



Office of Inspector General United States Department of State

ISP-I-19-07

Office of Inspections

February 2019

Inspection of Embassy Majuro, Republic of the Marshall Islands

BUREAU OF EAST ASIAN AND PACIFIC AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-19-07

What OIG Inspected

OIG inspected the executive direction, consular, resource management, and information management operations of Embassy Majuro.

What OIG Recommended

This report includes 12 recommendations. OIG made 11 recommendations to Embassy Majuro to improve consular, resource management, and information management operations, and 1 recommendation to Embassy Manila to document Information Systems Security Officer reviews.

In its comments on the draft report, the Department concurred with all 12 recommendations. OIG considers all 12 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 response is reprinted in its entirety in Appendix B.

February 2019

OFFICE OF INSPECTIONS

Bureau of East Asian and Pacific Affairs

Inspection of Embassy Majuro, Republic of the Marshall Islands

What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Majuro in a professional and collaborative manner.
- Embassy Majuro lacked sufficient internal controls in consular, resource management, security, and information management operations.
- Embassy Manila generally provided adequate support to Embassy Majuro in information management and management operations.
- Embassy Majuro had deficiencies in the implementation of its information management and information security programs that could put Department of State computer systems at risk.

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CONTEXT

The Republic of the Marshall Islands (RMI) is a small atoll country with limited air services and significant transportation and connectivity challenges. The majority of the population lives in two urban centers: Majuro, the capital, and Ebeye. The remainder is disbursed over 27 other remote atolls and five islands, making business and logistics challenging, even at the most basic levels. Additionally, because most of RMI is located only a meter or two above sea level, severe climate change and natural disasters could cause significant losses, including human lives.

After almost four decades under U.S. administration as part of the United Nations Trust Territory¹ of the Pacific Islands, the RMI attained independence in 1986 under a Compact of Free Association (COFA).² The RMI received approximately \$1 billion in aid, primarily for health, education, and public infrastructure, from the United States from 1986 to 2001 under the original COFA. In 2002 and 2003, the United States and the Marshall Islands renegotiated the COFA's financial package for an additional 20-year period, which ends in 2024. Under the amended COFA, the RMI will receive \$1.5 billion in direct U.S. assistance, and the United States and Marshall Islands will jointly fund a trust fund for Marshallese citizens that will provide an income stream beyond 2024. Most RMI citizens are free to travel, live, study, and work indefinitely in the United States without visas; U.S. citizens generally have the same rights with respect to RMI. The United States is responsible for the country's defense as if it were a U.S. territory and has access and strategic denial rights over its 750,000 square mile Exclusive Economic Zone.

The RMI hosts the U.S. Army Kwajalein Atoll Reagan Missile Test Site, a key installation in the U.S. missile defense network and a unique strategic asset with more than \$1 billion of advanced facilities. Kwajalein also hosts one of the four dedicated ground antennas used for the Global Positioning System, or GPS, navigation. U.S. assistance and lease payments to use the Kwajalein Atoll as a military base are the mainstay of the RMI budget. Agricultural production, primarily subsistence farming, provides some additional income.

Embassy Majuro's primary Integrated Country Strategy (ICS) goals are to:

- Maintain the United States as the RMI's primary security guarantor and partner of choice in the region.
- Support the country's strong, sustainable, balanced, and inclusive economic growth and environmental stewardship commitments.
- Strengthen democratic governance and civil society to increase the dignity of all people in the RMI.

¹ A trust territory is a colony or territory placed under the administration of one or more countries by commission of the United Nations.

² The COFA is a treaty that establishes free association between the United States and the RMI. The COFA was signed into law in 1983 and became effective in 1986 when the RMI gained independence.

At the time of the inspection, Embassy Majuro was authorized 4 Department of State (Department) U.S. direct-hire personnel, 1 eligible family member position, and 37 locally employed (LE) staff members. Other agencies represented at the embassy are the Department of Interior and the U.S. Agency for International Development, each with one direct-hire American employee.

