



Office of Inspector General
United States Department of State

ISP-I-19-14

Office of Inspections

April 2019

Inspection of Embassy Bogota, Colombia

BUREAU OF WESTERN HEMISPHERE AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-19-14

What OIG Inspected

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

What OIG Recommends

OIG made 39 recommendations: 29 to Embassy Bogota to improve management and information management operations and 9 to address issues in the Political, International Narcotics and Law Enforcement, Public Diplomacy, and Consular Sections; and 1 to the Bureau of Consular Affairs regarding the collection and reconciliation of nonimmigrant visa application fees.

In its comments on the draft report, the Department concurred with 38 recommendations and disagreed with 1. OIG considers all recommendations, except one, 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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What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Bogota in a professional and collaborative manner consistent with the Department of State's leadership principles.
- The Bureau of Consular Affairs needed to determine and correct the cause of a persistent shortfall in nonimmigrant visa application fees at Embassy Bogota.
- Consular Section leadership focused on adjudication speed in the visa unit to the detriment of other priorities.
- The embassy's International Narcotics and Law Enforcement Section needed to improve its end use monitoring of Department of Defense articles.
- The embassy ranked second highest in the Department for total number of motor vehicle collisions overseas, with 265 incidents from FY 2012 through FY 2017.
- The Information Management Section needed to correct several deficiencies to protect personally identifiable information and comply with Department information security standards at the Embassy Branch Office in Cartagena.
- Spotlight on Success: The embassy's Regional Security Office created an innovative map of Colombia that consolidated up-to-date threat information and security incidents in areas visited by embassy personnel.

CONTENTS

CONTEXT	1
EXECUTIVE DIRECTION	2
Tone at the Top and Standards of Conduct	2
Execution of Foreign Policy Goals and Objectives	3
Adherence to Internal Controls.....	5
Security and Emergency Planning	5
Developing and Mentoring Foreign Service Professionals	6
POLICY AND PROGRAM IMPLEMENTATION	6
Political and Economic Sections	7
International Narcotics and Law Enforcement	9
Public Diplomacy	14
Consular Affairs	16
RESOURCE MANAGEMENT	18
General Services Operations	18
Human Resources.....	23
Financial Management.....	25
Facilities Management	28
INFORMATION MANAGEMENT	29
RECOMMENDATIONS	35
PRINCIPAL OFFICIALS	46
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	47
APPENDIX B: MANAGEMENT RESPONSES	48
ABBREVIATIONS	59
OIG INSPECTION TEAM MEMBERS	60

CONTEXT

The Republic of Colombia is the fifth largest country in Latin America with a population of nearly 48 million. Bogota, the capital, is also the largest city with 10.6 million people. Other important urban centers include Barranquilla, Cali, Cartagena, and Medellin. Diplomatic relations between Colombia and the United States date from 1822.

The United States supports Colombia's efforts to build on the political, economic, and social progress achieved since the Colombian Government and the Revolutionary Armed Forces of Colombia, or FARC, signed a peace treaty in 2016. This accord ended 52 years of armed conflict that killed more than 220,000 people and displaced more than 7 million. However, Colombia's recovery from conflict is hindered by a resurgence in coca cultivation, a proliferation of criminal organizations, and political and economic instability in neighboring Venezuela, which resulted in an influx of Venezuelans into Colombia.

Colombia is currently the world's leading coca cultivator. After decreases in cocaine production from 2008 to 2012, cocaine production has increased each year since 2012.¹ Independent researchers and non-governmental experts² describe the increase as a multi-faceted problem.³ In particular, Department officials cite the termination of U.S.-funded aerial eradication and a shift in Colombia's narcotics control strategy as key factors in the rise in coca cultivation and cocaine production.

Since FY 2000, the U.S. Government has provided more than \$10 billion in foreign assistance to Colombia, primarily to combat the illicit drug trade and support security and development programs. The United States also provides assistance to support Colombia's efforts to address the more than 1 million Venezuelans who have crossed into Colombia due to Venezuela's instability.

In 2017, the United States was Colombia's largest trading partner and Colombia was the United States' 22nd largest export market for U.S. goods. That year, U.S. goods exported to Colombia totaled \$13.3 billion while U.S. goods imported from Colombia totaled \$13.6 billion. In 2012, the two countries implemented the U.S.-Colombia Trade Promotion Agreement, which eliminated tariffs on more than 80 percent of U.S. exports of consumer and industrial products

¹ This report uses cocaine production statistics prepared by the Office of National Drug Control Policy. These statistics refer to potential pure cocaine production that could be produced from coca under cultivation as "cocaine production." Between 2012 and 2017, cocaine production increased 338 percent.

² Government Accountability Office, *U.S. Counternarcotics Assistance Achieved Some Positive Results, but State Needs to Review the Overall U.S. Approach* (GAO-19-06, December 2018).

³ Independent researchers and non-governmental experts identify four primary reasons for the increase in coca cultivation and cocaine production: (1) FARC leadership encouraged coca growers to plant more coca in advance of the peace agreement's implementation in anticipation of payments from the Government of Colombia for crop substitution programs; (2) Colombia's existing crop substitution and alternative development efforts have been underfunded and less than fully effective; (3) the aerial eradication program has been eliminated without a corresponding increase in manual eradication efforts, facilitating higher levels of coca planting; and (4) factors such as higher global demand and declines in gold prices strengthened financial incentives for coca cultivation.

to Colombia. In May 2018, Colombia became a member of the Organization for Economic Cooperation and Development, reflecting its attainment of policy standards and institutional changes that improved competitiveness, governance, and prospects for sustainable growth.

Embassy Bogota's 2018 Integrated Country Strategy (ICS) primary goals include:

- Promote and support a whole-of-government strategy to strengthen government institutions, build capacity to address threats, develop licit economies, foster citizen security, and combat organized crime.
- Promote and enhance U.S. prosperity and job creation through trade promotion, inclusive growth, and an improved investment climate.
- Advance Colombia's capacity to strengthen governance and transition to a sustainable peace.

Embassy Bogota's authorized staffing levels in FY 2018 included 521 U.S. direct-hire employees and 584 locally employed (LE) staff members. Other agencies represented in the mission included USAID, the Peace Corps, and the Departments of Agriculture, Commerce, Defense, Homeland Security, Justice, Labor, and the Treasury. U.S. bilateral foreign assistance to Colombia in FY 2017 was \$391.2 million.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.⁴ A related classified inspection report discusses the mission's security program, issues affecting the safety of mission personnel and facilities, and Sensitive But Unclassified findings related to the information management program.

EXECUTIVE DIRECTION

OIG assessed embassy leadership on the basis of 359 interviews that included comments on the Ambassador's and the Deputy Chief of Mission's (DCM) performance, a review of staff questionnaires, and OIG's review of documents and activities during the course of the on-site portion of the inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in Bogota in 2014 after serving in the Bureau of Western Hemisphere Affairs as Deputy Assistant Secretary of State for South America. Previously, he also served in four posts in the region and in the offices of Cuban Affairs and Andean Affairs in Washington. The DCM, also a member of the Senior Foreign Service, arrived in Bogota in February 2016 after serving as director of the bureau's Office of Policy Planning and Coordination. Prior to that, he had multiple domestic and overseas assignments.

⁴ See Appendix A.

Embassy staff and Department officials told OIG the Ambassador and the DCM functioned as a seamless team and that the DCM served as the Ambassador's alter ego, consistent with their roles as outlined in 2 Foreign Affairs Manual (FAM) 113.1-2. The Front Office divided responsibilities effectively, with the Ambassador taking the lead on policy, discussions with Washington and the interagency, and media messaging, and the DCM managing internal embassy operations. For example, the Ambassador took the lead on giving Colombian media timely and strategic interviews on the bilateral relationship, while the DCM led the embassy's efforts to re-locate the Embassy Branch Office in Cartagena to an alternate facility.

The Ambassador and the DCM led the mission in a professional and collaborative manner consistent with the Department's leadership principles outlined in 3 FAM 1214. In interviews with OIG, the country team and senior staff presented a positive view of the tone set by the Ambassador, consistently praising his regional expertise, decisiveness, and strategic interactions with Colombian and international interlocutors. Staff consistently described the DCM as approachable and highly responsive. They also stated that he was a hands-on manager who regularly visited mission sections and agencies, chaired or attended numerous working group meetings, and participated in official programs and embassy community activities.

Equal Employment Opportunity Program

The embassy's Equal Employment Opportunity program met the requirements of 3 FAM 1514.2. The Ambassador and the DCM emphasized the importance of Equal Employment Opportunity and diversity principles. Embassy staff told OIG that the Ambassador supported hiring policies that better reflected Colombia's diverse population, including the Afro-Colombian and Indigenous Colombian communities.

Department and embassy employees told OIG that, prior to the Ambassador's arrival at post, LE staff morale was low after years of wage freezes. To address this, he championed wage increases for the staff and successfully appealed a 2018 partial increase that would have applied to only some employees, securing an across-the-board raise for all LE staff. LE staff told OIG they believed the Ambassador's efforts demonstrated his interest in their welfare and that they appreciated his efforts to improve morale.

Execution of Foreign Policy Goals and Objectives

The longstanding bipartisan consensus in the U.S. Congress and successive administrations that Colombia is a key U.S. ally enabled the Ambassador to lead the country team with clear direction, consistent with 3 FAM 1214b(3).

Embassy Took Whole-of-Government Approach to Address Challenges

The embassy's most urgent policy challenge, included in its first ICS goal, is addressing the surge in coca cultivation and cocaine production, which reached a peak in 2017. Consistent with the ICS, embassy staff told OIG that long-term progress in meeting this goal and promoting economic development required a whole-of-government approach. The United States and

Colombia agreed in March 2018 to a goal of reducing coca cultivation and production by 50 percent by 2023. At the Ambassador's direction, in 2017, the embassy instituted a pilot program called Plan Antioquia, in Antioquia province.⁵ Plan Antioquia is a comprehensive project to secure areas from violence, eradicate coca, engage in crop substitution and rural development, and support economic growth. The project closely aligns foreign assistance from the Department, the Department of Defense, and USAID with Colombian private sector and government counterparts. If successful, this approach could be replicated over time in other regions of the country.

Beyond Plan Antioquia, OIG found that the embassy effectively coordinated law enforcement and narcotics policy issues and partnered with the Government of Colombia to intensify interdiction and eradication efforts. For example, the Ambassador was involved in facilitating the extradition of alleged high-value Colombian narcotics traffickers. He also oversaw the 2016 donation of aerial eradication aircraft to preserve future Colombian capacity should aerial spraying resume.⁶

Trade and Economic Engagement to Enhance Colombia as a U.S. Business Partner

The Ambassador and the DCM led an interagency effort to pursue Embassy Bogota's ICS goal to promote economic growth and an improved investment climate. Outreach and advocacy by the Front Office in 2018 included the Ambassador's participation on a Free Trade Agreement panel in June and a speech by the DCM at the American Chamber of Commerce's annual conference in March. During the inspection, the Ambassador contributed an editorial to an American Chamber of Commerce publication, and the DCM spoke at a large-scale entrepreneurship and innovation event in Cali. Under the Chief of Mission's mandate, staff in the Economic Section, U.S. Commercial Service, and Foreign Agricultural Service worked daily with Colombian counterparts to advance economic and business ties between the two countries and export opportunities for U.S. companies. At the same time, the Front Office participated in entrepreneurial conferences, trade delegations, and business negotiations.

Interagency Coordination Driven by Chief of Mission Leadership

In interviews with OIG, embassy staff characterized the Ambassador as a leader with a clear vision who directed embassy interagency coordination effectively. OIG found that strategic-level coordination occurred through the country team and multiple working groups in areas such as law enforcement, mission messaging, humanitarian assistance, and economic and trade issues. For example, the Ambassador's March 2018 declaration of a humanitarian disaster triggered \$76.4 million in needed U.S. emergency relief to Colombian communities affected by the influx of Venezuelans. Washington policymakers praised the Ambassador's cables, which were written at critical junctures in the U.S.-Colombian relationship, and noted that the timely

⁵ According to embassy officials, Antioquia was selected for the pilot project because of its comparatively strong local government, private sector, and civil society institutions as well as a relatively secure environment.

⁶ Until 2015, coca fields in Colombia were sprayed with the herbicide glyphosate. In October 2015, Colombia halted the aerial eradication program amid concerns that glyphosate harmed public health.

information informed their policy deliberations and provided valuable context about developments in Colombia. In addition, the embassy had operational coordination mechanisms for maritime interdiction, human rights, aviation support, and anti-money laundering, among other areas. Embassy staff described these mechanisms as effective venues for translating the Ambassador's strategic policy guidance into coordinated operational activities.

Adherence to Internal Controls

The Ambassador and the DCM prepared the FY 2018 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1), which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. For example, the Ambassador assigned oversight responsibilities to section and agency staff. The DCM also met weekly with the embassy's management controls coordinator to discuss the mission's adherence to internal controls. The mission's statement of assurance did not identify any significant deficiencies or material weaknesses. During the inspection, OIG found some deficiencies in political, international narcotics and law enforcement, public diplomacy, consular, management, and information management, as described later in this report.

Security and Emergency Planning

Embassy Bogota met Department standards for emergency preparedness across sections. Embassy employees told OIG that the Ambassador and the DCM fully supported mission efforts to protect embassy staff, families, and facilities. With one exception, as discussed in the companion classified inspection report, the Ambassador was involved in maintaining mission safety and security, consistent with his responsibilities under 12 Foreign Affairs Handbook (FAH)-1 H-721a. For example, during the inspection, the Front Office oversaw an effort to increase staff participation in weekly radio checks. During a 10-month period in 2018, the embassy held 11 security drills and one crisis management exercise. In addition, the Consular Section held a crisis management exercise in December 2017, to which it invited participants from other embassy sections, the Government of Colombia, and consular sections from other foreign embassies in Bogota.

