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ISP-I-19-18 Office of Inspections June 2019

# Inspection of Embassy Port-au-Prince, Haiti

#### **BUREAU OF WESTERN HEMISPHERE AFFAIRS**

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ISP-I-19-18

#### What OIG Inspected

OIG inspected the executive direction, program and policy implementation, and resource management operations of Embassy Port-au-Prince.

#### What OIG Recommends

OIG made 42 recommendations to improve Embassy Port-au-Prince's operations: 41 to the embassy and 1 to the Bureau of Overseas Buildings Operations.

In its comments on the draft report, the Department concurred with all 42 recommendations. OIG considers the 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.

### June 2019 OFFICE OF INSPECTIONS

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# Inspection of Embassy Port-au-Prince, Haiti What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Port-au-Prince in a professional and collaborative manner, and effectively engaged the Government of Haiti.
- Staff praised the Ambassador and the Deputy Chief of Mission for supporting embassy personnel and programs. However, multiple internal control deficiencies existed across Embassy Port-au-Prince's resource management and information management operations.
- The Consular Section's Immigrant Visa Unit accepted more immigrant visa cases than it had the capacity to process, leading to an uneven distribution of workload and low morale.
- Embassy Port-au-Prince had the highest number of motor vehicle mishaps in the Department of State, with 379 motor vehicle collisions from FY 2012 through FY 2018. Sixty-two percent of the collisions were categorized as preventable.
- The embassy did not conduct required seismic safety assessments of 25 leased residential units despite Haiti's location in a high-risk seismic area.
- The embassy lacked information technology contingency planning to efficiently respond to system outages.

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#### **CONTEXT**

Haiti, the poorest country in the Western Hemisphere, has a population of 10.6 million, including 2.6 million in the capital city of Port-au-Prince. The country has experienced political instability for much of its history. Although it has sustained a democratic government since the 2017 presidential inauguration, it continues to confront multiple challenges such as high unemployment and severe deficits in housing, education, and health care. Corruption, an underfunded judiciary, and the weak capacity of public institutions complicate progress on fundamental problems of governance and provision of public services.

Haiti is a close neighbor whose success affects the security of the United States and the region. The \$5.3 billion earthquake recovery funding the United States provided to Haiti since 2010 has largely been expended. As a result, the embassy was transitioning its focus to combatting HIV/AIDS, increasing the capacity of the Haitian National Police, and providing development assistance. As a prerequisite to spending foreign assistance funds to support Haiti's government, the Secretary of State in August 2018 certified to Congress that the Haitian Government was taking effective steps to strengthen rule of law, combat corruption, increase government revenues, and resolve commercial disputes.¹ However, in October 2018, a rise in street protests against the Haitian Government's failure to combat corruption and hold accountable those responsible for the alleged misappropriation of \$2 billion in Venezuelan foreign assistance threatened to bring down the government. The country will also face three major events in 2019 that could cause potential unrest: planned legislative elections, the expected return of up to 58,000 Haitians when their temporary protected status in the United States is terminated, and the end of the United Nations (UN) peacekeeping mission.

Embassy Port-au-Prince works with the Haitian Government and civil society to advance strategic objectives outlined in its 2018 Integrated Country Strategy (ICS). The embassy's four strategic goals are:

- Support Haitian-led efforts to strengthen democratic governance.
- Improve economic and educational opportunities in Haiti.
- Create a strong health system to improve health and mitigate the risk of global health threats.
- Protect U.S. borders and citizens, and combat transnational crime.

The embassy works with the Government of Haiti and other international partners to implement judicial reform and build the capacity and professionalism of the Haitian National

<sup>&</sup>lt;sup>1</sup> The Foreign Operations and Related Appropriations Act, 2018 (Div. K, P.L. 115-141), Section 745(c)(1), requires the Secretary of State to certify that the central government of Haiti is taking effective steps to combat corruption, strengthen rule of law, increase government revenues and resolve commercial disputes before the United States provides certain foreign assistance funds. Annual appropriations acts since FY 2015 have included similar certifications.

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Police and border police. The embassy also partners with the Haitian tax authority and Ministry of Interior to increase government revenue streams, as well as promote investment that will increase Haiti's ability to finance its own economic development and decrease the country's reliance on international assistance. Finally, the embassy promotes mutually beneficial relations between Haiti, its neighbors, and other countries in the region and engagement that supports combatting illicit migration and facilitating lawful travel.

At the time of the inspection, Embassy Port-au-Prince had 119 Department of State (Department) and other agency direct-hire employees and 1,145 locally employed (LE) staff. Agencies represented at the mission are the Departments of Agriculture, Defense, Health and Human Services, Homeland Security, and Justice, and the U.S. Agency for International Development. U.S. bilateral foreign assistance to Haiti in FY 2017 totaled approximately \$193 million, which included \$101 million for the President's Emergency Plan for AIDS Relief (PEPFAR).

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.<sup>2</sup> A related classified inspection report discusses the mission's security program, issues affecting the safety of mission personnel and facilities, and one sensitive finding related to the information management program.

#### **EXECUTIVE DIRECTION**

OIG based the following assessments of Embassy Port-au-Prince's leadership on the basis of 88 interviews that included comments on Front Office performance, staff questionnaires, and OIG's review of documents and observations of meetings and activities during the course of the on-site inspection.

#### Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in February 2018 after an assignment as U.S. Deputy Representative to the United Nations. The Deputy Chief of Mission (DCM), also a career Foreign Service officer, arrived in August 2017 after a tour as the Minister Counselor for Public Affairs at the U.S. Embassy in Baghdad, Iraq.

The Ambassador and the DCM led Embassy Port-au-Prince in a professional, authoritative, and collaborative manner consistent with Department leadership principles in 3 Foreign Affairs Manual (FAM) 1214. Embassy staff reported excellent relationships with the Front Office and told OIG that the Front Office is an experienced team with an Ambassador and a DCM who complement each other. Staff viewed the Ambassador as focused, hard-working, and detail-oriented, and praised her extensive experience and knowledge that enabled her to advance U.S. policy in Haiti. Staff viewed the DCM as supportive, a good listener, and a valuable source of advice and mentoring. For example, embassy personnel credited the DCM with using her

<sup>&</sup>lt;sup>2</sup> See Appendix A.

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public diplomacy background to highlight the importance of involving the Public Diplomacy Section in embassy activities.

The Ambassador and the DCM consistently encouraged adherence to Department policy; stated in emails and staff meetings that fraud, waste, and abuse would not be tolerated; and set the example in that regard. The Ambassador hosted frequent town halls where she disseminated a wide variety of information of interest to the embassy community.

#### **Equal Employment Opportunity Program**

OIG found that the embassy's Equal Employment Opportunity program generally met Department requirements in 3 FAM 1514.2. The embassy had two Foreign Service Institute-trained counselors and 12 LE staff liaisons. Program information was posted throughout the embassy. Staff told OIG that the Ambassador and the DCM handled a recent instance of racially tinged cultural insensitivity particularly well, immediately requesting Department assistance when the problem surfaced.

#### **Foreign Policy Goals and Objectives**

The Ambassador led a collaborative effort that integrated input from the country team to develop the 2018 ICS in accordance with 18 FAM 301.2-1b. The Ambassador launched the ICS exercise in a country team meeting in April 2018, during which she provided an overview of her vision and goals keyed to Administration priorities. A First- and Second-Tour (FAST) officer in the Political Section, working with other sections, coordinated ICS development. They formed four working groups to address democracy and governance; economy; health; and security. The Department approved the ICS on August 13, 2018.

The Ambassador fulfilled her responsibilities under 2 FAM 113.1 to develop close relations with host government officials, establish relations with leaders from all levels of society, maintain contact with international organizations, and attend and host representational events. She was in almost daily contact with the Haitian president and other senior officials and used these opportunities to emphasize U.S. policy goals in Haiti. To further develop the bilateral relationship, she hosted an event at her residence with the new Regional Security Officer to demonstrate to the Haitian National Police that the Embassy Law Enforcement Working Group members worked as one team. She also actively engaged the Haitian Government to meet its commitments related to U.S. foreign assistance investments in the country. For example, the Ambassador pressed the host country government on the importance of meeting its \$11 million funding obligation for the construction of a hospital jointly financed by the U.S. Agency for International Development and the French Government. As noted later in this report, at the time of the inspection the Haitian Government had yet to meet its financial commitment for the hospital, nonetheless, embassy staff, particularly in the Political and Economic Sections, told OIG they appreciated her efforts.

#### **Adherence to Internal Controls**

The Ambassador and the DCM prepared the FY 2018 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1), which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. The statement of assurance identified two potential material weaknesses regarding motor pool fleet management and financial accounting in the American Employee Association. During the inspection, OIG identified multiple deficiencies in foreign assistance, international narcotics and law enforcement, public diplomacy, consular, management, information management, and security operations. These issues are detailed later in this report and in the related classified report.

#### **Security and Emergency Planning**

OIG determined that the Ambassador generally conducted her security and emergency planning responsibilities in accordance with 12 Foreign Affairs Handbook (FAH)-1 H-721. However, OIG identified deficiencies related to the embassy's emergency preparedness and physical and residential security, which are discussed in the related classified report.

The embassy's priorities related to mission security constantly shifted to address Haiti's frequently changing security conditions. The Ambassador took an active role in informing the country team and embassy community of relevant security-related incidents. For example, the Ambassador hosted three Emergency Action Committee meetings and a town hall for embassy employees and their families during the inspection to address recent security incidents, scheduled demonstrations, and possible political violence. Embassy employees told OIG that the Ambassador and the DCM fully supported mission efforts to protect embassy staff, families, and facilities. Employees told OIG that the Ambassador and the DCM set the example when it came to security. Both met with the Regional Security Officer weekly and participated in security drills and weekly radio checks. OIG confirmed that all embassy security directives were current.

#### **Developing and Mentoring Foreign Service Professionals**

The DCM took an active role in mentoring 24 FAST officers and specialists in accordance with 3 FAM 2242.4a. She held monthly meetings with the FAST committee and met with new FAST employees upon their arrival to discuss her expectations for their roles and participation in the program. The program featured professional development opportunities, such as note taking at country team meetings, planning and attending representational events at the Ambassador's residence, and assisting with official visits. The DCM also hosted an after-hours event for them at her residence. FAST employees told OIG that, although they met regularly with the DCM, they would like to see more Front Office guidance and additional advance notice and assignment flexibility when professional development opportunities arise. OIG discussed these comments with the Ambassador and the DCM, who agreed to address them.

#### POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Port-au-Prince's policy and program implementation through a review of the advocacy and analysis work performed by the Political and Economic Sections, the counternarcotics and law enforcement efforts of the International Narcotics and Law Enforcement Affairs (INL) Section, the efforts of the Public Diplomacy Section, and the operations of the Consular Section. OIG found the embassy generally met Department requirements for policy and program implementation, except as described below.

#### **Political and Economic Sections**

OIG reviewed the Political and Economic Sections' leadership and management, policy engagement and coordination, reporting and advocacy, and commercial promotion and found they generally conformed to Department requirements. The staff collaborated with other embassy sections and agencies and the Washington interagency community to advance ICS goals.

#### Political and Economic Sections Advanced Policy Objectives

The Political and Economic Sections conducted outreach, advocacy, and activities to advance the embassy's ICS goals and implement provisions of Congressional legislation on Haiti.<sup>3</sup> For example, political officers met with legislators, government officials, and opposition politicians to assess the Haitian Government's stability, and advocated for implementation of its antitrafficking in persons plan. Economic officers pressed the government to increase health funding and supported U.S. Department of Labor assessments of apparel factories' compliance with labor standards. OIG reviewed 167 reporting cables from April 1 through September 30, 2018, and found they were relevant to ICS goals and coordinated across the embassy. Department offices and other agencies described the reporting as responsive and relevant to policy deliberations. They highlighted reporting following civil unrest in July and October 2018, progress toward UN benchmarks for the departure of the police assistance mission, and the assessments of International Financial Institutions on Haiti's finances. OIG discussed with Political and Economic Section heads 18 FAM 301.2-4c requirements to review and assess progress on mission strategic objectives by, for example, aligning reporting, travel, and representation plans to ICS goals. Staff described to OIG staffing gaps in the Economic Section but noted that, with renewed emphasis on economic development, the embassy was considering ways to add more senior economic staff.