Embassy Majuro is heavily dependent on regional support because of its small staffing footprint. The Regional Consular Officer provides consular support twice a year from Embassy Bangkok, and Embassy Manila provides security, information management, general services, financial management, human resources, facilities management, and medical support through a March 2015 memorandum of understanding. Embassy Manila provides assistance for all functional areas via telephone, email, and temporary duty (TDY) support, although the amount of TDY support varies according to the function. For example, information technology (IT) personnel visit approximately twice a year. An Embassy Manila-based Assistant Regional Security Officer visits each quarter, while general services, financial management, human resources, and facilities management visits occur quarterly or as needed.

The current memorandum of understanding does not specifically state the amount of TDY support to be provided. Embassy Majuro staff told OIG that while they were pleased with the support Embassy Manila provides, more visits would be helpful. At the time of the inspection, a revised memorandum was in the approval process.

OIG conducted this inspection of Embassy Majuro consistent with Section 209 of the Foreign Service Act.³ Using its risk-based approach to inspections, OIG inspected executive direction, consular operations, management operations including management controls, and information management. The companion classified inspection report discusses the embassy's security program and issues affecting the safety of mission personnel and facilities.

EXECUTIVE DIRECTION

OIG assessed leadership on the basis of on-site interviews that included comments on Front Office performance; staff questionnaires; and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career Foreign Service Officer, arrived in July 2016. She previously served as the Political Advisor to the Vice Chairman of the Joint Chiefs of Staff and Supreme Allied Commander Transformation, North Atlantic Treaty Organization. The Deputy Chief of Mission (DCM) arrived in August 2017 after serving as the Consular Section Chief at Embassy Oslo, Norway.

³ See Appendix A.

The Ambassador and the DCM demonstrated the Department's leadership and management principles outlined in 3 FAM 1214. Embassy staff told OIG the relationship between the Ambassador and the DCM was excellent. The two evenly divided the workload, and both stayed in regular communication with the staff. The Ambassador hosted weekly country team meetings and monthly meetings with the entire staff, and the DCM had weekly one-on-one meetings with each U.S. direct hire employee. The Ambassador also hosted events for all staff at her residence for major holidays. The Ambassador and the DCM encouraged adherence to Department policies. The Ambassador emphasized in meetings that fraud, waste, and abuse would not be tolerated, while the DCM took steps to ensure LE staff members were held accountable to standards on time and attendance and prevention of sexual harassment.

Equal Employment Opportunity

The embassy's Equal Employment Opportunity (EEO) program did not meet the requirements of 3 FAM 1500. Although the embassy posted EEO notices and references on a communal bulletin board, it did not include contact information for Embassy Manila's EEO counselors. In addition, the embassy did not have a designated EEO counselor. Furthermore, OIG found during interviews that some LE staff members did not understand the purpose of the EEO program. Guidance in 2 FAM 1514.2d encourages at least one non-American LE staff EEO liaison at overseas posts. During the inspection, the embassy filled the vacant counselor position and appointed an LE liaison. OIG advised the Ambassador, the DCM, and the newly appointed counselor to provide an EEO presentation to the LE staff, which they agreed to do. As a result, OIG did not make a recommendation to address these issues.

Execution of Foreign Policy Goals and Objectives

The embassy prepared its FY 2017-FY 2019 ICS in May 2018 in accordance with the most recent Department guidance.⁴ The embassy involved all U.S. direct-hire personnel in the process, which began with an off-site session hosted by the Ambassador at her residence. The group determined that the new ICS would contain three pillars: security, economic development, and environmental resilience. The Ambassador also included some LE staff members in the ICS review to gain a Marshallese perspective. The Department approved the ICS in October 2018.

Through the COFA, the U.S. Government provided almost \$100 million in annual assistance to the RMI from more than 40 Federal agencies. In the year prior to the inspection, the embassy granted country clearance to more than 500 U.S. Government visitors. As a result, the Ambassador hosted or attended one or more representational events almost daily. The Ambassador and the DCM engage with Washington through regular calls to the Bureau of East Asian and Pacific Affairs. Washington officials told OIG they were pleased with the Ambassador's performance.

⁴ Criteria for the updated strategic planning process are contained in Department cable 17 STATE 96230, "Update of the Strategic Planning Process for the Joint Strategic Plan, Bureau and Country Strategies," September 20, 2017. The Department announced the 2018 ICS program in cable 18 STATE 17760, "Launch of Bureau and Mission Strategic Planning," February 27, 2018.

