



**OIG**

**Office of Inspector General**

U.S. Department of State • Broadcasting Board of Governors

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Office of Inspections

April 2017

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# **Inspection of Embassy Colombo, Sri Lanka**

**BUREAU OF SOUTH AND CENTRAL ASIAN AFFAIRS**

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# OIG HIGHLIGHTS

ISP-I-17-14

UNCLASSIFIED

April 2017

OFFICE OF INSPECTIONS

Bureau of South and Central Asian Affairs

Inspection of Embassy Colombo, Sri Lanka

## What OIG Found

- Embassy Colombo engaged proactively with government, media, and civil society in Sri Lanka and Maldives, during a period of significant change in the bilateral relationships with both countries.
- Mission staff praised that the Ambassador for his knowledge and accessibility, but said his last-minute decisions and changes to proposals and projects complicated their planning efforts.
- The Public Affairs Section's strategic planning did not ensure effective management of its resources and programs.
- The embassy's internal controls reviews did not identify deficiencies in six areas that are the subject of recommendations in this report: records management; unannounced cash counts; annual purchase card reviews; fuel management; overtime; and the training needs for grants officer representatives.
- The embassy's management of bulk fuel had numerous physical safety and internal control deficiencies.
- Spotlight on Success: The "iBus" mobile classroom took social media training on the road to diverse and underserved communities.

## What OIG Inspected

OIG inspected U.S. Embassy Colombo from October 31 to November 19, 2016. OIG also inspected embassy operations in Maldives.

## What OIG Recommended

OIG made nine recommendations to improve the embassy's public diplomacy and policy and program implementation, and its motor pool, procurement and financial management.

In their comments on the draft report, Department stakeholders concurred with the recommendations. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. OIG considers the recommendations resolved. The Department's formal written response is reprinted in its entirety in Appendix B.

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## CONTEXT

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Sri Lanka is an island slightly larger than West Virginia in the Indian Ocean, south of India. As Ceylon, it became independent of British rule in 1948; its name was changed to Sri Lanka in 1972. Three-fourths of the population of 22 million is Sinhalese, who are mostly Buddhist; Hindu and Muslim Tamils make up another 20 percent. Tensions between the Sinhalese majority and Tamil separatists erupted into war in 1983. Since the end of the 26-year conflict in 2009, the government has enacted an ambitious program of economic development projects, many of which are financed by loans from the Government of China. Per capita income is around \$10,600 per year (2015 estimated). However, little progress has been made on more contentious and politically difficult issues such as holding accountable those alleged to have been involved in human rights violations and other abuses during the conflict. The President and Prime Minister, who both came into office through a democratic election in January 2015, appear committed to reconciliation, human rights, and the improvement of relations with the United States and international community.

The FY 2015-2017 Integrated Country Strategy (ICS) aims to support the Government of Sri Lanka's accountability and reconciliation efforts and to assist Sri Lanka in addressing structural impediments to good governance and sustainable economic growth. U.S. assistance in these efforts totaled \$3.9 million in FY 2015.

The U.S. Ambassador in Sri Lanka is also accredited to the Republic of Maldives, a group of atolls in the Indian Ocean south-southwest of India. The population of nearly 400,000 is predominantly Sunni Muslim. It became a republic in 1968, three years after independence from Britain. Maldives has grown rapidly into a middle-income country, driven by tourism development, with a per capita income around \$14,900 per year (2015 estimated). Near-term challenges facing the government include diversifying the economy beyond tourism and fishing, reforming public finance, increasing employment opportunities, and combating corruption, cronyism, and a growing drug problem. Over the longer term, global warming threatens this low-lying country; 80 percent of the area is one meter or less above sea level. In Maldives, the U.S. implemented modest people-to-people, environmental, security, anti-terrorism and law enforcement programs totaling \$3.35 million in FY 2015.

Embassy Colombo includes 6 U.S. Government agencies with 75 U.S. direct-hire positions and 452 Locally Employed (LE) staff positions. The U.S. Agency for International Development (USAID) is the second largest agency in the embassy. The Departments of Defense and Homeland Security are also represented. Construction began on a new embassy compound (NEC) in 2016 and is scheduled to be completed in 2020.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.<sup>1</sup> OIG also assessed security, which is covered in a separate classified report. The classified report contains a comprehensive

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<sup>1</sup> See Appendix A.

discussion of the conduct of the security program and issues affecting the safety of mission personnel and facilities.