Spotlight on Success: Innovative Use of Geospatial Mapping Software Showed Threat Information

Personnel under Chief of Mission authority often travel to areas throughout Colombia that require prior approval by the Regional Security Office. The office's Senior Foreign Service National Investigator consolidated up-to-date threat information and security incidents obtained from the Colombian military and security forces and from internal embassy sources to populate interactive geospatial mapping software. Specific characteristics include visual representations of active criminal and terrorist organizations' areas of operation, reported security incidents, and locations of U.S. Government projects and areas visited by embassy personnel. The map provides the Regional Security Office with a quick reference to show current areas of concern and is used as a risk management tool when coordinating official travel within Colombia. The Regional Security Officer told OIG he plans to share the tool with

other U.S. embassies in the region, security counterparts at other foreign missions in Colombia, and with the Overseas Security Advisory Council.

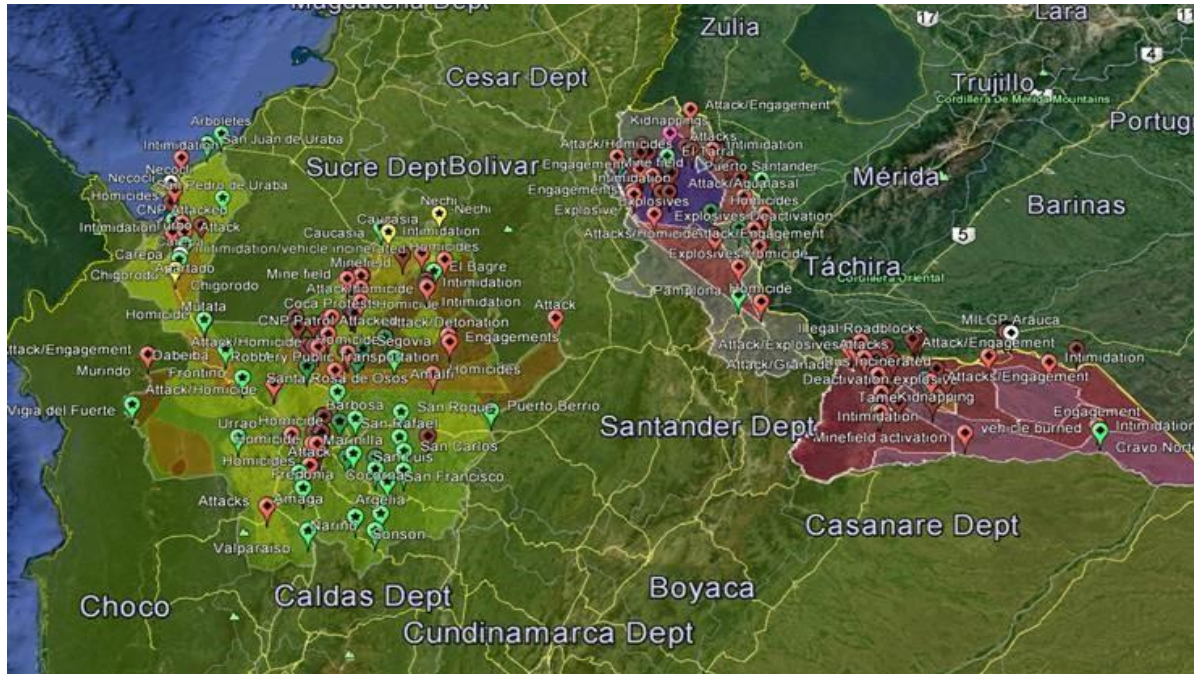


Figure 1: Regional Security Office tool showing threat information Source: Embassy Bogota.

Developing and Mentoring Foreign Service Professionals

The DCM oversaw the mission's First- and Second-Tour employee development program for 56 Department, USAID, and other agency officers and specialists, in accordance with 3 FAM 2242.4. Participating employees told OIG that the DCM was engaged personally in their activities and career development. For example, employees told OIG they had opportunities for short-term assignments, such as serving as control officer for a high-level visit or as staff assistant in the Front Office. In addition, First- and Second-Tour officers and specialists had the opportunity to improve their public speaking skills by giving presentations at cultural and educational institutions.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Bogota's policy and program implementation through a review of the Political and Economic Sections' advocacy and analysis work, the counternarcotics and law enforcement efforts of the International Narcotics and Law Enforcement Section, the Public Diplomacy Section's public diplomacy efforts, and the Consular Section's provision of American citizen and visa services. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions noted below.

Political and Economic Sections

OIG reviewed the Political and Economic Sections' leadership and management, policy engagement and coordination, reporting, Leahy vetting, grants, commercial promotion, and end use monitoring functions. OIG determined that both sections regularly engaged with Washington and collaborated well with other mission agencies through regular and ad hoc working groups, frequent informal interaction, and joint travel outside the capital. OIG determined the sections to be in compliance with Department standards in all but one area, as noted below.

Political and Economic Sections Advanced Integrated Country Strategy Goals

OIG found that the Political and Economic Sections advanced the mission's ICS goals through policy engagement and advocacy, program management and support, and reporting. Washington consumers consistently described the sections' reporting as being valuable, of high quality, and reflective of a productive bilateral relationship. Consumers praised reporting on elections and on the priorities of the newly elected Colombian Government, as well as on trade and energy issues. Representatives from the Department and the interagency community credited embassy engagement and reporting on issues related to Colombia's accession to the Organization for Economic Cooperation and Development with helping to pave the way for agreement on a unified U.S. position. Department officials also told OIG that embassy engagement helped to secure Colombia's participation in a Group of Seven, or G-7, women, peace, and security initiative during the challenging Colombian Government transition. OIG's review of more than 160 cables transmitted from March 2018 to September 2018 found they were relevant to ICS goals and reflected coordination across the mission, consistent with the Department's 3 FAM 1214b(4) and (7) principles of communication and collaboration.

Required Documentation Added to Incomplete Grant Files

OIG reviewed files of all nine foreign assistance grants managed by the Political and Economic Sections, with a total value of \$748,956. The sections closed out eight of the nine grants in FY 2017 and FY 2018; one grant that expired on August 31, 2018, was being closed out during the inspection. The initial file review revealed that some documentation required by the 2016 Federal Assistance Policy Directive was missing. OIG also found that the Public Diplomacy Section assisted the Economic Section with grant file administration, despite Department guidance that public diplomacy sections should not be involved in managing grants without an intrinsic public diplomacy objective. OIG advised both sections on the Department's updated grants management requirements. During the inspection, the sections' staff located and added the missing documentation to the grants files. As a result, OIG did not make a recommendation to address this issue.

Leahy Vetting Exceeded Requirements as Extensive Local Database Allowed for Additional Due Diligence

OIG's review of Embassy Bogota's processing of Leahy vetting cases⁷ for the first 10 months of 2018 found they were handled in accordance with Department guidelines. Specifically, from January 1 to October 22, 2018, the embassy processed Leahy vetting requests for 10,052 individuals and units. Historically, the embassy processed the second highest volume of Leahy vetting cases in the world and, over time, developed an extensive database with more than 166,000 names, including information on 8,051 human rights violators. The use of this database and other checks, combined with excellent cooperation with the Government of Colombia, enabled timely, comprehensive vetting for gross violations of human rights and other issues prior to required submission to Washington. For example, the embassy submitted cases for Washington vetting with an average lead time of more than 20 days, double the Department's requirement of 10 days. To enable additional due-diligence for non-security assistance, the Leahy vetting team also conducted "courtesy vetting" of individuals receiving other U.S.-funded non-security training and assistance, consistent with 3 FAM 1214(5) and (7). This additional screening accounted for approximately the same number of cases as submitted for Leahy vetting, bringing the total number of candidates vetted by Embassy Bogota to more than 20,000. Major vetting customers told OIG they were highly satisfied with Embassy Bogota's Leahy vetting service.

Restructuring of the Political Section Created Additional Supervisory Layers Over Some Locally Employed Staff

OIG found that the Political Section's leadership had restructured the section to reduce the large number of subordinates directly managed by the Deputy Political Counselor. However, the resulting change in organizational structure generated additional supervisory layers for two LE staff at the Foreign Service National (FSN)-09 level. Thus, instead of reporting to the Deputy Political Counselor, the two LE staff reported to an FSN-10 Political Specialist, who reported to a mid-level officer, who in turn reported to the Deputy Political Counselor. Guidance in 1 FAM 014.5a states that the addition of nonessential supervisory layers increases problems associated with establishing clear delegation of responsibility and authority, transmission of information, work flow, clearances, operational costs, and morale. During the inspection, OIG observed that the reporting structure hampered information-sharing and contributed to a sense of marginalization among the affected staff. As a result, OIG advised the embassy to review the Political Section's organizational structure to ensure it promoted effective use of employees in performance of the section's mission. Because the embassy agreed to perform such a review, OIG did not make a recommendation to address this issue.

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

International Narcotics and Law Enforcement

Embassy Bogota hosts one of the largest International Narcotics and Law Enforcement (INL) sections in the world, with 310 employees and contractors. Since FY 2013, INL Bogota has received \$810.8 million in funding for counternarcotics programs intended to reduce coca cultivation, support narcotics interdiction, and provide technical assistance to facilitate investigations of drug traffickers. INL Bogota's policy objectives, as outlined in the ICS, are to reduce drug production and coca cultivation and strengthen the effectiveness of security and criminal justice institutions. These policy objectives have remained fundamentally unchanged since the initiation of Plan Colombia in 1999.⁸



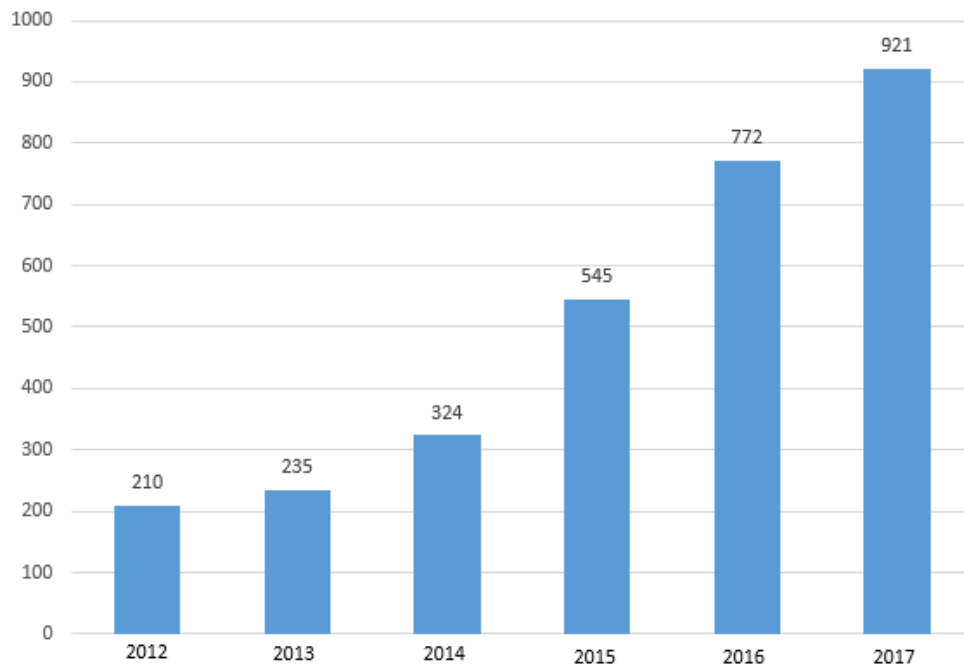
Figure 2: Colombian National Police inspect coca plants. Source: OIG Photo.

Overall, Colombia's security situation improved substantially from 2000 to 2016. For example, the country's murder rate fell by 53 percent and kidnappings have decreased by 94 percent, in that time period. In 2017, the majority of the 12,000 active FARC members demobilized amid a

⁸ The U.S. Government developed Plan Colombia in 1999 with the stated goals of reducing cocaine trafficking and production by 50 percent within 6 years, and seeking to strengthen Colombia's security and government institutions. The U.S. Government substantially increased foreign assistance to Colombia beginning in 2000 in support of Plan Colombia.

series of ceasefires. Despite progress in strengthening Colombian institutions and reducing levels of violent crime, the embassy faced an urgent policy challenge from a surge in cocaine production, which reached record levels in 2017, as shown in Figure 3, below.

Figure 3: Potential Pure Cocaine Production in Colombia, 2012–2017 (in Metric Tons)



Source: Office of National Drug Control Policy.

As part of the inspection, OIG reviewed INL Bogota's actions to support intensified coca eradication and interdiction activities. OIG also reviewed INL Bogota's end use monitoring, contract and grants management, and performance metrics. OIG's observations and findings are detailed below.

Embassy Focused on Intensifying Eradication Efforts

OIG found that INL Bogota worked with the Government of Colombia to intensify interdiction and eradication efforts in order to address the surge in cocaine cultivation and production. To address this challenge, INL Bogota was assessing requirements for restarting an aerial eradication program, terminated by INL Bogota in 2016, should the Government of Colombia request U.S. support. INL Bogota staff told OIG that aircraft donated to Colombia in 2016 could be repurposed for aerial eradication. The cost of restarting the program could reach \$100 million, with annual support costs of \$50 million. Previous assessments of aerial eradication in Colombia concluded that countermeasures from coca producers⁹ significantly impeded the effectiveness of the program, and similar constraints likely would apply if the program is resumed. INL Bogota employees told OIG that while aerial eradication is an important tool, it is only one component of the embassy's eradication and interdiction strategy.

⁹ Specifically, these countermeasures included treating leaves with molasses to retard pesticide penetration, post-spraying pruning of coca bushes, public protests, and fragmentation of coca fields into smaller plots.