<sup>&</sup>lt;sup>3</sup> In addition to the 2018 Foreign Operations and Related Appropriations Act, Congressional legislation on Haiti includes the Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008, P.L. 110-234, (HOPE II Act) and the Haiti Economic Lift Program Act of 2010, P.L. 111-171, (HELP), both of which provide dutyfree preferences for certain light-manufacturing products produced in Haiti (in particular, apparel products). Haitian apparel factories eligible for duty-free entry into the United States under HOPE II and HELP must comply with international core labor standards and Haitian labor law.

#### **Foreign Assistance**

At the time of the inspection, the embassy was concluding nearly 8 years of interagency foreign assistance programming that supported earthquake recovery and reconstruction. U.S. foreign assistance programs in Haiti expended close to \$5.3 billion since 2010 to reconstruct hospitals, housing, police stations, and prisons; revive industry to create jobs; and improve basic health indicators. The embassy was transitioning to a focus on combatting HIV/AIDS, increasing the capacity of the Haitian National Police, and providing development assistance. Embassy employees credited the Ambassador with playing an active role in foreign assistance decisions through meetings with Haiti's political leadership and embassy section chiefs and agency heads.

OIG found that Embassy Port-au-Prince faced significant challenges in ensuring the sustainability of foreign assistance program investments because of a lack of host country financial and operational capacity. For example, the completion of a \$100 million hospital—jointly financed by the U.S. Agency for International Development and the French Government—was at risk because the Haitian Government had yet to contribute its \$11 million share of the costs. Haitian Government budget shortfalls in key sectors such as health and security placed at risk the sustainability of foreign assistance programs in those areas. In addition, changes in UN stabilization support affected embassy efforts in Haiti. The UN withdrew its Stabilization Mission in Haiti in October 2017, replacing it with a smaller, police-focused Mission for Justice Support in Haiti that was scheduled to be completely withdrawn by October 2019. The withdrawal of this UN police mission will require the Haitian National Police to assume sole responsibility for policing in the lead up to the October 2019 national elections and for supporting public order in coming years. The UN withdrawal also leaves the embassy's INL program providing the majority of bilateral assistance for training and equipping the national police.

### President's Emergency Program for AIDS Relief (PEPFAR)

#### Progress Made in Meeting HIV/AIDS Epidemic Control Goals, but Challenges Remain

OIG found that the PEPFAR Coordinator<sup>4</sup> worked effectively with counterparts to advance PEPFAR's mission. The United States has invested \$1.8 billion in Haiti to combat HIV/AIDS since 2004. According to the PEPFAR Haiti Country Operational Plan 2018, an estimated 150,000 people in Haiti, or 1.4 percent of the total population, are infected with HIV/AIDS, "constituting the greatest burden of HIV/AIDS in the Caribbean region." The program made progress during the past several years in identifying at-risk populations and in moving Haiti closer to UN AIDS-related epidemic control goals<sup>5</sup> but still faced major challenges in reaching epidemic control. For example, approximately 62 percent of people in Haiti living with HIV were being treated,

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<sup>&</sup>lt;sup>4</sup> The Coordinator is a Department employee responsible for coordinating programs across agencies.

<sup>&</sup>lt;sup>5</sup> AIDS epidemic control is defined as the point at which new HIV infections decrease and fall below the number of AIDS-related deaths.

but only 42 percent of those on HIV treatment were virally suppressed (that is, incapable of transmitting the disease). Epidemic control goals require improving this and other key program metrics. Additionally, despite a commitment by Haiti's president to increase health spending,<sup>6</sup> the reduction of health funding in the Haitian 2018 national budget from 4.4 percent to 3.9 percent means the United States and other external donors now fund 98 percent of Haiti's HIV/AIDS relief programs.

#### Regional Mission and Staffing Responsibilities Uncertain

At the time of the inspection, Embassy Port-au-Prince faced challenges caused by PEPFAR regional consolidation and the need for a successor PEPFAR coordinator. The Office of the Global AIDS Coordinator was in the process of consolidating the Haiti and Dominican Republic PEPFAR programs into one regional platform. Embassy staff told OIG that PEPFAR offices in both embassies were developing a joint proposal outlining the consolidation process and that the potential overall effect on the Haitian PEPFAR program was uncertain.

In addition, the Haiti PEPFAR Coordinator's scheduled departure in December 2018 raised the risk of an extended staffing gap in this critical position. The Office of the Global AIDS Coordinator had yet to begin recruiting for a replacement at the time of the inspection. An extended vacancy in the position could impede financial oversight of Haiti's estimated \$100 million annual program, monitoring functions, and interagency coordination. OIG advised the embassy to work with the Office of the Global AIDS Coordinator to prioritize filling the coordinator position.

#### International Narcotics and Law Enforcement

Since 2013, INL has programmed at least \$198.6 million, including earthquake supplemental funding that was first authorized in 2010, in five priority areas: police development and reform; counternarcotics; anti-money laundering and financial crimes; criminal justice and corrections development; and support for UN police positions. Following the end of earthquake supplemental funding in 2016, INL refocused its programming from general reconstruction of the Haiti National Police to tailored law enforcement training and support. OIG reviewed INL Port-au-Prince's program evaluation, contracts management, end use monitoring, and property management and found the deficiencies discussed below.

<sup>&</sup>lt;sup>6</sup> Prior to 2008, Haiti's health sector historically received allocations of between 9 and 14 percent of the national budget. Due in large part to the surge in external donor funding for health in the post-earthquake period, national budget allocations to health dramatically declined.

#### **Evaluations of Key Programs and Projects Not Conducted**

OIG found that the embassy did not prepare annual evaluation reports with the Government of Haiti, as required by a 2013 Letter of Agreement. The embassy also did not conduct any other formal evaluation efforts to analyze the impact of the section's five key projects. INL guidance states that each project should have a system for verifying and measuring performance in achieving project goals, including project evaluations. Additionally, the Letter of Agreement states that both parties should jointly conduct an annual program evaluation. INL's reports focused on the achievement of quantitative metrics, such as the number of new national police recruits and the completion of construction projects. While useful in tracking short-term outputs, the lack of formal project and program evaluations impeded INL Port-au-Prince's ability to improve program design and implementation. In the context of handing over policing responsibilities to the Haitian National Police, better information on the performance of the police development and reform program would enable INL to assess progress and challenges in this critical area. Without proper evaluations of projects and programs, the embassy was at risk that INL programs would not meet their intended policy objectives.

**Recommendation 1:** Embassy Port-au-Prince should conduct project and program evaluations in accordance with Department guidance. (Action: Embassy Port-au-Prince)

#### **Contract Files Missing Key Monitoring and Oversight Documentation**

INL Port-au-Prince Contracting Officer's Representative (COR) contract files did not consistently include key monitoring and oversight documentation, as required by Federal regulation<sup>9</sup> and Department standards. OIG reviewed 6 contract files (total value \$44.4 million) out of a total of 11 contracts (total value \$53.3 million).<sup>10</sup> OIG found that although pre-award and award contract documentation was substantially complete, the files did not include post-award administrative documents. For example, none of the contract files OIG reviewed included quality assurance surveillance plans,<sup>11</sup> nor did they contain sufficient documentation of COR review of contractor progress reports or overall contractor performance, as required.<sup>12</sup> In

<sup>&</sup>lt;sup>7</sup> A Letter of Agreement is the binding agreement between the United States and the host government under which foreign assistance is provided for a specific project. Such letters include the commitments made by both parties and the necessary provisions to legally obligate INL funds to finance the project activities.

<sup>&</sup>lt;sup>8</sup>INL Doctrine Tier II Program Management Guides: Project Design Guide.

<sup>&</sup>lt;sup>9</sup> Federal Acquisition Regulation 46.401(a) requires quality assurance surveillance plans and outlines required performance metrics and how the contractor will be evaluated against those metrics.

<sup>&</sup>lt;sup>10</sup> The sample included INL-funded contracts that had a contract action since FY 2015, were not a purchase order or delivery order contract, and had a total value above the simplified acquisition threshold of \$250,000.

<sup>&</sup>lt;sup>11</sup> Quality assurance surveillance plans, required by Federal Acquisition Regulation 46.401(a), outline required performance metrics and how the contractor will be evaluated against those metrics.

<sup>&</sup>lt;sup>12</sup> INL Standard Operating Policy Procedures for Contracting Officer's Representative Working File Maintenance, No. 420, January 14, 2016, Appendix A provides a list of 21 types of documentation that all CORs must maintain in the contract file, including a quality assurance surveillance plan, copies of all progress reports submitted by the

addition, five of the six files did not include all required contractor status reports updating performance progress. Proper contract monitoring and documentation of oversight is necessary to ensure that INL Port-au-Prince properly assesses contractor performance and maintains the documentation required to hold the contractor responsible for its actions.

**Recommendation 2:** Embassy Port-au-Prince should require all contracting officer's representatives in the International Narcotics and Law Enforcement Affairs Section to maintain their contract files in accordance with Department standards. (Action: Embassy Port-au-Prince)

### Procedures for Receiving INL-Funded Fuel Deliveries Did Not Comply With Department Standards

OIG found that the section did not adequately supervise INL-funded fuel deliveries. INL Port-au-Prince provided fuel to the Haitian National Police for generators and vehicles through the embassy's bulk fuel contract, at a cost of \$180,000 annually. Based on guidance provided in a 2016 INL assistance visit report, the section had Haitian Government personnel, rather than a U.S. Government employee, accept fuel delivered through the embassy's contract. However, the guidance on which INL Port-au-Prince relied did not align with Department standards. Specifically, as stated in 14 FAM 413.3b, receiving property is an inherently governmental function that must be performed by a U.S. Government employee. Without adequate internal controls over fuel, the embassy was at an increased risk of waste, fraud, and mismanagement of fuel deliveries.

**Recommendation 3:** Embassy Port-au-Prince should comply with Department standards for acceptance of all fuel deliveries. (Action: Embassy Port-au-Prince)

#### **Leahy Vetting**

OIG's review of Leahy vetting found that Embassy Port-au-Prince processed cases in accordance with Department guidelines. <sup>13</sup> Specifically, in the one-year period ending November 1, 2018, the INL Section vetted 1,682 individuals and units. However, the embassy did not have an approved backup Leahy Vetting coordinator. Instead, an LE staff member provided backup support for the designated coordinator, contrary to the Department's 2017 Leahy Vetting Guide, which requires that a cleared U.S. citizen certify and submit Leahy vetting documentation to the INL Bureau. The lack of a cleared U.S. citizen backup coordinator led to delays in the vetting process and preparations for training programs when the coordinator was away from post.

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contractor, and items related to COR monitoring and oversight duties. In addition, 14 FAH-2 H-517 includes 15 items that must be included in the COR working file, including all contractor progress reports, documentation of site visits results, and the COR's final assessment of contractor performance.

<sup>&</sup>lt;sup>13</sup> The Leahy Amendment to the Foreign Service Act of 1961 prohibits the Department from furnishing assistance to foreign security forces if the Department has credible information that such forces have committed gross violations of human rights. See 22 U.S.C. § 2378d.

**Recommendation 4:** Embassy Port-au-Prince should designate a cleared U.S. citizen employee as the backup for the Leahy Vetting Coordinator in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

#### **End Use Monitoring Policy Guidance Was Incomplete**

OIG found that INL Port-au-Prince's end use monitoring of defense articles provided to Haitian security forces<sup>14</sup> generally met Department standards, but its end use monitoring policy guidance was incomplete. OIG found that the guidance did not include information on conducting spot inspections, disposal processes, and lifecycle standards for property subject to end use monitoring, which created operational inefficiencies. For example, embassy staff traveled through dangerous areas to sites outside the capital to visually check 100 percent of property in the end use monitoring program even though the guidance did not require such a strict standard. OIG advised the embassy to revise its standard operating procedure for end use monitoring to align with INL Bureau guidance, which it agreed to do.

