



Office of Inspector General
United States Department of State

ISP-I-19-17

Office of Inspections

July 2019

**Inspection of Embassy Santo Domingo,
Dominican Republic**

BUREAU OF WESTERN HEMISPHERE AFFAIRS



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-19-17

What OIG Inspected

OIG inspected the executive direction, program and policy implementation, and resource management operations of Embassy Santo Domingo. This inspection included the consular agencies in Punta Cana and Puerto Plata.

What OIG Recommends

OIG made 21 recommendations: 1 to improve coordination of law enforcement activities; 6 to address policy and program implementation issues; and 14 to improve management and information management operations.

In its comments on the draft report, the Department concurred with 20 recommendations and neither agreed nor disagreed with 1 recommendation. OIG considers the 21 recommendations resolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

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What OIG Found

- The Ambassador and the Deputy Chief of Mission effectively engaged the Government of the Dominican Republic while also supporting Embassy Santo Domingo personnel and programs.
- Coordination among the embassy's 11 different U.S. Government agencies and sections conducting law enforcement activities needed to be strengthened.
- Embassy Santo Domingo did not follow requirements to review unliquidated obligations, resulting in a potential \$1.3 million in U.S. Government funds that could be put to better use.
- The training program for consular officers providing services to American citizens was inadequate.
- Consular managers did not complete all visa case reviews in accordance with Department of State standards.
- Internal control deficiencies in the Management Section, primarily in financial management and general services, were exacerbated by staffing gaps in key positions.
- Spotlight on Success: Embassy Santo Domingo partnered with the Government of Colombia under the U.S.-Colombia Action Plan to deliver law enforcement training to Dominican Government officials, strengthening regional collaboration and significantly reducing training costs.

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CONTEXT

The Dominican Republic is a Caribbean island nation of 10.7 million people. It is the Caribbean region's third largest country and has the region's second largest economy, with a gross domestic product of \$74.9 billion in 2017. The country shares the island of Hispaniola with Haiti. The latter's devastation by the 2010 earthquake and lower level of economic development continue to affect the Dominican Republic through an influx of undocumented economic migrants estimated to number as many as 500,000. The Dominican Republic also has a native-born population of Haitian descent, possibly as many as 135,000, some of whom are unrecognized by the Dominican Government and therefore lack citizenship status.

The Dominican Republic is a key U.S. partner in the Caribbean due to the extensive people-to-people ties, trade, and law enforcement cooperation. However, the Dominican Government does not always support U.S. policies, particularly regarding human rights and anti-corruption. Its central location in the Caribbean makes it a popular destination for tourism and business, as well as for transnational crime. The embassy's consular operations support an estimated 300,000 U.S. citizens who reside in the Dominican Republic and an estimated 3 million American visitors each year.

Trade with the United States continues to grow, with approximately half of the Dominican Republic's exports going to, and 40 percent of its imports coming from, the United States. Since the start of the Dominican Republic-Central America Free Trade Agreement in 2007, U.S. exports have increased 30 percent and bilateral trade has grown by \$2 billion.

Eleven different U.S. Government agencies and embassy sections support the Dominican Republic's capacity to combat narcotics trafficking and transnational crime. The Department of State (Department) views the Dominican Republic as one of the United States' most capable security partners in the region.

The embassy's four strategic objectives, as outlined in its September 2018 Integrated Country Strategy (ICS), are:

- Protecting America's security at home and in the Dominican Republic.
- Promoting a democratic Dominican Republic.
- Supporting a Dominican Republic that promotes U.S. prosperity.
- Advancing a Dominican Republic receptive to U.S. leadership and values.

At the time of the inspection, Embassy Santo Domingo had 152 Department and other Federal agency U.S. direct-hire employees and 562 locally employed (LE) staff. The embassy also operates consular agencies in Punta Cana and Puerto Plata due to the high volume of U.S. citizens visiting those locations. At the time of the inspection, each consular agency was staffed by one LE staff member. However, the Department expected to add one U.S. direct-hire consular agent at each location in the near future. The other Federal agencies represented at the mission are the Departments of Agriculture, Commerce, Defense, Health and Human

Services, Homeland Security, Justice, and the U.S. Agency for International Development (USAID). The Peace Corps has approximately 160 volunteers serving in the country. U.S. foreign assistance to the Dominican Republic totaled approximately \$29.8 million in FY 2017.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.¹ A related classified inspection report discusses the mission's security program and issues affecting the safety of mission personnel and facilities.

EXECUTIVE DIRECTION

OIG assessed Embassy Santo Domingo's leadership on the basis of 77 interviews that included comments on the Ambassador's and the Deputy Chief of Mission's (DCM) performance, 195 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 non-career Ambassador arrived in Santo Domingo on August 30, 2018. She presented her credentials to the Dominican Government on September 6 and was recalled to Washington the next day to discuss the Dominican Government's recent decision to break diplomatic ties with Taiwan and recognize China. She returned to the post on September 14, just 3 weeks before the on-site portion of the inspection began. The Ambassador has four decades of experience in business, government, and the non-profit community.

The DCM, a career member of the Senior Foreign Service, arrived at the embassy in July 2017. He previously served as Deputy Director for the counternarcotics program at Embassy Bogota, Colombia. He served as Chargé d'Affaires (Chargé), ad interim from his arrival at Embassy Santo Domingo until the Ambassador arrived. The USAID Director served as acting DCM from January 2017 until the Ambassador's arrival in August 2018.

In the short time since her arrival, the Ambassador established productive working relationships with the DCM and embassy staff. Both the Ambassador and the DCM consistently exhibited traits that align with the Department's leadership principles in 3 Foreign Affairs Manual (FAM) 1214. To learn the chief of mission's roles and responsibilities, the Ambassador spent time with each embassy section finding out how it supports the mission. Embassy personnel described the Ambassador as energetic and cordial; they also assessed the DCM as a strong, competent leader. OIG found that both the Ambassador and the DCM enthusiastically supported embassy personnel and programs. Shortly after her arrival, the Ambassador held a town hall meeting for embassy staff during which she discussed her four priorities: education, disaster preparedness, trade and commerce, and security. She stressed that the embassy community was "One Team and One Mission," and that employees should treat each other with equality and respect. The Ambassador also set up a suggestion box in the cafeteria and

¹ See Appendix A.

met with some staff members who provided suggestions. The DCM ate lunch with a different group of employees in the cafeteria each day. The Ambassador and the DCM consistently encouraged adherence to Department policies and non-tolerance of fraud, waste, and abuse in emails and staff meetings and set an example in that regard.

Equal Employment Opportunity

OIG found that the embassy's Equal Employment Opportunity (EEO) program met Department requirements in 3 FAM 1514.2. Embassy staff told OIG that the Ambassador and the DCM advanced EEO principles in the way they conducted themselves and related to employees. In addition, they discussed EEO at country team meetings and sent email reminders to embassy staff concerning leading with integrity, respecting others, and attending EEO training. The embassy also posted current EEO notices and information in the chancery. The embassy's two EEO counselors received training at the Department's Foreign Service Institute; the two LE staff EEO liaisons were scheduled to receive training shortly after the inspection.

Execution of Foreign Policy Goals and Objectives

Embassy Santo Domingo prepared its 2018 ICS in accordance with 18 FAM 300. The International Narcotics and Law Enforcement (INL) Section Director, with oversight from the Chargé, coordinated the ICS preparation, which included input from all concerned embassy sections. The Department approved the final version on September 26, 2018. The Ambassador and the DCM consistently incorporated ICS goals into their meetings with embassy staff. The Ambassador also indicated that the embassy would conduct quarterly reviews of its progress toward meeting the ICS goals.

Upon her arrival, the Ambassador immediately began engaging with the host government. She met with the Dominican President, the Foreign Minister, and the Ministers of Finance and Health. She also was active in the diplomatic community, attending several events hosted by other embassies. At the time of the inspection, the Ambassador had yet to conduct any official travel outside the capital, but she planned to visit the northern area of the country in early November. The Ambassador and the DCM held a weekly conference call with the Bureau of Western Hemisphere Affairs.

Law Enforcement Oversight and Coordination Needed to be Strengthened

OIG found that Embassy Santo Domingo needed to strengthen oversight, coordination, and documentation of U.S. law enforcement activities in the Dominican Republic. Guidance in 11 FAM 427 and 11 FAM 012.1 gives chiefs of mission responsibility for the coordination and supervision of all executive branch offices and personnel in country, including law enforcement. The Ambassador and the DCM oversaw 11 U.S. Government agencies and embassy sections involved in law enforcement activities. They sought to conduct oversight by requiring decision memoranda to the Ambassador for key law enforcement activities, chairing the Law

Enforcement Working Group² meetings, and consulting with individual agencies and embassy sections.

Despite these efforts, OIG identified a range of shortcomings in the embassy's law enforcement oversight and coordination. The working group lacked Front Office guidance on how law enforcement operations should be coordinated. In addition, OIG identified instances where law enforcement agencies did not share information with each other prior to an operational activity, potentially jeopardizing its success. The embassy also did not have guidance on what types of operational activity required formal, written Ambassadorial approval. Furthermore, OIG found the working group did not document its discussions and decisions, and it did not review the status of law enforcement assistance programs following significant changes in the local operating environment.

Embassy staff attributed these deficiencies to competing priorities in the Front Office rather than to lack of knowledge, given that both the Chargé and acting DCM were in those positions for more than one year. During the inspection, the embassy started a second, smaller operationally focused sub-group, limited to Front Office and law enforcement personnel, to address some coordination and communication challenges. Nonetheless, given the large number of U.S. Government-supported law enforcement activities in the Dominican Republic, the lack of clear policies and guidelines for approving, coordinating, and reviewing law enforcement operations and assistance heightened the risk of duplication, waste, or harm to U.S. law enforcement efforts.

