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Inspection of the Bureau of Consular Affairs, Office of Consular Systems and Technology

DOMESTIC OPERATIONS AND SPECIAL REPORTS

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OIG HIGHLIGHTS

ISP-I-17-04

December 2016
OFFICE OF INSPECTIONS
Domestic Operations

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What OIG Found

- The Director of the Office of Consular Systems and Technology implemented a reorganization and new processes to improve the workflow, provide more information on projects, and prioritize work. These actions advanced office and Bureau of Consular Affairs strategic goals and objectives.
- Staffing vacancies, which increased from 14 percent in 2015 to 27 percent in 2016, negatively affected office and bureau-wide operations. Such vacancies—ranging from deputy director to financial officer—hindered the office's ability to carry out day-to-day functions, delayed the development of critical software, and contributed to weak management controls.
- The Office of Consular Systems and Technology stabilized legacy consular systems applications to improve the availability, integrity, and security of the data they contain. However, the office did not develop proper security and contingency plans for its current program to modernize key consular systems.
- The office required improved input, collaboration, and communication with the rest of bureau and with its own staff to effectively manage its legacy systems and ConsularOne development.
- OIG found deficiencies in management controls. Some internal controls were weak or not operating—including required segregation of duties between budget, acquisition, and contracting oversight functions—which increased the risk of fraud, waste and abuse. The office also did not follow Department of State requirements in preparing management control statements of assurance, closing contracts, and monitoring unliquidated obligations. The failure to monitor unliquidated obligations resulted in \$18.54 million that could be put to better use.

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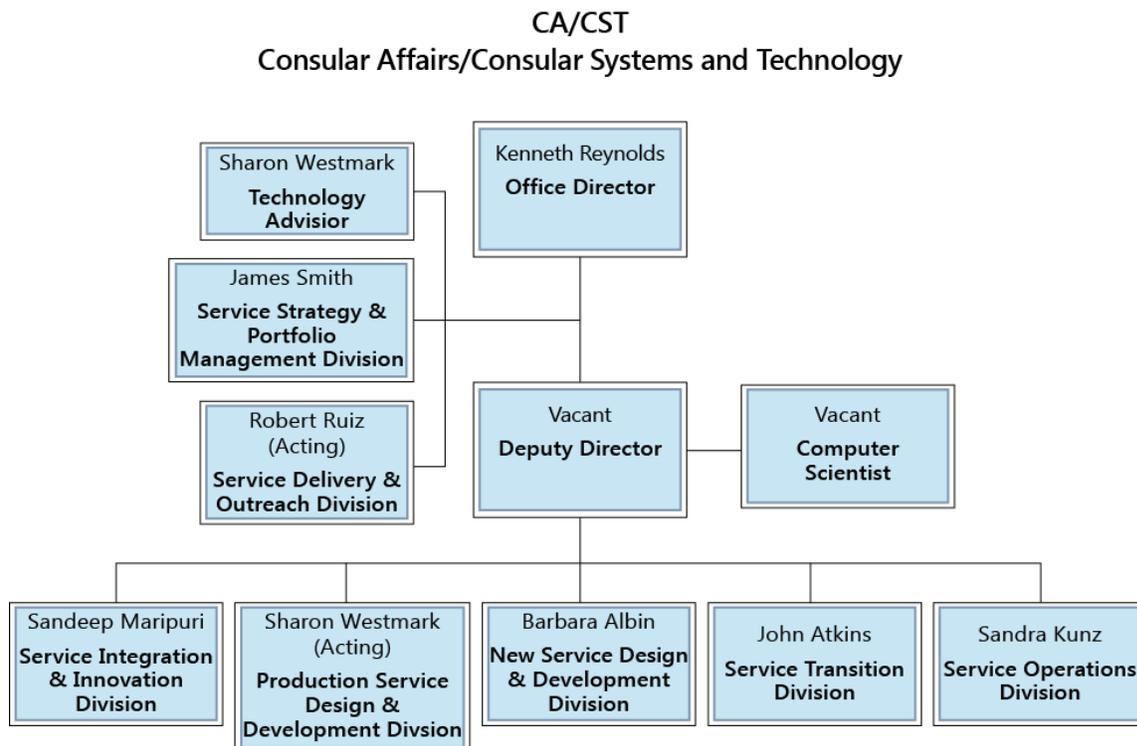
CONTEXT

The mission of the Bureau of Consular Affairs (CA) is to provide consular operations that efficiently and effectively protect U.S. citizens, ensure U.S. security, facilitate the entry of travelers, and foster economic growth. According to its 2015-2017 Functional Bureau Strategy, reliable and secure IT systems are essential to achieving CA's mission and to support its 12,000 employees at 28 domestic passport facilities, 2 domestic visa centers, 8 headquarters offices, and more than 240 consular sections at embassies and consulates around the world.

One of the bureau's strategic goals in its Functional Bureau Strategy is to strengthen the management of IT systems by modernizing systems and infrastructure, increasing the public's access to consular services online, and improving the quality, flexibility, and efficiency of services. CA's Office of Consular Systems and Technology (CST) is tasked with the responsibility to meet this goal. As CA's IT branch, CST's mission is to design, develop, and deploy consular systems, databases, and infrastructure, including modernization efforts to update and integrate consular operations under the ConsularOne program.

CST consists of seven divisions to support its mission:

Figure 1: CA/CST Organization Chart



Source: CA/CST

- The Service Strategy and Portfolio Management Division is responsible for IT governance, enterprise requirements management, project/program management,

acquisitions, contract management, budget planning, and internal management oversight.

- The Service Delivery and Outreach Division is responsible for hardware acquisition, warehouse management, and the deployment of hardware and software to all domestic and overseas consular locations.
- The Service Integration and Innovation Division provides guidance and implementation support in the areas of enterprise architecture, software engineering, and emerging technologies and biometrics.
- The Production Service Design and Development Division develops and maintains production application software, business intelligence and reporting tools, and web content that support CA's mission, as well as application support for legacy consular systems.
- The New Service Design and Development Division selects, designs, and implements new technology services that support CA.
- The Service Transition Division oversees physical security and information systems security.
- The Service Operations Division provides database support and 24/7 consolidated tier I and tier II support for CA systems and applications.

CST maintains many legacy systems which are functioning well beyond their designed lifespan and are becoming less reliable. According to CA's Functional Bureau Strategy, one legacy system is the Consular Consolidated Database (CCD), which contains sensitive and personally identifiable information for the use of officials in CA, other Department of State (Department) bureaus and posts, and other Federal agencies. For example, Department of Homeland Security officials use the CCD as one source of information when making decisions on whether to admit people into the United States, or to grant them immigration benefits.

Outages in the legacy systems during the summers of 2014 and 2015 slowed, and at times stopped, the processing of routine consular services such as adjudicating passport and visa applications and issuing documents. For example, the June 2015 outages halted visa processing for 13 days. This created a backlog of 650,000 visas, which took an additional 5 days to clear.