#### **Public Diplomacy**

OIG reviewed the Public Diplomacy Section's operations in strategic planning, reporting, resource and knowledge management, Federal assistance awards, American Spaces, <sup>15</sup> Bureau of Educational and Cultural Affairs programs, and media engagement. OIG found that, in addition to the mission-wide security and Haitian infrastructure challenges, the section had the additional challenge of working in three languages: English, French, and Creole. The section contributed to ICS goals through a mix of programming, outreach, and embassy-wide collaboration on its activities. As one example, both embassy leadership and Washington consumers praised the value of the section's timely and well-chosen media reporting in the daily media summary and other products. OIG found the section operated in accordance with Department standards, with the following exceptions.

#### Section Lacked Social Media Strategy and Formal Crisis Communications Plan

OIG found that the Public Diplomacy Section lacked a social media strategy and a formal crisis communications plan. According to 10 FAH-1 H-061 and cable 13 STATE 144456, <sup>16</sup> each mission

<sup>&</sup>lt;sup>14</sup> Defense articles are defined as any item or technical data designated in 22 Code of Federal Regulations §121.1 (The United States Munitions List). End-use monitoring fulfills the requirements of Section 484(b) of the Foreign Assistance Act of 1961 and Section 40A of the Arms Export Control Act. See 22 U.S.C. § 2991(c) and 22 U.S.C. § 2785.

<sup>&</sup>lt;sup>15</sup> As outlined in 1 FAM 354.2, "American Spaces," American Spaces, including American Centers and American Corners, are open-access facilities used to engage foreign audiences overseas where they can learn about the United States. There are two American Spaces in Port-au-Prince.

<sup>&</sup>lt;sup>16</sup> Cable 13 STATE 144456, "Social Media Guidance Cable #5: Social Media Strategy for Overseas Missions," October 18, 2013.

should have an overarching social media strategy. In addition, cable 18 STATE 70388<sup>17</sup> states that embassies should establish a plan to ensure they can communicate accurate and timely official information via social media during an emergency. The embassy cited long staffing gaps and a high rotation of officers at this labor-intensive post as the main reasons they had not created these documents. Notwithstanding this explanation, the lack of a social media strategy potentially reduces the efficiency and effect of the embassy's programming as well as its capability to evaluate effectiveness. Furthermore, the lack of a crisis communications strategy could potentially delay dissemination of important information to U.S. citizens in Haiti during a crisis.

**Recommendation 5:** Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of Global Public Affairs, should create a social media strategy and a crisis communication plan in accordance with Department guidance. (Action Embassy Port-au-Prince, in coordination with WHA and GPA)

#### Grants Files Did Not Meet Department Standards for Documentation

OIG found that Public Diplomacy Section grants supported the embassy's ICS goals, but grant files did not consistently meet Department standards for documentation. <sup>18</sup> OIG reviewed all FY 2017 and FY 2018 federal assistance grants files with a value of more than \$20,000. These 28 grants amounted to \$1.2 million, or 84 percent of the 51 federal assistance grants (total value, \$1.4 million) the section awarded in those 2 years. Examples of documentation missing from some files included evidence of open competition with a panel review process or sole-source justifications, excluded parties list checks, and grants officer representative designation letters. However, section staff provided sufficient information for OIG to determine that grants funds were being used as intended. In many cases, staff located missing documents in response to OIG requests. The section attributed the incomplete documentation to frequent American and LE staff turnover and a lack of familiarity with the recently required use of State Assistance Management System Overseas, the Department-wide software used to track federal assistance awards. This issue should be addressed because failure to fully document all steps in the grants award process in one place hindered the embassy's ability to effectively award and manage federal funds.

**Recommendation 6:** Embassy Port-au-Prince should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Port-au-Prince)

<sup>&</sup>lt;sup>17</sup> Cable 18 STATE 70388, "Using Social Media in a Crisis: Resources for Planning How and What to Communicate," July 11, 2018.

<sup>&</sup>lt;sup>18</sup>Grants reviewed by OIG were subject to the Department's *Federal Assistance Directive* (issued May 2017, revised October 2017) and the *Federal Assistance Policy Directive* (issued March 2015, revised January 2016).

#### **Consular Affairs**

Embassy Port-au-Prince's Consular Section, with more than 75 employees, is the sixth largest issuer of immigrant visas worldwide. The section also provides American citizen services to a U.S. citizen community that includes an estimated 90,000 residents and, as needed, to an estimated 80,000 visitors annually. An adoption sub-unit assisted adoptive U.S. citizen parents with their children's immigrant visas. From FY 2014 to FY 2017, the workload for immigrant visas increased by 112 percent, for passports by 57 percent, and for nonimmigrant visas by 43 percent. Conditions such as the lack of infrastructure in the country, Haiti's susceptibility to natural disasters requiring crisis response, and a high-fraud environment make consular operations challenging and complex.

Crisis preparedness was a major focus for the section, including planning, cross-training, and crisis management exercises. Section staff executed the crisis preparedness plan during July and October 2018, when protests erupted in the capital and other parts of the country. The embassy developed an effective network of U.S. Citizen Liaison Volunteers. At the time of the inspection, the embassy was developing plans for the arrival of U.S. citizen children whose parents are among the 58,000 Haitians expected to return to Haiti when their temporary protected status in the United States is to be terminated in 2019.

At the time of the inspection, the Consul General had been in his position for 2 months. The Immigrant Visa Unit chief position had been vacant since mid-July 2018 and was expected to remain so through May 2019. In October 2018, the Department started sending temporary duty officers to serve as acting unit chief until the permanent replacement arrived.

OIG reviewed consular operations, including consular leadership, American citizen services, crisis preparedness, management controls, visa services and processing, outreach, and antifraud programs. With the exception of the deficiencies described below, OIG found that the Consular Section's operations complied with Department guidelines in 7 FAM, 9 FAM, and 7 FAH.

#### Immigrant Visa Workload Not Managed Effectively

OIG found that the Immigrant Visa (IV) Unit accepted more cases than it had the capacity to process in an efficient and effective manner. This resulted in a daily workload that was heavy and unevenly distributed among 4 consular officers and 23 LE staff. In particular, until November 2018, the unit had requested from the National Visa Center (NVC) about 1,400 new IV cases per month, but the requests did not factor in the unit's high volume of locally scheduled cases. Locally scheduled cases are necessary to accommodate IV applicants who are refused at their first appointment due to incomplete documentation. Applicants are then scheduled locally to return when they have the additional documentation. OIG noted that, as a result of the combined volume of cases, relatively inexperienced adjudicating officers were working long hours to adjudicate the daily number of applicants regularly scheduled by NVC, as well as the locally scheduled applicants. Additionally, some officers told OIG that their initial

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training program was shortened because of the heavy workload, which affected their productivity and contributed to low morale in the IV Unit.

OIG found that the embassy had started taking steps to address these issues. Specifically, the newly arrived Consul General began matching resources to capacity. In addition, to lower the weekly refusal rate, the embassy engaged the NVC to propose measures to enhance the preparedness level of IV applicants.

In accordance with 3 FAM 1214b(2), 7 FAH-1 H-262.3-4, Workload Distribution, and 7 FAH-1 H-242c(6), Workload Analysis, consular managers are expected to plan strategically and use consular management tools to analyze processes and workload to effectively manage resources. Guidance in the Bureau of Consular Affairs' leadership tenets, management framework, and 7 FAH-1 H-241 and 7 FAH-1 H-261 also outline expectations for consular managers to manage "existing resources to deal effectively with consular workloads," "seek ways to improve operational effectiveness," and "effectively distribute resources in an equitable manner to ensure mission accomplishment." Failure to plan strategically to manage existing resources and deal effectively with consular workloads creates backlogs, lowers productivity and morale, truncates training, and leads to overtime costs.

**Recommendation 7:** Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to manage the immigrant visa workload more effectively. (Action: Embassy Port-au-Prince)

#### Reviews of Immigrant Visa Refusals Did Not Meet Department Standards

The embassy did not review all of the refused immigrant visa cases required by Department standards. For example, between April 1 and June 30, 2018, managers did not review 380 of 447 (85 percent) of the refusals that should have been reviewed. Guidance in 9 FAM 504.11-3(A)(2), however, states that consular managers must review all immigrant visa refusals that cannot be overcome by presentation of additional evidence. Notwithstanding this guidance, consular managers did not prioritize these reviews. Failure to conduct reviews of refusal cases increases the risk of adjudication errors and denying the immigration benefit to an eligible applicant.

**Recommendation 8:** Embassy Port-au-Prince should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

#### Consular Section Intake Procedures, Use of Space Were Inefficient

OIG found that the embassy did not make the most efficient use of intake procedures and available space to process Consular Section customers and accommodate them as efficiently,

<sup>&</sup>lt;sup>19</sup> The Bureau of Consular Affairs created the Consular Leadership Tenets to provide a value-based approach to leadership. The bureau's 1CA Management Framework is designed to complement the leadership tenets and provide consular teams with tools to analyze and address common consular management and leadership issues.

safely, and pleasantly as possible. For example, applicants typically were accommodated on a first-come, first-served basis, rather than according to their appointment time. Applicants arriving at the consular compound access control area were grouped by their requested consular services, admitted to the embassy compound, and, after reaching the consular waiting room, again were sorted and directed to initial processing. Waiting times varied depending on the requested service, with some applicants spending up to an hour standing in line before seeing an adjudicator. Furthermore, a covered seating area between the access control area and the waiting room entrance that would allow some applicants to sit while they waited remained largely unused. 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. In addition, the Bureau of Consular Affairs' management framework, which consular managers did not consult for guidance on this issue, provides tools to conduct workflow analysis in order to more efficiently process applicants. Without more attention to procedures and accommodations, applicants often wait longer than necessary in uncomfortable conditions, and consular productivity is decreased due to inefficient processes.

**Recommendation 9:** Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to comply with Department guidance for processing and accommodating consular customers. (Action: Embassy Port-au-Prince)

#### Global Support Services Were Not Monitored in Accordance With Department Standards

OIG found that the embassy did not monitor the Global Support Strategy program<sup>20</sup> in accordance with Department standards. The section's Global Post/Mission Coordinator did not perform quarterly test calls to monitor call center services to verify the accuracy and quality of information, language skills, and stated call center hours of operation. In addition, the coordinator did not retrieve and review the audio or electronic files of a sample applicant to assess the accuracy of information and language skills quarterly, as required by the Bureau of Consular Affairs' Global Post/Mission Coordinator Checklist. These deficiencies occurred because the Consular Section did not prioritize these duties. Failure to perform these functions, however, leaves the embassy unable to verify the accuracy and quality of information the call center provides to applicants.

**Recommendation 10:** Embassy Port-au-Prince should monitor Global Support Services to verify the accuracy and quality of information provided to visa applicants in accordance with Department standards. (Action: Embassy Port-au-Prince)

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<sup>&</sup>lt;sup>20</sup> Global Support Strategy is a Bureau of Consular Affairs worldwide program to provide support services for nonimmigrant and immigrant visa operations that are not inherently governmental functions. Services may include information services, appointment systems, offsite fee collection, document delivery, onsite greeters, and offsite biometric data collection. This program requires posts to provide management oversight of the services they receive.

#### Visa Priority Appointment Requests Were Not Documented as Required

The Consular Section did not comply with procedures in 9 FAM 601.8-4 for documenting nonimmigrant visa priority appointment requests. An OIG analysis of 48 of the 200 requests in 2018 showed that 25 (52 percent) were improperly documented. In 19 cases, the requesting officer failed to affirm that assisting the contact was in the national interest or a mission priority; failed to affirm that the contact was personally and favorably known or the requesting officer had reasonable knowledge of the bona fides of the applicant; or failed to attach the visa confirmation page to the request form. In three cases, the adjudicating officer did not scan documentation into the non-immigrant visa electronic application while in two cases the requesting official did not sign the request form. Consular management failed to enforce Department procedures regarding these issues. Improper documentation of visa priority appointment request cases introduces risks to the integrity and monitoring of the nonimmigrant visa process.