Recommendation 1: Embassy Santo Domingo should strengthen oversight and coordination of law enforcement activities by implementing written standard operating procedures defining when law enforcement agency operations require formal Chief of Mission approval, monitoring law enforcement assistance, and documenting Law Enforcement Working Group discussions and decisions. (Action: Embassy Santo Domingo)

Adherence to Internal Controls

The Management Officer, with guidance from the Chargé and acting DCM, led the preparation of 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. The effort included all applicable members of the embassy, who reviewed every aspect of their processes related to management controls. The Ambassador reviewed and signed the statement shortly after her arrival. The mission's Statement of Assurance identified a potential material weakness, which also had been reported in the embassy's 2017 statement, concerning the requirements for the embassy's leased housing compound, Los Bambues. The Bureau of Overseas Buildings Operations (OBO) was negotiating the purchase of the property at the time of the inspection,

² The USAID Director, as Acting DCM, chaired the meetings from January 2017 until August 2018. Once the Ambassador arrived in August 2018, the Chargé reverted to his DCM role, which included chairing the Law Enforcement Working Group meetings.

and the embassy expected the deficiencies to be resolved soon after the purchase is completed.

As described later in this report, OIG identified internal control vulnerabilities in foreign assistance, public diplomacy, consular operations, resource management, and information management. OIG attributed these deficiencies to the extended period the embassy was without an Ambassador, which made it difficult for the DCM to actively manage embassy operations, while also serving as Chargé.

The DCM carried out regular reviews of the Consular Section chief's nonimmigrant visa adjudications, from August 10 through October 24, 2018, as required by 9 FAM 403.12.

Security and Emergency Planning

Security and emergency planning were two of the Ambassador's top priorities. Embassy staff told OIG they generally believed the embassy was as prepared as it could be for a possible emergency. All personnel interviewed stated that the Ambassador and the DCM set the example when it came to security, including participating in emergency drills and weekly radio checks. OIG found that the Ambassador and the DCM generally conducted their security responsibilities in accordance with 12 Foreign Affairs Handbook (FAH)-1 H-721. However, OIG identified deficiencies related to physical security, residential security, and the surveillance detection programs, which are discussed in the companion classified report.

The Regional Security Office drafted new security directives, which the Ambassador signed during the inspection. The DCM chaired the embassy's Emergency Action Committee, which met as needed to discuss emergency preparedness and security-related developments. Additionally, the DCM met with the Regional Security Officer weekly. The embassy was up to date on all required drills and exercises, although the consular agencies in Puerto Plata and Punta Cana did not conduct drills. This deficiency is discussed further in the companion classified report.

Developing and Mentoring Foreign Service Professionals

At the time of the inspection, the DCM had just ended a 13-month period as the Chargé, during which the USAID Director, acting as DCM and in addition to his other duties, mentored the embassy's First- and Second-Tour officers and specialists, in accordance with 3 FAM 2242.4a. OIG met with the embassy First- and Second-Tour employees during the inspection and found that most would like to see more professional development opportunities and a more formalized program. The Ambassador and the DCM concurred with OIG's suggestion to conduct more Department-focused activities and to contact other embassies for ways to expand or enhance employees' professional development opportunities.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Santo Domingo's policy and program implementation through a review of the advocacy and analysis work performed by the Political-Economic Section, the counternarcotics and law enforcement efforts of the INL Section, the public diplomacy efforts of the Public Diplomacy Section, and the operations of the Consular Section. OIG generally found the embassy met Department requirements for policy and program implementation, with the exceptions noted below.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, commercial promotion, Leahy vetting,³ and grants management. OIG also reviewed the section's support for, and administration of, Department foreign assistance, which funds programs in the Dominican Republic to support refugees and migrants, advance human rights, combat trafficking in persons, and promote labor laws. Department assistance also funds training and equipment for the Dominican military, administered through the embassy's Office of Security Cooperation. OIG found that the Political-Economic section's operations generally conformed to Department requirements.

Section Advanced Integrated Country Strategy Goals With Limited Local Staff

The Political-Economic section advanced the U.S. Strategy for Engagement in the Caribbean and the embassy's ICS goals through its advocacy and reporting. However, OIG found that having only one LE staff member hampered the section's effectiveness. Department offices and other agencies described the section's reporting as useful, particularly following the Dominican Government's recognition of China. However, some agencies and Department offices told OIG that the embassy's overall reporting was insufficient. In the 6 months preceding the inspection, the six-officer section transmitted 37 reporting cables, an average of one cable per officer per month. OIG found, however, that with only one LE staff member, Foreign Service officers had to spend time on administrative tasks, which limited their availability for reporting and advocacy. In addition, the lack of LE staff and the rotations of Foreign Service officers led to a lack of institutional knowledge. At the time of the inspection, the section was in the process of hiring an additional LE staff member and one Expanded Professional Associate Program employee,⁴ and had requested three additional LE positions in the embassy's FY 2020 Mission Resource Request. According to the Department's 2014 rightsizing report,⁵ which endorsed the section's

³ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department of State 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.

⁴ The Expanded Professional Associate Program provides U.S. citizen eligible family members serving overseas with professional-level Foreign Service full-time positions in Economics, Financial Management, General Services, Human Resources, Management, Office Management, Political, Public Diplomacy, Information Management, and Registered Nurse areas.

⁵ Office of Management Policy, Rightsizing and Innovation, "Rightsizing Review of the U.S. Mission to the Dominican Republic," July 15, 2014.

need for an additional LE staff member, comparable missions have four to six LE staff members in their Political-Economic Sections.

Leahy Vetting Conducted in Accordance With Department Requirements

OIG's review of Leahy vetting cases for the 10 months prior to the inspection found that the embassy processed them in accordance with Department guidelines. Specifically, between November 15, 2017, and September 15, 2018, the embassy processed Leahy vetting requests for 2,023 individuals and units. During the inspection, the Bureau of Western Hemisphere Affairs trained new embassy staff in Leahy vetting requirements and assisted in updating the embassy's standard operating procedures.

International Narcotics and Law Enforcement Affairs Section

From FY 2014 through FY 2018, INL Santo Domingo administered \$41.2 million in foreign assistance focused on law enforcement professionalization, counternarcotic measures, money laundering and financial crimes, and rule of law. OIG reviewed the section's leadership, contracts and grants management, end use monitoring, property management, policy implementation, performance metrics, and reporting. OIG's observations and findings are detailed below.

Biometrics Program Not Meeting Key Program Goal

OIG found that a \$2.8 million program to create a modern fingerprint database system, linking Dominican law enforcement agencies with each other and with compatible international systems, did not meet a key program goal. The Automated Fingerprint Identification System program strengthened the ability of the Dominican police—the largest user of the system—to conduct criminal investigations. However, the system did not link Dominican law enforcement agencies domestically and regionally because only two of the six Dominican law enforcement agencies were using the equipment. INL installed 36 biometric scanners and analytic units in those agencies, but 14 of those were not being used at the time of the inspection. Embassy staff told OIG that the other four Dominican agencies were not using the equipment due to a lack of political will, insufficient internet connectivity, and lack of host government funding for annual maintenance and support costs.

Section staff told OIG that the INL Bureau included the country in the fingerprint program under the Caribbean Basin Security Initiative,⁶ even though the Dominicans had not requested it. According to the bureau's Project Design Guide, project design teams should complete a political feasibility analysis before undertaking a project to ensure there is sufficient partner government commitment and available resources to sustain the project over time.⁷ The guide also requires an evaluation plan that includes mid-project and end-of-project evaluations to

⁶ The Caribbean Basin Security Initiative brings members of the Caribbean Community, also known as CARICOM, and the Dominican Republic together to collaborate on regional security with the United States as a partner. The United States has committed \$437 million in funding to the security initiative since 2010.

⁷ INL, *Doctrine Tier II Program Management Guides: Project Design Guide*.

analyze its progress and recommend changes or redirection. OIG found that the INL Bureau had not followed these guidelines for the Automated Fingerprint Identification System project. The 14 unused biometric scanners and analytic units represented \$394,348 in funds not used for their intended purpose. Because, according to embassy staff, the Dominican police had requested additional fingerprint stations, at least some of the 14 unused biometric scanners and analytic units could be put to use there. Whether it be with the Dominican police or other Dominican law enforcement agencies, identifying users for the remaining Automated Fingerprint Information System units will ensure INL Santo Domingo is making the best use of resources allotted for the biometrics program.

Recommendation 2: Embassy Santo Domingo, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should transfer the 14 unused Automated Fingerprint Information System units to the Dominican police or other Dominican agencies where they will be used. (Action: Embassy Santo Domingo, in coordination with INL)

INL-Funded Emergency Response System Will Continue to Use American Software

Since 2014, INL provided \$18.3 million in expertise and technology to assist the Dominican Republic with the creation of a 911 system for the cities of Santo Domingo and Santiago. As INL sought to transition financial responsibility for the system, the host government informed the embassy in August 2018, that it intended to obtain Chinese software and services to maintain and expand the Santo Domingo system, creating operational and security concerns. During the inspection, OIG identified opportunities to strengthen INL's evaluation practices to ensure future programs continue to use U.S. technology. OIG shared its observations with INL Santo Domingo, but because the host government subsequently agreed to extend the use of U.S. software until May 2020, OIG did not make a recommendation to address this issue.