## EXECUTIVE DIRECTION

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

OIG assessed embassy leadership on the basis of 158 on-site interviews and 45 interviews in Washington that included comments on Front Office performance; 158 questionnaires that U.S. direct-hire and LE staff completed; and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

The Ambassador, a career member of the Senior Foreign Service, arrived in Sri Lanka in August 2015 after serving for two years as a Deputy Assistant Secretary of State in the Bureau of South and Central Asian Affairs. The Deputy Chief of Mission (DCM), also a career member of the Senior Foreign Service, arrived in June 2016, after an assignment as Director of the Office of Press and Public Diplomacy for the Bureau of Near Eastern Affairs.

Embassy staff consistently told OIG that the Ambassador was energetic and extremely knowledgeable about Sri Lanka and the South Asia region, and praised his proactive engagement with government, media and civil society in Sri Lanka and Maldives. OIG observed collegial interaction between the Ambassador and staff in dealing with policy and mission management issues. Staff told OIG that the Ambassador and DCM were accessible, and the Front Office implemented various means to facilitate communication. This included a weekly staff meeting the Ambassador held with LE staff from the Political, Economic, and Public Affairs Sections to review developments from their perspectives, and weekly open office hours when officers and LE staff could discuss any issue with the Ambassador.

The Ambassador and the DCM demonstrated a commitment to integrity and ethical values by adhering to Department standards. The embassy received gifts in accordance with 2 FAM 960 and maintained a gift registry as required by 2 Foreign Affairs Manual (FAM) 964. The embassy reissued its gift and representational policy management notices during the inspection.

### ***Ambassador's Temperament and Uncertainty about His Preferences Resulted in Planning Issues***

Despite the positive comments regarding communication, staff were uncertain of the Ambassador's priorities and preferences. Staff reported that advance planning when dealing with the Front Office frequently resulted in wasted efforts as the Ambassador changed proposals or projects late in the process. American and LE staff stated that the Ambassador had lost his temper on occasion. Because of this, staff told OIG they were reluctant to raise these planning or temperament issues with the Ambassador or DCM. In speaking with the Ambassador about this issue, he acknowledged the problem and took OIG's suggestions for improvement positively and seriously. OIG also advised the Ambassador to review the Leadership and Management Principles for Department Employees found in 3 FAM 1214 and to work closely with the DCM to improve planning and better direct the mission's work. Finally, OIG also encouraged section

chiefs to communicate workload and personnel issues with the Front Office consistent with the 3 FAM 1214b (9) charge to “follow courageously by dissenting respectfully when appropriate.”

## **Execution of Foreign Policy Goals and Objectives**

The Ambassador led a unified country team in pursuit of U.S. foreign policy objectives in accordance with his responsibilities under 2 FAM 113.1b. Washington stakeholders and embassy staff told OIG of the Ambassador's detailed knowledge of the issues in Sri Lanka and Maldives. They also remarked on his ability to reach back to Washington policy makers to shape U.S. policy responses to support the democratically elected reformist Sri Lankan government.

Representatives of non-Department agencies told OIG of the Ambassador's support for and knowledge of their programs. The Ambassador enjoyed regular access to the most senior levels of the Sri Lanka government consistent with the 2 FAM 113.1c (7) mandate that an ambassador maintain close relations with host government officials. A review of the Ambassador's calendar since his arrival in August 2015 through mid-November 2016 indicated that he had met with the President 14 times and the Prime Minister on 20 occasions. He had a total of 217 meetings with host government officials, foreign diplomats, and private citizens, including business leaders. The Ambassador and other members of the embassy met with the leadership of Sri Lankan political parties, religions, and ethnicities to urge support for the coalition government and its economic, political, and security sector reform agenda and to urge further progress on justice, reconciliation, and constitutional reform. In Maldives, the embassy sought to maintain links with police, intelligence, military and civil society figures and urged the government to address the governance and economic concerns of its increasingly restive population. The Ambassador maintained near-daily contact with the more than 5,000 followers of his Twitter account in an effort to advance understanding of U.S. policy among the general public.