CA recognized the limitations of these legacy systems and is in the midst of a large modernization program, ConsularOne, to update and integrate consular operations—an effort managed by CST. This new system will consolidate all existing major consular applications into a single system that uses a common interface. CST is designing ConsularOne to facilitate existing workflows and add new functions. According to the Functional Bureau Strategy, the majority of ConsularOne elements were scheduled to be rolled out by the end of FY 2017; however, the current timeline envisions a 2020 completion.

At the time of the inspection, CST staff comprised 135 employees—126 Civil Service and 9 Foreign Service officers—of which 42 positions were vacant as of June 10, 2016. More than 1,000 contractors supported CST.

EXECUTIVE DIRECTION

OIG based the following assessments of CST leadership on the results of 198 documented interviews (87 of which elicited comments about the CST Director); meetings with CA and other bureaus; 298 questionnaires completed by government and contractor staff that rated or commented on leadership performance; 138 customer service questionnaires from customers in CA and at overseas consular posts; and OIG's review of documents and observations of CST meetings and activities during the course of the on-site inspection.

Tone At The Top

Overall, CA senior leaders, CST division directors, and the CST workforce expressed to OIG their confidence in the CST Director's leadership.¹ The CA Assistant Secretary and Deputy Assistant Secretary told OIG that the Director had moved organizational goals forward, despite such challenges as staffing vacancies and tensions with other CA offices. CA named him the permanent Director in May 2016, after nearly a year as acting director. Division chiefs told OIG they had confidence in his leadership, citing such factors as his calm demeanor, business-like approach, and technical acumen. The CST workforce, in responses to OIG personal questionnaires, also demonstrated confidence in the Director, with the overall average ranking of his leadership skills as positive.

Improvements in the Management of CST

The CST Director improved the management of the office. OIG's last inspection of CST in 2011² found a negative atmosphere within the office. Since that inspection, there have been 5 directors or acting directors. OIG interviews with CA and CST managers indicated that the long-standing negative atmosphere was dissipating because of the current Director and the continuity in leadership. Other leaders and managers across CA—including the CA Front Office, other bureau offices, and CST division chiefs—consistently told OIG they valued the current Director's commitment and positive behaviors, which have improved the office atmosphere and restored stability to the office..

The Director's role in improving stability was particularly important. A major outage in the CCD—the legacy system critical to a number of CA functions such as processing visas, issuing passports, and providing overseas citizen services—occurred in June 2015, soon after he became the acting Director. He led the effort, with the help of external stakeholders, to stabilize the CCD. These efforts are discussed in the Stabilizing and Modernizing IT Operations section of this report.

¹ The Department's 10 leadership principles are enumerated in 3 Foreign Affairs Manual 1214, and include such attributes as modeling integrity, planning strategically, being decisive, and taking responsibility.

² OIG, *Inspection of the Bureau of Consular Affairs Office of Computer Systems and Technology* (ISP-I-11-51, May 2011).

The Director implemented organizational and process improvements that support CA and CST goals by facilitating and managing project workflow and identifying priorities. For example, the Director implemented a major reorganization of CST, which oriented the office away from a “stove-piped” structure to one where IT projects flowed logically from portfolio management through design, development, transition, deployment, and operation. The reorganization was consistent with the CA’s Functional Bureau Strategy objective of implementing an IT service management framework across the organization.

The Director also implemented a CST-wide integrated master schedule to improve the management of IT projects throughout the office. The schedule estimated the workload and timeframes for each project and tracked its progress, helping to manage all projects systematically. In contrast, the previous approach made it difficult to hold project managers accountable. The integrated master schedule, and the process it represents, was consistent with the CST strategic plan objectives to create a prioritization system for all CST projects, to assure that project approaches and resource allocations align to priorities, and to identify and resolve resource capacity bottlenecks.

Internal Controls

Despite Improvements, Serious Challenges Remain

Despite these improvements, OIG identified several serious management challenges that needed urgent attention. As the top manager in CST, the Director is responsible for ensuring that internal controls are in place to provide reasonable assurance that the organization’s objectives will be achieved.³ These internal control issues cover all aspects of the organizations objectives—operations, reporting, and compliance. They include problems regarding staff shortfalls, coordination and communication with other CA offices and within CST, management of the ConsularOne modernization program, information security, management controls, financial management, and acquisition management. In several areas, internal controls were weak or missing, thus increasing the risk of fraud, waste and abuse. More details on each of these challenges—many of which were long-standing—are in the Stabilizing and Modernizing IT Operations and the Resource Management sections of this report.

In addition, staff vacancies—including in the deputy director position—negatively affected CST operations and other CA offices. Staffing vacancies will continue to challenge CST in the absence of resources.

Need to Fill Deputy Director Position

With the May 2016 appointment of the deputy director as the permanent Director, the deputy director position became vacant. Appointing a deputy director would be an effective way to assist the Director in focusing on CST’s management challenges. This position had essentially

³ Government Accountability Office, *Standards for Internal Control in the Federal Government*, (GAO-14-704G, September 2014), Principle 14.

been vacant since June 2015 when the incumbent assumed the acting director positions. He told OIG that he chose not to appoint an acting deputy director because he needed all the division chiefs to focus full time on their division needs. However, CST division chiefs told OIG that having one person responsible for both the director and deputy director duties created an excessive workload, forcing the Director to conduct triage between managing daily operations, liaising with other CA offices, overseeing management controls, and planning for the future. Department standards allow for a deputy when the volume and nature of the principal's work cannot be effectively accomplished by one person.⁴ This is such a situation. A deputy is expected to participate with the principal in carrying out the full range of management responsibilities and to act with full authority over the total work of the organization during the principal's unavailability or absence.

The 2011 OIG inspection of CST showed that hiring a new deputy director could require a lengthy recruitment process. That report noted that the deputy position had been vacant for 18 months. At that time, CST experienced difficulties filling the position and had posted the vacancy four times in 2009 and 2010, with none of the certified candidates selected. In the 2011 report, OIG noted the important role the deputy plays and recommended that the position be filled promptly by bureau leadership.⁵

Recommendation 1: The Bureau of Consular Affairs should fill the deputy director position for the Office of Consular Systems and Technology. (Action: CA)

Vacancies Hinder Program Implementation

CST staffing vacancies and challenges with the hiring process hindered the office's progress in completing ongoing projects and in carrying out day-to-day functions. The Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government*,⁶ states that management should establish an organizational structure, assign responsibility, and delegate authority to achieve the agency's objectives by recruiting, developing, and retaining competent individuals. Both CA and CST identified staff recruitment as a high priority. The FY 2015-2017 Functional Bureau Strategy (updated in November 2013) noted that the bureau should identify and manage staffing gaps, and recruit high-caliber candidates for vacancies in IT. In addition, CA's Strategic Plan for 2014-2016 included objectives to aggressively recruit high-quality staff, hire more technical talent in key roles, and develop more internal technical subject matter experts.

Yet staffing vacancies at CST, which increased from 14 percent in 2015 to 27 percent in 2016, remained a pervasive concern within the office and bureau. CST employees told OIG that they did not know what could be accomplished with a full staff because it had never occurred.

⁴ The Foreign Affairs Manual, 1 FAM 014.7, "Organizational Policies and Criteria", dated 8/27/2014.