Embassy staff told OIG that its strategy for long-term reductions in coca cultivation and cocaine production depended on having an effective whole-of-government approach that integrates alternative development interdiction and eradication components. More than 50 years of civil war left coca-producing rural areas of Colombia without basic government services, such as roads, schools, health care, electricity, and security. Estimated costs for establishing a state presence in these areas, as called for in the 2016 peace accord, are as high as \$45 billion. At the time of the inspection, Colombian and U.S. Government budget constraints made funding prospects uncertain. INL Bogota supported targeted assistance to rural areas, primarily through the Rural Security Program,¹⁰ with annual funding of \$18 million, which it coordinated with USAID. Additionally, as described earlier in this report, INL Bogota participated in Plan Antioquia to facilitate integration of its programs with USAID's alternative development programs.

End Use Monitoring of Defense Articles Did Not Comply With Department Standards

INL Bogota's program to ensure continuous end use monitoring of defense articles¹¹ provided to Colombian security forces did not fully comply with Department standards. Specifically, OIG found that the embassy did not conduct on-site inspections in 2017 for approximately 39 percent of the defense articles subject to continuous monitoring, as reported in the inventory system of record.¹² The embassy had not monitored approximately 3,500 defense articles for at least 3 years. In addition, as of October 2018, the embassy identified 98 defense articles as missing. Bureau of International Narcotics and Law Enforcement Affairs standards describe enhanced monitoring of defense articles as essential to prevent illegal defense exports and technology transfers and state that such monitoring should be conducted by U.S. Government employees through on-site inspections.¹³ U.S. law¹⁴ also requires end use monitoring to ensure compliance with Government policies on the use and transfer of defense articles and that such items are used only for intended purposes. Continuous monitoring of defense articles in Colombia is especially important because the U.S. Government provided to the country's

¹⁰ INL's Rural Security Program supports the Colombian National Police efforts to establish and maintain rural security through construction projects, purchases of equipment, specialized training, and logistical support.

¹¹ Defense articles are defined as any item or technical data designated in 22 Code of Federal Regulations § 121.1 (The United States Munitions List). End use monitoring fulfills the requirements of Section 484(b) of the Foreign Assistance Act of 1961 and Section 40A of the Arms Export Control Act. See 22 U.S.C. § 2991(b) and 22 U.S.C. § 2785. Although "continuous monitoring" is not defined explicitly in INL's Standard Operating Procedure for End Use Monitoring (March 3, 2017), this guidance does require annual end use monitoring, including procedures for enhanced monitoring of defense articles.

¹² As described in INL Standard Operating Policy Procedure for End Use Monitoring, the Integrated Logistics Management System End Use Monitoring Module is the system of record for tracking and reporting property designated for monitoring. As noted subsequently, because of data discrepancies between the system of record and other sources of information, OIG was not able to fully validate the accuracy of reported end use monitoring activities.

¹³ The INL Bureau's March 2017 Standard Operating Policy Procedure for End Use Monitoring states that on-site inspection is the recommended method of monitoring defense articles, except when security conditions prevent it. In these instances, planned deviations must be documented in post's end use monitoring plan.

¹⁴ 22 U.S.C. § 2785(a)(2)(B)(i) and (ii).

security services at least 50,000 defense articles, such as weapons, aircraft, communications equipment, and vehicles.

INL Bogota employees told OIG that conducting the required on-site inspections was particularly challenging for several reasons. First, 28 Colombian agencies had a total of 512 defense-article custodians, including in remote, high-threat locations where travel by U.S. Government employees was difficult or impossible. Under these circumstances, INL guidance permits inspection by secondary methods, such as monitoring by the host country or contract personnel. Using such secondary methods would allow the embassy to meet end use monitoring standards. However, INL Bogota had not documented in its annual end use monitoring plan the possible use of these methods. Second, the end use monitoring system of record contained significant data discrepancies that impeded conducting a comprehensive inspection process. A 2016 INL Bureau review identified these discrepancies between the system of record and other files, such as Government of Colombia records, shipping records, and contractor databases. An INL Bureau comprehensive audit of these records was ongoing at the time of the inspection. Finally, INL Bogota employees told OIG that the end use monitoring unit had insufficient staffing and training. Embassy Bogota developed a corrective action plan in 2016 to address most of these deficiencies. However, the plan did not include milestones and resource requirements to enhance defense article monitoring through increased on-site and secondary inspections. Without increased inspections of defense articles, there is increased risk that they could be used for unauthorized purposes.

Recommendation 1: Embassy Bogota, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should comply with Department standards for end use monitoring of defense articles. (Action: Embassy Bogota, in coordination with INL)

Contract Files Missing Key Monitoring and Oversight Documentation

INL Bogota contracting officer's representative (COR) contract files did not always include key monitoring and oversight documentation, as required by Federal regulations and Department standards. OIG reviewed 11 COR contract files, totaling \$249 million, out of a total universe of 33 contracts with an award value of \$265.9 million.¹⁵ Although pre-award and award contract files were substantially complete, post-award administrative documents were missing in some cases. For example, OIG found that 7 of the 11 contract files reviewed did not contain quality assurance surveillance plans.¹⁶ In addition, only one of the reviewed files contained sufficient documentation of the COR's review of progress reports submitted by contractors. Furthermore, OIG found that 5 of the 11 files did not include sufficient documentation of site visit reports or

¹⁵ The sample universe included INL-funded contracts that met the following criteria: (1) had a contract action within the last 3 fiscal years; (2) were awarded as definitive contracts; and (3) had a total award value above the simplified acquisition threshold. The file selected represented 95 percent of the total award value of the sample universe.

¹⁶ Quality assurance surveillance plans should be prepared according to Federal Acquisition Regulation 46.401(a) and should outline required performance metrics and how the contractor will be evaluated against those metrics.

assessments of contractor performance, as required by INL Bureau standards.¹⁷ Proper contract monitoring and documentation of oversight is necessary to ensure that INL Bogota properly assessed contractor performance and maintained the documentation required to ensure that contractors comply with their obligations.

Recommendation 2: Embassy Bogota should comply with Department standards related to contracting officer's representative contract file documentation for contracts administered by the International Narcotics and Law Enforcement Affairs Section. (Action: Embassy Bogota)

Federal Assistance Award Files Missing Post-Award Documentation

OIG found that INL Bogota's Federal assistance award files did not always include key post-award documentation. OIG reviewed 6 grants totaling \$50.2 million, out of a total universe of 13 grants with an award value of \$54.4 million.¹⁸ While the award files were substantially complete for pre-award and award documentation, post-award administrative files were missing in some cases. For example, four of the six grants reviewed did not have initial monitoring plans or evidence of monitoring.¹⁹ Monitoring plans are required in order to assess the recipient's performance against the award's goals and objectives. Additionally, five of the six grants reviewed did not contain all of the required reports needed to document recipient performance and financial expenditures. Department standards,²⁰ however, require grants management staff to develop monitoring plans and grant recipients to submit performance and financial reports. OIG found that that these problems occurred, in part, because of a lack of grants quality control monitoring by INL Bogota program managers. Proper award monitoring is necessary to ensure that recipients complied with terms and conditions of the award or achieved intended program goals.

Recommendation 3: Embassy Bogota should comply with Department standards for Federal assistance award file documentation for awards administered by the embassy's International Narcotics and Law Enforcement Section. (Action: Embassy Bogota)

¹⁷ INL Standard Operating Policy Procedures for Contracting Officer's Representative Working File Maintenance provides a list of 21 types of documentation that all CORs must maintain in the contract file, including a quality assurance surveillance plan, copies of all progress reports submitted by the contractor, and a number of items related to COR monitoring and oversight duties. In addition, 14 FAH-2 H-517 includes 15 items that must be included in the COR working file, including all contractor progress reports, documentation of site visits results, and the COR's final assessment of contractor performance.

¹⁸ The six assistance award files reviewed represented 92 percent of the total assistance value of active awards in FY 2017 and FY 2018.

¹⁹ One of the four awards without an initial monitoring plan established a plan later in the life of the award.

²⁰ Based on the date of award, different federal assistance award guidance applies to the assistance awards reviewed. These include the Grants Policy Directives, valid until March 12, 2015; the Federal Assistance Policy Directives, valid from March 13, 2015, through May 19, 2017; the Federal Assistance Directive, Version 1.2, valid from May 20, 2017, through September 30, 2017; and the Federal Assistance Directive, Version 2.3, which took effect on October 1, 2017.

Section's Program Performance Metrics Under Development

OIG found that INL Bogota was updating its program performance metrics with assistance from an INL Bureau team. Although INL Bogota had a strategic plan with program metrics, employees interviewed by OIG generally were unaware of the metrics that applied to their programs. Furthermore, contracts and grants that OIG reviewed lacked performance indicators tied to program and ICS goals. INL Bogota told OIG it was examining ways to incorporate metrics into program design, in accordance with Department guidance, using INL Mexico City documents as a model. Staff told OIG that developing performance metrics for diverse programs such as anti-money laundering, rule of law, maritime interdiction, and aviation was technically challenging and that metrics needed to reflect specialized conditions in Colombia. The INL Bureau assigned two monitoring and evaluation contractors to assist INL Bogota as part of a bureau-wide exercise to develop new metrics for all programs, as required by 18 FAM 301.4-2. Because of this pending exercise, OIG did not make a recommendation to address this issue.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning and reporting, resource and knowledge management, Federal assistance, exchanges and cultural affairs, and media engagement. OIG also reviewed the section's American Spaces operations at nine Binational Centers.²¹ The Public Affairs Counselor effectively managed a broad range of public diplomacy resources and activities that promoted collaboration across the mission. Public diplomacy operations focused on ICS goals while supporting a high tempo of Washington visitors. OIG found the mission's public diplomacy activities met Department standards and guidance, with the exceptions noted below.

Public Diplomacy Funds Used for Non-Public Diplomacy Related Mission Support

OIG found that the Public Diplomacy Section used public diplomacy funds for non-public diplomacy mission support. Specifically, section staff provided non-public diplomacy related audio visual and photography support to the mission in FY 2017 and FY 2018. For example, 70 percent of embassy requests for section assistance in a 1-year period were for internal events with no public diplomacy component. Forms to request section assistance, located on the embassy's SharePoint site and available to all mission employees, helped institutionalize this legacy arrangement. According to 10 FAH-1 H-020, however, these funds may only be used for authorized public diplomacy purposes. By providing non-public diplomacy support to the mission, the Public Diplomacy Section funded activities that did not comply with Department standards for the effective and responsible management of public diplomacy resources.

²¹ 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. Binational centers are autonomous cultural and educational institutions that promote mutual understanding between the United States and the host country and are recognized by the Department as eligible to receive support funds from the Bureau of International Information Programs. Binational Centers in Colombia are located in Armenia, Barranquilla, Bogota, Bucaramanga, Cali, Cartagena, Manizales, Medellin, and Pereira.

Recommendation 4: Embassy Bogota should comply with Department standards for the use of public diplomacy funds. (Action: Embassy Bogota)

Grant Files Did Not Meet Department Standards for Monitoring

OIG found that while pre-award and award documentation in the section's Federal assistance records was substantially complete, post-award documentation lacked evidence of monitoring. OIG reviewed 31 FY 2017 and FY 2018 award files totaling \$2.1 million, including all grants equal to or more than \$25,000. OIG found that 75 percent of the grant files lacked evidence of monitoring.²² The Federal Assistance Directive requires monitoring of all grants in accordance with appropriate regulations, the U.S. Department of State Procedural Guide to Grants, and the grant's monitoring plan. Grants Officers and Grants Officer Representatives told OIG they did not complete grant file documentation due to competing priorities. Post-award documentation in the grant files should include evidence of monitoring, as effective monitoring reduces the chance of loss or misuse of U.S. Government funds and helps ensure that grants meet program objectives.

Recommendation 5: Embassy Bogota should document public diplomacy grants in accordance with the Federal Assistance Directive. (Action: Embassy Bogota)

Supervisory Structure of Staff Supporting the American Spaces Program Did Not Meet Department Standards

OIG found that the Public Diplomacy Section's organizational structure had an additional supervisory layer that limited the Regional Public Engagement Specialist's²³ direct supervision of LE staff supporting the American Spaces program. After the Department established a Regional Public Engagement Specialist position in Bogota in 2016, the section reclassified a Public Engagement Assistant position to support American Spaces programming and report to the engagement specialist.²⁴ However, once hired, the assistant instead reported to a senior LE staff member,²⁵ creating a supervisory layer between the engagement specialist and the assistant. Guidance in 1 FAM 014.5a states that the addition of nonessential supervisory layers risks problems associated with establishing clear delegation of responsibility and authority, transmission of information, work flow, clearances, operational costs, and morale. The section's supervisory structure generated confusion in determining American Spaces program responsibility and authority that limited its ability to effectively manage and strategically direct funding to the American Spaces.

²² Of the 16 FY 2017 and FY 2018 grants that required monitoring, 12 lacked evidence of monitoring.

²³ Regional Public Engagement Specialists are Foreign Service specialists who oversee American Spaces programs.

²⁴ The reclassified position was not filled until June 2018 due to the Government-wide hiring freeze, which was first announced on January 23, 2017. While most positions were frozen and could not be filled if vacant, the Secretary approved specific exemptions to ensure the Department could meet critical needs. The Secretary lifted the hiring freeze in May 2018.

²⁵ The senior LE staff member also had American Spaces responsibilities, but did not report to the Regional Public Engagement Specialist.