International Narcotics and Law Enforcement Program Updating Performance Metrics

OIG found that INL Santo Domingo was in the process of updating performance metrics for its programs. Although the section developed a strategic plan with program metrics, the contracts and grants reviewed by OIG lacked specific performance indicators tied to program and ICS goals. According to INL guidance,⁸ projects should include at least one indicator that is tied to program goals and describes the quality, quantity, and time frames expected from the program. Section staff told OIG that developing performance metrics for diverse programs such as anti-money laundering, rule of law, and maritime interdiction was technically challenging and that metrics needed to be adapted to reflect locally available statistical data. As part of a bureau-wide exercise to develop new metrics for all bureau programs, as required by 18 FAM 301.4-2, the INL Bureau assigned a monitoring and evaluation contractor to INL Santo Domingo to help develop new program metrics. Because of this ongoing exercise, OIG did not make a recommendation to address this issue.

⁸ INL, *Doctrine Tier II Program Management Guides: Project Design Guide*.

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

INL Santo Domingo's program to conduct end use monitoring of defense articles provided to Dominican security forces did not fully comply with Department standards.⁹ As described in INL standards, end use monitoring of defense articles is essential to prevent illegal defense exports and technology transfers and should be conducted by U.S. Government employees through on-site inspections.¹⁰ OIG found that although INL Santo Domingo generally complied with monitoring standards, it did not conduct required on-site monitoring of 19 defense articles provided to the Dominican Navy. Section staff told OIG this happened because the Dominican Navy was unfamiliar with monitoring requirements and did not provide access to the site where the 19 articles are located. After OIG raised this issue during the inspection, the section completed the on-site inspection, bringing the program into compliance with Department standards.

Implementation Delays Slowed Execution of Section's Projects

OIG found that completion of INL information technology (IT) projects intended to strengthen Dominican law enforcement's ability to fight transnational crime were delayed anywhere from 8 to 22 months beyond their anticipated completion date. According to section staff, these delays occurred because of the lengthy contract award process, longer than anticipated processing and shipping by vendors, and Dominican Government delays in installing or implementing new technology. In an attempt to reduce these delays, INL began to shift its procurement from Embassy Santo Domingo to Washington-based offices, which are better equipped to handle complex and costly procurement actions. However, the INL Section continued to rely on the embassy's General Services Office (GSO) to execute certain procurements that required local service contracts. INL Bureau acquisitions guidelines state that GSO should be the least preferred method for arranging acquisitions.¹¹ OIG provided INL Santo Domingo and GSO staff with a sample memorandum of understanding from another embassy that more clearly defines the extent and nature of support for procurement services. The INL Section told OIG it would use the memorandum in future discussions with GSO.

⁹ Defense articles are defined as any item or technical data designated in 22 Code of Federal Regulations §121.1 (The United States Munitions List). INL's *Standard Operating Policy/Procedure for End Use Monitoring* (March 3, 2017) requires annual end use monitoring, including procedures for enhanced monitoring of defense articles. See Section 484(b) of the Foreign Assistance Act of 1961 and Section 40A of the Arms Export Control Act.

¹⁰ According to INL's *Standard Operating Policy/Procedure for End Use Monitoring*, inspections via secondary means are not authorized for defense articles, except when security conditions prevent it. In these instances, planned deviations must be documented in post's end use monitoring plan. That exception does not apply to the Dominican Republic.

¹¹ INL, *INL Acquisition and Assistance Policies and Procedures*, April 2010.

Spotlight on Success: U.S.-Colombia Action Plan Reduced Training Costs, Overhead

INL Santo Domingo in 2017 expanded a collaborative program with the Government of Colombia to provide training and technical assistance for Dominican police, judges, and prosecutors. By using this program, rather than contractors, the U.S. Government saved significant funds and strengthened regional collaboration. Under the U.S.-Colombia Action Plan on Regional Security Cooperation, INL Santo Domingo funded 52 training and technical assistance activities in the Dominican Republic in 2017. From 2014 to 2018, the program trained 2,735 Dominican police officers in 158 similar activities. Under this program, Colombian National Police trained the Dominican National Police in areas such as criminal investigations and internal affairs and management. Colombian legal professionals also trained their Dominican counterparts in anti-money laundering and countering transnational crime. The United States funded travel costs, the Colombians covered instructor salaries and training expenses, and the Dominicans provided the training facilities. The average cost to the U.S. Government for a 2-week program was approximately \$18,000, a significant savings over the up to \$109,000 for comparable training activities when INL Santo Domingo used contractors.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning, reporting, resource and knowledge management, Federal assistance awards, American Spaces, educational and cultural affairs programs, and media engagement. The section contributed to ICS goals through a mix of programming and outreach. It also collaborated mission-wide in its activities, most notably with the Consular Section in the embassy's efforts to promote and facilitate legitimate travel to the United States. OIG found the section operated in accordance with Department standards.

During the inspection, OIG identified cases of incomplete documentation in the section's grants files uploaded to the Department's SAMS Overseas system,¹² including missing panel review decisions for competed grants, monitoring reports, and designation of Grant Officer Representative's letters. The section brought the grant files into compliance with Department guidelines prior to the conclusion of the on-site portion of the inspection. As a result, OIG did not make a recommendation to address this issue.

Consular Affairs

In FY 2017, Embassy Santo Domingo's Consular Section, with 147 employees, adjudicated the second largest number of immigrant visas in the world (66,606), and the tenth largest number of nonimmigrant visas (328,221). The section also provided services to a community of U.S. citizens consisting of an estimated 300,000 residents and 3 million visitors annually. In addition to the sheer volume of the workload, the recent growth in visa demand, a high volume of fraud

¹² The overseas State Assistance Management System (SAMS Overseas), part of the Integrated Logistics Management System, automates and centralizes the Federal assistance process at posts. Use of SAMS Overseas is mandatory for all embassies and consulates at which it has been deployed.

cases, and the early departure of senior Foreign Service consular managers made the section's work challenging and complex. In FY 2014 through FY 2017, the demands for nonimmigrant visas increased by 240 percent, for immigrant visas by 102 percent, and for passports by 20 percent, leading to backlogs in visa issuances and passport services. The Bureau of Consular Affairs took actions to address these increased demands. For example, to reduce wait times, the bureau sent 94 temporary duty personnel to the embassy throughout FY 2017 and an additional 12 in the first quarter of FY 2018; created 4 additional entry level positions, which it expected to fill by the end of 2018; and hired 2 new consular agents, who were in the clearance process at the time of the inspection, to fill year-long vacancies at the consular agencies in Punta Cana and Puerto Plata.

OIG reviewed Embassy Santo Domingo's consular operations, including consular leadership, American citizen services, crisis preparedness, management controls, visa services and processing, outreach, and anti-fraud programs. OIG concluded that consular management led the section in a proactive, transparent, and inclusive manner, and made great strides in improving overall section management and reducing wait times despite the increased demand for services. OIG found that consular operations complied with Department guidelines, with the exceptions discussed below.

American Citizen Services Unit Lacked Adequate Training Program

OIG found that First- and Second-Tour officers rotating into the American citizens services unit did not receive adequate training for their new duties. Officers told OIG the only training they received consisted of one or two days to observe the unit's operations before beginning to interview full-time, compared to the extensive training they received in the other Consular Section units. A bureau Consular Management Assistance Team also identified this lack of training in its March 2018 report. Guidance in 7 FAH-1 H-242c(3) and 7 FAH-1 H-645.2a outlines the responsibility of consular managers to conduct regular training. Although the Consular Section has training materials, managers had not updated these materials or implemented a training program. Failure to provide adequate training can lead to errors in adjudication, inefficient operations, and a loss in proficiency, effectiveness, and customer service.

Recommendation 3: Embassy Santo Domingo should implement a training program for First- and Second-Tour officers rotating into the Consular Section's American citizen services unit, in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Canopies in the Outdoor Waiting Area Did Not Provide Adequate Protection from Rain

The two large canopies in the outdoor consular waiting area did not provide adequate protection for applicants seated there. Section staff told OIG that four of six drainage holes in the canopies tend to overflow in heavy rain and empty directly onto the bench seats. Guidance in 7 FAH-1 H-281a states that an effective Consular Section needs to provide secure, adequate, efficient, comfortable, and attractive accommodation for both visitors and staff.

Recommendation 4: Embassy Santo Domingo should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Santo Domingo)

Walkway for Visa Applicants Did Not Comply with Department Standards

In addition to the issue in the outdoor consular waiting area, consular applicants also lacked adequate protection when walking from the consular compound access control facility to the consular inside waiting room. The walkway between the two areas was uncovered, leaving more than 400,000 consular applicants a year exposed to oppressive sun or heavy rains, depending on the season. This is contrary to Department guidance. In accordance with 7 FAH-1 H-281a, every effort should be made in consular lines and waiting areas to accommodate the public as efficiently, safely, and pleasantly as possible. The chancery compound design originally included an awning from the access control facility to the consular waiting room, but the Bureau of Consular Affairs told OIG it was removed in the late stages of construction to reduce costs.

Recommendation 5: Embassy Santo Domingo, in coordination with the Bureau of Overseas Buildings Operations, should provide protection for consular applicants in accordance with Department standards. (Action: Embassy Santo Domingo, in coordination with OBO)

Consular Managers Did Not Review All Required Immigrant Visa Refusals

Consular managers did not review all the refused immigrant visa cases required by Department guidelines. For example, managers did not review 284 (23 percent) of the refusals that should have been reviewed between April 1 and June 30, 2018. According to 9 FAM 504.11-3(A)(2), consular managers must review all immigrant visa refusals that cannot be overcome by presenting additional evidence. This occurred due to competing priorities. Failure to complete required reviews increases the risk of denying the immigration benefit to an eligible applicant.