## **Adherence to Internal Controls**

The Ambassador and the DCM prepared the FY 2016 Annual Chief of Mission Management Control Statement of Assurance in August 2016, in fulfillment of the 2 FAM 022.7 (1) requirement that chiefs of mission develop and maintain appropriate systems of management controls for their organizations. The DCM tasked section heads with conducting review processes for their respective sections. The Ambassador and the DCM reviewed the responses with section heads prior to the Ambassador signing the statement. OIG found that section heads reported no significant deficiencies in six areas that are the subject of recommendations in this report: records management; unannounced cash counts; annual purchase card reviews; fuel management; overtime; and the training needs for Grants Officer Representatives (GORs).

Embassy leadership told OIG that it was aware of the internal controls stress created by hosting a large number of official U.S. visitors. The increased official U.S. interest in Sri Lanka in the wake of the election of a reformist government in 2015 led to an increase in high-level visits, including a visit by the Secretary of State, which was the first in 42 years. Embassy records indicated 768 officials visited Sri Lanka in FY 2016.

The embassy dealt with performance and conduct issues for its employees through a range of responses, from counseling and training to suspension and termination. In FY 2016, 4 LE staff

were terminated, 10 were suspended, 21 were issued written reprimands, 4 were placed on performance improvement plans, and 4 were placed on leave without pay.

Since his arrival, the DCM performed nonimmigrant visa adjudication reviews, a required element of consular internal controls prescribed by 9 FAM 403.9-2 (D) and 9 FAM 403.10-3(D), for 100 percent of the adjudication days in FY 2016.

## **Security of the Mission**

The Ambassador and the DCM were attentive to their security responsibilities as required by the President's Letter of Instruction. Reviewed records indicated the embassy conducted emergency drills as required by 12 Foreign Affairs Handbook (FAH)-1 H-765. The Ambassador and DCM stressed the importance of participation in tests of the emergency and evacuation radio network.

In September, the DCM directed a crisis management exercise the embassy developed based on local conditions. At the time of the inspection, the embassy was reviewing the lessons learned from this exercise. The Ambassador and the DCM each hosted town halls in 2016 for the non-official American community to discuss security and other matters, in fulfillment of the 2 FAM 113.1 c (14) requirement to advise, protect, and assist U.S. citizens.

At the time of the inspection, the annual update of the security memorandum of agreement between the chief of mission and the Department of Defense geographic combatant commander was pending. The embassy will submit it to the Department as required by 2 FAH-2 H116.4 b once the geographic combatant commander has approved the revised agreement.

## **Developing and Mentoring Future Foreign Service Leadership**

Ten Foreign Service specialists and generalists participated in the embassy's First- and Second-Tour (FAST) program. The DCM oversaw the program as directed by 3 FAM 2242.4. The Department intends for the program to give entry-level personnel opportunities to practice a wide variety of skills, including drafting reporting cables, participating in public outreach and community service activities, engaging with different interlocutors, building a network of contacts, and displaying leadership and management skills.

FAST employees commented favorably on the DCM's willingness to mentor them. He met with the FAST employees, forwarded them articles on Foreign Service tradecraft and career development, invited them to attend an event with a local think tank, and ensured they were invited to representational events. The Ambassador made representational funds available to them to host two events with counterparts in the diplomatic community. Three FAST employees attended a regional FAST workshop in India.

OIG advised the DCM to ensure that all FAST employees understood the purpose of the FAST program and participated in the full range of FAST activities.

## POLICY AND PROGRAM IMPLEMENTATION

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### Advocacy and Analysis

#### *Political and Economic Sections Met Reporting and Advocacy Responsibilities*

OIG found that officers in the Political and Economic Sections fulfilled their advocacy and reporting responsibilities in accordance with ICS goals. They engaged with contacts in the government and the opposition, with ethnic and religious minorities, with non-governmental organizations, and with the private sector as part of these responsibilities. Outreach to these groups led to informed embassy reporting on political and economic issues in Sri Lanka and Maldives. Washington offices consistently praised embassy reporting. OIG reviewed six months of reporting cables and found them to be properly sourced, timely, and relevant to ICS goals.

#### **Leahy Vetting Conducted in Accordance with Department Requirements**

In 2015, the embassy vetted 472 individuals and security units for potential gross human rights abuses in accordance with applicable laws and Department requirements.<sup>2</sup> Through October 19, 2016, the embassy vetted an additional 487 individuals and security units. During the inspection, the Bureau of Democracy, Human Rights and Labor cleared the embassy's updated Leahy Standard Operating Procedures, and the embassy published them on its SharePoint site. OIG advised Political Section supervisors to consider giving several embassy sections access to the International Vetting Security Tracking Leahy vetting software program, and seek training for those new participants, a sharing of duties that the bureau considers a best practice.