Recommendation 6: Embassy Bogota should align the supervisory structure in the Public Diplomacy Section in accordance with Department standards. (Action: Embassy Bogota)

Consular Affairs

OIG reviewed Embassy Bogota's consular operations, including consular leadership, American citizen services, crisis preparedness, management controls, visa services and processing, outreach, and anti-fraud programs. OIG determined that the embassy's consular programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies. The Consular Section's experienced management team and staff efficiently processed one of the largest and busiest consular workloads in the world. In FY 2016, the American Citizen Services Unit adapted to increases in passport services of up to 42 percent without additional American direct-hire staff and without altering its appointment schedule. In FY 2018, the visa unit processed almost 400,000 nonimmigrant visa applications, the sixth largest volume in the world, while absorbing more than 4,000 immigrant visa cases for Cuban applicants after the Department halted most visa operations in Cuba.²⁶ The Consular Section also sent staff to four other posts to fill staffing gaps and help with unexpected workload increases; this assistance took place over the course of 296 days in FY 2018. However, adjusting to these workload increases while also losing staff to temporary assignments outside the section led consular managers to implement policies detrimental to the section's welfare, as described below.

Visa Unit's Overreliance on Speed Violated Department Standards

OIG found that consular managers required nonimmigrant visa adjudicators to maintain an average of 30 in-person interviews per hour. This violates Department guidance in 7 FAH-1 H-221b that states, "Consular managers—section chiefs in particular—must resist pressures to speed up visa or passport processing at the expense of security concerns." In addition, 7 FAH-1 H-225b and c specify "interviewing must not be perfunctory ... and will help ensure the applicant is qualified for the visa type sought and eligible to receive a visa." Moreover, adjudicators told OIG they believed that training programs advocated relying on stereotypes to facilitate quick decision making. Consular managers, however, told OIG that the rationale for the 30 interviews per hour requirement was to process visas efficiently so that adjudicators had time to complete other assigned duties and participate in professional development opportunities, such as congressional delegation visits and temporary duty assignments. However, the requirement to maintain a specific number of visa adjudications per hour risked inadequately justified decisions and rushed security reviews, and adversely affected staff morale.

²⁶ According to a March 2, 2018, Department Media Note, Embassy Havana "...operated under ordered departure status ... due to health attacks affecting U.S. Embassy Havana employees." The ordered departure period was from September 29, 2017, until March 5, 2018. Because of ample space and staffing in Embassy Bogota, the Department transferred Embassy Havana's immigrant visa workload to Embassy Bogota from December 2017 until April 2018.

Recommendation 7: Embassy Bogota should eliminate the requirement that adjudicators complete a specific number of visa interviews per hour and focus training on developing appropriate decision-making skills and visa security. (Action: Embassy Bogota)

Consular Managers Failed to Use the Bureau of Consular Affairs' Management Framework

Consular managers did not use the Bureau of Consular Affairs' management framework²⁷ and tools found in 7 FAH-1 H-241 and 7 FAH-1 H-261 to "manag[e] existing resources to deal effectively with consular workloads," "seek ways to improve operational effectiveness," and "effectively distribute resources in an equitable manner to ensure mission accomplishment." Failure to use the bureau's management and leadership principles resulted in a lack of innovation, inadequate communication within the section, and a failure to correct a rigid top-down management style by some LE supervisors that inhibited teamwork and lowered morale. For example, consular managers were unaware that adjudicators were concerned that speed was valued over quality of adjudications. Consular Section managers' failure to use the bureau's management framework risks implementing policies and procedures that do not effectively support U.S. Government objectives.

Recommendation 8: Embassy Bogota should use the Bureau of Consular Affairs' management framework to align operations with Department standards and U.S. Government objectives. (Action: Embassy Bogota)

Correspondence Unit Duplicated Function That Contractor Was Paid to Perform

The consular correspondence unit responded to as many as 5,000 email visa inquiries monthly, most of which were routine and therefore should have been handled by an outside contractor hired by the Bureau of Consular Affairs. As Department guidance explains, "Staff need not and should not duplicate services provided by the vendor..."²⁸ OIG estimated that 65 percent of the email visa inquiries were routine and that transferring this work to the contractor would allow correspondence unit staff members to perform other duties. Consular managers told OIG they were unaware that the contractor's task order provided for this service. Assigning consular staff to answer correspondence covered by the task order is duplicative, does not appropriately employ the staff's expertise, and represents funds that could be put to better use. OIG estimated that the Department could put approximately \$65,200²⁹ annually to better use by transferring the routine email visa inquiries to the outside contractor.

Recommendation 9: Embassy Bogota should conform to the terms of the Bureau of Consular Affairs' contractor's task order requiring applicants to submit general visa inquiries

²⁷ The Bureau of Consular Affairs created the Consular Leadership Tenets to provide a value-based approach to leadership. The bureau's 1CA Management Framework is designed to complement the leadership tenets and provide consular teams with tools to analyze and address common consular management and leadership issues.

²⁸ Cable 15 STATE 87970, "Global Support Strategy Information Services," July 24, 2015.

²⁹ The Consular section estimated that responding to routine inquiries required the equivalent of two full-time FSN-07 positions. Salary and benefits for two FSN-07s is \$32,600 x 2= \$65,200.

to the contractor in order to appropriately employ staff expertise and put funds of approximately \$65,200 to better use. (Action: Embassy Bogota)

Embassy Bogota Had Persistent Nonimmigrant Visa Application Fee Shortfall

Early in the inspection, the Bureau of Consular Affairs notified OIG of a persistent shortfall in nonimmigrant visa application fees at Embassy Bogota since at least 2014.³⁰ As of summer 2018, the shortfall was approximately \$1.6 million. According to the bureau, Embassy Bogota is the only mission in the world that has a shortfall; indeed, embassies typically have a surplus. Guidance in 7 FAH-1 H-721a states, “Ensuring integrity and accountability in collecting consular fees is one of the consular manager’s most important responsibilities,” while 4 FAM 041e requires that “agencies develop and maintain financial management systems that substantially comply with Federal accounting standards.” Because the shortfall could be caused by a number of factors, OIG reviewed local procedures and controls in an unsuccessful attempt to determine whether they might have caused the shortfall. An expert the bureau sent during the inspection to review the issue also could not pinpoint any aspect of the embassy’s consular accounting or record keeping processes as the root cause. As a result, the bureau began a more in-depth review of visa application fee documentation in an attempt to determine the cause for the persistent shortfall.

Recommendation 10: The Bureau of Consular Affairs, in coordination with Embassy Bogota, should complete its review of fee collections and reconciliations in Colombia to determine and correct the cause of the shortfall in nonimmigrant visa application fees. (Action: CA, in coordination with Embassy Bogota)

RESOURCE MANAGEMENT

OIG reviewed internal control systems in human resources, financial management, general services, facilities management, and information management operations. OIG found that the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, except as described below. In addition, Embassy Bogota corrected a number of deficiencies during the inspection, as noted below.

General Services Operations

OIG identified several internal control deficiencies in the General Services Office, which the embassy corrected during the inspection. In particular, the embassy took the following actions:

- Contracting officer’s representatives and government technical monitors obtained Federal acquisition certifications and filed financial disclosure reports, in accordance with guidance issued in 2012 by the Department’s Office of the Procurement Executive in Procurement Information Bulletin No. 2012-15.

³⁰ In 2010, the Bureau of Consular Affairs adopted a system called Global Support Strategy that awarded contracts for worldwide visa support services, including collection of nonimmigrant visa application fees.

- The General Services Officer conducted periodic unannounced spot counts of expendable and nonexpendable property stored in embassy warehouses, as required by 14 FAM 411.2-2c.
- The General Services Officer reviewed the mission's motor vehicle policy, in accordance with 14 FAM 432.5; recalculated the mission's fee for other authorized use, in accordance with 14 FAM 433.4b(3); and brought controls for official vehicle keys into compliance with 14 FAM 436.3c.

Embassy Had High Levels of Preventable Motor Vehicle Accidents

Embassy Bogota had a high level of preventable motor vehicle accidents and ranked second in the world in Department motor vehicle collisions based on reports from FY 2012 through FY 2017. In that time frame, the embassy had 215 motor vehicles collisions, of which 48 percent were deemed preventable. While the majority of the collisions were in the two most minor categories—Class C or D³¹—the embassy reported one serious accident, a Class B mishap,³² in FY 2012. Additionally, during the inspection, the embassy experienced a very serious Class A mishap.³³ Approximately 60 percent of the reported collisions involved other agencies' employees. Since FY 2012, the total cost of damages related to these collisions was \$425,108, of which \$190,810 came from collisions determined to be preventable. The reasons given in the accident reports for the high number of preventable collisions included driver fatigue, failure to yield, and failure to maintain a safe distance, among others. According to the Department's Motor Vehicle Safety Management Program for Overseas Posts Section 10(d), embassies must take corrective action to help preclude recurrence of preventable mishaps. Corrective actions may include training or retraining, changes to post's motor vehicle use and safety policy, or improved enforcement of existing policy. Failure to take corrective action increases the risk to employee life and safety and damage to U.S. Government property.

Recommendation 11: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of embassy motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO)

Other Agencies Did Not Always Report Mishaps as Required

OIG found that other agencies at the embassy did not consistently adhere to Department guidelines in 15 FAM 964 setting forth requirements for mishap investigations and reporting. This created persistent problems for Embassy Bogota. Management staff told OIG that in some

³¹ Pursuant to 15 FAM 964.2(3), a Class C mishap is an injury or illness resulting in medical treatment other than first aid, loss of consciousness, lost time from work, restricted duty, or temporary transfer to a different job, or vehicular and other property damage from \$1,000 up to \$50,000. According to 15 FAM 964.2(4), a Class D mishap is an injury or illness requiring no lost time from work or restricted duty, or vehicular and other property damage of less than \$1,000.

³² According to 15 FAM 964.2(2), a Class B mishap is an injury or illness requiring inpatient (overnight) hospitalization, or vehicular and other property damage from \$50,000 up to \$100,000.

³³ Pursuant to 15 FAM 964.2(1), a Class A mishap is an injury or illness resulting in a fatality, permanent total disability, or vehicular and other property damage of \$100,000 or more.

cases, other agencies did not report their motor vehicle mishaps or did not report them within the prescribed time frames. For example, several agencies did not submit to the Post Occupational Safety and Health Officer (POSHO) the required forms to report four mishaps that occurred in February 2018. In total, the POSHO never received 36 mishap reports from collisions that occurred from FY 2015 to FY 2018. This is inconsistent with specific Department guidance, which require Class A and B mishaps to be reported within 12 hours of the incident and Class C and D mishaps to be reported within 30 days of the incident.³⁴ If an agency fails to submit the required report, the embassy cannot conduct an investigation or take corrective action to mitigate and prevent reoccurrences.

Recommendation 12: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should require all agencies under chief of mission authority to comply with Department standards for reporting motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO)

Mission Colombia Did Not Monitor Operating Costs of its Official Vehicles

Neither Embassy Bogota nor Embassy Branch Office Cartagena monitored the operating costs of their official vehicles. Specifically, the motor pool managers did not complete the monthly fleet summary report, as required by 14 FAH-1 H-816.1-2, or the monthly fuel and oil consumption report, as required by 14 FAH-1 H-814.2-2, because of competing priorities. These monthly reports include useful information about fuel and oil consumption, vehicle repairs, and kilometers driven. For example, significant changes in fuel or oil consumption could be an indicator of unresolved mechanical issues or theft. This internal control weakness increases the risk of mismanagement and theft.

Recommendation 13: Embassy Bogota should complete its fleet reports in accordance with Department standards. (Action: Embassy Bogota)

Mission Colombia Did Not Fully Comply with Department's Motor Vehicles Safety Standards

Embassy Bogota and Embassy Branch Office Cartagena did not comply with some elements of the Department's overseas motor vehicle safety standards. Specifically:

- Three out of 44 chauffeurs who drove armored vehicles did not receive armored vehicle training as required in 12 FAM 389b.
- Fifteen chauffeurs and 87 incidental (self-drive) drivers did not receive driver safety training or required retraining as called for in 14 FAM 432.4c(2).
- Forty-seven chauffeurs and 84 incidental (self-drive) drivers held expired medical certifications or never received medical certifications before driving official vehicles, contrary to guidance in 14 FAM 432.4c(4)(a)-(b).

³⁴ 15 FAM 964.4-1, 4-2.

Additionally, OIG found 155 instances, over 8 weeks, where chauffeurs exceeded the 10-hour per day limit on driving shifts. Guidance in 14 FAM 432.4c(3), 15 FAM 957.3(4), and the Department's Overseas Motor Vehicle Safety Management Program limit on the number of hours a driver is allowed to work.

These internal control deficiencies occurred because of a lack of management oversight. Failure to enforce these motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. Government property.

Recommendation 14: Embassy Bogota should comply with applicable Department overseas motor vehicle safety requirements for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Bogota)

Embassy Did Not Properly Document All Property Disposals

According to Integrated Logistics Management System³⁵ (ILMS) property metrics, Embassy Bogota disposed of 8,406 assets between October 1, 2016, and April 30, 2018. OIG determined that 1,203 of these disposals did not include the required documentation. According to guidance in 14 FAH-1 H-713.1a, however, the property management officer must approve disposals in advance of the action taking place. In these instances, embassy staff overlooked this requirement. This deficiency is an internal control weakness that increases the risk of theft.

Recommendation 15: Embassy Bogota should document future property disposals in accordance with Department standards. (Action: Embassy Bogota)

Not All Expendable Supplies Were Tracked Using the Department-Approved Property Record System

Embassy Bogota did not track motor pool and facilities management expendable supplies, such as motor oil, oil filters, pipes, and light bulbs, in ILMS, as required. Instead, embassy staff maintained paper logs to document the issuance and inventory of motor pool and facilities management expendable supplies. As stated in 14 FAM 414.2-1a(2), ILMS is the Department-approved property record system for expendable supplies. Guidance in 14 FAM 414.5 requires the accountable property officer to ensure that effective internal requisitioning and issuing procedures are established and enforced, including the use of specific forms to document the issuance and return of expendable supplies. Embassy staff told OIG this deficiency occurred because of poor past property management practices. This concern should be addressed, as failure to use the Department-approved property record system increases the risk of theft.