**Recommendation 11:** Embassy Port-au-Prince should document nonimmigrant visa priority appointment requests in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### **RESOURCE MANAGEMENT**

OIG reviewed internal control systems in general services, facilities management, financial management, human resources, and the employee association. While the section's human resources function 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. Section staff attributed many of these deficiencies to lack of management oversight, unfamiliarity with Department guidelines, and staff vacancies resulting from the hiring freeze.<sup>21</sup> In addition, during the inspection, Embassy Port-au-Prince corrected four deficiencies in the General Services Office.

#### **General Services**

OIG identified four internal control deficiencies in the General Services Office, which the embassy corrected during the inspection. Specifically, the General Services Officer:

• Reviewed and updated the embassy's motor vehicle policy as required in 14 FAM 432.5.

<sup>&</sup>lt;sup>21</sup> A U.S. government-wide hiring freeze was first announced by the Office of Management in Budget on January 23, 2017. While most Department positions were frozen and could not be filled if vacant, the Secretary approved specific exemptions to the hiring freeze to ensure the Department was able to meet critical needs. In January 2018, the Secretary announced he would give greater authority to the bureaus to strategically manage the exemption process and fill vacant positions through lateral reassignments and internal promotions. In addition, he stated he would authorize each of the regional bureaus to fill 1,500 priority eligible family member positions abroad in FY 2018, to meet the Department's security, health, and safety requirements. In May 2018, the Secretary lifted the hiring freeze.

- Began conducting periodic unannounced spot counts of expendable and nonexpendable property stored in embassy warehouses, as required by 14 FAM 411.2-2c.
- Began requiring occupants of embassy housing to sign residential inventories, as called for in 14 FAM 416.3a.
- Began tracking stocks of embassy-provided uniforms for facilities management and general services staff in the Integrated Logistics Management System (ILMS), pursuant to 14 FAM 446.1.

#### **Embassy Had High Levels of Preventable Motor Vehicle Accidents**

Department data showed that Embassy Port-au-Prince had the highest number of motor vehicle mishaps among overseas missions. From FY 2012 through FY 2017, the embassy had 311 motor vehicles mishaps, of which it deemed nearly 60 percent as preventable. In FY 2018, the embassy had 68 motor vehicle mishaps, 65 percent of which it deemed preventable. More than 68 percent of the reported mishaps involved incidental (self-drive) drivers and other nonmotor pool chauffeurs. The total cost of damages related to motor vehicle mishaps was \$685,100 between FY 2012 and FY 2018, of which \$331,288 came from collisions determined to be preventable. The accident reports cited drivers' failure to check, inspect, or monitor driving conditions as some of the major causes for the preventable mishaps. Management staff also cited problems with enforcing disciplinary action consistently across embassy sections and other agencies for employees involved in mishaps, particularly of U.S. direct-hire staff; this was due in part to the vacancy in a particular position in the General Services Office—this position had in fact been vacant for a year. According to the Bureau of Overseas Buildings Operations' (OBO) Motor Vehicle Safety Management Program for Overseas Posts, Section 10(c), embassies are required to take corrective action to help preclude recurrence of preventable mishaps. Corrective action includes training or retraining, changes to the post motor vehicle use and safety policy, or improved enforcement of existing policy. Failure to take these steps increases the risk to employee life and safety and damage to U.S. Government property.

**Recommendation 12:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of preventable motor vehicle mishaps. (Action: Embassy Port-au-Prince, in coordination with OBO)

#### Embassy Did Not Fully Comply With Department's Motor Vehicle Safety Standards

OIG found that Embassy Port-au-Prince did not comply with elements of the Department's Overseas Motor Vehicle Safety Standards. Specifically:

- Twenty-four chauffeurs who drove armored vehicles did not receive armored vehicle training, as required in 12 FAM 389b.
- Five chauffeurs and 94 incidental (self-drive) drivers whose training had lapsed needed to be retrained in driver safety, pursuant to 14 FAM 433.5a-b.

- Twelve chauffeurs and 143 incidental (self-drive) drivers held expired medical certifications or never received medical certifications before driving official vehicles, contrary to guidance in 14 FAM 433.4.
- Chauffeurs exceeded the 10-hour per day limit on driving shifts a total of 546 times over an 8-week period evaluated by OIG. Guidance in 14 FAM 433.8, 15 FAM 957.3(4), and the Department's Motor Vehicle Safety Management Program for Overseas Posts delineate limits on the maximum number of hours a driver is allowed to work.

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

**Recommendation 13:** Embassy Port-au-Prince should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department Overseas Motor Vehicle Safety Standards. (Action: Embassy Port-au-Prince)

#### **Embassy Did Not Monitor Operating Costs of its Official Vehicles**

Embassy Port-au-Prince did not complete reports used to monitor the operating costs of its official vehicles. Specifically, the motor pool did not complete the monthly fleet summary report, as required by 14 FAH-1 H-816.1-2, or the monthly fuel and oil consumption report, as required by 14 FAH-1 H-814.2-2. These monthly reports include useful information about fuel and oil consumption, vehicle repairs, and kilometers driven. For example, significant changes in fuel or oil consumption could be an indicator of unresolved mechanical issues or fuel theft. Motor pool staff told OIG these reports were not completed because of competing priorities. This internal control weakness, however, increases the risk of mismanagement and theft.

**Recommendation 14:** Embassy Port-au-Prince should complete its fleet reports in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### Section Did Not Document Nonexpendable Property Transfers to Embassy Residences

Data in the ILMS<sup>22</sup> property system showed the embassy did not document 21.3 percent of nonexpendable property transfers to residences between October 1, 2016, and April 30, 2018. Guidance in 14 FAM 416.3 requires that property transfers be documented and signed for by the occupant, and the signed property forms be maintained in residential inventory files. This process allows the embassy to track changes to the original inventory prepared when an employee first moves into a residence. Guidance in 14 FAM 414.5 states the accountable property officer must ensure that effective internal requisitioning and issuing procedures to document nonexpendable property transactions are established and enforced. Embassy staff

<sup>&</sup>lt;sup>22</sup> ILMS is an integrated web-based system that encompasses all the Department supply chain functions in one system. It is designed to upgrade supply chain management by improving operations in areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

was unable to provide a reason for the lack of transfer documentation. This deficiency is an internal management control weakness that increases the risk of theft.

**Recommendation 15:** Embassy Port-au-Prince should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### **Embassy Did Not Use Electronic Scanners to Inventory Residential Assets**

Embassy Port-au-Prince did not consistently use electronic barcode scanners to conduct residential inventories. According to ILMS data, in the 3 years prior to the inspection, property management staff inventoried 37.4 percent of assets located in residential units manually instead of with electronic scanners. Manual reconciliation of residential inventories increases the risk of property mismanagement and theft. OIG advised the embassy that the Department's preferred method of conducting residential inventory is to use electronic scanners compatible with ILMS. The embassy agreed to start using the electronic scanners.

#### Bulk Fuel Operation Was Not Managed in Accordance With Department Standards

Embassy Port-au-Prince did not manage its bulk fuel operation in accordance with Department standards. The embassy implemented a new standard operating procedure in October 2018 but did not include requirements to maintain fuel property records in accordance with 14 FAH-1 H-815.5a. In addition, staff did not conduct and document fuel inventories in accordance with 14 FAH-1 H-815.6a. Embassy staff told OIG they were unaware of these requirements. Failure to implement adequate management controls over bulk fuel operations increases the risk of mismanagement and theft.

**Recommendation 16:** Embassy Port-au-Prince should manage its bulk fuel operation in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### **Procurement Files Were Not Closed Out Within Required Timeframes**

Embassy Port-au-Prince did not close out procurement files in the Department's Electronic Filing System within the required timeframes. Specifically, the contracting officer did not close out 21 procurement files on which all procurement action had been taken from FY 2015, 22 procurement files from FY 2016, 110 procurement files from FY 2017, and 97 procurement files from FY 2018. Additionally, the embassy had a backlog of 3,936 procurements from FY 2015 to FY 2017 that required procurement staff action to complete closeout. 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. Embassy staff told OIG the backlog occurred because of competing priorities. Nonetheless, failure to close out procurement files within the required timeframe increases the risk of inaccuracies in Department procurement records and of internal controls deficiencies in procurement operations.

**Recommendation 17:** Embassy Port-au-Prince should close out procurement files in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### Contracting Officer's Representatives Did Not Document Contractor Performance as Required

The embassy's CORs did not document contractor performance in accordance with Department standards. OIG reviewed five of the eight COR files and found that 4 lacked performance review documentation, among other documents. Guidance in 14 FAM 222c(1)(2), states that the COR is the primary individual assigned to monitor a contract and evaluate the contractor's performance, while 14 FAH-2 H-142 outlines a COR's responsibilities, which include maintaining a file for each assigned contract. In addition, Federal Acquisition Regulation 42.1502(a) requires past performance evaluations to be prepared annually and entered into the contractor performance assessment reporting system. Procurement staff told OIG that CORs did not maintain complete files because of competing priorities. Failure to comply with these requirements, however, increases the risk of excessive costs, misuse of U.S. Government resources, and substandard contractor performance.

**Recommendation 18:** Embassy Port-au-Prince should require all contracting officer's representatives to administer their contracts in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### Foreign Per Diem Rates Were Out of Date for Six Locations in Haiti

Foreign per diem rates for six Haiti locations were out of date.<sup>23</sup> According to the Bureau of Administration, Embassy Port-au-Prince last submitted a hotel and restaurant report<sup>24</sup> in 2011 for one location, and in 2013 for the other five locations. Department of State Standardized Regulation section 074.2, states that all agencies having responsibility to prepare and submit reports shall provide complete accurate, and supportable information in the biennial hotel and restaurant report. Embassy personnel were unaware that the foreign per diem rates were outdated. Failure to submit these reports on a timely basis could result in overpayment, or underpayment, of allowances to U.S. Government personnel.

**Recommendation 19:** Embassy Port-au-Prince should submit its hotel and restaurant reports to the Bureau of Administration in accordance with Department standards. (Action: Embassy Port-au-Prince)

<sup>&</sup>lt;sup>23</sup> These locations were Cap Haitien, Jacmel, Montrouis, Petionville, and Port-au-Prince, as well as the general category of "other," which encompasses all non-listed locations.

<sup>&</sup>lt;sup>24</sup> The Department uses Hotel and Restaurants Reports to determine the appropriate U.S. Government per diem allowance.

#### **Facilities Management**

### Embassy's Use of Generators at Embassy Housing Compound Was Costlier Than Procuring Power From the Local Utility Company

The embassy used generators to power the new 86-unit "Stecher-Roumain" housing compound, which opened in 2018. However, OIG determined that such an approach was costlier than procuring power from the local utility company. Specifically, OIG estimated that on an annual basis, generator power cost approximately \$1,442,738, whereas power supplied by the local utility company would cost approximately \$837,588—an estimated savings of \$605,150 per year. Embassy staff told OIG that the housing compound did not have the infrastructure needed to connect to the local power grid because OBO did not include it in the construction contract. However, both the embassy and another adjacent housing compound are connected to the local power grid, which suggests that the "Stecher-Roumain" housing compound also could be connected. During the inspection, OBO and the embassy began determining how this could be done. Such a change would be consistent with the Department's Overseas Cost Containment Initiative, 25 which states that embassies should develop process improvements and other local cost containment measures. Connection to the local power grid would allow the Department to put funds of up to \$3.03 million over 5 years to better use.

**Recommendation 20:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Port-au-Prince, should connect the "Stecher-Roumain" housing compound to the local power grid, and put funds of up to \$3.03 million over 5 years to better use. (Action: OBO, in coordination with Embassy Port-au-Prince)

#### Housing Program Did Not Fully Comply With Department Safety and Security Standards

Embassy Port-au-Prince's housing program did not fully meet Department safety and security standards. OIG found that 12 of 15 housing files reviewed had incomplete Post Occupational Safety and Health Officer (POSHO) certifications and no copies of security surveys. OIG also found no documentation that the embassy had conducted the required safety re-certifications for three of the 15 residences. In addition, the POSHO did not enter certifications for more than 100 residential and non-residential properties listed in OBO's real property database into the POSHO Certification Application, <sup>26</sup> while another 59 were only partially completed. Pursuant to 15 FAM 252.5(c), posts should complete and document certifications in the POSHO Certification Application and maintain a copy of the certification as part of the post property record. In addition, the POSHO should certify leased properties at lease inception, and re-certify at each lease renewal, or at least every 5 years, and certify Government-owned and long-term leased properties initially and every 5 years thereafter. Post must retain all lease documentation, including POSHO certifications, for 5 years. Embassy management overlooked these housing file

<sup>&</sup>lt;sup>25</sup> Cable 14 STATE 112728, "Introducing the Overseas Cost Containment Initiative," September 17, 2014.