Spotlight on Success: End-of-Week Report Keeps Stakeholders Informed

Embassy Majuro produced an end-of-week email report that discussed news and activities that promote ICS goals. The weekly report included a variety of articles and photographs related to activities in the Marshall Islands during that period, including major weather events, Kwajalein base activities, the Ambassador's travel, upcoming official visitors, and training provided to local officials. In addition to the regional bureau and other Department personnel, the embassy sent the end-of-week report to other agencies, such as the Departments of Defense, Health and Human Services, and Agriculture; the National Oceanic and Atmospheric Administration; and the U.S. Agency for International Development. Embassy staff also developed a calendar for presentation to official visitors that included photographs of embassy activities in support of ICS goals. Both U.S. direct-hire and LE staff contributed to these efforts, which resulted in better informed stakeholders and official visitors who were aware of the embassy's activities within the local community.

Adherence to Internal Controls

The embassy prepared the FY 2017 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 024. The Political/Economic/Consular officer coordinated its preparation, in which embassy staff reviewed all aspects of their processes related to management controls. He and the Ambassador then consulted with the regional bureau and submitted the Statement of Assurance to the Department in September 2017. The current DCM was not involved in the process, as it occurred shortly before her arrival. At the time of the inspection, the embassy held monthly internal controls meetings and, according to the regional bureau, the DCM was fully engaged on management controls. Nevertheless, OIG identified internal control vulnerabilities in consular operations, resource management, information management, and security that are discussed below and in the companion classified report.

OIG found that the Ambassador and the DCM complied with the requirements of 9 FAM 403.9-2(D) to regularly review the Consular Section chief's visa adjudications.

Security and Emergency Planning

The Ambassador conducted her security responsibilities in accordance with 12 Foreign Affairs Handbook (FAH)-1 H-721. However, OIG found deficiencies in Embassy Majuro's physical security, residential security, and local guard programs that are discussed in the companion classified report. Embassy Majuro had a good working relationship with the Embassy Manila-based Regional Security Officer, and the Ambassador met with him each time he came to Majuro. The embassy's Emergency Action Plan and security directives were up-to-date. The Ambassador and the DCM participated in emergency drills, and the embassy tested its satellite phones. OIG identified security discrepancies that the embassy was able to resolve during the inspection, including repairs to the perimeter lighting and Imminent Danger Notification System. The Ambassador conducted the required annual review of the Memorandum of

Agreement on Security of Department of Defense Elements and Personnel Between Chiefs of Mission and Geographic Combatant Commanders.⁵

CONSULAR AFFAIRS

Embassy Majuro's Political/Economic/Consular officer led the Consular Section and spent approximately one-half of his time on consular work. He was assisted by one LE staff member. The volume of consular work was low; the embassy processed 480 nonimmigrant visas and 188 U.S. passport applications in FY 2017. Under the COFA, most RMI citizens do not need visas to visit, study, or work in the United States, so most nonimmigrant visa applicants are third-country nationals. The embassy estimated that more than 3,700 American citizens reside in the RMI, and there are more than 500 visitors annually. The country's transportation and connectivity issues make it challenging for the embassy to provide consular services to American citizens living on scattered islands throughout the country. Embassy Manila processes all immigrant visas for RMI citizens.

OIG reviewed the Consular Section's leadership and management, nonimmigrant visa operations, American citizen services, anti-fraud programs, cashiering operations, facilities, and crisis preparedness. OIG concluded that the embassy implemented consular management controls in most areas in accordance with regulations and Department standards. However, OIG noted some areas, discussed below, where the embassy could improve consular operations.

Embassy Did Not Update Its Warden System

The embassy did not meet Department standards for maintaining and testing its warden system.⁶ Guidance in 7 FAM 071a states that a warden system "is essential for a post to carry out its primary function of U.S. citizen protection in times of crisis." A warden system enables a consular section both to reach U.S. citizens in an emergency and to obtain information from them. The embassy was aware that it needed to update its warden system, test it, and hold periodic meetings with the wardens, but it had not yet done so due to competing priorities. Without an updated and tested warden system, the embassy would be hampered in protecting American citizens during a crisis. This is especially true in the RMI, as the U.S. citizen community is located on several islands covering a large geographic area with limited options for transportation.