³⁵ ILMS is an integrated web-based system that encompasses all of the Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

Recommendation 16: Embassy Bogota should use the Integrated Logistics Management System for all expendable supplies in accordance with Department standards. (Action: Embassy Bogota)

Electronic Scanners Not Used To Inventory Residential Assets

OIG found that Embassy Bogota did not consistently use electronic barcode scanners to conduct residential inventories. According to ILMS property metrics, the embassy inventoried 68.34 percent of assets located in residential units manually instead of with scanners in the 3 years prior to the inspection. Manual reconciliation of inventories increases the risk of property mismanagement and theft. OIG advised Embassy Bogota that the Department's preferred method of conducting residential inventory is to use electronic scanners compatible with ILMS.

Improper Segregation of Duties for Bulk Fuel Receiving Clerk

The embassy assigned both receiving and property record keeping duties for the bulk fuel supplies to the same employee. Guidance in 14 FAM 423.1 requires that property accountability and property receiving duties be separated. Additionally, the embassy did not designate the fuel receiving clerk in writing, as required by 14 FAH-1 H-815.2b. In both instances, the embassy overlooked these requirements. These weaknesses should be addressed, as failure to maintain adequate separation of duties increases the risk of theft.

Recommendation 17: Embassy Bogota should assign separate receiving and property record keeping clerks for its bulk fuel operation and designate those duties in writing, in accordance with Department standards. (Action: Embassy Bogota)

Procurement Files Not Closed Within Required Time frame

Embassy Bogota did not close procurement files within the required time frame. Specifically, the embassy did not close 3 procurement files from FY 2016, 183 procurement files from FY 2017, and 245 procurement files from FY 2018. Additionally, the embassy had a backlog of 4,401 procurements from FY 2015 to FY 2017 that required additional procurement staff action to complete closeout. Guidance in 14 FAH-2 H-573.2b and Federal Acquisition Regulation 4.804-1 states that contracts conducted under simplified acquisition procedures should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Embassy staff told OIG the backlog occurred because of inadequate training, staffing gaps, and competing priorities. Failure to close out procurement files within the regulatory time frame increases the risk of inaccuracies in Department's administrative procurement records.

Recommendation 18: Embassy Bogota should close out procurement files in accordance with Department standards. (Action: Embassy Bogota)

No Annual Review of Blanket Purchase Agreements

OIG found that Embassy Bogota did not conduct an annual review of its 2018 blanket purchase agreements.³⁶ The embassy had a total of 98 blanket purchase agreements to procure a variety of goods and services. According to Department of State Acquisition Regulation, Section 613.303-6, contracting officers must conduct an annual review to ensure that authorized blanket purchase agreement procedures are being followed and report the results of the review, including needed corrective action, to the head of the contracting activity. The contracting officer told OIG the embassy did not conduct the review because of competing priorities. Without an annual review, however, the embassy cannot guarantee procurement integrity, maintain awareness of changes in market conditions, and determine whether there are other pertinent factors that may warrant making new arrangements with different suppliers or modifying existing arrangements.

Recommendation 19: Embassy Bogota should conduct its annual 2018 review of its blanket purchase agreements, in accordance with Department standards. (Action: Embassy Bogota)

Per Diem Rates Were Out of Date for Nine Locations in Colombia

Foreign per diem rates for nine Colombia locations³⁷ were out of date. Department of State Standardized Regulation 074.2 states that all agencies having responsibility to prepare and submit reports must provide complete, accurate, and supportable information in the biennial hotel and restaurant reports. The Bureau of Administration's Office of Allowances website, however, showed that Embassy Bogota had not submitted a hotel and restaurant report since 2010 for these locations. Embassy staff were unaware that their per diem reports were outdated. Failure to submit reports on a timely basis could result in overpayment or underpayment to U.S. Government personnel.

Recommendation 20: Embassy Bogota should submit the hotel and restaurant reports for its outdated foreign per diem locations to the Bureau of Administration's Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota)

Human Resources

Retail Price Surveys Were Outdated

Mission Colombia last submitted its retail price surveys—used to set the mission's cost of living allowance—in 2015.³⁸ The Bureau of Administration's Office of Allowances reported that the embassy should have submitted surveys in May 2017 for Embassy Bogota and Embassy Branch

³⁶ A blanket purchase agreement is a simplified method of filling anticipated repetitive needs for supplies or services by establishing "charge accounts" with qualified sources of supply.

³⁷ These locations are Barranquilla, Bogota, Buenaventura, Cali, Cartagena, Medellin, San Andres, and Santa Marta, as well as the general category of "other," which encompasses all non-listed locations.

³⁸ Department of State Standardized Regulation 228.2 states the cost of living allowance level is based on living costs in the foreign location relative to that of Washington, D.C.

Office Cartagena, and in January 2018 for Consular Agency Barranquilla. To ensure that the rates accurately reflect local costs, the Office of Allowances requires embassies to submit a retail price survey every two years.³⁹ Management staff attributed the delays in completing the surveys to staffing shortages resulting from the Department's hiring freeze and competing priorities. Nonetheless, the lack of updated allowance reports increases the risk of inaccurate allowance and travel payments.

Recommendation 21: Embassy Bogota should submit the required retail price surveys to the Office of Allowances in accordance with Department guidelines. (Action: Embassy Bogota)

Post Hardship Surveys Were Overdue

OIG found that Mission Colombia did not submit its post hardship differential surveys by the required deadlines.⁴⁰ Department of State Standardized Regulation 920 establishes a schedule for submitting post hardship survey every 2 years. According to the Office of Allowances website, surveys for Embassy Bogota and Embassy Branch Office Cartagena were due in August 2017, and that of Consular Agency Barranquilla in September 2018. Management staff told OIG that they were unaware of the deadlines. Failure to submit timely hardship surveys to the Office of Allowances increases the risk of overpayments or underpayments to U.S. Government employees.

Recommendation 22: Embassy Bogota should submit all required hardship differential surveys to the Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota)

Post Reports Were Outdated or Nonexistent

OIG found that Embassy Bogota last updated portions of its post report for Bogota in 2012, and did not complete a post report for Embassy Branch Office Cartagena. According to 2 FAM 172.1a, every post must comprehensively review its post report annually, while 2 FAM 171.3-1(1) states that the management counselor or officer is responsible for maintaining a comprehensive online post report that covers each location where employees are assigned. Department employees use post reports as a basic reference when deciding whether to bid on a position at that mission. The embassy overlooked Department requirements because of competing priorities. An accurate post report is crucial to ensure that those bidding on mission

³⁹ An OIG audit (*Audit of Select Cost-of-Living Allowances for American Employees Stationed in Foreign Areas* (AUD-FM-17-51, August 2017)) recommended eliminating the location-specific survey data process for individual posts. Notwithstanding this recommendation, so long as the current process is still in place, the Department should ensure that it is followed correctly. Accordingly, OIG is making a specific recommendation to address the problem at Embassy Bogota.

⁴⁰ Hardship differential provides additional compensation to staff for service at foreign locations where environmental conditions differ substantially from those in the continental United States and warrant additional compensation as a recruitment and retention incentive.

positions will have sufficient and accurate information about local conditions to determine their choice of assignments and orient themselves and their families before arrival.

Recommendation 23: Embassy Bogota should comply with Department guidelines for completion of post reports. (Action: Embassy Bogota)

Financial Management

OIG identified three internal control deficiencies in the embassy Financial Management Center, which the center corrected during the inspection. In particular:

- The Ambassador began paying official residence expense staff⁴¹ using an offsite employment agreement, in accordance with 3 FAM 3257a, rather than by the cashier depositing salary payments into local bank accounts of the official residence staff.
- Supervisors of the embassy's principal cashiers began conducting unannounced, random cashier reconciliations, in accordance with the June 2017 Department's Cashier User Guide, Section 13.2(1), rather than on a predictable schedule.
- The embassy began to schedule alternate cashiers to work as acting principal cashier two to three times per month, in accordance with the June 2017 Department's Cashier User Guide, Section 3.6, instead of infrequently or only during periodic absences of the principal cashier.

Unreconciled Balances in the Suspense Deposit Abroad Account

The Financial Management Center had an unreconciled balance totaling \$39,957 in the Suspense Deposit Abroad⁴² account from two transactions recorded in July and August 2017. According to 4 FAH-3 H-322c(2), authorized transactions put into such an account should be cleared as quickly as possible, preferably within 30 days, and no amount should be held for more than 60 days. The financial staff had not cleared these Suspense Deposit Account transactions due to other priorities. Without timely reconciliation, the embassy cannot use funds deposited in the Suspense Deposit Account for other purposes.

Recommendation 24: Embassy Bogota should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines and put funds of \$39,957 to better use. (Action: Embassy Bogota)

On October 18, 2018, the Financial Management Center cleared the balance of \$39,957 held in the Suspense Deposit Abroad account generated from the transactions recorded in 2017.

⁴¹ Official residence expense household staff are employed by a principal representative to perform household duties at an official residence and are not employees of the U.S. Government.

⁴² According to 4 FAH-3 H-326.1a, Suspense Deposits Abroad transactions are official collection amounts for payments on behalf of and as directed by the depositors. The U.S. Government is responsible to each such depositor for ensuring that amounts received are appropriately disbursed or returned.

Overdue Travel Advances

As of October 16, 2018, the Department's financial system open advance report showed 213 overdue travel advances totaling \$1,451,820 for Mission Colombia. Ninety-five of the 213 advances were more than 30 days overdue, with 42 of these outstanding for more than 90 days. According to 4 FAM 465.1, each traveler is required to submit an expense report (voucher or claim) within 5 business days from the travel ending date to account for the travel performed and for the related authorized costs. If travelers do not submit their vouchers on time, the Financial Management Center is responsible for debt collection, as outlined in 4 FAM 492.1. Pursuant to 4 FAM 493.1-3, in no case should a debt delinquent for more than 90 days remain with post for collection. Financial staff told OIG that the overdue travel advances occurred because travelers did not submit their vouchers on time despite receiving multiple reminders. Staff told OIG it also was difficult to enforce compliance with Department standards given the embassy's large number of travelers and the difficulty of collecting advances from invitational travelers.⁴³ Nonetheless, overdue travel advances represent a loss of funds to the Department if they remain uncollected. The embassy could put to better use any funds collected by clearing overdue travel advances.

Recommendation 25: Embassy Bogota should clear overdue travel advances in accordance with Department guidelines and put funds up to \$1,451,820 to better use. (Action: Embassy Bogota)

Unprocessed Financial Transactions

As of October 2018, Embassy Bogota had 245 unprocessed financial transactions totaling \$2,064,793. These unprocessed transactions included 226 labeled as "held for processing FY 2019 lease payments" because the embassy had yet to receive the necessary funding, while the remaining 19 were rejected transactions for payroll, vouchers, and other obligations. Pursuant to 4 FAM 251.7, the financial management staff must review all disbursements and related financial reports in a timely manner to ensure all financial transactions are properly recorded, and staff should ensure unprocessed transactions are resolved expeditiously. The rejected transactions occurred because the financial staff did not enter correct fiscal data into the financial system or did not obligate sufficient funds to process the transaction. Unprocessed transactions affect available funding, and expeditious clearing of rejected transactions provides allotment holders with an accurate balance of available funds. OIG advised the embassy to clear the unprocessed transactions, which it began to do during the inspection. As a result, OIG did not make a recommendation to address this issue.

⁴³ According to 4 FAM 463.2b(3), an individual serving without pay or at \$1 a year is referred to as "invitational traveler."

Only One of Six Information Management Positions Was Programmed to International Cooperative Administrative Support Services

OIG found that the International Cooperative Administrative Support Services⁴⁴ (ICASS) funded only one of six Information Management U.S. direct-hire positions, even though the embassy estimated that some Information Management staff members allocated more than 50 percent of their time to ICASS⁴⁵ services. According to 6 FAH-5 H-013.2, agencies pay their share of post administrative costs based on usage. Pursuant to 6 FAH-5 H-341.9, ICASS costs should include salaries and benefits of all U.S. direct-hire and LE staff who deliver services to other agencies, overhead associated with those staff, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at posts with multiple U.S. direct-hire Information Management officers, the first position is paid through the Department's Diplomatic and Consular Program funding, while the second one is always paid through ICASS. Where there are more than two officers, the embassy should determine an appropriate mix of Program- and ICASS-funded positions. Failure to reprogram additional positions to ICASS means the Department would continue to subsidize most of the costs for other agencies. OIG estimated the Department could recover \$81,331 per position annually in funds put to better use by converting additional Embassy Bogota Information Management positions to ICASS.⁴⁶

Recommendation 26: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of \$81,331 per position to better use. (Action: Embassy Bogota, in coordination with WHA and CGFS)

Embassy Bogota Voucher Processing Efficiency Lower Than Other Embassies

The 18 LE staff voucher examiners in Embassy Bogota's vouchering unit processed 1,665.2 transactions or strip codes⁴⁷ per year, on average. This number was below the Bureau of Western Hemisphere Affairs average of 2,341.6 strip codes per voucher examiner and below the level of other embassies in the region. For example, at Embassy Mexico City, the region's most efficient vouchering unit, the 16 LE voucher examiners each processed an annual average of 5,563.9 strip codes. The Financial Management Officer agreed that the voucher examiners could be more efficient. OIG advised the staff to solicit input from other embassies to

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

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

⁴⁶ Relying on Department-provided figures, OIG estimated the Department could recover \$81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of \$268,419 and the worldwide average percentage of time U.S. direct-hire IM staff support other agencies of 30.3 percent ($\$268,419 \times 0.303 = \$81,331$).