<sup>&</sup>lt;sup>26</sup> The POSHO Certification Application generates and documents the form used by the POSHO to certify that all residences meet the requirements of 15 FAM 252.5 for POSHO certification. The form contains the safety requirements that must be certified prior to occupancy and allows relevant documentation to be attached.

requirements. Failure to maintain housing files, including safety certifications and security surveys, could lead to the staff placing U.S. direct-hire employees in unsafe and unsecure residences.

**Recommendation 21:** Embassy Port-au-Prince should comply with Department standards for residential safety and security certifications. (Action: Embassy Port-au-Prince)

#### **Embassy Did Not Conduct Seismic Evaluations for Leased Residences**

Embassy Port-au-Prince did not conduct seismic safety assessments of 25 leased residential units as required by Department standards. Guidance in 15 FAM 252.6f requires that posts in high-risk seismic areas perform seismic assessments using an OBO-approved structural engineer to assess the safety of residences. None of the 25 housing files had records of any seismic inspections or confirmation that an engineer had conducted assessments. Leasing properties without performing seismic safety assessments poses significant risk to the life and safety of occupants.

**Recommendation 22:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of its residential properties in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

#### **Elevator Program Did Not Comply With Department Standards**

Embassy Port-au-Prince's elevator program did not comply with Department standards. OBO's International Maintenance Assistance Program team identified 48 deficiencies for the embassy's two elevators during its April 2018 site visit. OIG found that these deficiencies remained unaddressed as of November 2018. The assistance team also deemed one elevator unsafe for continued use and reported that both elevators lacked a current Certificate of Use.<sup>27</sup> According to 15 FAM 661g(1), a safety inspector must routinely certify equipment safe for operation. These elevator deficiencies, which create a potential workplace safety hazard, occurred because of a lack of management oversight and failure to follow Department standards.

**Recommendation 23:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should complete all outstanding elevator repairs needed to obtain a current Certificate of Use for each elevator, in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

<sup>&</sup>lt;sup>27</sup> In order to receive a Certificate of Use, an elevator must be inspected annually by an accredited elevator inspector, with a comprehensive inspection every 5 years, and the embassy must complete any necessary repairs, after which the elevator is again inspected. If the re-inspection indicates full compliance, OBO issues a 1-year Certificate of Use.

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

OIG identified three elements of Embassy Port-au-Prince's safety, health, and environmental management program that did not comply with Department standards. Specifically, the embassy:

- Did not have a comprehensive safety and occupational health and environmental loss control program, as required by 15 FAM 961. For example, OIG observed unsafe and hazardous working conditions at the embassy and housing compound utility buildings that staff could have mitigated by implementing such a program. Unsafe conditions included oil spills in the generator room, oil-contaminated soil outside of the buildings, slipping hazards created from standing water puddles on the floor, and tripping hazards created by storing materials on the floor.
- Did not perform the safety inspections mandated in 15 FAM 962c, which requires the POSHO to inspect all office work areas annually and "increased-risk" areas and operations twice a year.<sup>28</sup>
- Did not conduct the required safety training for management officials and new employees. Guidance in 15 FAM 965a requires the POSHO to ensure that management officials receive an orientation and other training that enables them to meet their safety and occupational health responsibilities. As stated in 15 FAM 965d, the POSHO also must ensure all new employees receive a safety and occupational health orientation and provide specialized safety, health, and environmental management training related to the work performed by certain employees.

These deficiencies occurred because of a lack of management oversight and adherence to Department standards. The absence of these programs, inspections, and training increases the risk of injury and loss of life.

**Recommendation 24:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should resolve the embassy safety, health, and environmental management program deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

#### Fire Protection Program Did Not Fully Comply With Department Standards

Embassy Port-au-Prince did not comply with four elements of the Department's fire protection program. Specifically:

<sup>&</sup>lt;sup>28</sup> According to 15 FAM 962(e), an increased risk work area is a workplace or environment with a high potential for mishaps or occupational illnesses, including activities involving machines, electrical or electronic functions, construction, maintenance and repair.

- The embassy did not report three fires to OBO's Office of Fire Protection, as mandated by 15 FAM 823. Department standards require that all fires be reported, regardless of their extent or resulting damage.
- The embassy did not inspect 65 fire extinguishers on a monthly basis as required by 15 FAM 842a. OIG found that staff inspected 43 fire extinguishers only once or twice in 2018. In addition, 13 fire extinguishers had not been inspected since 2017, 2 since 2014, and 7 had no inspection tags. The staff also did not conduct monthly inspections of fire extinguishers located in the Ambassador and DCM residences.
- Residents did not conduct monthly fire extinguisher inspections as mandated in 15 FAM 842b. OIG's inspection of 15 residences found fire extinguisher inspection tags that showed residents conducted inspections only once or twice in 2018.
- The embassy did not maintain or inspect residential smoke detectors as required by 15 FAM 841.<sup>29</sup> OIG found 7 of 15 residences inspected had inoperable or missing smoke alarms and smoke alarms without batteries. In addition, there was no record that residents inspected smoke alarms on a monthly basis as required.

These fire protection deficiencies occurred because of insufficient management oversight, lack of adherence to Department guidelines, and residential occupants' failure to perform monthly inspections. The lack of inspections and correction of all reported fire deficiencies increases the risk of injury and loss of life.

**Recommendation 25:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

#### **Financial Management**

#### **Overdue Travel Advances**

As of October 2018, the Department's financial system open travel advance report showed Embassy Port-au-Prince had 188 overdue travel advances totaling \$146,557. Of these, 140 were more than 30 days overdue, with 89 of the 140 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 Office is responsible for debt collection, as outlined in 4 FAM 492.1. Pursuant to 4

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<sup>&</sup>lt;sup>29</sup> Pursuant to 15 FAM 841(a), post must install in each residential unit one single-station smoke alarm in each sleeping room, in each corridor serving the sleeping rooms, and at the top of the stairs on each level leading to the sleeping rooms. Pursuant to 15 FAM 841(b), residential occupants must conduct a visual inspection and test each installed battery-operated smoke alarm monthly, and replace batteries following the manufacturer's recommendation.

FAM 493.1-3, 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 multiple reminders. The staff also told OIG that it was difficult to enforce compliance with Department standards given the embassy's large number of travelers, the difficulty of collecting advances from invitational travelers, <sup>30</sup> and LE staff vacancies. Notwithstanding these points, overdue travel advances represent a loss of funds to the Department if they remain uncollected. The embassy could put up to \$146,557 to better use by collecting overdue travel advances.

**Recommendation 26:** Embassy Port-au-Prince should clear overdue travel advances in accordance with Department guidelines, and put up to \$146,557 to better use. (Action: Embassy Port-au-Prince)

#### **Unprocessed Financial Transactions**

As of October 2018, Embassy Port-au-Prince's unprocessed financial transactions report showed 229 transactions totaling \$754,500. These included 63 transactions recorded as "held for processing" and 166 rejected vouchers and obligations. Pursuant to 4 FAM 251.7, the financial management staff must review all disbursements and related financial reports in a timely manner to ensure transactions are properly recorded and that unprocessed transactions are resolved expeditiously. The rejected transactions occurred because the financial management staff entered incorrect fiscal data into the financial system or did not obligate sufficient funds, which caused the system to reject the transactions. Staff also told OIG they were unable to reconcile the transactions because of LE staff vacancies. Unprocessed transactions affect available funding and prevent expeditious clearing of rejected transactions that provide allotment holders with an accurate balance of available funds.

**Recommendation 27:** Embassy Port-au-Prince, in coordination with the Bureau of the Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in accordance with Department guidelines. (Action: Embassy Port-au-Prince, in coordination with CGFS)

### Embassy Programmed Only One of Four Information Management Positions to International Cooperative Administrative Support Services

OIG found that International Cooperative Administrative Support Services<sup>31</sup> (ICASS) funded only one of four Information Management U.S. direct-hire positions, although the section provided

<sup>&</sup>lt;sup>30</sup> According to 4 FAM 463.2(b)(3) "an individual serving without pay or at \$1 a year (also referred to as "invitational traveler")."

<sup>&</sup>lt;sup>31</sup> ICASS, established in 1997, is the principal means by which U.S. Government agencies share the cost of common administrative support services at more than 250 diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions, in accordance with 6 FAM 911 and 6 FAH-5 H-013.2.

support to other agencies. The Department paid for the remaining three positions through its Diplomatic and Consular Program funding, even though the embassy estimated that these three employees allocated more than 40 percent of their time to ICASS services. This is inconsistent with Department guidance. According to 6 FAH-5 H-013.2, agencies pay their share of post administrative costs based on usage. Pursuant to 6 FAH-5 H-341.9-1,<sup>32</sup> ICASS costs should include salaries and benefits of all U.S. direct-hire and LE staff who deliver services to other agencies, overhead associated with those staff members, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at posts with multiple U.S. direct-hire Information Management officers and specialists, the Department pays for the first position, while the second one is always paid through ICASS. Where there are more than two such employees, post should determine an appropriate mix of Program- and ICASS-funded positions. Thus, at Embassy Port-au-Prince, one or both additional U.S. direct-hire Information Management employees could be reprogrammed to ICASS. Failure to do so means the Department's Program budget would continue to subsidize most of the costs for other agencies. OIG estimated the Department could recover \$81,331 per position annually in funds put to better use by converting additional embassy Information Management positions to ICASS.<sup>33</sup>

**Recommendation 28:** Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards in order to put funds of \$81,331 per position to better use. (Action: Embassy Port-au-Prince, in coordination with WHA and CGFS)

#### Alternate Cashier Did Not Regularly Assume Principal Cashier's Duties

The embassy's alternate cashier served as the main cashier only during principal cashier absences and not more regularly, as required by Department guidelines. The Department's Cashier Users Guide 3.6 states the American supervisor should establish a schedule that allows the alternate cashier to work as the acting principal cashier two to three times per month to ensure that the alternate cashier maintains the necessary skills. Financial management staff told OIG they were unaware of this requirement. An alternate cashier who is unfamiliar with cashiering procedures risks making errors in cashiering operations when the principal cashier is away.

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<sup>&</sup>lt;sup>32</sup> See 6 FAH-5 H-341.9-1(B), 6 FAH-5 H-341.9-2(B), and 6 FAH-5 H-341.9-3(B).

<sup>&</sup>lt;sup>33</sup> Relying on Department-provided figures, OIG estimated the Department could recover \$81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of \$268,419 and the worldwide average percentage of time U.S. direct-hire IM staff support other agencies of 30.3 percent (\$268,419 x .303 = \$81,331).

**Recommendation 29:** Embassy Port-au-Prince should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

#### Embassy Port-au-Prince Voucher Processing Efficiency Lower Than Other Embassies

Embassy Port-au-Prince's seven LE staff voucher examiners processed 1,867.5 transactions or strip codes<sup>34</sup> per year, well below the Bureau of Western Hemisphere Affairs annual average of 2,341.6 strip codes per voucher examiner and that of other embassies in the region. For example, Embassy Mexico City was the most efficient vouchering unit in the region. With an annual workload of 89,578 strip codes and an LE staff complement of 16 voucher examiners, it processed 5,563.9 strip codes per voucher examiner. OIG advised the Financial Management Officer to solicit advice from other embassies to determine the most efficient processing procedures and revise the embassy's procedures accordingly, which he agreed to do.