Recommendation 1: Embassy Majuro should update and test its warden system in accordance with Department standards. (Action: Embassy Majuro)

⁵ Cable 18 STATE 16195, "Security Responsibility for DOD Personnel Overseas – Mandatory Annual Review of MOA Between COMs and GCCs on Security of DOD Elements and Personnel," April 6, 2018.

⁶ During the inspection, the Department announced a new system to improve the warden system's ability to promote the safety and security of U.S. citizens overseas and to make the system more relevant in an age of social media. Because the new American Liaison Network had not been codified in the FAM at the time of the inspection, OIG continued to use the term "warden system" in this report.

Embassy Did Not Engage with the U.S. Citizen Community

The embassy had not engaged with the country's U.S. citizen community in the 2 years prior to the inspection. Guidance in 7 FAM 078(1) requires consular sections to connect with the community through participation in town halls and other venues in order to provide information on security issues, explain the embassy's role in helping U.S. citizens, and seek feedback. Because organizations such as an American Chamber of Commerce or Overseas Security Advisory Council do not exist in the RMI, town halls would be the primary venue with which to engage the U.S. citizen community. The embassy was aware that it needed to take these steps but had not yet done so. Embassy officers have informal contact with individual U.S. citizens throughout the country, but without periodic town hall meetings, the U.S. citizen community may not have the information it needs on security issues, including how to respond to emergencies or crises.

Recommendation 2: Embassy Majuro should implement a plan to engage the U.S. citizen community throughout the Republic of the Marshall Islands. (Action: Embassy Majuro)

Embassy Did Not Conduct a Validation Study on Issued Nonimmigrant Visas

The embassy had not conducted a validation study on issued nonimmigrant visas in the year prior to the inspection. Guidance in 7 FAH-1 H-943.6-2b, however, requires consular sections to conduct such studies each year to analyze entry and exit data for visa holders to determine whether they used their visas in accordance with the law. The embassy was aware of this requirement but had yet to do such a study. Failure to conduct validation studies means the embassy is unable to determine whether officers are adjudicating visa applications appropriately or additional training is needed.

Recommendation 3: Embassy Majuro should conduct a validation study on nonimmigrant visas in accordance with Department standards. (Action: Embassy Majuro)

Consular Officer Did Not Have Line of Sight to the Consular Work Area

The Political/Economic/Consular Officer did not have line of sight to the area where the sole LE consular staff member worked. The other duties of the consular officer required that his office be located on the embassy's second floor, whereas the consular section is on the first floor. Guidelines in 7 FAH-1 H-281e state that line of sight allows supervisors to monitor operations, including controlled items such as visa foils, print stations, and the cashier booth. The embassy had focused on resolving this issue since 2017, but it was only shortly before the inspection that it received funding to install a closed-circuit TV system. This issue should be addressed promptly, as the lack of line of sight increases the risk of improper use of controlled items.

Recommendation 4: Embassy Majuro, in coordination with Embassy Manila, should install a closed-circuit TV or other system in the office of the Political/Economic/Consular Officer to provide line of sight in the Consular Section in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

RESOURCE MANAGEMENT

OIG reviewed Embassy Majuro's General Services, Financial Management, Human Resources, and Facilities Management Sections and determined that the operations generally complied with Department standards and policies, with the exception of weaknesses in embassy fleet management and facilities management.

Embassy Did Not Hold Semi-Annual Meetings of Its Safety, Health, and Environmental Management Committee

Embassy Majuro's Safety, Health, and Environmental Management Committee did not meet semi-annually as required by Department standards. The committee last met in March 2017. Guidance in 15 FAM 933.2a, however, requires that each post with more than 25 employees establish a Safety, Health, and Environmental Management Committee and that the committee meet at least semi-annually. The Post Occupational Safety and Health Officer did not make the meetings a priority because of competing requirements and a lack of facilities management expertise and training. An active committee could proactively identify safety issues and implement preventative measures to mitigate the potential for injury at the embassy.