⁴⁷ Financial strip codes are the workload metric ICASS uses to distribute the costs of providing voucher services to interagency customers.

determine the most efficient procedures for processing vouchers and revise its voucher processing procedures accordingly, which the staff agreed to do.

Facilities Management

Status of the Embassy Branch Office in Cartagena

Embassy Bogota in October 2017 requested that the Department expedite the consideration and approval process to allow it to begin the search for a branch office facility to meet the space requirements of the agencies operating there.⁴⁸ In addition to the Department, these include the Drug Enforcement Administration, Immigration and Customs Enforcement, and various Department of Defense agencies. As a result of the embassy's request, the Bureau of Overseas Buildings Operations began an analysis to determine the long-term real estate solution for the embassy branch office upon expiration of its lease in 2021. Options under consideration include constructing a new office building, entering into a build-lease agreement with a local developer, entering into a new lease agreement with the current landlords, and leasing an alternate facility. The bureau's decision was pending at the time of inspection.

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

OIG identified three elements of the embassy branch office's safety, health, and environmental management program that did not comply with Department standards. Specifically, the embassy branch office's POSHO did not:

- Perform required safety inspections. Guidance in 15 FAM 962c requires the POSHO to inspect all office work areas annually and "increased-risk"⁴⁹ areas and operations twice a year.
- Convene safety, health, and environmental management meetings. Guidance in 15 FAM 933.2a requires each post having more than 25 employees to establish a post safety, health, and environmental management standing committee, which should meet at least semiannually.
- Conduct required safety training. According to 15 FAM 965a, the POSHO should ensure that management officials receive an orientation and other learning experiences that enable them to meet their safety and occupational health responsibilities. In addition, 15 FAM 965d states that the POSHO will ensure that a safety and occupational health orientation is provided for all new employees, and that specialized safety, health, and environmental management training related to the work performed by particular employees is provided.

⁴⁸ Cable 17 BOGOTA 2550, "Bogota Requests OBO Consideration of a Potential Major Lease Action - Cartagena EBO Relocation," October 5, 2017.

⁴⁹ According to 15 FAM 962e, an increased-risk work area is a workplace or environment with a high potential for mishaps or occupational illnesses, including activities involving machines, electrical or electronic functions, construction, maintenance and repair (e.g., GSO or Facility Management work areas at Embassy Bogota).

Branch office staff told OIG these deficiencies occurred because of understaffing and competing priorities within the Management Section. The absence of required inspections, training, and meetings increases the risk of injury and loss of life.

Recommendation 27: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should bring Embassy Branch Office Cartagena's safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO)

Fire Protection Program Did Not Fully Comply With Department Standards

Neither Embassy Bogota nor Embassy Branch Office Cartagena complied with elements of the Department's fire protection program. Specifically:

- Sixteen branch office fire extinguishers lacked records of inspection. Guidance in 15 FAM 842a requires every fire extinguisher to be visually inspected monthly for operable condition and, at a minimum, serviced once each year, and the actions recorded either on the extinguisher inspection tag or electronically.
- Fire extinguishers in Bogota and Cartagena residences had no record of inspection. Guidance in 15 FAM 842b requires occupants to conduct a visual inspection of their fire extinguishers monthly for operable condition and report any deficiencies to the facilities manager or general services officer. Inspection dates must be recorded on the extinguisher inspection tag.
- Seven deficiencies identified by a Bureau of Overseas Buildings Operations Office of Fire Protection inspection team in May 2017 remained outstanding at the time of the inspection. The team identified 40 deficiencies at Embassy Bogota, of which the embassy had corrected 33.

Management staff told OIG the fire safety deficiencies occurred because of understaffing at the branch office, vacancies created by the hiring freeze, and occupants' failure to perform monthly inspections. Nonetheless, the lack of fire extinguisher inspections as well as uncorrected fire inspection deficiencies increase the risk of injury and loss of life.

Recommendation 28: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO)

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. The Information Management staff provided off-site support to Embassy Branch Office Cartagena and INL Bogota's facility in Guaymaral, Colombia. In addition, the staff supported frequent high-

profile visits to the region. Although OIG determined the Information Management staff met these additional requirements as well as the mission's day-to-day computing and communications needs, the inspection found deficiencies in the implementation of effective information security and program management, as detailed below and in the companion classified report.

Personally Identifiable Information Stored on Dedicated Internet Network Without Adequate Information Security Controls

The Information Management Section improperly stored a database containing personally identifiable information (PII) on a DIN, contrary to Department standards. Specifically, 5 FAM 872.2a states that Department PII must not be processed, stored, or transmitted on DINs, except in limited amounts under exigent circumstances. Section staff told OIG that although the local configuration control board in 2012 approved a KACTUS⁵⁰ database—used to calculate and store LE staff social security payment information required by the Colombian Government—the Bureau of Information Resource Management prohibited its use on the Department's unclassified network. Because of a business need for the database, section managers decided to store it on a DIN despite the 5 FAM 469 guidance on protecting PII. OIG found that the section also did not use the National Institute of Standards and Technology's Risk Management Framework,⁵¹ which requires performing a risk assessment to ensure that appropriate information security controls are implemented. Failure to appropriately secure PII could compromise employees' information and places them at risk of identity theft.

Recommendation 29: Embassy Bogota should remove the KACTUS database from the dedicated internet network and conduct a risk assessment based on the National Institute of Standards and Technology's Risk Management Framework. (Action: Embassy Bogota)

Telecommunications Demarcation Point Improperly Located

The demarcation point connecting the embassy's telecommunications systems with the public telecommunication network was located in three limited access communications rooms within the chancery buildings. This configuration is contrary to 12 FAH-6 H-651.5-2, which requires the demarcation point to be located in a separate, locked building within the facility grounds or in a separate locked room. Section staff told OIG they were unaware of this requirement. Locating the public telecommunication equipment in limited access communications rooms creates security vulnerabilities each time the embassy grants access to non-cleared internet service provider employees.

⁵⁰ KACTUS is a human capital management software program for payroll and human resource functions.

⁵¹ The Risk Management Framework for Federal Information Systems provides guidelines for managing risk, including security categorization, security control selection and implementation, security control assessment, information system authorization, and security control monitoring.

Recommendation 30: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs, should relocate the telecommunications demarcation point outside the limited access communications rooms. (Action: Embassy Bogota in coordination with WHA)

Information Systems Security Officers Did Not Perform All Duties

The embassy's unclassified and classified Information Systems Security Officers (ISSO) did not consistently use the Department's ISSO checklist, per 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 inconsistent system auditing for malicious activity, inactive user accounts, inconsistent reviews of users' accesses to files and folders, and 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 identified similar issues at other embassies and Department entities and in May 2017 issued a management assistance report that highlighted widespread failures to perform ISSO duties.⁵² In a subsequent Department cable,⁵³ the Bureau of Information Resource Management requested that embassy management work with ISSOs to ensure performance of their duties by prioritizing resources to ensure that cybersecurity needs were met and documented. In this case, OIG found an inadequate workload balance among section staff and a lack of prioritization of cybersecurity needs led to non-performance of these duties, which put the security of the Department's computer systems at risk.

Recommendation 31: Embassy Bogota should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Bogota)

Ineffective Active Directory Group Management Created Security Risk

Embassy Bogota did not maintain its Active Directory⁵⁴ security and distribution groups for its unclassified and classified computer networks in accordance with 12 FAH-10 H-112.5-2(1) and 12 FAH-10 H-112.1-1a(2-3). As a result, OIG found instances of user accounts with elevated access privileges or access to information in shared folders that users did not need to perform their duties. This occurred, at least in part, because section staff did not develop standard operating procedures for checking and maintaining Active Directory security and distribution groups, which are used to manage access to information and computer resources to ensure information is distributed to, or accessed by, the intended personnel. Failure to accurately maintain these groups increases the risk of a security breach, especially if a group has been given inappropriate administrative privileges.

⁵² OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

⁵³ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

⁵⁴ Active Directory captures properties of users, groups, computers, servers, printers, network shares, and additional systems information.

Recommendation 32: Embassy Bogota should implement standard operating procedures to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Bogota)

Embassy Branch Office Mail Room Did Not Meet Security Standards

Embassy Branch Office Cartagena did not keep its mail room locked at all times to prevent unauthorized access, as required in 14 FAH-4 H-122.2a. During the inspection, OIG found the mail room unlocked on two occasions even after informing branch office staff of this security requirement. OIG determined that keeping the mail room unlocked was a long-standing practice that allowed employees to retrieve and drop off their mail at their convenience. The absence of proper mail room security standards puts employees' mail at risk of unauthorized interception and theft.

The Department's Office of Diplomatic Pouch and Mail advised OIG that it would suspend mail service to the branch office if the embassy did not appoint a unit mail clerk and secure the mail room. Although the embassy had filled the position, staff told OIG that the clerk would not begin work until sometime in 2019. OIG advised the Information Management Officer to send an embassy mail clerk to Cartagena to implement the necessary security standards until the new employee arrived.

Recommendation 33: Embassy Bogota should implement procedures to control access to Embassy Branch Office Cartagena's mail room in accordance with Department standards. (Action: Embassy Bogota)

Embassy Lacked Active Local Information Technology Configuration Control Board

Embassy Bogota did not have an active local IT configuration control board, as required in 5 FAM 115.6-2a and 5 FAM 862a, and therefore lacked accurate software inventories for its networks. Additionally, the embassy developed local software applications without receiving local configuration control board approval and without registering the applications in the Department's Integrated Management, Analytics, and Technology Resource for Information Exchange database. OIG found that although section managers approved some IT hardware retroactively, the local IT configuration control board did not approve all locally developed applications, nor did it maintain the required software inventory. Without accurate inventories, section managers could not assure proper review, testing, and implementation of IT security controls to protect the embassy's information and networks.

Recommendation 34: Embassy Bogota should maintain its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Bogota)

Embassy Did Not Follow Department Processes for Assessment and Authorization of Locally Developed Software

Embassy Bogota developed local applications containing PII without submitting them to the Bureau of Information Resource Management's Information Assurance for assessment and authorization, as required in 12 FAH-10 H-312.4. While not all enterprise-approved applications⁵⁵ require a separate authorization to operate, the Information Assurance system data type checklist categorizes PII—such as a national identification number—at a moderate security impact level for confidentiality, integrity and availability.⁵⁶ Therefore, assessment and authorization⁵⁷ is required for any system containing this type of data prior to deployment. Section managers told OIG they were unaware of this requirement. Without proper assessment and authorization of locally developed or modified software, section managers could not verify the appropriate level of protection needed for their databases or that the databases do not create undue risk to the network.

Recommendation 35: Embassy Bogota should inventory its databases and submit appropriate security documentation for databases containing personally identifiable information to the Bureau of Information Resource Management for an authorization decision. (Action: Embassy Bogota)

Lack of Patch Management Plan for Locally Developed Software Applications

Embassy Bogota's Information Management Section did not implement a patch management plan⁵⁸ to address potential vulnerabilities for its locally developed software applications, as required in 5 FAM 862.1e. While the Department's patch management process covers enterprise systems, embassies are responsible for actively monitoring and patching software for their unique applications. However, section managers did not develop standard operating procedures for systematically patching locally developed software applications. The lack of a patch management plan limited their ability to identify and correct vulnerabilities and configuration compliance issues.

Recommendation 36: Embassy Bogota should implement a patch management process for locally approved software operating on its networks, in accordance with Department standards. (Action: Embassy Bogota)

⁵⁵ Enterprise-approved applications are those approved for Department-wide use.

⁵⁶ The security category determines the potential effect of the loss of confidentiality, integrity or availability of the information involved.

⁵⁷ Security authorization is the official management decision by a senior organizational official to authorize operation of an information system and to explicitly accept the risk to organizational operations and assets, individuals, other organizations, and the nation based on the implementation of an agreed-upon set of security controls.

⁵⁸ Patch management plans outline the processes to remediate flaws in software and firmware.

Knowledge Management Process for Documenting Information Management Operations Lacking

Embassy Bogota lacked knowledge management procedures to ensure reliable documentation and historical information for managing information management programs. According to 5 FAM 867, managers must maintain such documentation for all aspects of computer support and operations to ensure continuity and consistency. OIG found instances where managers were unable to provide information on the status of their operations. OIG also found inconsistent systems maintenance recordkeeping for unclassified and classified network operations as well as a lack of standard operating procedures for account management and systems backup. OIG determined that although section managers were aware of some of these deficiencies, they did not focus on correcting them. The absence of reliable information adversely affects internal control and diminishes the effectiveness of information management programs.

Recommendation 37: Embassy Bogota should implement standard operating procedures for knowledge management that outline how it will capture, share, transfer, and retain information related to its information management programs. (Action: Embassy Bogota)

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 this training is delivered to employees based on their IT contingency planning roles and responsibilities. Section managers did not conduct this training because they had not focused on 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 38: Embassy Bogota should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bogota)

Information Technology Contingency Planning Was Inadequate

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

Recommendation 39: Embassy Bogota should test the information technology contingency plans for unclassified and classified networks in accordance with Department standards. (Action: Embassy Bogota)

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 Bogota and the Bureau of Consular Affairs. The Department's complete responses can be found in Appendix B.⁵⁹ The Department also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Bogota, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should comply with Department standards for end use monitoring of defense articles. (Action: Embassy Bogota, in coordination with INL)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota's end use monitoring of defense articles complies with Department standards.

Recommendation 2: Embassy Bogota should comply with Department standards related to contracting officer's representative contract file documentation for contracts administered by the International Narcotics and Law Enforcement Affairs Section. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

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

Recommendation 3: Embassy Bogota should comply with Department standards for Federal assistance award file documentation for awards administered by the embassy's International Narcotics and Law Enforcement Section. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of May 31, 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that assistance award files comply with Department standards.