⁵ ISP-I-11-51, May 2011. OIG closed the referenced recommendation in its compliance response dated September 30, 2011.

⁶ GAO-14-704G, September 2014. Principle 3.

During this inspection, CST was staffed below the authorized full time equivalent levels across the office. Such staffing shortfalls also were described in OIG's 2011 CST inspection. Over the last three years, CST's authorized positions increased by 13 percent, while at the same time its actual staffing decreased by 27 percent.

CA's Human Resources Division worked with CST to address its vacancy and hiring issues. For example, the Human Resources Division created a vacancy tracker to monitor progress in meeting the Department's goal of 80 days to identify, process, and fill a vacancy. The tracker showed that the 5 CST vacancies filled in 2015 took an average of 116 days to identify, process, and fill—significantly more than the 80-day goal.

Based on interviews, OIG found that CST managers lacked sufficient time to perform their required tasks in the hiring process because they were in meetings throughout the work day. The result was a delay in hiring the people they needed to manage the workload. The June 2016 update to the vacancy tracker showed that CST identified 38 vacancies. The office had identified 12 of these in October 2015 but had yet to forward paperwork to the Human Resources Division to start the vacancy announcement process—a delay of 8 months as of mid-June 2016. The Director designated 6 of the 12 as high priority positions for recruitment. OIG advised the Director and the division chiefs of the need for CST managers to dedicate time each week to filling staff vacancies. Further, OIG found that problems retaining existing employees exacerbated CST's staffing shortfalls. CST employees told OIG that turnover was caused by a variety of factors, such as people accepting promotions elsewhere, leaving for personal reasons, and working arrangements. Staff also cited disparities among divisions in allowing telework and providing awards, as well as poor internal communication, as reasons for turnover.

CST managers concluded that staff vacancies delayed software development timelines by 15 percent. In addition, and as discussed in detail in the Resource Management section of this report, vacancies in positions related to management controls weakened internal controls and increased the risks of fraud, waste and abuse.

Recommendation 2: The Bureau of Consular Affairs should implement a plan to expedite the filling of staff vacancies in the Office of Consular Systems and Technology. (Action: CA)

STABILIZING AND MODERNIZING IT SYSTEMS

Stabilization Progressing For Legacy Systems

CCD's major outages in 2014 and 2015 highlighted the need for CST to improve and stabilize the legacy systems. The CCD—the repository for data (including personally identifiable information) from all the individual consular sections and passport office databases—supports domestic and overseas passport and visa service delivery. Department personnel, as well as those in other agencies such as the Department of Homeland Security, Federal Bureau of Investigation, and Social Security Administration, use the CCD. Because of the CCD's importance to national security, ensuring its data integrity, availability, and confidentiality is vital.

The 2015 CCD outage was the more serious of the two because it resulted in a complete unavailability of a critical portion of the system. This outage stemmed from an issue impacting the system’s storage network and resulted in a loss of that portion of the system, requiring CST to rebuild the database.

CST took several steps to mitigate future risks to the repaired and fully functional system. First, it completed an upgrade and migration of CCD’s underlying commercial software and operating environment to a new platform with improved redundancy and failover capability. Second, CST implemented improved monitoring and alerting capabilities to enable more proactive maintenance actions. Third, it designed additional backup and recovery solutions to augment existing capabilities and to provide multiple, fast recovery options in the event of a future hardware failure. CST used software tools and worked with other Department and Federal agencies to mitigate risks and trace and monitor any changes to the database that could signal a risk or problem. In fall 2015, several media outlets reported that the CCD was either vulnerable to hacking or had been successfully hacked. These reports originated from the bureau’s attempts to improve its data protections by identifying vulnerabilities and correcting them rather than from an outside hacking attempt. CST reported the status of these efforts to the Deputy Secretary of State for Management and Resources on a biweekly basis.

Improvements Needed for Modernization

Delays in Consular Systems Modernization

CST began a modernization program for consular operations in 2009, but the first component was not expected to be deployed until the end of 2016. Originally, CA intended to develop a global visa system to integrate nonimmigrant and immigrant visa processes into one system, followed soon afterwards with a global citizens services system. But in 2011 CA decided to cancel both programs and fold them into an enterprise-wide system. The chart below shows the current timeline for CA’s systems modernization efforts.

Figure 2: Consular Systems Modernization Efforts



Source: Information provided by CST

The current program, known as ConsularOne, is intended to integrate and replace the nearly 100 applications currently supporting consular operations. CST was responsible for designing and delivering the information systems for the ConsularOne effort. In its 2015-2017 Functional Bureau Strategy, CA said the majority of ConsularOne elements would be rolled out by the end

of FY 2017. However, as of this inspection, no part of ConsularOne had been deployed. In their responses to an OIG survey, officers in overseas consular sections and domestic CA offices expressed doubt about CST's capacity to successfully execute ConsularOne in a timely manner.

CST staff cited contracting delays and operational considerations as contributing to ConsularOne's deployment delays. In April 2016, CA announced a nearly 2-year delay in deploying the online passport renewal project that was originally scheduled to be released early in the modernization program to assist with the expected 2017 surge⁷ in passport applications. For operational reasons, the Passport Services Directorate agreed to postpone deployment of the online passport renewal project until after the expected surge. OIG noted during the inspection that CST and the Bureau of Administration Office of Acquisitions were actively preparing to issue a Request for Proposals for a large contract designed to integrate the development of all elements of ConsularOne.

Inappropriate System Owner for ConsularOne

CST designated the Service Transition Division chief as the system owner for ConsularOne, but the position did not have the necessary span of control required by 5 Foreign Affairs Manual (FAM) 825. This guidance requires that a system owner be responsible and accountable for managing all aspects of the system throughout its life cycle, including business aspects such as funding and training. However, the current system owner was not involved with project or system funding and was unable to represent the interests of ConsularOne throughout its life cycle. CST was unable to provide to OIG the official designation memo that assigned the current system owner, but the ConsularOne project team leads and bureau leadership told OIG that the Service Transition Division chief held that role. The division chief also told OIG that while he understood the designation was to be temporary, he had been in the role for approximately 1 year with no discussion of re-designating the assignment. The designation of a system owner without responsibility for the complete life cycle of the system risks a loss of critical oversight for major components of development, implementation, and operations, including cyber security and contingency planning.

Recommendation 3: The Bureau of Consular Affairs should designate a system owner for ConsularOne who is responsible and accountable for all aspects of the system throughout its life cycle. (Action: CA)

No System Security Plan for ConsularOne

The ConsularOne system did not have a system security plan as required by 12 FAM 620 and National Institute of Standards and Technology Special Publication 800-37⁸. These guidelines

⁷ Based on the Passport Services Directorate's analysis of renewal application trends, CA expects that passport renewal rates will significantly increase from previous years beginning in FY 2017, to a rate of approximately 31 percent of total application receipts, or 5.6 million renewal applicants per year, compared with 28 percent in FY 2012.

⁸ National Institute for Standards and Technology Special Publication 800-37: Guide for Applying the Risk Management Framework to Federal Information Systems, June 2014.

require a system security plan to be created during the concept phase of a system's development life cycle. Dozens of ConsularOne project activities since 2013 had been documented on the ConsularOne Activity Tracker website, including scope management, risk management, procurement, and strategy. No system security plans were included.