#### **Embassy Did Not Consistently Use Record Emails**

Employees did not consistently use record emails to document activities and operations. As 5 FAM 1214.3, 5 FAM 443.1, and 5 FAM 443.2 require, employees must use record emails to preserve information. From July 24 to October 24, 2016, embassy personnel sent 73,533 total messages, of which four were record emails. None of the record emails were from the Front Office or the Political, Economic, Consular, or Public Affairs Sections. Employees had not received training on how to use record emails and were unfamiliar with or confused by existing guidance. Failure to use record emails risks the loss of information useful for their successors, for policy formulation and review, and for the preservation of historical records.

**Recommendation 1:** Embassy Colombo should require and train employees to transmit official record correspondence using State Messaging and Archive Retrieval Toolset archive record emails, in accordance with Department guidance. (Action: Embassy Colombo)

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<sup>2</sup> The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department of State from furnishing assistance to foreign security forces if the Department receives credible information that such forces have committed gross violations of human rights. See 22 USC 2378d.

## Political Section Did Not Comply with Records Disposition Requirements

The Political Section did not meet Department records disposition requirements found in 5 FAH-4 H-300, 5 FAM 433, and 5 FAM 434. Although the section attested to proper records management in preparation of the Chief of Mission's Annual Management Control Statement of Assurance, the section maintained a five-drawer safe filled with old, unused, and unorganized paper files, most requiring retirement or destruction. Competing priorities and staff shortages in the section relegated paper file management to a low office priority. This is a concern because retention of such files burdens the embassy with unused paper copies of classified and sensitive records that require continuing monitoring and security efforts and deprives the Department of potentially useful archival materials. The section assigned responsibility for disposing these files to the Office Management Assistant who arrived in August 2016.

**Recommendation 2:** Embassy Colombo should dispose of Political Section paper files in accordance with the Department's Foreign Records Disposition Schedules. (Action: Embassy Colombo)

## Public Diplomacy

### *Public Diplomacy Programming Supported Integrated Country Strategy Goals*

In Sri Lanka, public diplomacy programming promoted ICS goals of interethnic reconciliation, freedom of expression, and economic opportunity. Programs reached elite and broader audiences, especially youth, throughout the country through social media, exchange programs, English-language instruction, cultural events, grants, and an American Spaces<sup>3</sup> network. The network included the Colombo American Center and the American Corners in Kandy and Jaffna, which received a combined total of 39,500 visitors in FY 2016.

In Maldives, public diplomacy programs focused on countering violent extremism and promoting freedom of expression through civil society grants and the American Corner in the city of Male, the only permanent U.S. Government presence in the country. The American Corner hosted 2,700 visitors in FY 2016. In 2016, the embassy signed a memorandum of understanding for a larger space for the American Corner, allowing for expanded programming opportunities.

The embassy expanded its social media footprint with a detailed social media plan and an Ambassador comfortable with social media. As of September 2016 the embassy had 129,081 Facebook followers, a 26 percent increase in one year, and 55,304 Twitter followers, a 204 percent increase over the same period. Almost all social media posts, however, are in English even though much of the population does not speak this language. OIG suggested the embassy could expand its reach to new audiences by increasing social media posts in Sinhala and Tamil in Sri Lanka, and Dhivehi in Maldives.

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<sup>3</sup> American Spaces are open-access facilities used to engage foreign audiences overseas.

### *Strategic Planning Needs Improvement*

The Public Affairs Section's strategic planning did not ensure effective management of its resources and programs. Its FY 2017 strategic plan was due to be submitted to the Department in November 2016 (same month of the inspection), but OIG found no evidence the process of developing a plan had begun. This is inconsistent with 18 FAM 101.4-3, which requires Department organizations to engage in strategic planning. The section staff told OIG that extended staff gaps at a time of a surge in official visits, increased program funding, and responding to the day-to-day needs of Front Office public diplomacy programming relegated strategic planning to a secondary priority. Notwithstanding these competing priorities, insufficient strategic planning weakens the embassy's ability to effectively use and monitor its resources.