Recommendation 5: Embassy Majuro should require that the Safety, Health, and Environmental Management Committee meet at least semi-annually, in accordance with Department standards. (Action: Embassy Majuro)

Embassy Unprepared for a Fire Emergency

Embassy Majuro did not have a written fire emergency action plan and was not conducting annual fire drills. Department standards in 15 FAM 812.1 and 15 FAM 831a and c, however, require a written fire plan for all occupied office buildings, and guidance in 12 FAH-1 H-762b requires posts to conduct two fire evacuation drills annually. The embassy did not meet these requirements due to other priorities. Failure to prepare for a fire increases the risk of loss of life and property during a fire emergency.

Recommendation 6: Embassy Majuro should publish a fire evacuation plan and hold fire drills in accordance with Department standards. (Action: Embassy Majuro)

Embassy Drivers Exceeded the Department's 10-Hour Workday Limit

Embassy Majuro employees who drove motor vehicles as part of their duties worked more than the maximum allowable 10 hours per 24 hour period. This is inconsistent with guidance in 14 FAM 432.4c(3) and the Department's Motor Vehicle Safety Management Program, Section C.7. The embassy did not manage the drivers' schedules carefully in order to comply with the standards. Failure to enforce this standard increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. Government property.

Recommendation 7: Embassy Majuro should adjust driver work schedules to bring them into compliance with Department standards. (Action: Embassy Majuro)

INFORMATION MANAGEMENT

OIG reviewed classified, unclassified, and dedicated internet network operations; physical protection of information technology assets; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services. One Information Management Officer was responsible for all aspects of information management operations and also served as the Post Security Officer and General Services Officer. One LE Computer Management Assistant administered the unclassified network. Embassy Manila's Regional Information Management Center provided guidance and TDY support.

OIG found that section personnel generally met the day-to-day computing and communications needs of the embassy, with a focus on customer service. However, embassy staff lacked the time to manage all aspects of information management operations due to competing security and general services duties responsibilities. As a result, OIG found significant deficiencies in the implementation of information management and information security programs, as detailed below and in the companion classified inspection report.

Information Technology Contingency Plans Were Outdated and Untested

Embassy Majuro had not updated and tested the IT contingency plan for the unclassified and classified computer networks. A May 2017 Bureau of Diplomatic Security Computer Security Assessment also identified this deficiency. According to 12 FAH-10 H-232.1 and 12 FAH-10 H-232.3-1b(1-3), each information system must have a documented contingency plan that is updated and tested annually. The Information Management Officer, who arrived at post a few weeks before the inspection, was aware of these issues but had not yet had the time to address them. An outdated and untested IT contingency plan increases the risk of ineffective responses to or loss of critical information during an emergency or crisis.

Recommendation 8: Embassy Majuro, in coordination with Embassy Manila, should update and conduct annual information technology contingency plan testing of the unclassified and classified networks in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

Local Information Technology Configuration Control Board Not Established

Embassy Majuro had not established a local IT Configuration Control Board to govern all systems equipment operated on the embassy's network. The May 2017 Bureau of Diplomatic Security Computer Security Assessment also identified this deficiency. Department standards in 5 FAM 862.1 state that an embassy that maintains its own IT systems must establish such a local board to ensure that the hardware, software, or network components installed on the local area networks do not adversely affect the existing local IT infrastructure. The embassy was aware of this issue, but section staff did not have the time to establish a board. The lack of a local IT Configuration Control Board can put Department computer systems at risk for outages, loss of information, and damage to computer equipment.

Recommendation 9: Embassy Majuro, in coordination with Embassy Manila, should establish an Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

Telecommunications Demarcation Point Improperly Located

The telecommunications demarcation point connecting the embassy's communications systems and the public telecommunication network was located improperly in the information systems center server room. This configuration is contrary to 12 FAH-6 H-651.5-2a, which requires the location of the demarcation point to be in a separate, locked building within the perimeter of the grounds or in a separate, locked room. Section staff were unaware of this guidance. Locating the public telecommunication equipment in the information systems server room creates security vulnerabilities when non-cleared internet service provider employees access the room to work on the public telecommunications system.