CST managers told OIG they did not believe a ConsularOne system security plan should be developed yet since developers had not finished identifying the system boundaries—the set of resources allocated to an information system, including personnel, equipment, funds, and information technology. However, according to 12 FAM 623.15 and 12 Foreign Affairs Handbook (FAH)-10 H-322.1, organizations have significant flexibility in determining what constitutes an information system and its associated boundary and determinations should be revisited periodically. Without a system security plan for ConsularOne, CST is at risk of having sensitive information accessed or used by unauthorized individuals, potentially affecting national security.

Recommendation 4: The Bureau of Consular Affairs should create a system security plan for ConsularOne. (Action: CA)

No Contingency Plan for ConsularOne

CST had not completed a contingency plan for the ConsularOne modernization project in accordance with 5 FAM 850, 12 FAM 623.7, and 12 FAH-10 H-230. CST staff told OIG they did not believe the project was mature enough to warrant a contingency plan. As with system security plans, integrating contingency plans early in the development of systems projects is the most cost-effective and efficient method to ensure that an information protection strategy is implemented throughout the system development life cycle. Department standards require that a contingency planning component be integrated into new systems during the detailed design phase of the system life cycle. The ConsularOne Frequently Asked Questions web page indicated that the detailed design phase was completed and that development was fully underway for the first two ConsularOne projects. The effects of the CCD system outages highlight the importance of contingency plans and the need to ensure data integrity, availability, and confidentiality.

Recommendation 5: The Bureau of Consular Affairs should create a contingency plan for ConsularOne. (Action: CA)

Coordination on Systems Matters Needs Improvement

In order to manage ConsularOne development efficiently and effectively, as well as maintain existing consular systems, CST required input from and collaboration and communication with the rest of CA⁹. However, this did not always occur. In addition, CST needed to improve its communication with users of consular systems in domestic and overseas operations.

⁹ In addition to CST, other CA business units are the Directorates of Passport Services, Visa Services, and Overseas Citizens Services; and the Offices of the Comptroller, 1CA, Deputy Assistant Secretary for Resources, Executive Director, Fraud Prevention Programs, and Policy Coordination and Public Affairs.

A 2015 GAO report¹⁰ listed nine critical factors that support the management of large-scale IT acquisitions across the Federal government. Three of those factors relate to coordination and communication:

- Program officials actively engaging with stakeholders.
- End users and stakeholders involved in the development of requirements.
- End users participating in testing of system functionality prior to end user acceptance testing.

Process for Approving Changes to Existing Systems Needs Refining

In 2012, CA created the Senior Steering Group (SSG)—a group of senior CA leaders and managers who meet to consider and prioritize IT projects bureau-wide. In August 2015, the SSG approved a strategy to maintain a 5-year modernization schedule while limiting changes to existing systems to those required for stabilization or implementation of legal or policy mandates. OIG observed an SSG meeting, interviewed representatives in the bureau’s business units, and attended a CST meeting on how to implement SSG decisions. OIG found that the process for setting priorities satisfied neither CST nor the other business units, and that CST did not have the capacity to engineer all the changes the business units believed they needed to improve operational efficiency. Given overall resource constraints, continuing to make changes to existing systems risks delaying the launch of ConsularOne applications. OIG advised CA to consider both imposing a limit on how many projects can be approved and giving greater weight to change requests from business units, such as the Visa Services Directorate, whose applications will be modernized later in the ConsularOne process.

Lack of Dedicated CA Staff to Support ConsularOne

CA had not assigned dedicated bureau staff to support ConsularOne. The bureau did not have a uniform, detailed, timely, and systematic method for the other CA business units to provide needed user and business practice information to the ConsularOne development process. Defining requirements is a critical part of any system development process and begins very early in the process, according to Federal IT standards.¹¹ CST used elements of the Agile methodology¹² for systems development, an approach that requires frequent meetings with all business units participating fully in the system development process.

Two directorates—Passport Services and Visa Services—participated in this process effectively. In particular, these directorates had IT liaison offices with the staffing and expertise to conduct business practice reviews, coordinate field user groups, and attend ConsularOne development

¹⁰ GAO, *High-Risk Series: An Update* (GAO-15-290, February 2015), Section “Improving the Management of Information Technology (IT) Acquisitions and Operations,” p. 38

¹¹ National Institute for Standards and Technology Special Publication 800-37, p. 9, section 2.2.

¹² The Agile methodology is an incremental, fast-paced style of software development designed to reduce the risk of failure, in which cross-functional teams meet frequently to coordinate next steps. Agile methodology requires close coordination and rapid responses to commitments made at implementation meetings.

meetings. Leaders in the Passport Services Directorate ensured that needed input was approved quickly at appropriate levels in order to keep up with the pace of the Agile process. The Passport Services Directorate's method of working with CST could serve as a model for other business units.

However, smaller CA business units, including the Overseas Citizens Services Directorate, the Office of Fraud Prevention Programs, and the Office of Policy Coordination and Public Affairs, delegated the systems liaison role to staff with other, and sometimes more urgent, responsibilities. They did not request additional financial or human resources to coordinate business practice reviews or user groups to ensure that the processes being automated were optimal for users in the field. In addition, these smaller offices were unable to send a representative to all ConsularOne development meetings. Not all business units may need a full-time staff member in this role. Instead, CA could consider having a larger office represent one or more smaller offices in the ConsularOne process. Regardless of the specific approach, CA must incorporate modernized business practices and the needs of users into ConsularOne's design. To do otherwise risks misuse of government funds to develop a system that will not meet the needs of CA, other agencies, or the public.

Recommendation 6: The Bureau of Consular Affairs should require all its directorates and offices to assign dedicated staff to support ConsularOne, employing a shared services concept where appropriate. (Action: CA)

Process for Scheduling System Maintenance Outages Problematic

CST did not have sufficient routine, scheduled, and predictable times available to take consular systems offline to perform systems maintenance (maintenance outages). GAO standards¹³ specify that management design appropriate control activities for IT systems.

This is a longstanding problem. In the 2014 inspection report of CA's Visa Services Directorate¹⁴, OIG recommended that CA establish system outage periods. In response, CA told OIG that a weekly maintenance window (four hours on Saturdays, when no component of CA's worldwide operations had normal business hours) satisfied that recommendation. In practice, however, OIG found that CST was not always able to use the weekly maintenance window because CA management allowed overseas consular sections and domestic passport agencies to schedule overtime work during this time frame. CST had no authority to override the scheduled overtime work by overseas and domestic consular offices. In addition to a weekly maintenance window, CST required longer outages on a quarterly basis. Outages should be scheduled and publicized up to a year in advance and reserved solely for CST's use to maintain, fix or upgrade consular systems.

¹³ GAO-14-740G, Principles 11.06-11.08, page 54

¹⁴ OIG, *Inspection of the Bureau of Consular Affairs, Visa Services Directorate* (ISP-I-15-01, October 2014).