#### **Human Resources**

#### Retail Price Schedule Was Outdated

Embassy Port-au-Prince last submitted its retail price survey—used to set its cost of living allowance—in 2016. According to the Bureau of Administration's Office of Allowances guidance, the embassy should have submitted its survey in June 2018. According to Department of State Standardized Regulation 228.2, the cost of living allowance level is based on living costs in the foreign location relative to that of Washington, D.C. To ensure that the rates accurately reflect local costs, the Office of Allowances requires embassies to submit a retail price every 2 years. Management staff told OIG it was unable to complete the surveys because of staffing vacancies and competing priorities. The lack of updated allowance reports increases the risk of inaccurate allowance and travel payments.

**Recommendation 30:** Embassy Port-au-Prince should submit its Retail Price Schedule to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

#### Local Compensation Plan Did Not Comply With Government of Haiti's Labor Law

Embassy Port-au-Prince's local compensation plan did not reflect current Haitian labor law. Guidance in 3 FAH-2 H-132.3a(1), requires embassies to implement a local compensation plan and review it at least annually to ensure it is current. The embassy and Bureau of Human

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<sup>&</sup>lt;sup>34</sup> Financial strip codes are the workload metric ICASS uses to distribute the costs of providing voucher services to interagency customers.

<sup>&</sup>lt;sup>35</sup> OIG's report *Audit of Select Cost-of-Living Allowances for American Employees Stationed in Foreign Areas* (AUD-FM-17-51, August 2017)) recommended eliminating the location-specific survey data process for individual posts. Notwithstanding this recommendation, so long as the current process is still in place, the Department should ensure that it is followed correctly, which is why OIG is making a specific recommendation to address the problem at the embassy.

Resources' Office of Overseas Employment acknowledged that the local compensation plan was outdated. This deficiency occurred because of a lack of management oversight. Without an accurate local compensation plan, the LE staff may not receive benefits to which they are entitled.

**Recommendation 31:** Embassy Port-au-Prince, in coordination with the Bureau of Human Resources, should update the local compensation plan to reflect current Haitian labor law, in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with DGHR)

#### **American Employee Association**

#### American Employee Association Did Not Submit Required Annual Audit Report

The American Employee Association did not submit a 2017 audit report to the Bureau of Administration's Office of Commissary and Recreation Affairs as required. Department standards in 6 FAM 557b require an audit, including a physical inventory of stock and equipment, be conducted at least annually. In addition, the embassy must submit the audit report by April 1, for the period January 1 through December 31 of the previous year. Embassy staff told OIG this deficiency occurred because of a lack of oversight. This internal control weakness increases the risk of mismanagement and theft.

**Recommendation 32:** Embassy Port-au-Prince should require the American Employee Association to submit an annual audit report in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### American Employee Association Operated Preschool Without Department Approval

The employee association began operating a preschool on U.S. Government property in August 2018 without Department authorization. According to 6 FAM 551a, employee associations must operate under an approved charter that specifies each service it provides. Prior to offering any new service, the association must submit a request to the Office of Commissary and Recreation Affairs and obtain written approval from the Assistant Secretary for Administration for a revised charter that includes the new service. The employee association told OIG that it believed it received approval to operate the preschool in August 2018 but was unable to provide OIG with any documentation confirming this statement. This issue should be addressed promptly because operating an unauthorized preschool on U.S. Government property poses potentially serious liability issues.

**Recommendation 33:** Embassy Port-au-Prince, in coordination with the Bureau of Administration, should request authorization to provide childcare services on U.S. Government property. (Action: Embassy Port-au-Prince, in coordination with A)

#### INFORMATION MANAGEMENT

OIG reviewed classified, unclassified, and dedicated internet computer operations; physical protection of information technology (IT) resources; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services at Embassy Port-au-Prince. OIG determined that the Information Management programs and services met the day-to-day computing and communications needs of the embassy. However, OIG found deficiencies in the implementation of effective information security and information management, as detailed below and in the companion classified report.

#### Information Technology Contingency Planning Did Not Meet Department Standards

The embassy did not complete or annually test the embassy's unclassified and classified IT contingency plans. Department standards in 12 FAH-10 H-232.3-1b(1-3) require management to develop and test IT contingency plans annually for effectiveness and to determine the mission's readiness to execute them during unplanned system outages or disruptions. Section managers told OIG that they did not complete or test the plans due to competing priorities. Inadequate contingency planning and testing prevents the Information Management Section from mitigating the risk of system and service disruptions.

**Recommendation 34:** Embassy Port-au-Prince should complete annual tests of the information technology contingency plans for unclassified and classified networks in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### 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 staff shortages. Failure to conduct initial and annual refresher IT contingency plan training impedes the embassy's ability to effectively respond to unplanned systems outages or disruptions.

**Recommendation 35:** Embassy Port-au-Prince 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 Port-au-Prince)

## Local Information Technology Configuration Control Board Did Not Perform Duties in Accordance with Department Standards

Embassy Port-au-Prince established a local IT Configuration Control Board as required by 5 FAM 862.1 to ensure that hardware, software, and network components installed on IT networks do

not adversely affect the existing infrastructure. However, the board did not review, approve, document, or report locally installed hardware in the Department's iMatrix<sup>36</sup> system as required by 5 FAM 862.1c. Although the embassy had procured the unapproved hardware and software prior to establishing the local board, it nonetheless needed to ensure the installed hardware and software complied with Department standards. Failure to identify, approve, and report software, hardware, and network components on the embassy's network created vulnerabilities that could compromise Department information.

**Recommendation 36:** Embassy Port-au-Prince should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Port-au-Prince)

#### **Records Management Program Did Not Comply With Department Standards**

The embassy's records management program did not comply with Department standards. The embassy did not have a records e-mail policy, nor had it trained the staff on records management since 2006. Department standards in 5 FAM 414.8(1) require that all Department employees preserve documentary materials meeting the definition of a record under the Federal Records Act.<sup>37</sup> In addition, 5 FAM 414.5 requires the principal officer at each embassy to implement and administer records policies, standards, systems, and procedures issued by the Department's Records Officer. This issue occurred because of lack of management oversight. The lack of an effective records management program resulted in the loss of important data and historical records that could affect the embassy's ability to conduct policy analysis, decision-making, and archival research.

**Recommendation 37:** Embassy Port-au-Prince should comply with Department standards for records management. (Action: Embassy Port-au-Prince)

#### Information Systems Security Officers Did Not Perform All Duties

The embassy's unclassified and classified Information Systems Security Officers (ISSO) did not perform all information systems security duties as required by 5 FAH-11 H-116 and 12 FAM 613.4. OIG found that the ISSOs did not review or analyze information systems audit logs for inappropriate or unusual activity. In addition, OIG found information security issues that could have been prevented with regular performance of ISSO duties. For example, the alternate ISSO used an unprotected dedicated internet network connection and computer with unauthorized operating software in the Information Programs Center. The failure to perform ISSO duties occurred, in part, because there was insufficient embassy oversight. OIG issued a Management

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<sup>&</sup>lt;sup>36</sup> iMatrix is the Department's tool for organizing and tracking its IT investments, projects, and assets, including services, systems, and products.

<sup>&</sup>lt;sup>37</sup> 44 U.S.C. § 3301

Assistance Report in May 2017<sup>38</sup> that identified the need to enforce the performance of ISSO duties by overseas information management personnel in accordance with Department standards. In a subsequent cable, <sup>39</sup> the Department directed embassy management to work with ISSOs to ensure performance of their duties by prioritizing resources to make sure that cybersecurity needs were met and documented. Nonetheless, a lack of planning and competing priorities led to these duties being neglected, which placed the security of the Department's information systems at risk.

**Recommendation 38:** Embassy Port-au-Prince should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### System Administrators Did Not Perform All Duties

The embassy's Information Management system administrators did not perform their duties as required in 5 FAM 826. OIG found information system deficiencies, including failure to install a firewall to protect the dedicated internet network, unapproved software on Department systems, inadequate system log retention, and inconsistent continuous system monitoring. Section staff told OIG staffing shortages and the lack of standard operating procedures, required by 5 FAM 867, contributed to system administrator duties not being performed. Without information systems administrators performing all assigned duties, systems are not protected from cyber threats.

**Recommendation 39:** Embassy Port-au-Prince should implement standard operating procedures for systems administrators in accordance with Department standards. (Action: Embassy Port-au-Prince)

#### **Unsafe Conditions in the Server Room**

OIG found that the location of the emergency power-off switch and exposed electrical wiring created unsafe conditions in the embassy's unclassified server room. The emergency power-off switch location outside the server room did not allow staff to rapidly disconnect the power during emergency situations inside the server room, and it did not restrict access to the switch. These conditions could cause prolonged emergency power-off time during electrical accidents and permit accidental or intentional shutdown of unclassified systems. Department standards in 12 FAH-10 H-272.8-1(2) require an emergency power-off control inside the server room adjacent to each egress door for access by authorized personnel. However, section staff told OIG it was unaware of this requirement. Additionally, OIG found an uncovered outlet enclosure with exposed electrical wiring in the server room, which created an electrical hazard. Department standards in 5 FAH-9 H-222.2-1(4) require electrical enclosures to be covered.

<sup>&</sup>lt;sup>38</sup> OIG, Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel (ISP-17-24, May 2017).

<sup>&</sup>lt;sup>39</sup> Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

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Although the section submitted a request to the Facilities Management Office to correct the problems, the repair was not completed during the inspection. Both issues create unsafe operating conditions in the server room.

**Recommendation 40:** Embassy Port-au-Prince should install an emergency power-off switch inside the unclassified server room adjacent to the egress door in accordance with Department standards. (Action: Port-au-Prince)

**Recommendation 41:** Embassy Port-au-Prince should repair the electrical wiring in the unclassified server room. (Action: Port-au-Prince)

#### Mobile Device Assets Were Not Accurately Inventoried

The Information Management Section did not issue, track, or accurately inventory enterprise mobile devices as required by 12 FAH-10 H-163.1a(3), nor was the embassy reporting actual or suspected loss, stolen, or compromised devices, per 12 FAH-10 H-163.3(10). OIG found that the section could not account for, and had not reported missing, approximately 200 enterprise mobile devices. Section staff acknowledged that poor accountability practices caused the inaccurate inventory. Inadequate inventory controls create the potential for fraud and mismanagement of U.S. Government property, as well as the potential loss of sensitive but unclassified and personally identifiable information.

**Recommendation 42:** Embassy Port-au-Prince should comply with Department standards for mobile device inventory. (Action: Embassy Port-au-Prince)

#### **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 Port-au-Prince and the Bureau of Overseas Buildings Operations. The Department's complete responses can be found in Appendix B.

**Recommendation 1:** Embassy Port-au-Prince should conduct project and program evaluations in accordance with Department guidance. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince conducts project and program evaluations in accordance with Department guidance.

**Recommendation 2:** Embassy Port-au-Prince should require all contracting officer's representatives in the International Narcotics and Law Enforcement Affairs Section to maintain their contract files in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the contracting officer's representatives' contract files comply with Department standards.

**Recommendation 3:** Embassy Port-au-Prince should comply with Department standards for acceptance of all fuel deliveries. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that fuel deliveries comply with Department standards.

**Recommendation 4:** Embassy Port-au-Prince should designate a cleared U.S. citizen employee as the backup for the Leahy Vetting Coordinator in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

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**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that a cleared U.S. citizen employee is designated as the backup for the Leahy Vetting Coordinator.

**Recommendation 5:** Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of Global Public Affairs, should create a social media strategy and a crisis communication plan in accordance with Department guidance. (Action Embassy Port-au-Prince, in coordination with WHA and GPA)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of June 30, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a social media strategy and crisis communication plan that comply with Department guidance.

**Recommendation 6:** Embassy Port-au-Prince should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of September 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the public diplomacy grants program complies with Department standards.

**Recommendation 7:** Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to manage the immigrant visa workload more effectively. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimate completion date of September 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince uses the Bureau of Consular Affairs' management framework to manage the immigrant visa workload.

**Recommendation 8:** Embassy Port-au-Prince should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

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**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of January 9, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince reviews immigrant visa refusals in accordance with Department guidelines.

**Recommendation 9:** Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to comply with Department guidance for processing and accommodating consular customers. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of December 31, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince uses the Bureau of Consular Affairs' management framework to process consular customers.