Recommendation 10: Embassy Majuro should relocate the telecommunications demarcation point outside the information systems server room in accordance with Department standards. (Action: Embassy Majuro)

Information Systems Security Officer Reviews Were Not Documented

Embassy Manila's Regional Information Systems Security Officer (ISSO) rarely completed information system audits, did not properly record the completed audit reviews, and did not complete the Department's ISSO checklist, as required by Department standards. Guidance in 12 FAM 623.2, however, requires the Department to create, protect, and retain information system audit records, which should include weekly vulnerability scanning, monthly random email reviews, and monthly random user data reviews. Additional guidance in 12 FAH-10 H-122.5-2 requires the Regional ISSO to conduct monthly reviews of audits records for indications of inappropriate activity. The newly arrived Regional ISSO provided limited monitoring in the 2 months prior to the inspection.

OIG issued a management assistance report in May 2017 that identified the need to enforce the performance of ISSO duties by overseas information management personnel in accordance with Department standards.⁷ In a subsequent Department cable, 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 cybersecurity needs were met and documented.⁸ Without regularly scheduled reviews and documented records, Department networks are vulnerable to potential unauthorized access and malicious activity.

⁷ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

⁸ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

Recommendation 11: Embassy Manila should complete and document Information Systems Security Officer reviews as required by Department standards. (Action: Embassy Manila)

Embassy Records Management Program Did Not Comply with Department Standards

Embassy Majuro did not have an effective records management program. Guidance in 5 FAM 414.5 requires the principal officer at each embassy to implement and administer records, policies, standards, systems, and procedures issued by the Department's Records Officer. In addition, 5 FAM 414.8 requires that all Department employees preserve documentary materials meeting the definition of a record under the Federal Records Act. OIG found that the embassy did not systematically reduce its paper files due to the lack of an effective embassy records management program that included training for embassy staff. The lack of an effective program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

Recommendation 12: Embassy Majuro should establish a records management program in accordance with Department standards. (Action: Embassy Majuro)

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 Majuro and Embassy Manila. Embassy Majuro's complete response, which was coordinated with Embassy Manila, can be found in Appendix B.⁹

Recommendation 1: Embassy Majuro should update and test its warden system in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Majuro updated and tested its warden system.

Recommendation 2: Embassy Majuro should implement a plan to engage the U.S. citizen community throughout the Republic of the Marshall Islands. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an implemented plan to engage the U.S. citizen community throughout the Republic of the Marshall Islands.

Recommendation 3: Embassy Majuro should conduct a validation study on nonimmigrant visas in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the validation study on nonimmigrant visas.

Recommendation 4: Embassy Majuro, in coordination with Embassy Manila, should install a closed-circuit TV or other system in the office of the Political/Economic/Consular Officer to provide line of sight in the Consular Section in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

⁹ The issuance of this report was delayed due to a 10-day Department-requested extension to provide its written comments, and the lapse in OIG's appropriations that occurred from 11:59 p.m. December 21, 2018, through January 25, 2019.

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a closed-circuit TV or other system that provides line of sight in the Consular Section.

Recommendation 5: Embassy Majuro should require that the Safety, Health, and Environmental Management Committee meet at least semi-annually, in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Safety, Health, and Environmental Management Committee semi-annual meetings.

Recommendation 6: Embassy Majuro should publish a fire evacuation plan and hold fire drills in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Majuro published a fire evacuation plan and holds fire drills in accordance with Department standards.

Recommendation 7: Embassy Majuro should adjust driver work schedules to bring them into compliance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of embassy driver work schedules that comply with Department standards.

Recommendation 8: Embassy Majuro, in coordination with Embassy Manila, should update and conduct annual information technology contingency plan testing of the unclassified and classified networks in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of annual information technology contingency plan tests that are conducted in accordance with Department standards.

Recommendation 9: Embassy Majuro, in coordination with Embassy Manila, should establish an Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Majuro established an Information Technology Configuration Control Board in accordance with Department standards.

