

Thank you for the opportunity to provide a compliance update on the subject draft Inspection Report.

Recommendation 6: The Bureau of Administration, in coordination with Embassy Banjul, should conduct a staff assistance visit to address contract administration deficiencies. (Action: A, in coordination with Embassy Banjul)

Management Response to Draft Report (11/1/2018): The Bureau of Administration, Office of the Procurement Executive agrees with this recommendation. Considering the size of Banjul, both number of employees and number of awards, a joint SAV with a larger Embassy will provide the greatest benefit to Banjul.

A/OPE will reach out to Embassy Banjul GSO staff in the next two weeks and will be hosting teleconferences and VTCs to assist with any issues until the SAV can take place.

A/OPE also plans a joint staff assistance visit (SAV) with Banjul and Accra with the physical SAV being conducted in Accra in FY2020 with the Banjul procurement team being invited to physically attend in Accra. OPE has found that the more participants in our SAVs the better exchange of communication, generating more questions, thoughts and ideas, an all-around better exchange of information and discussions. Therefore, OPE would also encourage Banjul to send a lead employee from their financial office, facilities office and possibly their information management office, since these are the offices that work most closely with procurement and are typically procurement's largest customers, to attend, if possible. For those Banjul employees that cannot physically attend, a scheduled list of presentations will be provided and a DVC between Accra and Banjul will be arranged. In addition, the OPE participants will set one day aside for individual discussions with the Banjul participants to include discussing the results of their e-file reviews and any post specific issues.

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ABBREVIATIONS

DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations

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