Senior CA leadership gave insufficient priority to CST's need to perform systems maintenance and had therefore not blocked enough time for these outages. Without reserved outage times for system maintenance, CST wasted money and man-hours and could not effectively plan its work. Postponing maintenance outages delayed system maintenance, which risked failure of consular systems, potentially affecting CA operations worldwide.

Recommendation 7: The Bureau of Consular Affairs should publish scheduled system maintenance outages, including weekly maintenance windows and periodic longer outages, in which the Office of Consular Systems and Technology has complete authority to take systems offline. (Action: CA)

Lack of Understanding about Consular Systems Modernization

CST did not communicate information to its users in ways that promoted understanding of consular systems technology matters. GAO standards¹⁵ state that management should internally communicate the necessary quality information to achieve the entity's objectives. Responses received to an April 2016 OIG survey of overseas consular managers and some domestic CA offices indicated that 45 out of 139 respondents had received little information about consular systems technology matters. In particular, many CA users lacked information about CST's plans and timeline for systems modernization.

CST's principal tool to communicate with users about the progress of modernization was a blog on the Department's intranet web site. CST told OIG the blog had about 500 subscribers out of 12,000 consular employees worldwide. OIG found that it used very technical terms unsuitable for a general audience. Furthermore, OIG's customer service survey found that many potential users were unaware of the blog. The geographic dispersion and diversity of those who need to learn about ConsularOne present unique challenges to CST in sharing information. CST hired a contractor to help with organizational change management, of which communication is a part. CA also has an Office of Policy Coordination and Public Affairs with expertise in messaging for a general audience, but this office did not assist CST in preparing material for the blog. Assistance from CA's public affairs professionals could help CST prepare targeted information for bureau users. Without clarity about the plans and timelines for modernization, CA users continue to press for improvements to existing systems and to express skepticism about the viability of ConsularOne.

Recommendation 8: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology, with assistance from its Office of Policy Coordination and Public Affairs, to design a plan for communication with consular users that would promote understanding of the stages, timeline, and content of the consular systems modernization program. (Action: CA)

¹⁵ GAO-14-704G, September 2014, Principle 14.

Lack of Routine Sharing of Information By Division Directors

CST staff reported in OIG questionnaires and interviews that they did not receive information regularly from division directors regarding matters affecting their work. GAO standards¹⁶ state that management should internally communicate the necessary quality information to achieve the entity's objectives. In addition, CA's Consular Management Handbook¹⁷ contains a framework for consular management that stresses the importance of strong internal communication. The CST Director made a significant effort in the months before the inspection to improve communications through monthly brown bag sessions and quarterly all hands meetings. The Director also briefed CST division directors at daily and weekly meetings with the understanding that they would in turn brief their staff members about significant issues. However, not all relevant information reached the staff level, in part because some divisions held infrequent meetings. OIG noted that CST's communications team, which has responsibility for internal communications, did not distribute notes from the weekly division directors' meeting. Without timely knowledge about broad CA initiatives and decisions, staff may be unable to set priorities appropriately or coordinate with colleagues to respond to urgent requirements.

Recommendation 9: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to convey information from its division directors meeting to its staff. (Action: CA)

Other IT Management and Security Issues

Lack of Updated Internal Procedures and Policies

CST employees lacked up-to-date guidance about internal office procedures and policies. CST had not updated its policies on project management, change management, integrated service life cycle, or CST in-progress reviews to reflect changes from its 2014 reorganization. OIG located standard operating procedures on CST's SharePoint site; however, these policy documents were dated 2011-2013 and were difficult to find. For example, OIG located CST's standard operating procedures on a SharePoint tab entitled "Administrative Assistants". Moreover, the files were not organized according to the type of content. GAO standards¹⁸ require management to use quality information to achieve the entity's objectives. CA's Consular Management Handbook¹⁹ contains a framework for consular management that emphasizes the importance of standard operating procedures to achieve clarity, transparency, and accountability. Without access to current policy guidance, CST staff, many of whom are new to the office and the U.S. Government, risk making avoidable errors affecting CST's mission.

¹⁶ GAO-14-704G, September 2014, Principle 14..

¹⁷ Consular Management Handbook, 7 FAH-1 H-241 and 7 FAH-1 H-242, dated November 27, 2013.

¹⁸ GAO-14-704G, September 2014, Principle 14.

¹⁹ 7 FAH-1 H-242 and 7 FAH-1 H-264, dated November 27, 2013.

Recommendation 10: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to update its internal procedures and policies. (Action: CA)

Self-Help Troubleshooting Web Site Is Ineffective

CA offices were unable to quickly and efficiently troubleshoot simple IT problems using CST's self-help web pages. Domestic and overseas scores for web site usefulness in OIG pre-inspection customer surveys were both below average. Survey responses included remarks about difficulties navigating in the website, irrelevant search responses, slow and confusing web site functions, and out-of-date and disorganized material. Users reported that problems that could have been resolved at a local level had to be escalated to the help desk, requiring staff time that could be more effectively used elsewhere. GAO standards²⁰ require that management use the necessary quality information to achieve the entity's objectives.

Recommendation 11: The Bureau of Consular Affairs should redesign its trouble-shooting websites for improved effectiveness and relevance. (Action: CA)

Lack of Dedicated Staff and Internal Procedures for CST's Record Management Program

CST had neither dedicated staff managing the office's records management program nor internal guidance on this subject. Therefore, CST did not have an active records management program to include adequate creation, maintenance, use, and disposition of records in accordance with 5 FAM 400.

CST assigned responsibility for ensuring that Department records management standards were being followed to a position within its Service Strategy and Portfolio Management Division. However, that position had been vacant for approximately 1 year at the time of the inspection. Management's internal tracking spreadsheet for human resources actions indicated that filling the position was a low priority for CST. Further, CST did not provide guidance to staff on how files and records should be maintained. As a result, office staff used several ways to maintain documents, including SharePoint libraries, network shared drives, individual user email folders, and hard copies located throughout the office. An OIG review of the network shared drives showed myriad folders with unclear naming conventions and poor organization, and files saved as long ago as 2006.

CST had not reached out to the bureau records coordinator, who could assist in reviewing the office's record management practices, reviewing files, and establishing an archiving and disposition schedule.

Recommendation 12: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to assign a dedicated team to manage the office's records management program. (Action: CA)

²⁰ GAO-14-704G, September 2014, Principle 14.

Information Systems Security Officer Duties Not Performed

Designated Information Systems Security Officers (ISSO) for CST were not performing all of the duties required by 12 FAM 632, 12 FAH-10, and 5 FAM 824. Security controls were not in place to ensure that all ISSO cyber security functions were performed and completed. OIG found that random scans of users' email accounts and personal folders were not being performed. There were multiple instances of expired Cyber Security Awareness user training certificates. Five ISSOs were named in a designation memo; however, the memo did not identify the systems for which each would be responsible, and no one was identified as primary or alternate.

Department standards require that each domestic system have a designated primary and alternate ISSO who conducts monthly reviews of randomly selected user accounts for prohibited or unauthorized items, and executes desktop security audits including random security scans. Further, Department standards also require that ISSOs ensure that users complete Cyber Security Awareness training annually. Not fully performing ISSO responsibilities puts CST's data at risk for loss or abuse, including the potential for unauthorized access to personally identifiable information.