Recommendation 10: Embassy Majuro should relocate the telecommunications demarcation point outside the information systems server room in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation. The embassy noted that it does not have sufficient resources to accomplish the modifications and has requested guidance from Embassy Manila, the Bureau of Overseas Buildings Operations, and the Regional Information Management Center.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the telecommunications demarcation point has been relocated outside the information systems server room.

Recommendation 11: Embassy Manila should complete and document Information Systems Security Officer reviews as required by Department standards. (Action: Embassy Manila)

Management Response: In its December 20, 2018, coordinated response with Embassy Majuro, Embassy Manila concurred with this recommendation. Embassy Manila noted that Embassy Majuro will complete and document the reviews for the classified system.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Information Systems Security Officer reviews are completed as required by Department standards.

Recommendation 12: Embassy Majuro should establish a records management program in accordance with Department standards. (Action: Embassy Majuro)

Management Response: In its December 20, 2018, response, Embassy Majuro concurred with this recommendation.

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

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Karen B. Stewart	7/2016
Deputy Chief of Mission	Katherine M. Reimondez	8/2017
Chiefs of Sections:		
Political/Economic/Consular	Daniel B. Dolan	11/2016
Security/Information Management/General Services	Laurel Bonds	4/2018
Other Agencies:		
Department of Interior	Fred R. Nysta	4/2016
Source: Embassy Majuro		

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 19 to October 12, 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 the Office of Inspector General (OIG) for the Department of State and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved, and 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.

In conducting inspections, OIG uses a risk-based approach to focus its inspection resources on areas of greatest impact. Consequently, OIG identified Embassy Majuro as a relatively small, lower risk mission and therefore limited the scope of this inspection to executive direction, consular operations, management operations, information management, and management controls.

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.

For this inspection, OIG conducted approximately 58 interviews and reviewed 66 questionnaires and approximately 269 documents. OIG also traveled to Embassy Manila to conduct interviews on the regional support provided to Embassy Majuro.

APPENDIX B: MANAGEMENT RESPONSE



U. S. Embassy Majuro

December 20, 2018

UNCLASSIFIED

THROUGH: EAP – W. Patrick Murphy, Senior Bureau Official

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

FROM: Embassy Majuro – Karen Stewart, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Majuro, Republic of the Marshall Islands

(U) Embassy Majuro has reviewed the draft OIG Inspection report. We provide the following comments in response to the OIG's recommendations:

(U) **OIG Recommendation 1:** Embassy Majuro should update and test its warden system in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Pol/Econ/Cons Officer has designated an American Liaison Network (ALN) Coordinator and has drafted an ALN Action Plan, which includes a new communication plan, Annual Liaison Roundtable Plan, and a Citizen Liaison Volunteer (CLV) Recruitment and Engagement Strategy. The Pol/Econ/Cons Officer will conduct an ALN kick-off with new CLVs in January 2019, will distribute new DLV Description of Duties documents and will obtain signed MOAs with all CLVs. Finally, the Pol/Econ/Cons officer will survey the CLVs to determine additional resources needed and will survey the U.S. citizen community to determine success of ALN within one year of ALN kick-off.

(U) **OIG Recommendation 2:** Embassy Majuro should implement a plan to engage the U.S. citizen community throughout the Republic of the Marshall Islands. (Action: Embassy Majuro)

(U) **Management Response:** Within a month following the ALN kick-off event, the Pol/Econ/Cons Officer will conduct a town hall with the American communities in Majuro and on Kwajalein to connect with the community and provide information on security issues, disaster/crisis response, and how we can assist American citizens. At the Town Halls, I will introduce the CLVs in attendance to the community and their roles. Additional information will be conveyed as needed via Facebook, Website, and Mascot. Within a year of the Town Halls,

the Pol/Econ/Cons officer will survey the American community to determine the success of our outreach efforts.

(U) **OIG Recommendation 3:** Embassy Majuro should conduct a validation study on nonimmigrant visas in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Pol/Econ/Cons Officer will conduct a nonimmigrant visa validation study in the first quarter of 2019 for all visas issued in 2016 and will analyze the data to determine if travelers used their visas properly and to determine any important trends that Consular officers at Post should be aware of.