Recommendation 6: Embassy Santo Domingo should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Fraud Prevention Manager Did Not Adjudicate Visa Cases as Required

OIG found that the Fraud Prevention Manager did not periodically adjudicate visas on the interview line as part of the fraud prevention program, as required. Guidance in 7 FAH-1 H-942.4a states that a fraud prevention manager should lead by example, periodically interviewing applicants on the visa interview line and adjudicating cases as a way to understand workload demands and remain aware of the types of potentially fraudulent cases officers encounter. The manager did not adjudicate cases on the interview line due to competing priorities. Without an understanding of the Consular Section's actual casework and clientele, the fraud prevention program is limited in its ability to provide guidance concerning fraud to the visa adjudicators.

Recommendation 7: Embassy Santo Domingo should conduct its fraud prevention program in accordance with Department standards. (Action: Embassy Santo Domingo)

Overall Crisis Preparedness Satisfactory, But More Planning Would Improve Disaster Readiness

The Dominican Republic ranks “very high” (33 out of 172 countries) on the 2018 World Risk Report for natural disasters.¹³ Although the Consular Section complied with crisis preparedness guidelines in 7 FAM 1810 and 7 FAM 1840, given the country’s history of hurricanes and earthquakes, OIG advised the Consul General on additional planning the embassy could do to improve disaster preparedness. For example, OIG advised the section to complete the Consular Risk Assessment Tool, an exercise that would help identify and mitigate post-specific risks to U.S. citizens; to update and distribute the Consular Disaster handbook to appropriate staff; and to include the consular agencies in future crisis management exercises.

RESOURCE MANAGEMENT

OIG reviewed internal controls systems in the Management Section’s financial management, general services, facilities management, and human resources operations. Although the section’s human resources function had generally implemented required processes and procedures in accordance with applicable laws and Department guidance, OIG found numerous deficiencies in the section’s other operations, as described below. The Management Officer, who has served in his position since August 2016, attributed the internal control deficiencies to the curtailment and retirement of some U.S. direct-hire staff and the loss of experienced LE staff, resulting in staffing gaps in key positions. During the inspection, the Management Officer and his team addressed some internal control deficiencies in both financial management and general services, which are also detailed below.

Financial Management

OIG identified two internal control deficiencies in the Financial Management Office, which the embassy corrected during the inspection. Specifically:

- The embassy required the supervisor of the embassy’s principal cashier to schedule alternate cashiers, in accordance with the June 2017 Department’s Cashier User Guide, Section 3.65.
- The Ambassador approved accommodation exchange services provided by the embassy cashier, in accordance with 4 FAH-3 H-361.2a.

Section Did Not Review Unliquidated Obligations in a Timely Manner

As of October 2018, Embassy Santo Domingo had not reviewed its unliquidated obligations of \$1.3 million from FY 2015 through FY 2017 to determine whether they were still valid. This amount included \$1.1 million from FY 2017, \$173,000 from FY 2016, and \$39,000 from FY 2015. According to 4 FAM 225d, unliquidated obligations with no activity in more than 1 year must be

¹³ United Nations University Institute for Environment and Human Security, World Risk Index, 2018. The five natural hazards are earthquakes, cyclones, floods, drought, and sea-level rise.

targeted and de-obligated if it cannot be documented that they remain valid. In addition, guidance in 4 FAM 225a requires that documents supporting unliquidated obligations be reviewed monthly. The financial management staff told OIG that some embassy sections did not respond to their queries about the status of the unliquidated obligations and that competing priorities kept them from following up. Consequently, the section was unable to de-obligate these amounts. Failure to review and de-obligate unliquidated obligations in a timely manner results in an accumulation of funds that could be put to better use.

Recommendation 8: Embassy Santo Domingo should review its unliquidated obligations in accordance with Department guidance, and put up to \$1.3 million to better use. (Action: Embassy Santo Domingo)

Embassy Had Outstanding Travel Advances

As of October 1, 2018, the Department's financial system open advance report showed Embassy Santo Domingo had 74 outstanding travel advances totaling \$55,020. Of these, 40 were more than 30 days overdue, and 15 were outstanding for more than 90 days. According to 4 FAM 465.1a, 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 section is responsible for debt collection, as outlined in 4 FAM 492.1a. Pursuant to 4 FAM 493.1-3a, in no case should a debt delinquent for more than 90 days remain with post for collection. Financial management staff told OIG that the overdue travel advances occurred because travelers did not submit their vouchers on time despite receiving reminders. Staff also said it was difficult to enforce compliance with Department standards given that some advances were for non-serviced agencies¹⁴ and invitational travelers.¹⁵ Overdue travel advances represent a loss of funds to the Department if they remain uncollected. Clearing overdue travel advances would allow the embassy to put any funds collected to better use.

Recommendation 9: Embassy Santo Domingo should clear overdue travel advances in accordance with Department guidelines, and put up to \$55,020 to better use. (Action: Embassy Santo Domingo)

Embassy Did Not Track Invoice Receipts and Payments

Embassy Santo Domingo did not record the dates invoices were received by the designated billing office or track the dates the payments were due. According to 4 FAM 422d, invoices are dated (stamped or otherwise annotated) upon receipt by the designated billing office (the office or employee designated in the contract to receive the invoices). In accordance with 4 FAH-3 H-422.1-2a, embassies should pay all bills as close to, but not later than, the due date or

¹⁴ A non-serviced agency is one that maintains its own accounting functions for all of its locations abroad, rather than subscribing to the services provided by the International Cooperative Administrative Support Services program.

¹⁵ According to 4 FAM 463.2b(3), a travel advance may be issued to "an individual serving without pay or at \$1 a year (also referred to as "invitational traveler")."

the discount date. In addition, 4 FAM 412.1b,¹⁶ requires Federal agencies to make payments in a timely manner; to pay interest penalties when payments are late; and to take discounts only when payments are made within the discount period. Guidance in 14 FAH-1 H-312d states that prompt payment regulations require embassies to track both the payment due date and the date any late payment interest starts to accrue. In 2017, the financial management staff attempted to track the receipt and payment of invoices but stopped in 2018 because they believed the process had become too difficult and cumbersome to maintain. Because the embassy was not tracking its invoices as required, and because most local vendors tend not to charge interest or penalties for late payments, it was impossible for OIG to determine whether the embassy had violated the Prompt Payment Act. However, failing to track the receipt and payment of invoices in accordance with Department standards is contrary to an effective system of internal control and a practice that could subject the embassy to possible Prompt Payment Act violations.

Recommendation 10: Embassy Santo Domingo should track and pay invoices in accordance with the Prompt Payment Act and Department standards. (Action: Embassy Santo Domingo)

General Services

OIG identified three internal control deficiencies in GSO, which the embassy corrected during the inspection. Specifically, the embassy:

- Required the contracting officer to review blanket purchase agreements annually, in accordance with Department of State Acquisition Regulation 613.303-6.
- Required the receiving staff to clear pending procurement receipts from incoming shipments within 7 days, as required by 14 FAH-1 H-312i.
- Required the motor pool staff to enter fleet data into the Fleet Management Information System, as required by General Services Administration Bulletin Federal Management Regulation B-15. OIG had found that the data entered into the system was either missing or of poor quality. After OIG raised this issue, GSO began enforcing the use of trip tickets, collecting accurate and timely fuel data, and entering maintenance cost data for post vehicles.

Embassy Did Not Close Out Procurement Files Within Required Timeframes

Embassy Santo Domingo did not close out procurement files in the Department's Electronic Filing (eFiling) System within the required timeframes. As of October 2018, the procurement unit had a backlog of 5,003 procurement files in post award status that required staff action to close out. Of these files, all of which were under the simplified acquisition threshold,¹⁷ 3,334 were from FY 2015 to FY 2017. OIG conducted a spot check of 10 of the FY 2015 files and

¹⁶ 4 FAM 412.1b details the Prompt Payment Act of 1982, as amended (31 U.S.C. 3901-3907).

¹⁷ The simplified acquisition threshold is the dollar amount below which purchases may be made using simplified acquisition procedures (a less arduous source selection process). The threshold was \$250,000 at the time of the inspection.

determined that the pending transactions had been paid and the file could have been closed out. Guidance in 14 FAH-2 H-573.2b states that contracts under simplified acquisition procedures should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Section staff told OIG that the backlog occurred because the system is time consuming and cumbersome; as a result, staff tend to postpone this work and to address other priorities. Failure to clear the backlog, however, creates inaccuracies and gaps in Department records and increases the risk of internal control deficiencies in procurement operations.

Recommendation 11: Embassy Santo Domingo should close out procurement files in accordance with Department standards. (Action: Embassy Santo Domingo)

Contracting Officer's Representative Program Did Not Meet Department Standards

The embassy did not comply with Department requirements for contracting officer's representatives (COR). OIG found that the Contracting Officer did not properly designate 2 of 12 CORs, none had received the proper certification, and 8 either did not have the relevant training or their training had lapsed. For example, the COR assigned to a \$22.8 million contract did not have the proper certification or training. Pursuant to 14 FAH-2 H-141b(4), contracting officers must designate and authorize in writing a COR for each contract. In addition, 14 FAH-2 H-143.1a requires all CORs to be properly trained and certified in order to be eligible for appointment and to continue their training in order to maintain their certification. Poor oversight by previous section leadership over the COR program resulted in these deficiencies. Failure to properly designate, certify, and train CORs increases the risk of poorly administered and monitored contracts, excessive costs and misuse of U.S. Government resources, and substandard contractor performance.