**Recommendation 3:** Embassy Colombo should establish a strategic planning process for Public Affairs Section activities in accordance with Department standards. (Action: Embassy Colombo)

### **Spotlight on Success: Mobile Social Media Classroom**

Embassy Colombo wanted to provide access to alternative sources of information to diverse audiences in Sri Lanka because the previous Sri Lankan government limited free access to information. Between 2012 and 2015, the embassy trained 2,500 people, 53 percent of them journalists, in social media through its Social Media Lab project. Training began at the American Center in Colombo and American Corners in Jaffna and Kandy. In 2015, the embassy expanded the Social Media Lab project to more remote rural areas of Sri Lanka with its iBus. The iBus is a mobile social media classroom that took training on the road to another 1,000 people from diverse and underserved communities such as teenage mothers in a shelter. The embassy planned to replicate the successful practice with an iBoat in Maldives. The Social Media Project strengthened civic participation, independent media, and advanced economic opportunity for underserved communities.



Figure: Photo of the Embassy Colombo iBus at an outreach stop  
Source: Embassy Colombo's Twitter account (@USEmbSL)

## Countering Violent Extremism

### *Embassy Countering Violent Extremism Efforts Focused on Maldives*

The embassy's Countering Violent Extremism efforts focused on programs in Maldives, in support of the ICS goal to provide alternatives to extremism. These programs included Bureau of Counterterrorism grants on community policing, funding a documentary film on how communities are affected by extremist recruitment, and a Public Affairs Section grant for distribution of independent news. The American Corner in Maldives provided opportunities, such as job skills training, for at-risk youth. The embassy also trained local law enforcement through its Anti-Terrorism Assistance (ATA) program, discussed in the classified annex to this report.

## Foreign Assistance and Grants

### *Grants Management Met Department Standards*

OIG reviewed three grants awarded by the Political Section totaling \$221,090. OIG found the section awarded and monitored the grants in accordance with the Department's Federal Assistance Policy Directive and Procedural Guide for Grants and Cooperative Agreements. OIG noted an omission from one grant file of required documentation of pre-award grant competition by the embassy. During the inspection, the Grants Officer reorganized section grant files and instituted a monthly grants review.

OIG also reviewed 14 of 68 grants awarded by the Public Affairs Section in FY 2016, and one FY 2015 grant for Maldives. The grants reviewed included all grants over \$20,000, totaling \$678,956 of \$1,153,627 awarded in FY 2016, and \$47,987 for Maldives in FY 2015. Grant files contained all required documentation, but Grants Officers and GORs used different forms to document their risk assessment and monitoring plans. OIG suggested that the embassy use consistent risk assessment and monitoring documentation standards for all Grants Officers and GORs.

### *Insufficient Grants Management Training*

Public Affairs Section Grants Officers and GORs reported they received insufficient grants management training to carry out their grants management responsibilities. Between August 2015 and August 2016, the embassy increased the number of GORs from one to 13 to handle an influx of new grant funding. In FY 2016 the Embassy agreed to pilot a new online grants administration system. To bring the new GORs on board rapidly and speed deployment of the new grants management system, the Bureau of South and Central Asian Affairs and the embassy compressed formal training for the new GORs from 40 hours to less than 5 hours. This approach does not comply with the 2016 Federal Assistance Policy Directive, 1.05C, which requires two specific courses and 40 hours of training to qualify as a GOR, and directs Grants Officers to ensure that individuals selected to serve as GORs are capable of performing the designated functions. Insufficient training threatens the ability of the embassy to adequately administer grants management, a critical part of overall internal controls. OIG advised the embassy to establish a training plan for all Grants Officers and GORs. During the inspection, the embassy

began reviewing the Department's grants management training materials and had scheduled dates for supplementary in-house training.

## **Consular Affairs**

OIG reviewed the full range of consular operations, including American citizen services, anti-fraud programs, immigrant visas (including the diversity visa program), and nonimmigrant visas. OIG concluded that the Consular Section performed its responsibilities in compliance with applicable law and Department guidance. Appointment wait times for American citizens' services and visa services were within Bureau of Consular Affairs standards.

### ***Consular and Embassy Leadership Promoted Outreach***

The Front Office supported the consular chief's efforts to promote outreach and professional development. The Ambassador and the DCM hosted town hall meetings with American citizens, the Ambassador spoke to immigrant visa recipients, and the DCM joined consular staff on their monthly visa outreach trip. The section's officers spoke to students about visas and visited schools and community centers to explain the diversity visa process.