**Recommendation 10:** Embassy Port-au-Prince should monitor Global Support Services to verify the accuracy and quality of information provided to visa applicants in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of September 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince monitors Global Support Services to verify the accuracy and quality of information provided to visa applicants.

**Recommendation 11:** Embassy Port-au-Prince should document nonimmigrant visa priority appointment requests in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of December 13, 2018.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of nonimmigrant visa priority appointment requests that comply with Department standards.

**Recommendation 12:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of preventable motor vehicle mishaps. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a corrective action plan to reduce the number of preventable motor vehicle mishaps.

**Recommendation 13:** Embassy Port-au-Prince should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department Overseas Motor Vehicle Safety Standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of September 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department Overseas Motor Vehicle Safety Standards.

**Recommendation 14:** Embassy Port-au-Prince should complete its fleet reports in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its Mau 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

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

**Recommendation 15:** Embassy Port-au-Prince should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a compliance date of January 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of nonexpendable property transfers that comply with Department standards.

**Recommendation 16:** Embassy Port-au-Prince should manage its bulk fuel operation in accordance with Department standards. (Action: Embassy Port-au-Prince)

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**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince manages its bulk fuel operation in accordance with Department standards.

**Recommendation 17:** Embassy Port-au-Prince should close out procurement files in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019 response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of January 31, 2019.

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

**Recommendation 18:** Embassy Port-au-Prince should require all contracting officer's representatives to administer their contracts in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of January 18, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that contracts are administered in accordance with Department standards.

**Recommendation 19:** Embassy Port-au-Prince should submit its hotel and restaurant reports to the Bureau of Administration in accordance with Department standards. (Action: Embassy Portau-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of January 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince submitted its hotel and restaurant reports to the Bureau of Administration.

**Recommendation 20:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Port-au-Prince, should connect the "Stecher-Roumain" housing compound to the local power grid, and put funds of up to \$3.03 million over 5 years to better use. (Action: OBO, in coordination with Embassy Port-au-Prince)

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**Management Response:** In its June 5, 2019, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the "Stecher-Roumain" housing compound is connected to the local power grid.

**Recommendation 21:** Embassy Port-au-Prince should comply with Department standards for residential safety and security certifications. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of June 30, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of residential safety and security certifications that comply with Department standards.

**Recommendation 22:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of its residential properties in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. Th embassy noted an estimated completion date of March 2020.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince performed seismic evaluations of its residential properties.

**Recommendation 23:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should complete all outstanding elevator repairs needed to obtain a current Certificate of Use for each elevator, in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of July 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a current Certificate of Use for each elevator.

**Recommendation 24:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should resolve the embassy safety, health, and environmental management program deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

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

**Recommendation 25:** Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

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

**Recommendation 26:** Embassy Port-au-Prince should clear overdue travel advances in accordance with Department guidelines, and put up to \$146,557 to better use. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of June 30, 2019.

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

**Recommendation 27:** Embassy Port-au-Prince, in coordination with the Bureau of the Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in accordance with Department guidelines. (Action: Embassy Port-au-Prince, in coordination with CGFS)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince cleared all unprocessed and rejected transactions in accordance with Department guidelines.

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**Recommendation 28:** Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards in order to put funds of \$81,331 per position to better use. (Action: Embassy Port-au-Prince, in coordination with WHA and CGFS)

Management Response: In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince reprogrammed additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions.

**Recommendation 29:** Embassy Port-au-Prince should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines.

**Recommendation 30:** Embassy Port-au-Prince should submit its Retail Price Schedule to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of January 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Retail Price Schedule was submitted to the Bureau of Administration's Office of Allowances.

**Recommendation 31:** Embassy Port-au-Prince, in coordination with the Bureau of Human Resources, should update the local compensation plan to reflect current Haitian labor law, in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with DGHR)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince updated the local compensation plan to reflect current Haitian labor law, in accordance with Department standards.

**Recommendation 32:** Embassy Port-au-Prince should require the American Employee Association to submit an annual audit report in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of April 29, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince submitted an annual audit report in accordance with Department standards.

**Recommendation 33:** Embassy Port-au-Prince, in coordination with the Bureau of Administration, should request authorization to provide childcare services on U.S. Government property. (Action: Embassy Port-au-Prince, in coordination with A)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted that the American Employee Associated ceased providing childcare services on February 15, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince either ceased providing childcare services or is authorized to provide childcare services on U.S. Government property.

**Recommendation 34:** Embassy Port-au-Prince should complete annual tests of the information technology contingency plans for unclassified and classified networks in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince completed annual tests of the information technology contingency plans for unclassified and classified networks in accordance with Department standards.

**Recommendation 35:** Embassy Port-au-Prince 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 Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of September 2019.

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

**Recommendation 36:** Embassy Port-au-Prince should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of September 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the local Information Technology Configuration Control Board complies with Department standards.

**Recommendation 37:** Embassy Port-au-Prince should comply with Department standards for records management. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of June 30, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Embassy Port-au-Prince records management program complies with Department standards.

**Recommendation 38:** Embassy Port-au-Prince should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of June 30, 2019.

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

**Recommendation 39:** Embassy Port-au-Prince should implement standard operating procedures for systems administrators in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted a completion date of March 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of standard operating procedures for systems administrators that comply with Department standards.

**Recommendation 40:** Embassy Port-au-Prince should install an emergency power-off switch inside the unclassified server room adjacent to the egress door in accordance with Department standards. (Action: Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an emergency power-off switch inside the unclassified server room.

**Recommendation 41:** Embassy Port-au-Prince should repair the electrical wiring in the unclassified server room. (Action: Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince repaired the electrical wiring in the unclassified server room.

**Recommendation 42:** Embassy Port-au-Prince should comply with Department standards for mobile device inventory. (Action: Embassy Port-au-Prince)

**Management Response:** In its May 24, 2019, response, Embassy Port-au-Prince concurred with this recommendation. The embassy noted an estimated completion date of May 31, 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Port-au-Prince complies with Department standards for mobile device inventory.

# PRINCIPAL OFFICIALS

Title	Name	<b>Arrival Date</b>
Chiefs of Mission:		
Ambassador	Michele J. Sison	02/2018
Deputy Chief of Mission	Robin Diallo	08/2017
Chiefs of Sections:		
Management	Beverly Rochester	08/2017
Consular	Scott Boswell	08/2018
Political	Melinda Crowley	09/2016
Economic	Tanya Spencer	11/2018
Public Affairs	Jeanne Clark	07/2017
Regional Security	Mario Reta	09/2018
PEPFAR	Nina Wadwa	06/2017
Office of Regional Affairs	Thomas Sullivan	08/2016
INL	Nicholas Hilgert	06/2017
Other Agencies:		
Drug Enforcement Administration	Vincent Williams	05/2017
Senior Defense Official – Defense Attaché	CDR Michael Bennett	08/2017
U.S. Citizenship and Immigration Services	Ginette Prophete, Acting	08/2016
Centers for Disease Control and Prevention	Dr. David Fitter	08/2016
U.S. Agency for International Development	Jene Thomas	06/2016

Source: Embassy Port-au-Prince

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 4, 2018, to March 7, 2019,<sup>1</sup> 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 224 interviews and reviewed responses to 137 personal questionnaires.

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<sup>&</sup>lt;sup>1</sup> 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



Embassy of the United States of America Port-au-Prince, Haiti

May 24, 2019

#### **UNCLASSIFIED**

THRU: WHA – Kimberly Breier, Assistant Secretary

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

FROM: Embassy Port-au-Prince – Michele J. Sison, Ambassador

SUBJECT: Response to Draft OIG Report - Inspection of Embassy Port-au-Prince, Haiti

Port-au-Prince has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG:

<u>OIG Recommendation 1</u>: Embassy Port-au-Prince should conduct project and program evaluations in accordance with Department guidance. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation, and has taken steps to remediate. The Department's Bureau of International Narcotics and Law Enforcement (INL) has contracted with a private vendor to develop appropriate criteria for monitoring and evaluating INL's programs worldwide. The contractor has engaged a sub-contractor to develop evaluation procedures for the Embassy's projects and programs consistent with these criteria. The initial contract award is for one year from January 2019.

<u>OlG Recommendation 2</u>: Embassy Port-au-Prince should require all contracting officer's representatives in the International Narcotics and Law Enforcement Affairs Section to maintain their contract files in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. Section standard operating procedures have been revised to ensure files are maintained in accordance with Department standards.

<u>OIG Recommendation 3</u>: Embassy Port-au-Prince should comply with Department standards for acceptance of all fuel deliveries. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. INL Haiti has reduced the number of fuel contracts it maintains, purchased tools to ensure

the quality of fuel at the time of delivery and trained recipients on the use of those tools, and has designated a U.S. government employee to monitor fuel deliveries.

<u>OlG Recommendation 4</u>: Embassy Port-au-Prince should designate a cleared U.S. citizen employee as the backup for the Leahy Vetting Coordinator in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. The Embassy has designated in writing the Human Rights Officer in the Political Section as the official back-up Leahy Vetting Coordinator.

<u>OlG Recommendation 5</u>: Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of International Information Programs, should create a social media strategy and a crisis communication plan in accordance with Department guidance. (Action Embassy Port-au-Prince, in coordination with WHA and IIP)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to remediate. In February 2019 the Embassy cleared a crisis communication plan with the Department and uploaded it to the Bureau of Diplomatic Security's Pegasys platform. The Embassy has drafted a social media strategy and plans to obtain all required Department clearances by June 30, 2019.

<u>OIG Recommendation 6</u>: Embassy Port-au-Prince should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Port-au-Prince).

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has begun remediation. Embassy grants files are now in compliance with Department standards. The Embassy is working with A/OPE/AP/FA to conduct virtual training for all staff working on grants, with an estimated completion by the end of Fiscal Year 2019.

<u>OlG Recommendation 7</u>: Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to manage the immigrant visa workload more effectively. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has begun remediation. The Embassy used the Bureau of Consular Affairs' management framework in January 2019 to establish a plan to manage immigrant visa workflow more effectively. The Embassy expects to complete implementation and evaluation of the plan by the end of Fiscal Year 2019.

<u>OlG Recommendation 8</u>: Embassy Port-au-Prince should review immigrant visa refusals in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed this action. On January 9, 2019, the Embassy implemented immigrant visa adjudication review standard operating procedures that meet Department guidelines.

<u>OlG Recommendation 9</u>: Embassy Port-au-Prince should use the Bureau of Consular Affairs' management framework to comply with Department guidance for processing and accommodating consular customers. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has begun remediation. The Embassy used the Bureau of Consular Affairs' management framework to establish in January 2019 a plan to bring the Embassy's processes for accommodating consular customers in compliance with Department standards. The Embassy has begun implementing the plan, and expects to complete short-, mid-, and long-term tasks, deliverables and goals by the end of Calendar Year 2019.

<u>OlG Recommendation 10</u>: Embassy Port-au-Prince should monitor Global Support Services to verify the accuracy and quality of information provided to visa applicants in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to remediate. The Embassy has designated specific individuals and established procedures to ensure accountability for monitoring of local Global Support Services in accordance with Department standards, and will be able to evaluate the effectiveness of this monitoring by the end of Fiscal Year 2019.

<u>OIG Recommendation 11</u>: Embassy Port-au-Prince should document nonimmigrant visa priority appointment requests in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. The Embassy updated its standard operating procedures (SOPs) and issued an updated Visa Referral Policy on December 13, 2018 in accordance with Department standards.

<u>OlG Recommendation 12</u>: Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to reduce the number of preventable motor vehicle mishaps. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and completed this action. The Embassy implemented a corrective plan in coordination with OBO on January 10, 2019.

<u>OlG Recommendation 13</u>: Embassy Port-au-Prince should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department Overseas Motor Vehicle Safety Standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to remediate. As of March 2019, the Embassy was largely in compliance with Overseas Motor Vehicle Safety Standards, and is working to meet standards relative to driver medical clearances. The Embassy intends to meet all standards by the end of Fiscal Year 2019.