Recommendation 12: Embassy Santo Domingo should comply with Department standards for its contracting officer's representatives. (Action: Embassy Santo Domingo)

Failure to Properly Administer Contracts Increased the Risk of Misuse of Government Funds

OIG reviewed the files of 5 of the 12 CORs and found that 3 did not monitor the contractor's technical progress or evaluate contractor performance—two key contract oversight responsibilities—in accordance with Department standards. The three CORs were responsible for administering the embassy language program, generator maintenance, and fuel delivery contracts totaling \$23.2 million. According to 14 FAH-2 H-142b(8), COR responsibilities include monitoring a contractor's technical progress and related expenditures, while Federal Acquisition Regulation 42.1502(a) requires past performance evaluations to be prepared annually and entered into the Contractor Performance Assessment Reporting system. Although the embassy received the contracted services, the CORs did not monitor their respective contracts due to the lack of oversight by previous contracting officers. Failure to administer contracts in accordance with Department standards increases the risk of fraud, excessive costs, misuse of U.S. Government resources, and substandard contractor performance.

Recommendation 13: Embassy Santo Domingo should verify and document the monitoring and evaluation of its contracts in accordance with Department guidance. (Action: Embassy Santo Domingo)

Motor Vehicle Safety Program Did Not Comply with Department Standards

Embassy Santo Domingo did not comply with four elements of the Department's Overseas Motor Vehicle Safety Management Program.

- Thirteen chauffeurs and some incidental (self-drive) drivers did not receive driver safety training or required retraining, as mandated by 14 FAM 432.4c(2).
- Sixteen chauffeurs did not have valid medical certifications, and the embassy did not track eye examinations of U.S. direct-hire incidental drivers, as required in 14 FAM 432.4c(4)(a)-(b).
- Chauffeurs regularly exceeded the Department's 10-hour per day limit on driving duty shifts. OIG found 22 to 30 instances per pay period, over a span of 8 weeks, where chauffeurs exceeded this limit, contrary to guidance in 14 FAM 432.4c(3), 15 FAM 957.3(4), and the Department's Overseas Motor Vehicle Safety Management Program.
- The motor pool did not conduct required annual motor vehicle safety inspections in accordance with the Department's Overseas Motor Vehicle Safety Management Program.

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

Recommendation 14: Embassy Santo Domingo should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Santo Domingo)

Internal Control Deficiencies in Personal Property Management

OIG identified five internal control deficiencies related to the embassy's management of \$10.1 million in non-expendable, and \$225,801 in expendable, personal property.¹⁸

- **Large number of early non-expendable property disposals:** The embassy disposed of 3,000 non-expendable property items prior to the end of their life cycle from October 2016 through April 2018, contrary to Department standards. OIG found that 486 of the items sold at auction, with a total value of \$223,000, had 3 years of service or less. These included appliances, household furniture, and office equipment such as scanners, printers and monitors. Another 197 items, with a total value of \$82,900, were disposed

¹⁸ Non-expendable personal property includes items such as furniture, office machines, and IT and communications equipment. Expendable personal property is property which, when put in use, is consumed, loses its identity, or becomes an integral part of another item of property. Examples include office supplies, automobile tires, machine parts, and installed computer parts.

of without ever being used. Guidance in 14 FAM 412.3a requires that all agencies use U.S. Government-wide minimum replacement standards for furniture, while 14 FAM 412.3b and 14 FAH-1 H-213 establish Department minimum replacement standards for different types of personal property, including 12 years for office and household furniture, 8 years for office equipment, and 4 years for data processing equipment.

- **Missing or incorrect documentation of property transfers:** The embassy did not document all nonexpendable property transfers or record them in the Department's Integrated Logistics Management System (ILMS). OIG found that 35.3 percent of all property transfers to office locations from October 2016 through April 2018 did not have the appropriate documentation. Guidance in 14 FAM 425.3-6 requires the use of a specific form (DS-584) in order to authorize and document the relocation, reutilization, or redistribution of nonexpendable property and that this information be recorded in ILMS.
- **No designated alternate receiving clerk:** The embassy did not have a designated alternate receiving clerk. GSO staff told OIG that as a result, when the receiving clerk was absent, property was taken to the warehouse or directly to the requestor without being recorded in ILMS. Guidance in 14 FAM 413.1a states that the embassy must designate, in writing, both a receiving clerk and an alternate. Additionally, 14 FAM 413.1b states that the receiving clerk must promptly inspect the quantity, quality, and condition of all property delivered to post and ensure that it meets the terms and specifications of the acquisition document.
- **Large number of items entered manually:** The embassy manually entered into its inventory database, rather than electronically scanning, a large number of non-expendable property items during the required annual inventory. In 2018, the embassy manually entered 802 of 818 items, totaling \$459,000, including copiers, projectors, printers, dehumidifiers, and household appliances. The ILMS Asset Management's recommended operating procedures for overseas posts state that while items may be entered manually if the assets are unavailable for electronic scanning, posts are required to justify manual entries to the Department's Property Management Desk Officers. In addition, guidance in both 14 FAH-1 H-612.2-5 and 14 FAH-1 H-621.4b(4) states that manual entries should be questioned by the accountable property officer. OIG found no evidence that the embassy followed either of these procedures. Electronically scanning property bar codes during the annual inventory digitally verifies an asset's presence. Manual entries are inherently more risky, as they are open to data manipulation. Furthermore, excessive manual entries during an inventory exercise can be a potential indicator of malfeasance, fraud, and mismanagement.
- **Lack of secure storage in the warehouse:** The embassy's on-compound warehouse did not have secure storage for non-expendable property. Instead, it stored these items in the warehouse's general storage area, in a holding area just outside the warehouse entrance, or in the receiving area, none of which met Department standards for secure

storage. Guidance in 14 FAH-1 H-313.2-7a states that a controlled access area must be established for the protection of sensitive and easily pilferable property.¹⁹ Although it was the embassy's practice to deliver high value and sensitive property to the recipient upon receipt, there were times when the receiving clerk was away or was unable to receive all property in a timely fashion. Furthermore, as described above, the embassy did not have an alternate receiving clerk. Without secure storage to control high-value items or sensitive personal property, the embassy risked items being stolen or misappropriated.

The Management Officer told OIG that the identified internal control deficiencies were due to the curtailment and retirement of U.S. direct-hire staff, the loss of experienced LE staff, and LE staffing gaps. Additionally, the embassy lacked documented procedures for property management. These deficiencies resulted in a lack of continuity in property management and inadequate oversight and supervision of the property management unit. OIG acknowledges that, despite the numerous internal control deficiencies listed above, OIG's review of the embassy's annual inventory records found that the property marked as lost was below the Department's 1 percent threshold.²⁰ Nonetheless, poor oversight of property management, combined with a failure to adhere to Department guidance, increases the risk of waste, fraud, and abuse of resources.

Recommendation 15: Embassy Santo Domingo, in coordination with the Bureau of Administration, should implement personal property management internal controls in accordance with Department standards. (Action: Embassy, Santo Domingo, in coordination with A)

Housing Program Files Did Not Fully Comply With Department Standards

Embassy Santo Domingo's housing program did not fully meet Department standards. For example, OIG found that 11 of 18 housing files reviewed lacked Post Occupational Safety and Health Officer (POSHO) safety certifications, as described in the next section, and that 7 files lacked security certifications. In addition, the Housing Unit did not have any residential lease files for the 75-unit leased Los Bambues housing compound.²¹ Guidance in 15 FAM 252.5c states that overseas posts should complete and document certifications in the POSHO Certification Application²² and maintain a copy of the certification as part of the post property record. In addition, 12 FAM 333.2b requires that a security survey be conducted prior to leasing

¹⁹ Sensitive property is that which requires a high degree of protection and control or is of a high value.

²⁰ Nonexpendable inventory shortages over 1 percent must be reported to the Department's Property Management Branch, as well as the embassy's property survey board for further investigation. However, at Embassy Santo Domingo, for FY 2018, the nonexpendable inventory of \$10.1 million had a shortage of \$84,000 (0.8 percent) and there were no shortages in the post's expendable supplies inventory of \$225,801.

²¹ At the time of the inspection, OBO was in the process of purchasing the "Los Bambues" housing compound.

²² The POSHO Certification Application generates and documents the form used by the POSHO to certify that a residence meets 15 FAM 252.5 requirements for POSHO certification and includes the safety requirements that must be certified prior to occupancy. The POSHO can attach relevant documentation for a given property to the form within the Certification Application.

or purchasing a property. OIG found that embassy staff had completed the safety and security certifications but did not put them in the appropriate residential lease file. OIG also determined that the embassy's housing staff overlooked the Department requirement to keep residential lease files for the multi-unit Los Bambues property. Failure to maintain residential lease files, including safety and security certifications, could lead to omissions and errors in administering the embassy's housing program. OIG advised the embassy to consolidate all of its housing safety and security certifications and other relevant documents in its hard copy lease files, which it agreed to do.

Embassy Did Not Use the Post Occupational Safety and Health Officer Certification Application as Required

The embassy did not use the POSHO Certification Application to complete and document residential inspections and certifications as required by Department standards. Guidance in 15 FAM 252.5c states that all POSHO safety certifications must be completed and documented in the POSHO Certification Application. The POSHO should certify leased properties at lease inception, and re-certify at each lease renewal, not to exceed 5 years, and certify Government-owned properties initially and every 5 years thereafter. In addition, 15 FAM 971 states that the POSHO must complete a certification document in the application for each property and retain a copy in the embassy property file. The POSHO was unaware of this requirement. Failure to certify in the Department-mandated system all residences prior to occupancy or obtain all required approvals can lead to safety and health vulnerabilities in the embassy's housing program.

Recommendation 16: Embassy Santo Domingo should use the Post Occupational Safety and Health Officer Certification Application to complete and document inspections and certifications for its residences prior to occupancy, as required by Department standards. (Action: Embassy Santo Domingo)

Facilities Management

Embassy Had Insufficient Staff to Maintain New Housing Compound

OIG determined that the embassy had yet to establish how it would meet the increased maintenance work that would result from purchasing the 75-unit Los Bambues housing compound. In September 2018, OBO exercised an option in its build-to-lease contract to purchase the housing compound for \$51 million.²³ The funds were obligated in FY 2018. However, at the time of the inspection, the Department and the property owner had yet to sign a final sales agreement or agree on a date to complete the sale.