⁵⁹ This work was delayed because of the lapse in OIG's appropriations that occurred from 11:59 p.m. December 21, 2018, through January 25, 2019. Additionally, OIG received Embassy Bogota's final comments on April 12, 2019.

Recommendation 4: Embassy Bogota should comply with Department standards for the use of public diplomacy funds. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred this recommendation. The embassy noted an estimated completion date of September 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota's use of public diplomacy funds complies with Department standards.

Recommendation 5: Embassy Bogota should document public diplomacy grants in accordance with the Federal Assistance Directive. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota's public diplomacy grants comply with the Federal Assistance Directive.

Recommendation 6: Embassy Bogota should align the supervisory structure in the Public Diplomacy Section in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota disagreed with this recommendation. The embassy emphasized the efficiency of the existing supervisory structure in the Public Diplomacy Section. The embassy noted that during the development of the new position description, Public Diplomacy Section leadership determined the Public Engagement Assistant position should not report directly to the Regional Public Engagement Specialist. This is because the Public Engagement Assistant position spends 30 percent of time on work related to the Regional Public Engagement Specialist, i.e., American Spaces, and 70 percent on non-American Spaces tasks. As a result, the Public Diplomacy Section leadership determined the position should report to a locally employed staff supervisor who in turn reports to the Cultural Affairs Officer.

OIG Reply: OIG considers the recommendation unresolved. OIG acknowledges that the position description for the Public Engagement Assistant indicates that 30 percent of the position's major duties are for "American Spaces (AS) Management." However, the position description also states that the basic function for the position is to "manage public diplomacy outreach programming associated with American Spaces." In addition, the position description designates 40 percent of time for "Program Management," which includes the responsibility for supporting "the Colombia-based portfolio and engagement of the Regional Public Engagement Specialist." OIG determined that the current position description reflects significant work related to the American Spaces program and therefore should be supervised by the Regional Public Engagement Specialist. The recommendation can be closed when OIG receives and

accepts documentation that Embassy Bogota aligned the supervisory structure in the Public Diplomacy Section in accordance with Department standards.

Recommendation 7: Embassy Bogota should eliminate the requirement that adjudicators complete a specific number of visa interviews per hour and focus training on developing appropriate decision-making skills and visa security. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota eliminated the requirement that adjudicators complete a specific number of visa interviews per hour and revised the training program to focus on decision-making skills and visa security.

Recommendation 8: Embassy Bogota should use the Bureau of Consular Affairs' management framework to align operations with Department standards and U.S. Government objectives. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota used the Bureau of Consular Affairs' management framework to align its operations with Department standards and U.S. Government objectives.

Recommendation 9: Embassy Bogota should conform to the terms of the Bureau of Consular Affairs' contractor's task order requiring applicants to submit general visa inquiries to the contractor in order to appropriately employ staff expertise and put funds of approximately \$65,200 to better use. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota conformed to the terms of the Bureau of Consular Affairs contractor's task order regarding visa inquiries.

Recommendation 10: The Bureau of Consular Affairs, in coordination with Embassy Bogota, should complete its review of fee collections and reconciliations in Colombia to determine and correct the cause of the shortfall in nonimmigrant visa application fees. (Action: CA, in coordination with Embassy Bogota)

Management Response: In its March 19, 2019, response, the Bureau of Consular Affairs concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs corrected the cause of the shortfall in nonimmigrant visa application fees.

Recommendation 11: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of embassy motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Bogota's corrective action plan to reduce the number of motor vehicle mishaps.

Recommendation 12: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should require all agencies under chief of mission authority to comply with Department standards for reporting motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all agencies under chief of mission authority comply with Department standards for reporting vehicle mishaps.

Recommendation 13: Embassy Bogota should complete its fleet reports in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of fleet reports completed in accordance with Department standards.

Recommendation 14: Embassy Bogota should comply with applicable Department overseas motor vehicle safety requirements for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of September 30, 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota complies with applicable Department overseas motor vehicle safety requirements for chauffeurs and incidental drivers.

Recommendation 15: Embassy Bogota should document future property disposals in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota's property disposals comply with Department standards.

Recommendation 16: Embassy Bogota should use the Integrated Logistics Management System for all expendable supplies, in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota uses the Integrated Logistics Management System for all expendable supplies, in accordance with Department standards.

Recommendation 17: Embassy Bogota should assign separate receiving and property record keeping clerks for its bulk fuel operation and designate those duties in writing, in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota assigned and designated separate receiving and property record keeping clerks, in accordance with Department standards.

Recommendation 18: Embassy Bogota should close out procurement files in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of June 15, 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the closed procurement files.

Recommendation 19: Embassy Bogota should conduct its annual 2018 review of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Bogota's 2018 review of its blanket purchase agreements.

Recommendation 20: Embassy Bogota should submit the hotel and restaurant reports for its outdated foreign per diem locations to the Bureau of Administration's Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of May 31, 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota updated its foreign per diem locations and submitted its hotel and restaurant reports to the Office of Allowances.

Recommendation 21: Embassy Bogota should submit the required retail price surveys to the Office of Allowances in accordance with Department guidelines. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of May 30, 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the retail price surveys were submitted to the Office of Allowances.

Recommendation 22: Embassy Bogota should submit all required hardship differential surveys to the Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of August 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the hardship differential surveys were submitted to the Office of Allowances.

Recommendation 23: Embassy Bogota should comply with Department guidelines for completion of post reports. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of November 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota post reports comply with Department guidelines.

Recommendation 24: Embassy Bogota should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines, and put funds of \$39,957 to better use. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota reconciled transactions in the Suspense Deposit Abroad account in accordance with Department guidelines.

Recommendation 25: Embassy Bogota should clear overdue travel advances in accordance with Department guidelines and put funds up to \$1,451,820 to better use. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of July 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota cleared overdue travel advances in accordance with Department guidelines.

Recommendation 26: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of \$81,331 per position to better use. (Action: Embassy Bogota, in coordination with WHA and CGFS)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of July 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota reprogrammed Information Management positions to International Cooperative Administrative Support Services-funded positions.

Recommendation 27: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should bring Embassy Branch Office Cartagena's safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

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

Recommendation 28: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an action plan to bring the mission's fire protection program into compliance with Department standards.

Recommendation 29: Embassy Bogota should remove the KACTUS database from the dedicated internet network and conduct a risk assessment based on the National Institute of Standards and Technology's Risk Management Framework. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota removed the KACTUS database from the dedicated internet network and conducted a risk assessment based on the National Institute of Standards and Technology's Risk Management Framework.

Recommendation 30: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs, should relocate the telecommunications demarcation point outside the limited access communications rooms. (Action: Embassy Bogota in coordination with WHA)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of September 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota relocated the telecommunications demarcation point outside the limited access communications rooms.

Recommendation 31: Embassy Bogota should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

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

Recommendation 32: Embassy Bogota should implement standard operating procedures to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of standard operating procedures to manage Embassy Bogota's Active Directory groups for its classified and unclassified networks.

Recommendation 33: Embassy Bogota should implement procedures to control access to Embassy Branch Office Cartagena's mail room in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of procedures to control access to Embassy Branch Office Cartagena's mail room.

Recommendation 34: Embassy Bogota should maintain its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of August 2019.

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

Recommendation 35: Embassy Bogota should inventory its databases and submit appropriate security documentation for databases containing personally identifiable information to the Bureau of Information Resource Management for an authorization decision. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota inventoried its databases and submitted security documentation for databases containing personally identifiable information to the Bureau of Information Resource Management.

Recommendation 36: Embassy Bogota should implement a patch management process for locally approved software operating on its networks, in accordance with Department standards. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a patch management process for locally approved software operating on Embassy Bogota's networks.

Recommendation 37: Embassy Bogota should implement standard operating procedures for knowledge management that outline how it will capture, share, transfer, and retain information related to its information management programs. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of September 2019.

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

Recommendation 38: Embassy Bogota should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of December 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bogota conducted initial and annual refresher information technology contingency training for appropriate employees.

Recommendation 39: Embassy Bogota should test the information technology contingency plans for unclassified and classified networks in accordance with Department standards.
(Action: Embassy Bogota)

Management Response: In its April 1, 2019, response, Embassy Bogota concurred with this recommendation. The embassy noted an expected completion date of December 2019.

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

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Kevin Whitaker	5/2014
Deputy Chief of Mission	Philip Laidlaw	2/2016
Chiefs of Sections:		
Management	Calvin Watlington (acting)	10/2014
Consular	Jeffrey Miles (acting)	6/2016
Political	Jennifer Davis Paguada	6/2016
Economic	Jaqueline Ward	6/2018
Public Diplomacy	Abigail Dressel	9/2017
Regional Security	Harland Rex (acting)	7/2018
International Narcotics and Law Enforcement	Christopher Landberg	7/2016
Other Agencies:		
Department of Defense	Michael Rayburn	6/2018
Department of Justice	Marlon Cobar	4/2012
U.S. Commercial Service	Yamilee Bastien (acting)	7/2018
Foreign Agricultural Service	Michael Conlon	8/2014
Federal Bureau of Investigations	Alexander Morales (acting)	6/2016
Drug Enforcement Administration	Richard Dobrich	8/2015
Department of Homeland Security	Luis Sierra	12/2013
Department of the Treasury	Gregory Stuart	1/2015

Source: Embassy Bogota

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 4 to November 29, 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 and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

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

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved and U.S. interests are accurately and effectively represented, and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; 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. For this inspection, OIG conducted 366 interviews and reviewed responses to 523 personal questionnaires.

APPENDIX B: MANAGEMENT RESPONSES



Embassy of the United States of America

April 1, 2019

UNCLASSIFIED

THRU: WHA – Assistant Secretary Kimberly Breier

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

FROM: U.S. Embassy Bogota – Ambassador Kevin Whitaker

SUBJECT: Response to Draft OIG Report – Inspection of U.S. Embassy Bogota

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

OIG Recommendation 1: Embassy Bogota, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should comply with Department standards for end use monitoring of defense articles. (Action: Embassy Bogota, in coordination with INL.)

Management Response: Embassy Bogota concurs with the recommendation. INL Bogota has a team dedicated to end use monitoring (EUM) of the more than 48,000 firearms, night vision devices, and related defense articles (DA) that it has donated to Colombian military and law enforcement institutions, many of which are constantly deployed to physically remote, sometimes dangerous police and military bases. According to data INL submitted in its annual EUM report, in 2018, INL Bogota performed EUM inspections on 75 percent of its DA inventory. A key tool for tracking compliance with Department standards is the anachronistic ILMS EUM database. INL and Embassy Bogota are working to implement long-planned, significant database upgrades to support program and oversight needs. Embassy Bogota and INL are implementing a comprehensive review of INL Bogota's EUM program to ensure compliance with all Department standards. In February 2019, INL completed a six-month comprehensive external audit of INL Bogota's DA paper documentation. The contract auditor's final report highlighted that it had accounted for all the paperwork for the defense articles and said the INL Bogota EUM "program has demonstrated their exceptional ability to track, maintain and account for all the DAs donated to the Government of Colombia from the onset of the original INL office decades ago, up to the modern day INL office in Bogota."

OIG Recommendation 2: Embassy Bogota should comply with Department standards related to contracting officer's representative contract file documentation for contracts administered by the International Narcotics and Law Enforcement Affairs Section. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. INL Bogota recently created and is filling two new grants officer/contracting officer positions to improve oversight of grant and contract documentation and monitoring activities. In March 2019, INL Bogota hosted an FSI-sponsored contracting officer's representative (COR) class and trained 13 CORs. Also in March 2019, INL Bogota hosted a contract file management workshop for 18 CORs and COR support personnel with a TDY CO from A/LM/AQM. The CO emphasized key aspects of 14 FAM/FAH such as 14 FAH-2 H-517 *Standard Contracting Officer's Representative (COR) Working File*. In December 2018, INL Bogota received training as an "early adopter" for the ILMS COR eFiling module, which reinforces COR filing rules per Department standards.

OIG Recommendation 3: Embassy Bogota should comply with Department standards for Federal assistance award file documentation for awards administered by the Embassy's International Narcotics and Law Enforcement Section. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. INL Bogota now uses the ILMS State Assistance Management System (SAMS) for eFiling all award documents (the "e-4012," the Official Federal Assistance File) which reinforces grants documentation filing with a structure that aligns with Department standards. INL Bogota recently created and is filling two new grants officer/contracting officer positions to improve oversight of grant and contract documentation and monitoring activities. In February 2019, INL Bogota hosted INL Mexico's experienced grants officer, who met individually with all INL Bogota grants officers and gave grants management workshops. INL Bogota is updating its grants management SOP. (Note: The current SOP does include guidance for documentation requirements for the grant file and grants monitoring in accordance with 10 FAM 230. End Note.) The expected completion date is May 31, 2019.

OIG Recommendation 4: Embassy Bogota should comply with Department standards for the use of public diplomacy funds. (Action: Embassy Bogota)

Management Response: Embassy Bogota agrees with the OIG response recommendation to ensure compliance with Department standards for the use of public diplomacy funds regarding A/V and photographic support. Since the OIG inspection, PAS Bogota has stopped supporting any requests for PAS photographers at internal Embassy events with no public diplomacy component. PAS and Management have developed a transition plan to transfer all A/V support for internal events (events with a USG-only audience) by the end of FY19.

OIG Recommendation 5: Embassy Bogota should document public diplomacy grants in accordance with the Federal Assistance Directive. (Action: Embassy Bogota.)

Management Response: PAS concurs with the recommendation and will implement a system starting in April 2019 to include documentation of grants monitoring activities in all new PAS grants going forward.