### ***Missing Guidance for American Citizens and Fraud Prevention Corrected***

OIG noted some instances of missing guidance related to American citizen services and fraud prevention. During the inspection, the section addressed these deficiencies. Consular staff began developing a handout for American citizens on the host nation criminal justice system; drafted written criteria for fraud prevention investigations; gave written descriptions of duties to citizen liaison volunteers (formerly known as wardens); and required citizen liaison volunteers to sign Memoranda of Agreement to safeguard the personal information of American citizens.

## **RESOURCE MANAGEMENT**

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### **Management Operations**

The chancery was built in 1984 and suffers from exterior damage, including oxidation of metal surfaces and moisture damage to wood elements, due to high humidity and its sea-front location. The Department awarded the NEC construction project in April 2016, with a projected completion date of early 2020. The NEC will be built on the current embassy compound, immediately adjacent to the current chancery. The construction project increased Bureau of Overseas Buildings Operations personnel at the embassy by seven, adding pressure to the embassy's existing management platform.

OIG reviewed the overall operations of the Financial Management, Human Resources, Facilities Maintenance, General Services, and Information Management offices and determined they were performing in accordance with Department standards and policies, with the exception of the areas noted below.

## Financial Management

### *Embassy Directly Paid Official Residence Expenses Salaries*

The embassy directly paid official residence expenses staff via cash advance from the Class B cashier. This practice violated 3 FAM 3257 (a), which requires the principal representative or the household manager to pay the official residence staff. OIG issued a Management Assistance Report in April 2014<sup>4</sup> that addressed this improper practice and recommended that the Department issue a directive that prohibits an embassy's direct payment to the official residence expenses staff. The report also recommended that the Department clarify regulations, or periodically remind overseas missions, that official residence expenses staff are the employees of the principal representatives. Although the Management Assistance Report was issued almost three years ago, the Department had not implemented OIG's recommendations. At the time of this inspection, OIG was conducting a compliance follow-up review to determine why the Department had not implemented the recommendations in OIG's 2014 report. As a result, OIG did not make a recommendation in this report.

### *Overtime Not Authorized in Advance*

Supervisors did not authorize claims for non-emergency overtime in advance, as required by 4 FAH-3 H-523.2. Failure to approve overtime in advance could result in abuse of premium pay.

**Recommendation 4:** Embassy Colombo should require supervisors to approve non-emergency overtime in advance. (Action: Embassy Colombo)

### *Vendor Invoices Not Submitted to Designated Billing Office*

Some vendors submitted invoices to warehouse staff rather than to the Financial Management Office, the designated billing office. This occurred because the embassy did not enforce the guidance in 4 FAM 422(d), which requires the designated billing office to be the sole recipient of invoices for payment. The receipt of invoices by warehouse staff did not allow for an appropriate separation of duties among the ordering, receiving, billing, approval, and payment processes, which creates vulnerability for fraud.

**Recommendation 5:** Embassy Colombo should enforce the requirement that only the designated billing office receive invoices. (Action: Embassy Colombo)

### *Warehouse Employees Received Collections*

The third-party vendor responsible for managing auctions and vehicle sales gave collections from auctions and vehicle sales to warehouse staff out of convenience. According to 4 FAH-3 H-323(a), however, only U.S. disbursing officers and Class B cashiers are authorized to receive collections. Failure to limit the number of employees entrusted with collections could result in

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<sup>4</sup> Management Assistance Report – Direct Payment of Official Residence Expenses Staff Salaries, ISP-I-14-08, April 3, 2014.

loss or theft of funds. During the course of the inspection, the embassy revised procedures so the vendor is required to deposit future collections with the Class B cashier.

### ***No Emergency Cash Payment Limitation Waiver***

In FY 2016, the embassy made 53 emergency cash payments over \$500, although there was no emergency cash waiver on file. The bulk of the payments were made to facilitate last-minute bodyguard and chauffeur travel. This is not consistent with guidance in 4 FAH-3 H-394.2-6(a), which permits an embassy to request a waiver to cash payment limitations only if it concludes that the cash payment limitations are unduly restrictive due to unique or extraordinary circumstances, such as if it operates in a cash-only economy. Cash payments increase the amount of funds a Class B cashier must have on hand, increasing the risk of fraud, theft, or misuse. The embassy requested a cash payment waiver from the Bureau of the Comptroller General and Financial Services during the course of the inspection.