Recommendation 13: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to implement an action plan with milestones for monitoring the performance of Information System Security Officer required duties at its locations. (Action: CA)

Closing Hours Security Checks Not Conducted

CST did not perform closing hours checks to ensure the safeguarding of classified material, nor did it have a closing hours security check policy as required by 12 FAM 534.2. A Bureau Security Officer was assigned from the Bureau of Diplomatic Security to serve as a subject matter expert and advisor on all matters that pertain to the safeguarding of classified and sensitive but unclassified material. Two Unit Security Officers were assigned the day-to-day management of CST security programs. Department guidance requires closing hours security checks and the use of Standard Form SF-701 to document them. However, CST did not designate employees on a weekly basis to conduct these checks of its offices. CST management did not pay enough attention to these procedural security requirements. Failing to implement and enforce a closing hours policy increases the risk that classified material could be compromised. In April 2016, the CST Security Branch submitted a draft policy to CST management; however, as of the conclusion of this on-site inspection, the policy was still awaiting the Director's approval.

Recommendation 14: The Bureau of Consular Affairs, in coordination with the Bureau of Diplomatic Security, should require the Office of Consular Systems and Technology to implement closing hours checks for its designated areas. (Action: CA, in coordination with DS)

RESOURCE MANAGEMENT

Financial Resources

At the time of the inspection, the CST FY 2016 budget was approved at \$573 million—an increase of approximately \$259 million from FY 2015. This is a one-year increase of approximately 49 percent. Much of the increase was for new passport books and related printers, software, and implementation. The remainder was funding for the ConsularOne modernization effort.

Figure 3: Computer Systems Technology Budget, FY 2015- FY 2017

(\$ in thousands)	FY 2015 (actual)	FY 2016 (Revised)	FY 2017 (President's Budget)*
Computer Systems Technology (CST)	314,915	470,690	388,232
Service Production Systems	*	*	80,711
Consular Systems Modernization	*	*	81,341
Enterprise & Infrastructure Operations	*	*	226,180
Consular Systems Support	65,347	64,197	*
Consular Systems Development & Enhancements	26,969	26,027	*
Enterprise Engineering & Data Management	37,708	31,753	*
Enterprise Operations	138,582	255,364	*
Enterprise Management Services	46,309	93,349	*

Source: Bureau of Consular Affairs Office of the Comptroller

* Data was captured differently in FY 2015 and FY 2016, resulting in no amounts shown. In FY 2017, CST restructured its portfolios from 5 to 3 items.

The FY 2017 President's Budget did not take into account the FY 2016 increases. The majority of the CST budget comes from Machine Readable Visa fee collections, with some additional funds from the Passport Security Surcharge. CST's budget, once authorized, are no-year funds and do not have to be obligated or spent within the fiscal year.

For FY 2017, CST revised its budget structure to align its services with Department and Office of Management and Budget categories. To facilitate this change, CST hired a management consulting firm that specializes in financial management, capital planning and investment control, and program management support to develop a budget crosswalk to transition to the new budget structure.

Management Controls

Improperly Completed Management Control Statement of Assurance

CST's 2015 review of management controls did not conform to Department requirements cited in the Management Control Statement of Assurance (MCSOA) memorandum to assistant secretaries and bureau directors. Specifically, CST's review did not include the plans, methods, policies, and procedures used to fulfill the Department's mission, strategic plan, goals, and objectives. Instead, CST relied on ongoing business meetings, periodic reports, and reviews conducted during the year to perform its 2015 MCSOA. However, these reports and reviews were not designed to examine CST's internal controls and did not include an assessment of its organizational structure, staffing, plans, and operating procedures.

CST management did not consider all aspects of internal controls due to an incomplete understanding of the requirements. This occurred because the office did not use checklists to guide the review and did not require any documentation to support the MCSOA. Without including all required components in its internal controls assessment, CA and CST management may be unaware of crucial strategic and operational matters that could impact the fulfillment of CST's mission.

Recommendation 15: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to include a review of the organizational structure, staffing, policies, and procedures in its assessment for the annual Management Control Statement of Assurance, and to document this review. (Action: CA)

Lack of Complete Reporting of Internal Significant Deficiencies

CST did not fully report internal significant deficiencies in attachment 4 of its annual MCSOA. According to the MSCOA guidance to assistant secretaries and bureau directors, matters identified by bureaus that do not reach the level of a Department material weakness or significant deficiency should be reported to the bureau management control coordinators in the MSCOA attachment.

In its MSCOA, CST included details on stabilizing the CCD, but did not include the effect staffing vacancies, outdated internal operating procedures, or delays in contracting and acquisition had on its ability to fulfill its mission. For example, vacancies in CST resulted in delays and in numerous short-term bridge contracts, acquisition planning deficiencies (such as in the large labor services contract discussed below), contract administration deficiencies (such as failure to close out contracts and process unliquidated obligations), and high interest penalties for late invoice processing. Delays in contracts and acquisitions (including protests) affect major plans for improvements, such as the implementation of new passport books and the online passport renewal project of ConsularOne, as well as annual spending plans. CST also lacked internal operating procedures, including policies on records management, as discussed in the Stabilizing and Modernizing IT Systems section of this report. CST did not fully report internal deficiencies due to an incomplete understanding of the requirements.

Recommendation 16: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to include the reporting of internal deficiencies in attachment 4 of the annual Management Control Statement of Assurance, including control deficiencies in organizational structure, staffing, and procedural management controls. (Action: CA)

Lack of Review of and Incorrect Reporting of a Large Labor Services Contract

Neither the CA Assistant Secretary nor the two contracting officers had approved the acquisition plan for CST's labor service contract²¹, valued at over \$25 million, nor did it have milestone dates. In addition, there was no documentation to show a CST management review of the contract to support statements made in the office's annual MCSOA. According to the MCSOA memorandum to assistant secretaries and bureau directors, bureaus were to attest in their assurance statements the effectiveness of the initial planning and continuous oversight of service contracts with anticipated annual expenditures exceeding \$25 million for any year during the period of performance. This attestation, required by the Department's Quadrennial Diplomacy and Development Review, was meant to ensure that a bureau approved the acquisition plans and considered all necessary resources needed to successfully fund, implement, support, and oversee service contracts over \$25 million.

CST did not properly report on this matter due to its reliance on ongoing contract administration reports and other periodic reporting, none of which identified the deficiencies noted above. Without proper review, there is a risk of incorrect reporting of existing conditions to senior Department management and failure to identify and correct deficiencies in contract administration. Additionally, weak internal controls in acquisition planning and contract administration increase the risk of fraud, waste, abuse, and contract mismanagement.

Recommendation 17: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to conduct and document a review of its labor service contract in accordance with the annual Management Control Statement of Assurance, to include the reporting on the status of the acquisition plan, funding, and oversight of this contract. (Action: CA)

Incorrect Reporting of Unliquidated Obligations

CST's 2015 MCSOA reported details of an audit performed on its unliquidated obligations; however, documentation provided by CST to OIG showed the audit was conducted in April 2012. MCSOA guidance on the annual review required bureaus to report only current year activity. Among the reasons CST incorrectly reported unliquidated obligations was its reliance on periodic reviews without obtaining documentation or verifying the current situation. Without accurate and timely reporting, management risks not taking necessary action to address issues regarding current activity and conditions.