<u>OIG Recommendation 14</u>: Embassy Port-au-Prince should complete its fleet reports in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has begun actions to remediate. Post projects this will be completed by June 30, 2019.

<u>OIG Recommendation 15</u>: Embassy Port-au-Prince should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy Port-au-Prince).

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. As of January 2019, all non-expendable property transfers are scanned and documented in accordance with Department standards.

<u>OIG Recommendation 16</u>: Embassy Port-au-Prince should manage its bulk fuel operation in accordance with Department standards. (Action: Embassy Port-au-Prince).

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. The Embassy is managing and documenting bulk fuel operations in accordance with Department standards.

<u>OIG Recommendation 17</u>: Embassy Port-au-Prince should close out procurement files in accordance with Department standards. (Action: Embassy Port-au-Prince).

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has initiated remediation action. The Embassy has pending procurement actions to close dating from 2015. The Embassy has established a plan and procedures to complete the close-out of all pending procurement files in accordance with Department standards by the end of Calendar Year 2019.

<u>OlG Recommendation 18</u>: Embassy Port-au-Prince should require all contracting officer's representatives to administer their contracts in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. As of January 18, 2019 all contracting officer's representatives are administering contracts in accordance with Department standards.

<u>OIG Recommendation 19</u>: Embassy Port-au-Prince should submit its hotel and restaurant reports to the Bureau of Administration in accordance with Department standards. (Action: Embassy Port-au-Prince).

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. The submitted completed hotel and restaurant survey to the Office of Allowances (A/OPR/ALS) in January 2019.

<u>OlG Recommendation 20</u>: The Bureau of Overseas Building Operations, in coordination with Embassy Port-au-Prince, should connect the "Stecher-Roumain" (SR) housing compound to the local power grid, and put funds of up to \$3.03 million over 5 years to better use. (Action: OBO, in coordination with Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has initiated action to remediate. The Embassy, in coordination with OBO, is working on projects required to connect the SR compound to the local power grid. Please see the attached response from OBO (Attachment A).

<u>OlG Recommendation 21</u>: Embassy Port-au-Prince should comply with Department standards for residential safety and security certifications. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken action to remediate. The Embassy has completed safety and security inspections for all residences and is uploading certifications into the SHEM website. This will be completed by June 30, 2019.

<u>OlG Recommendation 22</u>: Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should perform seismic evaluations of its residential properties in accordance with Department standards (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation. Seismic evaluations have been performed on all compounds and GO residences and they are all fit for occupancy. Post is coordinating with OBO to hire an engineering firm to perform seismic evaluations of the remaining seven leased residential properties. Post is preparing a Statement of Work and expects that OBO will have contractor chosen by December 31, 2019, with the evaluations to take place in the first quarter of 2020.

<u>OIG Recommendation 23</u>: Embassy Port-au-Prince, in coordination with the Bureau of Overseas Building Operations, should complete all outstanding elevator repairs needed to obtain a current Certificate of Use for each elevator, in accordance with Department standards. (Action: Embassy Portau-Prince, in coordination with OBO)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has begun mitigation. The Embassy has completed most required repairs, and expects to fully complete repairs by July 2019. The Embassy will then coordinate with OBO to issue a Certificate of Use for both elevators.

<u>OlG Recommendation 24</u>: Embassy Port-au-Prince, in coordination with the Bureau of Overseas Buildings Operations, should resolve the embassy safety, health, and environmental management program deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed it. The Embassy has established a safety and occupational health and environment loss control program, a schedule providing for safety inspections every six months, and procedures to provide new employees whose duties require safety orientation to receive safety briefings within 60 days of employment.

<u>OIG Recommendation 25</u>: Embassy Port-au-Prince, in coordination with the Bureau of Overseas Building Operations, should resolve the mission's fire protection deficiencies and bring the program into full compliance with Department standards. (Action: Embassy Port-au-Prince, in coordination with OBO)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to mitigate. The Embassy has developed Standard Operating Procedures (SOPs) for fire reporting and for fire extinguisher inspections for both residential and non-residential properties, and established a regular schedule for inspection of extinguishers and smoke detectors.

<u>OIG Recommendation 26</u>: Embassy Port-au-Prince should clear overdue travel advances in accordance with Department guidelines, and put up to \$146,557 to better use. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to mitigate. Post has cleared most overdue travel advances of May 24, 2019, and expects to clear all overdue advances by June 30, 2019.

<u>OIG Recommendation 27</u>: Embassy Port-au-Prince, in coordination with the Bureau of the Comptroller and Global Financial Services, should clear all unprocessed and rejected transactions in accordance with Department guidelines. (Action: Embassy Port-au-Prince, in coordination with CGFS)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and completed it. The Embassy has cleared all unprocessed and rejected transactions.

<u>OlG Recommendation 28</u>: Embassy Port-au-Prince, in coordination with the Bureau of Western Hemisphere Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards in order to put funds of \$81,331 per position to better use. (Action: Embassy Port-au-Prince, in coordination with WHA and CGFS)

Management Response: Embassy Port-au-Prince concurs with the recommendation and has taken steps to address it. The Embassy notes that reprogramming of any position would require the concurrence of the Embassy's ICASS Council and regional bureau. The Embassy is preparing an analysis of all four USDH positions and will submit a recommendation to the local ICASS Council in June 2019. The reprogramming of any additional position(s) will be effective in FY2020.

<u>OlG Recommendation 29</u>: Embassy Port-au-Prince should establish a schedule that allows the alternate cashier to work as the principal cashier in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and completed it. The Embassy has established a schedule to allow the alternate cashier to work as the principal cashier at least monthly.

<u>OlG Recommendation 30</u>: Embassy Port-au-Prince should submit its Retail Price Schedule to the Bureau of Administration's Office of Allowances in accordance with Department guidelines. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the action. Post submitted the report to the Office of Allowances in January 2019. .

<u>OlG Recommendation 31</u>: Embassy Port-au-Prince, in coordination with the Bureau of Human Resources, should update the local compensation plan to reflect current Haitian labor law, in accordance with Department standards. (Action: Embassy Port-au-Prince, in coordination with DGHR)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation, and has taken steps to mitigate. The Embassy has regularly updated its local compensation plan based on OE authorizations, DOS regulations and local law, and will continue to do so. Post will coordinate with DGHR to ensure recent updates are in accordance with Department standards.

#### **OIG Recommendation 32:**

Embassy Port-au-Prince should require the American Employee Association to submit an annual audit report in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation, and has completed it. The American Employee Association submitted its annual audit report to A/OPR/CR on April 1, 2019, and the chief of mission compliance certification on April 29, 2019.

#### **OIG Recommendation 33:**

Embassy Port-au-Prince, in coordination with the Bureau of Administration, should request authorization to provide childcare services on U.S. Government property. (Action: Embassy Port-au-Prince)

Management Response: Embassy Port-au-Prince concurs with the recommendation, and notes that all childcare services ceased on U.S. Government property on February 15, 2019, due to the Ordered Departure of all Eligible Family Members (EFMs). The Embassy has since requested that the Department designate Port-au-Prince as an Adult EFM only post. The American Employee Association therefore will no longer provide childcare services.

<u>OlG Recommendation 34</u>: Embassy Port-au-Prince should complete and conduct annual tests of the information technology contingency plans for unclassified and classified networks in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and plans to continue to comply. The Embassy's previous documented test of its information technology contingency plan was in July 2018. The Embassy plans to conduct another test by the end of June 2019.

<u>OlG Recommendation 35</u>: Embassy Port-au-Prince 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 Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and is taking steps to mitigate. The IRM staff have scheduled annual refresher training for IT employees with contingency planning responsibilities, to be completed by the end of Fiscal Year 2019.

<u>OIG Recommendation 36</u>: Embassy Port-au-Prince should require its local Information Technology Configuration Control Board to comply with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and is taking steps to mitigate. The Embassy began to use the iMatrix system during the inspection, and will ensure the Information Technology Configuration Control Board meets Department standards by the end of Fiscal Year 2019.

<u>OIG Recommendation 37</u>: Embassy Port-au-Prince should comply with Department standards for records management. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to mitigate. The Embassy is revising its records management policy to comply with Department standards, and expects to implement standard operating procedures by June 30, 2019.

<u>OlG Recommendation 38</u>: Embassy Port-au-Prince should require that Information Systems Security Officers perform information security system security duties in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation, and has taken steps to mitigate. The Embassy has reprioritized staff resources to ensure ISSO duties are performed in accordance with Department standards, and expects to be able to complete this by the end of Fiscal Year 2019.

<u>OIG Recommendation 39</u>: Embassy Port-au-Prince should implement standard operating procedures for systems administrators in accordance with Department standards. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed it. The Embassy established standard operating procedures for system administrators in March 2019.

<u>OlG Recommendation 40</u>: Embassy Port-au-Prince should install an emergency power-off switch inside the unclassified server room adjacent to the egress door in accordance with Department standards. (Action: Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has completed the installation.

<u>OIG Recommendation 41</u>: Embassy Port-au-Prince should repair the electrical wiring in the unclassified server room. (Action: Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation. Electrical wiring in the unclassified server room has been repaired and has completed the repairs.

<u>OIG Recommendation 42</u>: Embassy Port-au-Prince should comply with Department standards for mobile device inventory. (Action: Embassy Port-au-Prince)

**Management Response:** Embassy Port-au-Prince concurs with the recommendation and has taken steps to mitigate. They established new standard operating procedures for inventorying mobile devices that comply with Department standards, and expects to complete an initial inventory under these procedures by May 31, 2019.

Drafted: SOstrem (+509-2229-8000)

Cleared:	WHA/FO KDueholm, Acting	(OK)
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WHA/Digital: BDrozd	(OK)
OBO: DKeller	(OK)
OBO: JReba	(OK)
CGFS: SRamirez	(info)
DGHR: SCintron	(OK)
IIP: DDurazo	(OK)
PAP: MSison	(OK)
DCM: RDiallo	(OK)
CONS: SBoswell	(OK)
MGMT: BRochester	(OK)
INL: NHilgert	(OK)
PD: JClark	(OK)
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GSO: YAccius	(OK)
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### **United States Department of State**

Washington, D.C. 20520

## UNCLASSIFIED MEMORANDUM

JUN 0 5 2019

TO:

OIG/ISP - Sandra Lewis, Assistant Inspector General for Inspections

FROM:

OBO/RM - Jeffrey C. Reba, Acting Deputy Director

SUBJECT:

Response to OIG Report - Inspection of Port-au-Prince, Haiti

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

Recommendation 20: The Bureau of Overseas Buildings Operations, in coordination with Embassy Port-au-Prince, should connect the "Stecher-Roumain" housing compound to the local power grid, and put funds of up to \$3.03 million over 5 years to better use. (OBO, in coordination with Embassy Port-au-Prince)

OBO Response, June 2019: OBO is in the process of developing a scope of work to connect the Stecher-Roumain housing compound to the local power grid. A local firm recently completed a survey of the work and OBO will engage a U.S. engineering firm to complete the design and evaluate the execution method for the construction/connection between local power and the housing complex. OBO anticipates the Design award for fiscal year 2019.

The point of contact for this memorandum is Amy Gertsch, Division Director, Policy and Policy Analysis.

UNCLASSIFIED

## **ABBREVIATIONS**

COR Contracting Officer's Representative

DCM Deputy Chief of Mission

FAH Foreign Affairs Handbook

FAM Foreign Affairs Manual

FAST First- and Second-Tour

ICASS International Cooperative Administrative Support Services

ICS Integrated Country Strategy

ILMS Integrated Logistics Management System

INL International Narcotics and Law Enforcement Affairs

ISSO Information Systems Security Officer

LE Locally Employed

OBO Bureau of Overseas Buildings Operations

PEPFAR President's Emergency Plan for AIDS Relief

POSHO Post Occupational Safety and Health Officer

## **OIG INSPECTION TEAM MEMBERS**

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Derwood Staeben

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# **HELP FIGHT**

FRAUD, WASTE, AND ABUSE

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If you fear reprisal, contact the OIG Whistleblower Coordinator to learn more about your rights. WPEAOmbuds@stateoig.gov