### ***Sub-cashier Supervisors Not Conducting Unannounced Cash Verifications***

Not all supervisors of the 14 sub-cashiers conducted unannounced cash verifications at the required intervals. Accordingly, these supervisors did not fulfill their responsibilities as required by 4 FAH-3 H-397.2-3(a). Failure to conduct unannounced cash verifications could result in the misuse or loss of funds.

**Recommendation 6:** Embassy Colombo should enforce the requirement that sub-cashier supervisors complete unannounced cash verifications. (Action: Embassy Colombo)

## **General Services Operations**

### ***Embassy Did Not Comply with Bulk Fuel Management Procedures***

The Ambassador directed a review of the mission's internal controls processes in response to an April 2016 cable reporting wide-scale, long-term fraud perpetrated by LE staff at another U.S. mission that resulted in millions of dollars of losses through theft of fuel.<sup>5</sup> Embassy staff told OIG that its review had resulted in strengthened internal controls over warehouse and other operations. However, OIG found that the internal review had not identified or corrected numerous and serious deficiencies in the embassy's fuel management processes.

In FY 2016, the embassy spent \$110,718 on bulk fuel—\$50,531 for diesel and \$60,187 for gasoline. The embassy used two underground fuel tanks located in its motor pool area to store bulk fuel, one tank for diesel fuel and the other for gasoline. A fuel pump to dispense fuel into vehicles was situated adjacent to these tanks. OIG found that the embassy did not follow Department guidance regarding procedures for securing and accounting for its bulk fuel inventory or for safe handling of fuel during deliveries. These deficiencies resulted from lack of supervisory oversight of bulk fuel management procedures. Problems noted by OIG included:

- Fuel delivery trucks were not grounded during deliveries of fuel, as required by 14 FAH-1 H-815.2 a, nor were fire extinguishers readily available during fuel deliveries.

<sup>5</sup> "Trust But Verify – Unfortunately We Didn't", 16 Tbilisi 632, 4/22/2016

- Tank inlets for both underground fuel storage tanks could not be locked, as required by 14 FAH FAH-1 H-815.4 d (2). On one occasion, OIG found the fuel pump unattended with the nozzle unsecured, a violation of 14 FAH-1 H-815.4 d (2).
- The same individual assigned property record keeping duties for bulk fuel supplies was also responsible for receiving and signing for fuel deliveries. Guidance in 14 FAM 423.1 requires that property accountability and property receiving duties be separated.
- Post did not perform monthly inventories of bulk fuel supplies and reconcile property records based on results of those inventories, as required by 14 FAH-1 H-815.6.
- Post did not enforce proper use of DS-1914, the Daily Fuel Issuance Record, to document quantities of fuel dispensed into vehicles, as required by 14 FAH-1 H-815.3.

Failure to follow security, accountability and safety procedures for management of bulk fuel heightens risks of theft of government resources, and compromises the safety of life and property.

**Recommendation 7:** Embassy Colombo should comply with Department guidance applicable to management of its bulk fuel supplies. (Action: Embassy Colombo)

### ***No Certifications of Purchase Card Program***

The embassy had not performed annual certifications of its purchase card program, although the responsible officer had certified he had done so in the embassy's internal review for the FY 2016 Annual Chief of Mission Management Control Statement of Assurance. Supervisors did not fulfill their responsibilities as outlined in the Department's Purchase Card Annual Review policy,<sup>6</sup> which requires the purchase card program coordinator to evaluate and certify this program annually. Documentation of that evaluation, and written certification of the program's compliance with guidelines, must be maintained for a minimum of three years. Failure to perform required annual evaluations of the purchase card program increases risks of misuse of purchase cards and loss of government resources.

**Recommendation 8:** Embassy Colombo should evaluate and certify its Purchase Card Program. (Action: Embassy Colombo)

### ***No Motor Vehicle Key Control***

The embassy lacked an effective motor vehicle key control system. The motor pool office had no locking cabinet for primary sets of vehicle keys and had no record of issuance of primary keys to drivers. OIG observed on several occasions official vehicles in the motor pool left unattended, unlocked, and with keys in the ignition. Because of these deficiencies, supervisors did not fulfill their responsibilities under 14 FAM 436.3, which requires that embassies have a system of vehicle key control, with a vehicle key control log, under control of the individual assigned motor vehicle control responsibility. Lack of a system of control for vehicle keys weakens internal controls guarding against unauthorized use of official vehicles.