²¹ Contract Number SAQMMA15C0071.

Recommendation 18: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to report reviews on its annual Management Control Statement of Assurance that are limited to the current year. (Action: CA)

Financial Management Internal Controls

To coordinate budget and financial management matters, CST works with CA's Office of the Comptroller, which has responsibility for overall management of the bureau's budget. OIG found that coordination was weak. For example, at the time of the inspection, the Office of the Comptroller position responsible for working with CST was vacant, and the CST Financial Management Division had been operating under an acting chief for 9 months. In addition, both the senior and mid-level positions with budget and financial management responsibilities in CST's IT Investment Planning and Financial Management (IIPFM) branch had been vacant for nearly a year. These staffing vacancies caused some of the internal control problems described earlier in this section of the report. OIG made a recommendation to address staff vacancies in the Stabilizing and Modernizing IT Systems section.

Lack of Financial Management Position Descriptions

CST did not have a designated financial management specialist position, even though the office was responsible for budget formulation and execution of the FY 2016 budget. At the time of the inspection, CST had a management analyst position whose assigned responsibilities include the more general analytical capabilities for IT capital investment planning. Further, position descriptions for IIPFM positions that should have these responsibilities did not include evaluation factors for knowledge of budget formulation and execution or for any aspect of Federal financial management. In accordance with 1 FAM 014.1, CST should ensure the most effective use of resources to strike a balance among the needs of the office and efficiency of operations. Inaccurate position descriptions make it difficult to hire staff with the requisite knowledge of budget formulation and execution. Without adequate financial management position descriptions, CST risks compromising its internal control procedures with an increased potential of fraud, waste and abuse.

Recommendation 19: The Bureau of Consular Affairs should establish a financial management position in the Office of Consular Systems and Technology. (Action: CA)

Lack of Segregation of Duties for Acquisition and Contracting Responsibilities

CST did not separate acquisition and contracting related responsibilities from financial management duties in the IIPFM branch. This lack of separation of duties was reported in OIG's 2005 inspection of the Bureau of Consular Affairs Executive Office²², which included the predecessor of CST. OIG's 2011 CST inspection²³ also reported confusion between the roles of

²² OIG, *Bureau of Consular Affairs Office of Executive Director*, (ISP-CA-05,05. September 2005).

²³ ISP-I-11-51, May 2011.

CA's Office of the Comptroller and the contracting and procurement functions in CST. Even though CA reported compliance with the recommendations in those reports, the issue remains.

GAO standards²⁴ state that management should consider segregation of duties in designing control activity responsibilities so that incompatible duties are separated and, where such segregation is not practical, design alternative control activities to address the risk. CST officials told OIG they relied on advice and assistance from CA's Human Resources Division in developing the position description. Without adequate separation of duties, CST risks compromising its internal control procedures, which increases the risk of fraud, waste, and abuse.

Recommendation 20: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to separate the performance of acquisition and contracting duties from financial management duties in the position descriptions of the office. (Action: CA)

Lack of Segregation of Duties for Financial Management Contract

CST also did not segregate responsibility for budget and financial management functions from acquisition and contracting functions for the financial management contract.²⁵ CST entered into this contract in March 2016 for the performance of financial management functions, including budget formulation, budget execution, capital planning and investment control, and integrated master scheduling. The director for the division that included CST's acquisitions and contracts responsibilities was the contracting officer's representative (COR) on the contract, while the government technical monitor was the branch chief in the same division. Both had CST acquisition and contracting duties, as well as budget and other financial responsibilities, for the office. The division director was also the COR for other CST contracts. Additionally, CA's Office of the Comptroller had no role in the administration of the contract, although it has overall responsibility for CA's budget, and has the professional budget expertise to oversee the financial and budget system complexities involved in this contract.

GAO's standards²⁶ state that management should consider segregation of duties so that incompatible duties are separated and, where such segregation is not practical, design alternative control activities to address the risk. Additionally, 14 FAH 2-H-143 states the COR should have sufficient technical expertise on the subject matter of the contract to perform effective oversight. In this case, the subject matter technical expertise needed is budget and financial management.

In CST, complete segregation of duties may not be possible; however, an alternative internal control to reduce risk of improper oversight of financial management functions can be achieved by modifying either role for this contract. Additionally, by appointing an employee from the

²⁴ GAO-14-704G, September 2014, Principle 10.

²⁵ Contract Number SAQMM16C0067.

²⁶ GAO-14-704G, September 2014, Principle 10.

Office of the Comptroller as the COR, CST can ensure the professional expertise necessary for oversight is provided.

Recommendation 21: The Bureau of Consular Affairs should designate an employee in the Office of the Comptroller as the contracting officer's representatives on the financial management services contract. (Action: CA)

Contracts and Acquisition Internal Controls

The contracting and acquisition branch was understaffed. In addition, one individual was serving a dual role as the acting branch chief and senior analyst for the financial management branch. Vacancies in key positions were an underlying cause of many of the management control issues reported in this section. OIG made a recommendation to address staff vacancies in the Stabilizing and Modernizing IT Systems section of this report.

OIG did not evaluate CST's contract administration due to a separate OIG audit underway on selected CST contracts at the time of this inspection. However, OIG did review management controls, acquisitions and contracting staffing structure and job series, and acquisition planning for labor service contracts over \$25 million.

Lack of Sufficient Number of Contracting Officer's Representatives

CST had too few CORs to provide the required oversight of its 142 contracts with a total value of approximately \$672 million. OIG found that in some contracts, the designated COR was no longer in CST, leaving no one to review contract documentation and monitor reports for accuracy. For the other contracts, the Service Strategy and Portfolio Management division chief was the designated COR. However, the division chief was unable to provide adequate contract oversight due to other work priorities. Without sufficient CORs for its contracts, CST risks continued weaknesses in internal controls over contracts management, resulting in implementation delays and additional costs.

Department of State Acquisition Regulation 601.604(d) requires CORs to be certified by the Bureau of Administration and to have sufficient technical expertise on the contract subject matter to perform effective oversight. GAO standards²⁷ state that management is responsible for evaluating pressure on personnel to help staff fulfill their assigned responsibilities in accordance with the entity's standards of conduct.

Recommendation 22: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to reassign the contracting officer's representative roles for its contracts to multiple qualified personnel to achieve a reasonable division of labor. (Action: CA)

²⁷ GAO-14-704G, September 2014, Principle 5.

Lack of Standard Operating Procedures for Contracts and Acquisitions

CST did not have standard operating procedures for closing out contracts, processing unliquidated obligations, or conducting market research, or for its contracting and acquisitions SharePoint site. Department of State Acquisition Regulation 604.804-70(d) has a contract close-out checklist, and the Bureau of Administration has a contract close-out desk guide, but CST used an internal partial contract close-out procedure that did not result in complete contract close out. In accordance with GAO standards²⁸, management should document in policies its responsibility for an operational process and control activity design, implementation, and operating effectiveness. Management then communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities. The lack of standard operating procedures creates inconsistent and incomplete contract and acquisition activities. Additionally, the organization's internal controls can be ineffective without standard operating procedures.