While the property is under lease, the landlord is responsible for maintenance, according to 15 FAM 632.1.-2. However, guidance in 15 FAM 632.1-1 states that when the Department takes ownership, it also assumes responsibility for all maintenance. Although OBO visited the

²³ OBO entered into a build-to-lease contract for the construction of the 75-unit compound in October 2013.

embassy in September 2018 to evaluate the maintenance implications, the embassy had yet to determine how it would meet the increased maintenance work requirements. The Facilities Manager estimated that maintenance of the Los Bambues compound, in addition to Government-owned embassy compound and chief of mission residence the staff already were maintaining, would require at least eight new LE staff positions. OIG advised the embassy to work with OBO to obtain the necessary resources to meet the maintenance work requirements once the housing compound purchase is completed. OIG also noted physical security deficiencies associated with the Los Bambues housing compound that are addressed in the companion classified inspection report.

INFORMATION MANAGEMENT

OIG reviewed the Information Management Section's classified, unclassified, and dedicated internet network operations; physical protection of IT resources; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services. OIG determined that the programs and services met the day-to-day computing and communications needs of the embassy, with the exception of the deficiencies cited below.

In addition, OIG identified four internal control deficiencies which the embassy corrected during the inspection. Specifically, the embassy:

- Monitored and disabled inactive unclassified and classified user accounts, as required by 12 FAH-10 H-112.1-1f.
- Limited users' access only to the information necessary to accomplish their assigned tasks, per 12 FAH-10 H-112.5-2(1).
- Established processes to ensure account privileges would be reviewed annually, as required by 12 FAH-10 H-112.1-1 (3).
- Reviewed, approved, documented, or reported locally installed hardware in the Department's iMATRIX system, as required by 5 FAM 862.1c.

As a result, OIG did not make recommendations to address these deficiencies

Information Technology Contingency Plan Testing Did Not Meet Department Standards

Section managers did not test the embassy's unclassified and classified IT contingency plans. Department guidelines in 12 FAH-10 H-232.3-1b(1-3) 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. Section managers told OIG that they did not test the plans due to competing priorities. Inadequate testing of IT contingency plans prevents managers from mitigating the risk of system and service disruptions.

Recommendation 17: Embassy Santo Domingo should test the information technology contingency plans for the unclassified and classified networks in accordance with Department standards. (Action: Embassy Santo Domingo)

Information Technology Contingency Plan Training Not Conducted

The embassy did not conduct initial and annual refresher IT contingency training for employees with IT contingency planning responsibilities. According to 12 FAH-10 H-232.2-1, management must ensure that employees receive initial and annual refresher IT contingency training based on their roles and responsibilities, as defined in the plans. Section managers told OIG they were unable to complete this task due to recent changes in personnel with contingency plan roles. Failure to conduct initial and annual refresher IT contingency plan training impeded the embassy's ability to effectively respond to unplanned systems outages or disruptions.

Recommendation 18: Embassy Santo Domingo should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities in accordance with Department standards. (Action: Embassy Santo Domingo)

Remote Access to Department Systems Not Approved

Embassy Santo Domingo participated in the Department's information system remote access program without the approval of post's Counterintelligence Working Group. Specifically, 12 FAH-10 H-174.1a states that the Counterintelligence Working Group must approve post participation in a Department-approved remote access program to ensure that adequate consideration is given to the local threat environment. The section was unaware of this requirement. Failure to evaluate the effect of local threats against participation in the remote access program leaves Department information vulnerable to compromise.

Recommendation 19: Embassy Santo Domingo should comply with Department guidelines for participation in the remote access program. (Action: Embassy Santo Domingo)

Emergency Power-Off Switch Incorrectly Located

The embassy's unclassified server room emergency power-off switch was located 15 feet outside the server room door, contrary to Department standards. A 2015 update to 12 FAH-10 H-272.8.1(2) requires that an emergency power-off control be located inside the server room adjacent to each egress door for access by authorized personnel. The section was unaware of the new requirement because the Bureau of Diplomatic Security did not update its Information Assurance training material to reflect this change. The current location outside the server room could prolong emergency power-off time during electrical accidents and permit accidental or intentional shutdown of all unclassified systems.

Recommendation 20: Embassy Santo Domingo should relocate emergency power-off switches in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Recommendation 21: The Bureau of Diplomatic Security should update its Information Assurance training materials to reflect current Department guidelines. (Action: DS)

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 Santo Domingo and the Bureau of Diplomatic Security. The Department's complete responses can be found in Appendix B. The Department also provided technical comments that were incorporated into this report, as appropriate.

Recommendation 1: Embassy Santo Domingo should strengthen oversight and coordination of law enforcement activities by implementing written standard operating procedures defining when law enforcement agency operations require formal Chief of Mission approval, monitoring law enforcement assistance, and documenting Law Enforcement Working Group discussions and decisions. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation. The embassy noted an estimated completion date of June 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of written standard operating procedures on oversight and coordination of law enforcement activities.

Recommendation 2: Embassy Santo Domingo, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should transfer the 14 unused Automated Fingerprint Information System units to the Dominican police or other Dominican agencies where they will be used. (Action: Embassy Santo Domingo, in coordination with INL)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the transfer of the 14 unused Automated Fingerprint Information System units to the Dominican police or other Dominican agencies.

Recommendation 3: Embassy Santo Domingo should implement a training program for First- and Second-Tour officers rotating into the Consular Section's American citizen services unit, in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a training program for First- and Second-Tour officers rotating into the Consular Section's American citizen services unit.

Recommendation 4: Embassy Santo Domingo should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo 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 embassy provided consular applicants with a waiting area that meets Department standards.

Recommendation 5: Embassy Santo Domingo, in coordination with the Bureau of Overseas Buildings Operations, should provide protection for consular applicants in accordance with Department standards. (Action: Embassy Santo Domingo, in coordination with OBO)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation. The embassy noted an estimated completion date of June 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that consular applicants are provided protection in accordance with Department guidance.

Recommendation 6: Embassy Santo Domingo should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy reviews immigrant visa refusals in accordance with Department guidelines.

Recommendation 7: Embassy Santo Domingo should conduct its fraud prevention program in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy conducts its fraud prevention program in accordance with Department guidance.

Recommendation 8: Embassy Santo Domingo should review its unliquidated obligations in accordance with Department guidance, and put up to \$1.3 million to better use. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy reviewed its unliquidated obligations.

Recommendation 9: Embassy Santo Domingo should clear overdue travel advances in accordance with Department guidelines, and put up to \$55,020 to better use. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

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

Recommendation 10: Embassy Santo Domingo should track and pay invoices in accordance with the Prompt Payment Act and Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy tracks and pays invoices in accordance with the Prompt Payment Act and Department standards.

Recommendation 11: Embassy Santo Domingo should close out procurement files in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation. The embassy noted an estimated 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 Santo Domingo closed out procurement files in accordance with Department standards.

Recommendation 12: Embassy Santo Domingo should comply with Department standards for its contracting officer's representatives. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy complied with Department standards for its contracting officer's representatives.

Recommendation 13: Embassy Santo Domingo should verify and document the monitoring and evaluation of its contracts in accordance with Department guidance. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy verifies and documents the monitoring and evaluation of its contracts in accordance with Department guidance.

Recommendation 14: Embassy Santo Domingo should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy complies with all Department Overseas Motor Vehicle Safety Management Program requirements.

Recommendation 15: Embassy Santo Domingo, in coordination with the Bureau of Administration, should implement personal property management internal controls in accordance with Department standards. (Action: Embassy, Santo Domingo, in coordination with A)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy implements personal property management internal controls in accordance with Department standards.

Recommendation 16: Embassy Santo Domingo should use the Post Occupational Safety and Health Officer Certification Application to complete and document inspections and certifications for its residences prior to occupancy, as required by Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy uses the Post Occupational Safety and Health Officer Certification Application for residence inspections and certifications.

Recommendation 17: Embassy Santo Domingo should test the information technology contingency plans for the unclassified and classified networks in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy tested the information technology contingency plans for the unclassified and classified networks.

Recommendation 18: Embassy Santo Domingo should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

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

Recommendation 19: Embassy Santo Domingo should comply with Department guidelines for participation in the remote access program. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy complied with Department guidelines for participation in the remote access program.

Recommendation 20: Embassy Santo Domingo should relocate emergency power-off switches in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: In its June 14, 2019, response, Embassy Santo Domingo concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy relocated the emergency power-off switches in accordance with Department guidelines.

Recommendation 21: The Bureau of Diplomatic Security should update its Information Assurance training materials to reflect current Department guidelines. (Action: DS)

Management Response: In its May 15, 2019 response,²⁴ the Bureau of Diplomatic Security neither agreed nor disagreed with this recommendation. The bureau noted that it reviews and updates its courses annually, or more frequently in case of urgent changes, to reflect changes to applicable policies, guidelines, and regulations. It also noted that course instructors emphasize to students the importance of periodically searching and reviewing these publications for the latest information. Finally, the bureau noted that this recommendation was obsolete because training material in the IAB IA210 System Administrators Cybersecurity Foundations course was updated on March 22, 2018.

OIG Reply: OIG considers the recommendation resolved. In its response, the Bureau of Diplomatic Security provided training materials that reflect outdated Department guidelines. Specifically, a slide from its IAB IA210 System Administrators Cybersecurity Foundations course (attachment 1 of the bureau's response) incorrectly states that the emergency power-off control is placed outside of the server room. In a subsequent email to OIG, the bureau clarified that they will update this slide to reflect current guidelines in the Foreign Affairs Handbook. The recommendation can be closed when OIG receives and accepts documentation that the bureau updated its Information Assurance training materials to reflect current Department guidelines.