OIG Recommendation 6: Embassy Bogota should align the supervisory structure in the Public Diplomacy Section in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: PAS Bogota does not concur with this recommendation. During the development of the new position description of the Public Engagement Assistant, PAS leadership considered the possibility of the position reporting to the Regional Engagement Specialist (REPS). However, since the incumbent (per his/her position description) spends 30 percent of his/her time on work related to American spaces and 70 percent of his/her time on non-American Spaces tasks, PAS leadership decided that it makes the most sense for the position to report to an LES who in turn reports to the CAO. This leadership chain was documented in the position reclassification documents. Because only 30 percent of the Public Engagement Assistant position is related to the work of the REPS and because this work is also overseen by the CAO, PAS Bogota believes that most efficient supervisory structure for the position is the one currently in place.

OIG Recommendation 7: Embassy Bogota should eliminate the requirement that adjudicators complete a specific number of visa interviews per hour and focus training on developing appropriate decision-making skills and visa security. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Following the OIG visit, post immediately eliminated the expectation that adjudicators complete a specific number of visa interviews per hour and emphasized instead the need to ensure applicants are qualified and eligible. Additionally, the Consular Section has formed adjudicator-led committees to revamp the training program and scheduling system. The new scheduling system was implemented in mid-December 2018.

OIG Recommendation 8: Embassy Bogota should use the Bureau of Consular Affairs' management framework to align operations with Department standards and U.S. Government objectives. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Post has undertaken a series of initiatives to better utilize CA's management framework and tools, and will continue to enculturate their usage throughout the section. For example, a core team of LE staff sent a series of emails to the Consular Section (in Spanish and English) spotlighting individual tools, and have employed these tools when looking at internal management processes. In addition, the Consular Section has formed committees of adjudicators to perform certain decision-making functions previously held by managers, improving communication and distribution of resources, and an LE staff committee focuses specifically on morale and team cohesion among the LE staff. Consular management has also underscored the foundational nature of the leadership tenets and is socializing the "Balanced, SMART, and Lean" management framework within the section. In addition, selected managers, adjudicators, and LE staff will attend 1CA training held at a nearby post. Finally, the section is looking forward to a visit by the Director of 1CA to post the end of April 2019.

OIG Recommendation 9: Embassy Bogota should conform to the terms of the Bureau of Consular Affairs' contractor's task order requiring applicants to submit general visa inquiries to

the contractor in order to appropriately employ staff expertise and put funds of approximately \$65,200 to better use. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Consular Section has initiated the process to reassign responsibility for general correspondence to the contractor. As this will be a new function, we anticipate working closely with the contractor over the coming months to coordinate scripts and train personnel as we transition routine correspondence to the contractor.

OIG Recommendation 10: The Bureau of Consular Affairs, in coordination with Embassy Bogota, should complete its review of fee collections and reconciliations in Colombia to determine and correct the cause of the shortfall in nonimmigrant visa application fees. (Action: CA, in coordination with Embassy Bogota.)

Management Response: The Bureau of Consular Affairs (CA) responded to this recommendation in a separate memorandum. Embassy Bogota concurs with CA's response and will coordinate with CA on implementation.

Recommendation 11: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of Embassy motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO.)

Management Response: Post Concur with the recommendation. All posts should work on reducing their Motor Vehicle Mishaps to zero. Post Occupational Safety and Health Officer (POSHO) and A/POSHO are working with other Embassy sections to develop a new database to track the training records, medical certifications, and driving responsibilities of those authorized to drive Government Vehicles. The new database will help post identify employees who need to receive SMITH and or AV training before they drive an Official Government Owned Vehicle. In Addition, post GSO and POSHO are working with the ICASS Council to develop a new Motor Pool Training position. This position will help track and train over 600 drivers within Mission Colombia.

Recommendation 12: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should require all agencies under chief of mission authority to comply with Department standards for reporting motor vehicle mishaps. (Action: Embassy Bogota, in coordination with OBO.)

Management Response: Post is revising the Motor Vehicle Safety Management Program (MVSP). The new MVSP incorporates mishap reporting requirements for personnel under Chief of Mission Authority. Additionally, POSHO and RSO have developed an email distribution list that informs members of any traffic incident involving U.S. government vehicles and privately owned vehicles.

OIG Recommendation 13: Embassy Bogota should complete its fleet reports in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy concurs with the recommendation and has implemented it.

OIG Recommendation 14: Embassy Bogota should comply with applicable Department overseas motor vehicle safety requirements for chauffeurs and incidental drivers under Chief of Mission authority. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Embassy Bogota is working with HR and ICASS Council to either re-program an open position or solicit approval for a new position in order to have a dedicated, professional trainer for the SMITH system as well as Armored Vehicle Driver training. Post expects to complete this process by September 30, 2019.

OIG Recommendation 15: Embassy Bogota should document future property disposals in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with recommendation. GSO Property Section has implemented this suggestion. Embassy will send management notice no later than April 30, 2019 to remind all employees to notify GSO before disposing of any USG assets.

OIG Recommendation 16: Embassy Bogota should use the Integrated Logistics Management System for all expendable supplies in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. GSO Property Section has implemented these recommendations.

Recommendation 17: Embassy Bogota should assign separate receiving and property record-keeping clerks for its bulk fuel operation and designate those duties in writing, in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation and implemented this change in March 2019. Standard Operating Procedures have been updated. Designation of duties in writing will be complete by April 5, 2019.

OIG Recommendation 18: Embassy Bogota should close out procurement files in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy concurs with OIG recommendation. Procurement has already closed out several thousand records since the OIG visit. Procurement section will complete closing out the approximately 3,000 remaining records by June 15, 2019.

Recommendation 19: Embassy Bogota should conduct its annual 2018 review of its blanket purchase agreements, in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Annual 2018 review of blanket purchase agreements (BPAs) was completed in October 2018.

Recommendation 20: Embassy Bogota should submit the hotel and restaurant reports for its outdated foreign per diem locations to the Bureau of Administration's Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Surveys have been completed and report is being compiled at this time. Embassy expects to complete report and submit to the Bureau of Administration Office of Allowances by May 31, 2019.

OIG Recommendation 21: Embassy Bogota should submit the required retail price surveys to the Office of Allowances in accordance with Department guidelines. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The embassy will implement the recommendation by submitting the required retail price survey to the Office of Allowances. The expected completion date is May 30, 2019.

OIG Recommendation 22: Embassy Bogota should submit all required hardship differential surveys to the Office of Allowances, in accordance with Department guidelines. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs and will implement the recommendation by submitting the required hardship differential survey to the Office of Allowances. The expected completion date is August 2019.

OIG Recommendation 23: Embassy Bogota should comply with Department guidelines for completion of post reports. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs and will implement the recommendation by completing changes to, and maintaining post reports for, Bogota. In addition, Embassy Bogota will produce a post report for Cartagena/Baranquilla. Various Management sections will participate in completing this recommendation. The expected completion date is November 2019.

OIG Recommendation 24: Embassy Bogota should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines and put funds of \$39,957 to better use. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has cleared the two referenced Suspense Deposit Abroad accounts and established weekly reviews by the FMO and accounting staff to ensure continued compliance.

OIG Recommendation 25: Embassy Bogota should clear overdue travel advances in accordance with Department guidelines and put up to \$1,451,820 to better use. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The embassy has established weekly reviews by the FMO and accounting staff to ensure compliance and is

working to establish Standard Operating Procedures for follow up on claims over five business days old. The expected date of compliance is July 2019.

OIG Recommendation 26: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of \$81,331 per position to better use. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy is currently working with relevant sections to determine the appropriate number of positions to transfer and will then work with the Bureau of Western Hemisphere Affairs to reprogram the Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services funded positions. The expected date of completion is July 2020.

Recommendation 27: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should bring Embassy Branch Office Cartagena's safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO.)

Management Response: Post is working with Embassy Branch Office Cartagena on developing a Safety, Health, and Environmental Management (SHEM) program. Embassy Bogota's POSHO is working with local staff to review Cartagena's SHEM program and hold a SHEM committee meeting in May of 2019.

Recommendation 28: Embassy Bogota, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Bogota, in coordination with OBO.)

Management Response: Post will work with GSO Housing to ensure occupants are made aware of their responsibility to visually check their fire extinguishers and to report any deficiencies to the GSO housing office or to the POSHO. Currently, post only has one outstanding fire protection deficiency that was identified on May 2017. Post will work with SEO, OBO, and DS to correct the egress functionality of a double-leafed FEBR door that is currently magnetically locked.

OIG Recommendation 29: Embassy Bogota should remove the KACTUS database from the dedicated internet network and conduct a risk assessment based on the National Institute of Standards and Technology's Risk Management Framework. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Embassy Bogota has taken the first steps to address this recommendation by isolating the KACTUS servers and computers into a single network, isolated from Post's Dedicated Internet network (DIN). In December 2018, Post submitted a System Categorization Form (SCF) to the Information Assurance directorate of the Bureau of Information Resource Management (IRM/IA) to begin

the assessment process. The time line for the remediation of this response is dependent on the IRM/IA assessment process.

OIG Recommendation 30: Embassy Bogota, in coordination with the Bureau of Western Hemisphere Affairs, should relocate the telecommunications demarcation point outside the limited access communications rooms. (Action: Embassy Bogota in coordination with WHA.)

Management Response: Embassy Bogota concurs with the recommendation. Embassy Bogota identified a suitable space to create a new demarcation point outside the Chancery building. The Embassy Facilities Maintenance office constructed a demarcation point that complies with 12 FAH-6 H-651.5-2. The necessary infrastructure materials to extend the existing demarcation points to the new space have been ordered. The estimated timeframe for completion of this project is September 2019.

OIG Recommendation 31: Embassy Bogota should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Embassy Bogota has implemented the recommendation by realigning ISSO responsibilities so ClassNet, OpenNet and Dedicated Internet Network (DIN) each have a dedicated ISSO. By distributing the ISSO responsibilities by network, Post's ISSOs can more effectively meet the oversight provisions per 5 FAH-11 H-116. Each ISSO documents the date the checks were performed and enters the results of their checks in a logbook.

OIG Recommendation 32: Embassy Bogota should implement standard operating procedures to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has implemented the recommendation by creating detailed Active Directory and Account management standard operating procedures (SOP) for the OpenNet and ClassNet systems. The IRM section has implemented procedure to ensure that USDH supervisors confirm the business need for security group membership and modified the checkout process to ensure employees are removed from the security groups upon departure from post.

OIG Recommendation 33: Embassy Bogota should implement procedures to control access to Embassy Branch Office Cartagena's mailroom in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has implemented the recommendation by instituting office hours for the DPO operation in the Embassy Branch Office in Cartagena. The Cartagena mailroom is secured outside normal office hours.

OIG Recommendation 34: Embassy Bogota should maintain its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has implemented the recommendation by the February 2018 establishment of a Local IT Change Control Board. The Embassy is currently developing an IT software and hardware baseline for submission to the local ITCCB. Post is currently leveraging the local ITCCB for all new approvals and anticipates completion of the ITCCB baseline by August 2019.

OIG Recommendation 35: Embassy Bogota should inventory its databases and submit appropriate security documentation for databases containing Personally Identifiable Information to the Bureau of Information Resource Management for an authorization decision. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has implemented the recommendation by consulting with the Directory of Information Assurance on the approvals and reviews required on locally developed databases created within the approved enterprise software platforms. IA concurred with Post that access controls should be implemented and that no formal review is required of these databases and associated SharePoint workflows. All Post databases are created in the enterprise approved environment.

OIG Recommendation 36: Embassy Bogota should implement a patch management process for locally approved software operating on its networks, in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy has implemented the recommendation by creating detailed patch management standard operating procedures (SOPs) for the OpenNet and ClassNet systems. These SOPs provide step-by-step instructions for all enterprise and locally developed applications.

OIG Recommendation 37: Embassy Bogota should implement standard operating procedures for knowledge management that outline how it will capture, share, transfer, and retain information related to its information management programs. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy is reviewing our knowledge holdings and drafting a standard operating procedure on how IT knowledge is captured, managed, and shared. The estimated completion date is September 2019.

OIG Recommendation 38: Embassy Bogota should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. Embassy Bogota is developing IT contingency training in conjunction with our updates to the IT Contingency Plan. Estimated completion date is December 2019.

OIG Recommendation 39: Embassy Bogota should test the information technology contingency plans for unclassified and classified networks in accordance with Department standards. (Action: Embassy Bogota.)

Management Response: Embassy Bogota concurs with the recommendation. The Embassy is currently updating the IT Contingency Plan and corresponding tests. The expected completion date for this is December 2019.

The point of contact for this memorandum is Management Officer Andrew Hudson, HUDSONAW@state.gov.



United States Department of State

Washington, D.C. 20520

March 19, 2019

UNCLASSIFIED

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

FROM: CA – Assistant Secretary Carl C. Risch

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

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

OIG Recommendation 10: The Bureau of Consular Affairs, in coordination with Embassy Bogota, should complete its review of fee collections and reconciliations in Colombia to determine and correct the cause of the shortfall in nonimmigrant visa application fees. (Action: CA, in coordination with Embassy Bogota).

Management Response: CA concurs with the recommendation. CA formed the Colombia MRV fee reconciliation working group, consisting of members from CA/EX, CA/C, and CA/FPP/CID to try to identify the cause of Colombia's MRV fee negative cumulative difference. The Bureau's efforts are ongoing.

We note that footnote 30 requires a correction to read “In 2010, the Bureau of Consular Affairs adopted a system called Global Support Strategy...” rather than 2014.

ABBREVIATIONS

COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FSN	Foreign Service National
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
INL	International Narcotics and Law Enforcement
ISSO	Information Systems Security Officer
LE	Locally Employed
PII	Personally Identifiable Information
POSHO	Post Occupational Safety and Health Officer
USAID	U.S. Agency for International Development

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