(U) **OIG Recommendation 4:** Embassy Majuro, in coordination with Embassy Manila, should install a closed-circuit TV or other system in the office of the Political/Economic/Consular Officer to provide line of sight in the Consular Section in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

(U) **Management Response:** ESO Manila traveled to Post and installed a camera from their stock into the Consular section. ESO Manila explained that the system would not be able to provide a live feed to a monitor in the Pol/Econ/Cons Officer's office, but rather records all of the data onto a DVR, which can then be accessed by the Pol/Econ/Cons officer as needed.

(U) **OIG Recommendation 5:** Embassy Majuro should require that the Safety, Health, and Environmental Management Committee meet at least semi-annually, in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Embassy Majuro agrees with the requirement. Post has had a staffing gap in the DCM position who serves as the committee chair. The new DCM is scheduled to arrive in Jan. 2019 after which Post will hold a SHEM committee meeting.

(U) **OIG Recommendation 6:** Embassy Majuro should publish a fire evacuation plan and hold fire drills in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Embassy Majuro held a fire drill on Oct. 23rd, 2018 and has another scheduled in Dec. This will complete the Embassy's fire drill requirements. During the last ARSO Manila quarterly visit, Post identified floor wardens and provided training for various emergency situations to include fires. Also prior to the Oct. 23rd drill, instructions were sent to all staff on how to react during a fire alarm. Majuro will complete the Fire section of EAP and publish as required.

(U) **OIG Recommendation 7:** Embassy Majuro should adjust driver work schedules to bring them into compliance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Embassy Majuro agrees with the recommendation. Since the time of the inspection, we have hired a full-time COM driver, which has reduced the driving hours of other GSO staff. Post still has one other driver who unfortunately has been on long-term medical absence since June. Post has advertised for a temporary position to fill this driver position and is in the approval process of another part-time driver.

(U) **OIG Recommendation 8:** Embassy Majuro, in coordination with Embassy Manila, should update and conduct annual information technology contingency plan testing of the unclassified and classified networks in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

(U) **Management Response:** Embassy Majuro agrees and will update the IT contingency plan and perform testing. The Embassy has been without a DCM for several months with the IMO filling in for most management roles. The new DCM is scheduled to arrive in January afterwards the IMO will have additional time to focus on IT contingency plan and testing.

(U) **OIG Recommendation 9:** Embassy Majuro, in coordination with Embassy Manila, should establish an Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Majuro, in coordination with Embassy Manila)

(U) **Management Response:** In agreement with Embassy Manila, Embassy Majuro's Local Change Control Board (LCCB) will fall under the umbrella of Manila's LCCB.

(U) **OIG Recommendation 10:** Embassy Majuro should relocate the telecommunications demarcation point outside the information systems server room in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Embassy Majuro agrees with the recommendation. The Embassy does not have sufficient resources to accomplish the modifications and has requested guidance from Manila Facilities, OBO and RIMC. A survey will need to be completed to determine available actions.

(U) **OIG Recommendation 11:** Embassy Manila should complete and document Information Systems Security Officer reviews as required by Department standards. (Action: Embassy Manila)

(U) **Management Response:** Embassy Manila has agreed to complete and document Information Systems Security Officer reviews for the Unclassified systems and are working to overcome the technical obstacles to conduct the scans remotely. Embassy Majuro will complete and document the reviews for the Classified systems.

(U) **OIG Recommendation 12:** Embassy Majuro should establish a records management program in accordance with Department standards. (Action: Embassy Majuro)

(U) **Management Response:** Embassy Majuro agrees with the recommendation. To date, electronic records for the previous DCM and Ambassador have been properly turned over. The backlog of Pol/Econ records have also been properly retired to the Records Service Center. Post continues to work through the additional backlog of paper files needing cataloged and hopes to finish early 2019. Staff is reviewing locally-stored records (i.e. financial, time & attendance) to ensure we are in compliance with the records disposition schedule, destroying files older than the retention schedule. The majority of staff have completed the new PK217 Records Management online course.

(U) The point of contact for this memorandum is Laurel Bonds, GSO/IMO/PSO.

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ABBREVIATIONS

COFA	Compact of Free Association
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
TDY	Temporary Duty

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