Recommendation 23: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to develop standard operating procedures for its contract and acquisition processes, including contract close-outs, processing prior year unliquidated obligations, and SharePoint records. (Action: CA)

Lack of Accounting Controls and Obligations Management

CST had a backlog of contracts that had not been closed out since 2013, resulting in approximately \$18.54 million in prior year unliquidated obligations. Staffing deficiencies and workload pressures, along with incomplete internal standard operating procedures for contract closeout, led to CST's failure to process unliquidated obligations. Closing unliquidated obligations would allow CST to recover these no-year funds and put them to better use.

Recommendation 24: The Bureau of Consular Affairs should direct the Office of Consular Systems and Technology to review the \$18.54 million of unliquidated obligations for contracts that require close out and document justifications of remaining prior year balances. (Action: CA)

According to 4 FAM 225, all officers are responsible for managing, tracking, and obligating allotted funds by implementing procedures for the review of obligations and available fund balances, including the review of documents supporting unliquidated obligations with financial management and accounting systems on a monthly basis. CST should monitor its contracts by reviewing obligations and fund balances as required to prevent a backlog of contracts requiring close out in the future.

²⁸ GAO-14-704G, September 2014, Principle 12.

Recommendation 25: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to establish a contract monitoring process to ensure contract close outs are processed in a timely manner. (Action: CA)

Lack of Risk Mitigation Controls for the Financial Management Contract

CST required contract status reports and performance reviews for the financial management contract, but did not have in place all of the risk mitigation controls required by the Department's Procurement Information Bulletin 2011-11, attachment 1, paragraph 1. This Procurement Information Bulletin includes, as a risk mitigation strategy, the scheduling of at least monthly meetings to review progress and make necessary course corrections. However, language in the financial management contract only required quarterly reviews. This may cause a lack of timely corrections to contract activities, potentially resulting in delays and/or extra costs.

Recommendation 26: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to request the Contracting Officer to modify the financial management contract to include required monthly meetings. (Action: CA)

RECOMMENDATIONS

Recommendation 1: The Bureau of Consular Affairs should fill the deputy director position for the Office of Consular Systems and Technology. (Action: CA)

Recommendation 2: The Bureau of Consular Affairs should implement a plan to expedite the filling of staff vacancies in the Office of Consular Systems and Technology. (Action: CA)

Recommendation 3: The Bureau of Consular Affairs should designate a system owner for ConsularOne who is responsible and accountable for all aspects of the system throughout its life cycle. (Action: CA)

Recommendation 4: The Bureau of Consular Affairs should create a system security plan for ConsularOne. (Action: CA)

Recommendation 5: The Bureau of Consular Affairs should create a contingency plan for ConsularOne. (Action: CA)

Recommendation 6: The Bureau of Consular Affairs should require all its directorates and offices to assign dedicated staff to support ConsularOne, employing a shared services concept where appropriate. (Action: CA)

Recommendation 7: The Bureau of Consular Affairs should publish scheduled system maintenance outages, including weekly maintenance windows and periodic longer outages, in which the Office of Consular Systems and Technology has complete authority to take systems offline. (Action: CA)

Recommendation 8: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology, with assistance from its Office of Policy Coordination and Public Affairs, to design a plan for communication with consular users that would promote understanding of the stages, timeline, and content of the consular systems modernization program. (Action: CA)

Recommendation 9: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to convey information from its division directors meeting to its staff. (Action: CA)

Recommendation 10: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to update its internal procedures and policies. (Action: CA)

Recommendation 11: The Bureau of Consular Affairs should redesign its trouble-shooting websites for improved effectiveness and relevance. (Action: CA)

Recommendation 12: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to assign a dedicated team to manage the office's records management program. (Action: CA)

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Recommendation 15: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to include a review of the organizational structure, staffing, policies, and procedures in its assessment for the annual Management Control Statement of Assurance, and to document this review. (Action: CA)

Recommendation 16: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to include the reporting of internal deficiencies in attachment 4 of the annual Management Control Statement of Assurance, including control deficiencies in organizational structure, staffing, and procedural management controls. (Action: CA)

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Recommendation 19: The Bureau of Consular Affairs should establish a financial management position in the Office of Consular Systems and Technology. (Action: CA)

Recommendation 20: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to separate the performance of acquisition and contracting duties from financial management duties in the position descriptions of the office. (Action: CA)

Recommendation 21: The Bureau of Consular Affairs should designate an employee in the Office of the Comptroller as the contracting officer's representatives on the financial management services contract. (Action: CA)

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Recommendation 24: The Bureau of Consular Affairs should direct the Office of Consular Systems and Technology to review the \$18.54 million of unliquidated obligations for contracts that require close out and document justifications of remaining prior year balances. (Action: CA)

Recommendation 25: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to establish a contract monitoring process to ensure contract close outs are processed in a timely manner. (Action: CA)

Recommendation 26: The Bureau of Consular Affairs should require the Office of Consular Systems and Technology to request the Contracting Officer to modify the financial management contract to include required monthly meetings. (Action: CA)

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Front Office:		
Office Director	Kenneth Reynolds*	11/2013
Division Chief, Service Strategy & Portfolio Management Division	James Smith	05/2009
Division Chief, Service Delivery & Outreach Division	Robert Ruiz (acting)	01/2006
Division Chief, Service Integration & Innovation Division	Sandeep Maripuri	02/2014
Division Chief, Service Transition Division	John Atkins	11/1996
Division Chief, New Service Design & Development Division	Barbara Albin	10/2001
Division Chief, Service Operations Division	Sandra Kunz	12/2015
Division Chief, Production Service Design and Development Division	Sharon Westmark (acting)	09/2013

Source: CA/CST

* Kenneth Reynolds was CST Deputy Director from November 2013 to June 2015, and acting Director from June 2015 to May 2016.

APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

This inspection was conducted 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 Broadcasting Board of Governors.

Purpose and Scope

The Office of Inspections provides the Secretary of State, the Chairman of the Broadcasting Board of Governors, and Congress with systematic and independent evaluations of the operations of the Department and the Broadcasting Board of Governors. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; whether U.S. interests are being accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

Methodology

In conducting inspections, OIG reviews pertinent records; as appropriate, circulates, reviews, and compiles the results of survey instruments; conducts onsite interviews; and reviews the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by the review.

For this inspection, OIG conducted approximately 49 interviews in the survey phase and 149 interviews in the inspection phase (some people were interviewed more than once). OIG also reviewed 298 personal questionnaires, 138 customer surveys, 7 bureau liaison surveys, and more than 450 documents.

ABBREVIATIONS

CA	Bureau of Consular Affairs
CCD	Consular Consolidated Database
COR	Contracting Officer's Representative
CST	Office of Consular Systems and Technology
Department	Department of State
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
GAO	Government Accountability Office
IIPFM IT	Investment Planning and Financial Management
ISSO	Information Systems Security Officer
MCSOA	Management Control Statement of Assurance
SSG	Senior Steering Group

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