²⁴ As stated previously, OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. In the draft report, Recommendation 21 was originally identified as Recommendation 22. Consequently, the Bureau of Diplomatic Security's management response in Appendix B references Recommendation 22.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Robin Bernstein	8/30/2018
Deputy Chief of Mission	Robert Copley	7/13/2017
Chiefs of Sections:		
Consular (Deputy, Acting Chief)	Shane Myers	8/10/2017
Political-Economic	Katharine Beamer	8/31/2016
Management	Arlen Holt	8/18/2016
Public Affairs	Chase Beamer	8/31/2016
Regional Security	Dominic Gagliardi	7/18/2016
Senior Advisor to the Ambassador	Doug Popovich	8/04/2017
International Narcotics and Law Enforcement	Timothy Peltier	8/01/2017
Other Agencies:		
Animal Plant Health Inspection Service (APHIS)	David Midgarden	7/27/2016
Centers for Disease Control and Prevention	Nelson Arboleda	6/15/2015
Defense Attaché	Lt. Col. Charles Preston	7/06/2017
Office of Security Cooperation	Agustin Dominguez	7/17/2018
Drug Enforcement Administration	Carl Shirer	8/20/2016
Immigration and Customs Enforcement	Cesar Cabrera	4/08/2017
U.S. Citizenship and Immigration Services	Miguel Figueroa	6/11/2017
Legal Attaché (Deputy, Acting LEGAT)	Grant Mann	7/10/2016
Peace Corps	Kristin Kaper	9/04/2016
U.S. Agency for International Development	Arthur Brown	8/15/2016
U.S. Commercial Service	Bryan Larson	7/10/2018
Foreign Agricultural Service	Elizabeth Autry	1/03/2017

Source: Embassy Santo Domingo

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 4, 2018, to January 29, 2019,¹ in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by OIG for the Department 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 surveys and compiles the results, 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 206 interviews and reviewed responses to 195 personal questionnaires.

¹ 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.

APPENDIX B: MANAGEMENT RESPONSES

June 14, 2019

UNCLASSIFIED

THRU: WHA Bureau – Kim Breier, Assistant Secretary

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

FROM: Embassy Santo Domingo – Robin Bernstein, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Santo Domingo

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

OIG Recommendation 1: Embassy Santo Domingo should strengthen oversight and coordination of law enforcement activities by implementing written standard operating procedures defining when law enforcement agency operations require formal Chief of Mission approval, monitoring law enforcement assistance, and documenting Law Enforcement Working Group discussions and decisions. (Action Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs with the recommendation and is coordinating specific language with law enforcement agencies at Post for a written SOP defining when Chief of Mission approval is required for operations. Post has already implemented the recommendations to document the discussions and decisions of the Law Enforcement Working Group. RSO takes notes during meetings and sends an agenda in advance. Estimated timeline for the written SOP is June 2019.

OIG Recommendation 2: Embassy Santo Domingo, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should transfer the 14 unused Automated Fingerprint Information System units to the Dominican police or other Dominican agencies where they will be used. (Action: Embassy Santo Domingo, in coordination with INL)

Management Response: Embassy Santo Domingo agrees with the spirit of this recommendation and INL Santo Domingo continues to work with the primary agencies involved in AFIS project to put the donated equipment to full use. This work is hampered, however, by interagency inertia on the Dominican side. INL Santo Domingo supports its equipment redistribution recommendations with site assessments similar to those required for the initial allocation of equipment. The Dominican National Police (DNP) remain the principal participant in the project. Nearly 700,000 biometric records have been entered into the system, annually averaging some 16,000 detainees processed using LiveScan and the input of some 14,000 paper records from locations where there are no LiveScans. These records have supported hundreds of investigations. On average, the DNP forensics department refers more than half a dozen cases

each month to investigators based on fingerprint analysis using the AFIS. The Embassy continues to engage with all of the program participants to encourage agencies to use the equipment or transfer it to agencies, like the Dominican National Police, who have a need for additional equipment. INL has also engaged with the manufacturer to arrange for extended, no-cost support of the equipment. However, since we no longer own the equipment, we cannot commit to a timeline for compliance with this recommendation.

OIG Recommendation 3: Embassy Santo Domingo should implement a training program for First- and Second-Tour officers rotating into the Consular Section's American citizen services unit, in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs and implementation is ongoing. The Consular Section's American citizen services unit has developed a standardized training schedule that utilizes the section wide format, and which focuses on augmenting the fundamental ACS skills taught in the basic consular course (passport and nationality and Special Citizen Services). The training program has a special focus on disaster preparedness and response given cyclone and tectonic activity in the region. As officers rotate into the Unit and complete the training program the materials and agenda will be updated to ensure all lessons learned are incorporated.

OIG Recommendation 4: Embassy Santo Domingo should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs, implementation is underway, with anticipated completion in August 2019. Post has capped the overflow drainage holes in the canopies that can overflow in heavy rain so that they do not empty directly onto the bench seats. Further, post has installed roll down "shutters" to provide protection for the elements on the sides of the waiting area.

OIG Recommendation 5: Embassy Santo Domingo, in coordination with the Bureau of Overseas Buildings Operations, should provide protection for consular applicants in accordance with Department standards. (Action: Embassy Santo Domingo, in coordination with OBO)

Management Response: Embassy Santo Domingo concurs. This is a DC-based action, on which post is engaged with Overseas Building Operations. Ideally, this project will be completed before June 2020.

OIG Recommendation 6: Embassy Santo Domingo should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. Managers in the Immigrant Visa Unit took immediate action to correct this issue, including increased training for adjudicators to reduce unnecessary administrative refusals under Section 221(g) of the Immigrant Nationality Act, and to ensure that all hard refusals (INA 212 (a) refusals) are properly documented. The unit managers re-ordered priorities to ensure they can properly review refusals, and the recent arrival of the second deputy in the unit after a long gap will aid in this process.

OIG Recommendation 7: Embassy Santo Domingo should conduct its fraud prevention program in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. This recommendation specifically calls for the Fraud Prevention Manager (FPM) to “periodically adjudicate visas on the interview line as part of the fraud prevention program.” The FPM has adjudicated some nonimmigrant visa applications. The appointment of a de facto deputy to the unit has reduced somewhat the demands on the FPM’s time, allowing her more time to focus on interviewing so that she may become more “aware of the types of potentially fraudulent cases officers encounter.” The FPM will continue to periodically adjudicate NIV cases and will also interview immigrant and American Citizen Services cases.

OIG Recommendation 8: Embassy Santo Domingo should review its unliquidated obligations in accordance with Department guidance, and put up to \$1.3 million to better use. (Action: Embassy Santo Domingo)

Management response: Embassy Santo Domingo concurs. The finance section reviews ULOs regularly. In the last six months, almost \$1.0 million ULOs have liquidated or been de-obligated. The remaining ULOs are valid or still under investigation. For example, the remaining FY2015 ULO pertains to a vendor who, though having completed the work, is disputing the underlying contract amount. Until the dispute is resolved, we must maintain the ULO.

Unliquidated Obligations (ULOs)

US Embassy Santo Domingo

	2015	2016	2017	Total
End of year ULO report	39,116	172,719	1,100,436	1,312,271
De-obligations/Payments	(14,018)	(134,797)	(790,243)	(939,057)
ULOs as of 04/26/2019	25,099	37,922	310,193	373,214

OIG Recommendation 9: Embassy Santo Domingo should clear overdue travel advances in accordance with Department guidelines, and put up to \$55,020 to better use. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. Travel advances are reviewed regularly and delinquent notices sent to the traveler and the supervisor when appropriate. Embassy Santo Domingo currently has \$26,798 in overdue travel advances, which includes some travelers who travel frequently with little time between trips.

OIG Recommendation 10: Embassy Santo Domingo should track and pay invoices in accordance with the Prompt Payment Act and Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. The FMO vouchering staff uses a voucher log that records the date the invoice was received. During the inspection, Post provided a copy of the voucher log with the column ‘Date Invoice Received in FMO’ clearly marked. Post notes that the date of invoice receipt is not always the date to begin counting for compliance with the Prompt Pay Act (PPA). The receipt of goods/services, if later than the date the invoice was received, is the date when the clock starts for payment within the PPA guidelines. Matching the actual disbursement with the date an invoice was received or the receipt of goods/services date is a manual effort. Post has approved a new finance clerk position that will have as a primary duty, the

responsibility of recording the disbursement date on the voucher log and highlighting invoices that are close to being in violation of the PPA. We expect to have this position filled before the end of FY19. Also, Embassy Santo Domingo is using the eInvoicing module more extensively, which will provide reports to show we are in compliance with the PPA. The vouchering section has a process to pay interest in cases where the disbursement of payment was not possible within the guidelines of the PPA.

OIG Recommendation 11: Embassy Santo Domingo should close out procurement files in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. The majority of the procurement files pending action are from 2017 and earlier, and most are pending invoice and payment verification. Post is developing an SOP for locating and uploading missing documentation from non-ILMS systems, including COAST and Filing Cabinet, in order to meet the requirements for contract closeout. Post's current goal is to close all files from FY2019 by the end of May 2019 and to then work backwards chronologically through the remaining files. We expect this process will update all our files before the end of the calendar year.

OIG Recommendation 12: Embassy Santo Domingo should comply with Department standards for its contracting officer's representatives. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. Post has identified Contracting Officer's Representatives (CORs) who have been designated as such without proof of required training. Those individuals are being required to complete the training before the end of May 2019. Post is also reviewing its process for identifying CORs in the A/OPE FAC-COR system.

OIG Recommendation 13: Embassy Santo Domingo should verify and document the monitoring and evaluation of its contracts in accordance with Department guidance. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs and has begun a series of informal training and information sessions to supplement the Department's required training for Contracting Officer's Representatives (CORs). The first session was held on April 30, and the next will take place in May 2019. Post Contracting Officers will review COR files at least once a quarter to ensure that documentation is being maintained and to identify any problem areas.

OIG Recommendation 14: Embassy Santo Domingo should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. Since the OIG inspection, post has identified and trained a second Smith System Instructor and received authorization from SHEM for a third instructor position. Post implemented a SharePoint-based driver compliance tracking system for Smith System training, medical evaluations, and driver's licenses. GSO also significantly increased outreach to customer sections regarding the 10-hour driver duty limits in order to maximize compliance with this requirement. Post identified a vendor located close to the Embassy capable of providing the Motor Vehicle Safety Management Plan's recommended annual vehicle inspections. The inspection forms are now translated into Spanish, and Post is in the process of sending vehicles for inspections to address any previously unidentified safety issues or defects. Armored vehicles have inspections performed by a local armored vehicle workshop.

Vehicle inspections are now being entered as an inspection work order in the Fleet Management Information System (FMIS) for tracking which includes an upload of the completed inspection.

OIG Recommendation 15: Embassy Santo Domingo, in coordination with the Bureau of Administration, should implement personal property management internal controls in accordance with Department standards. (Action: Embassy, Santo Domingo, in coordination with A)

Management Response: Embassy Santo Domingo concurs and has taken steps to strengthen Property operations and management controls. Prior to the arrival of the OIG team, post bought into deployment of the new A/LM Annual Inventory Modernization (AIM) tool in ILMS, which will be deployed in Santo Domingo in June 2019. The module streamlines and digitizes some parts of the paperwork process and enables post to auto-identify some IT assets for inventory, minimizing data entry and other errors while decreasing opportunities for bad actors. Post also installed secure storage cages in the receiving area. The GSO team is continuing to develop SOPs for Property operations.

OIG Recommendation 16: Embassy Santo Domingo should use the Post Occupational Safety and Health Officer Certification Application to complete and document inspections and certifications for its residences prior to occupancy, as required by Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. On October 15, 2018, Embassy Santo Domingo's Facility Management Section was able to use the POSHO Certification Application. Post entered its first inspection into the application for residence Erwin Walter Palmer #7, which was soon followed by a second residence at Calle Sanabacoa #27 on October 17, 2018. These were entered during the inspection. Since 15 October 2018, every POSHO certification conducted was done using the POSHO Certification Application exclusively.

OIG Recommendation 17: Embassy Santo Domingo should test the information technology contingency plans for the unclassified and classified networks in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs and IRM is developing a plan to test the IT contingency plans within the current fiscal quarter.

OIG Recommendation 18: Embassy Santo Domingo should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities in accordance with Department standards. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs. Under the direction of the DCM, IRM will conduct training sessions for the appropriate personnel immediately following weekly Country Team meetings beginning this quarter.

OIG Recommendation 19: Embassy Santo Domingo should comply with Department guidelines for participation in the remote access program. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs and the Regional Security Office (RSO) held a Counter Intelligence Working Group (CIWG) meeting to approve post's participation in the remote access program (see 19 Santo Domingo 3).

OIG Recommendation 20: Embassy Santo Domingo should relocate emergency power-off switches in accordance with Department guidelines. (Action: Embassy Santo Domingo)

Management Response: Embassy Santo Domingo concurs and IRM and Facilities sections are creating a project plan to relocate the emergency power-off switches within this quarter. It is worth noting that the switches were relocated a few years ago based on prior Department guidance and we are now moving them back to their original location.

OIG Recommendation 21: The Bureau of Diplomatic Security should update its Information Assurance Training materials to reflect current Department Guidelines. (Action: DS)

Management Response: Embassy Santo Domingo's Regional Security Officer forwarded this recommendation to DS International Programs (DS/IP) who we understand will coordinate with DS Training DS/T to address the OIG recommendation.

The point of contact for this memorandum is Acting Deputy Chief of Mission Shane I Myers.




United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

May 15, 2019

INFORMATION MEMO TO INSPECTOR GENERAL LINICK - OIG

FROM: DS – Michael T. Evanoff 

SUBJECT: Bureau of Diplomatic Security response to the Office of Inspector General (OIG) Inspection of Embassy Santo Domingo, Dominican Republic (ISP-I-19-17) (April 2019)

Below is the Bureau of Diplomatic Security's response to recommendation 22 of the subject report.

Recommendation #22: The Bureau of Diplomatic Security should update its Information Assurance training materials to reflect current Department guidelines. (Action: DS)

DS Response (May 15, 2019): Due to the changing FAM/FAH regulations over the years, our program reviews its courseware annually, or more frequently in cases of urgent changes, to incorporate and align all of our curriculum with existing and newly established policies, regulations, and guidelines. In each course offering, our experienced instructors use various adult learning techniques to teach and instill in each student the importance of searching and verifying FAM/FAH regulations regularly to ensure IT compliance through each individual and team exercises and activities. Therefore, this OIG recommendation regarding post's placement is obsolete as it is based on previous iterations of our courseware.

Information regarding "emergency power-control" for server rooms can be found in IAB IA210 System Administrators Cybersecurity Foundation course, Version 3.0, Lesson 04 - Secure Server Data Center, Slide 64 of 92. In Attachment 1, Slide 64 was updated on March 22, 2018 to reflect the 2015 policy update to 12 FAH-10 H272.8.1 (2) regulation requiring that an emergency power-off control be located inside the server room adjacent to each egress door for access by authorized personnel.

It is also our policy that every IT professional with elevated privilege including system administrators and designated ISSO personnel attend the appropriate role-based cybersecurity basic training and refresher training every three years in accordance with 12 FAH-10 H-212.1-3(2) regulations. Another regulation mandates post's ISSO to work closely with IMO/ISO/system administrator to ensure all security related functions and activities are performed in 5 FAM 824. The IMO at post, however, has the ultimate responsibility for any decisions that the IMO section makes, which may have been delegated to the IPO or information systems officer (ISO) in 5 FAM 120. This person also must ensure that all personnel in the IMO section are current on all security regulations, awareness, and guidelines as they pertain to IMO operations, equipment, and infrastructure as defined by 5 FAM 121.1 Para (9, a) under Security.

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FAM and FAH regulations are often subject to revision. As a result a student cannot rely on course content they received years prior for accuracy. IAB instructors teach students how search these regulations and stress the importance to periodically search and review these publications checking for changes and updates to ensure post compliance with the latest regulations.

Attachment 1: Exhibit A – Excerpt from IAB IA210 System Administrators Cybersecurity Foundations course, version 3.0, Lesson 04 – Secure Server Data Center

Environmental Protections

Domestically, A/OPR/FMS; abroad, the IMO must provide:

- **Power distribution panels labeling**
- **Emergency power-off control outside the server room; ensure power-off controls power to the ventilation system**
- **Emergency lighting in the server room**
- **Short-term [M,H] and long-term [H] uninterruptible or alternate power supply**

The system administrator ensures the above.

12 FAH-10 H-272.7 through 10

Continued...

Diplomatic Security Training Center

4-64
Unclassified

Lesson 4: Secure Server Data Center

◀ Slide 64 of 92 ▶ Notes

Excerpt from IAB IA210 System Administrators Cybersecurity Foundation course, version 3.0, Lesson 04 - Secure Server Data Center, Slide 64 of 92. (See 12 FAH-10 H-272.8 Emergency Shutoff dated 11-16-2015.)

Attachment 2.0: Exhibit B – ISSO Recommended Readings / ISSO Checklist 4.5

ISSO Recommended Readings

The list provides essential knowledge for your role as an ISSO

<u>FAM/FAHs</u> <small>(also 12 FAH 6 - Classified)</small>	<u>Security Configuration Documents</u>	<u>ALDACs</u>	<u>LISTSERV</u>	<u>US-CERT</u>	<u>Post Profiles</u>	<u>ISSO Oversight</u>
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Diplomatic Security Training Center
2-13
Unclassified
Lesson 2: Establishing the ISSO Role

◀ Slide 13 of 29 ▶
📝 Notes

Excerpt from IAB IA110 Information Systems Security Officer Cybersecurity Foundation course, version 3.0, Lesson 02 Basic Knowledge, Slide 13 of 29. (See [ISSO Checklist 4.5](#) via Official [ISSO Oversight](#).)

Approved: DS – Michael T. Evanoff MTE

Analyst: DS/MGT/PPD – Adom M. Cooper ext.5-2747

Drafted: DS/FASTC/SECD – Dwindle Patrick, patrickdj@state.gov, (571) 226 9743

Cleared: DS/DSS – BGorman, acting OK
DS/EX – WTerrini OK
DS/EX/MGT – JSchools OK
DS/MGT/PPD – MScherger OK
DS/MGT/PPD – LLong OK
DS/T/FASTC – RWeitzel OK
M – EKlimow OK
M/PRI – MSchild OK
IRM – NThomas OK
IRM/IA/PLT – DPierre-LouisOK

ABBREVIATIONS

COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
GSO	General Services Office
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
INL	International Narcotics and Law Enforcement
LE	Locally Employed
OBO	Overseas Buildings Operations
POSHO	Post Occupational Safety and Health Officer
USAID	U.S. Agency for International Development

OIG INSPECTION TEAM MEMBERS

Jeannine Juhnke, Team Leader

Calvin Carlsen, Team Manager

Todd Fontaine

Leo Hession

Mark Jeleniewicz

Edward Loo

Eleanor Nagy

Chris Rowan

Paul Sanders

Derwood Staeben

Erik Winther



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