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<sup>6</sup> This policy is published on the intranet site of the Bureau for Administration at [pcard.a.state.gov](http://pcard.a.state.gov).

**Recommendation 9:** Embassy Colombo should establish a motor vehicle key control system.  
(Action: Embassy Colombo)

## Information Management

OIG verified that Information Management programs and services met customer needs and complied with 5 FAM 120 with the exception of the deficiency identified below. The section received an "A" rating from the Bureau of Information Resource Management. OIG reviewed emergency operations, equipment inventories, records management, communications security, mobile computing, cyber security controls on unclassified and dedicated internet networks, radio and telephone systems, and classified and unclassified pouch.

### *Information Management Position Not Programmed To International Cooperative Administrative Support Services*

The Information Management Unit has three Department-funded positions—an Information Management Officer, an Information Programs Officer, and an Information Management Specialist—that cost an average of \$268,419 annually per position. Despite being funded by the Department, these U.S. direct-hire officers also delivered some information management (IM) support services to other agencies at the mission. Unlike other U.S. direct-hire management positions that deliver support services (such as human resources and financial management), the cost of IM officer positions was not captured in the International Cooperative Administrative Support Services (ICASS)<sup>7</sup> system to ensure these costs were distributed among the agencies who used their services. When ICASS began 20 years ago, IM positions primarily supported and handled communications for core Department offices. According to Department officials and documentation, however, IM functions evolved significantly and U.S. direct-hire IM staff now deliver more support to other agencies.

To ensure the cost of IM services are equitably shared, in June 2010, the Office of Management Policy, Rightsizing, and Innovation (M/PRI) advised some embassies, including Embassy Colombo, to convert one of their U.S. direct-hire IM positions to ICASS as soon as budgetary provisions could be made. In its 2015 rightsizing review of Embassy Colombo, M/PRI reiterated this recommendation. At the time of the inspection, this conversion had not occurred. OIG is preparing a Management Assistance Report that will again recommend the conversion of one U.S. direct-hire IM position to ICASS in many embassies, including Colombo. As a result, OIG did not make a recommendation in this report.

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<sup>7</sup> The International Cooperative Administrative Support Services (ICASS) system, 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 ICASS, which operates a 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.

## RECOMMENDATIONS

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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 Colombo. Their complete responses can be found in Appendix B. The Department also provided technical comments that OIG incorporated, as appropriate into this report.

**Recommendation 1:** Embassy Colombo should require and train employees to transmit official record correspondence using State Messaging and Archive Retrieval Toolset archive record emails, in accordance with Department guidance. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted that a management notice was issued regarding the use of official record correspondence. Additionally, the embassy made one-on-one SMART training available to all staff.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Sri Lanka's management notice and SMART training records.

**Recommendation 2:** Embassy Colombo should dispose of Political Section paper files in accordance with the Department's Foreign Records Disposition Schedules. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted the Political Section started a records management project to retire or destroy documents in accordance with Department standards. The section intends to have the eligible records retired or destroyed by October 2017.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Sri Lanka's records retirement and disposition schedules.

**Recommendation 3:** Embassy Colombo should establish a strategic planning process for Public Affairs Section activities in accordance with Department standards. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted the embassy submitted the required Public Diplomacy Implementation Plans for Sri Lanka and Maldives. Both plans were accepted by the Office of the Under Secretary for Public Affairs and Public Diplomacy. Additionally, the Public Affairs Section implemented monthly strategic communications planning meetings and monthly interagency working group meetings.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the public diplomacy plans for Sri Lanka and Maldives.

**Recommendation 4:** Embassy Colombo should require supervisors to approve non-emergency overtime in advance. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. On November 10, 2016 the Financial Management Section reissued the Embassy's Overtime Work Policy and Procedures. Additionally, the embassy has provided training on how to properly complete the overtime forms and has stressed the importance of this requirement to country team and senior staff members.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Embassy's overtime work policy and procedures.

**Recommendation 5:** Embassy Colombo should enforce the requirement that only the designated billing office receive invoices. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted that the Management Officer directed management staff to follow established procedures and guidance for invoice handling. On December 1, 2016, the Financial Management Office established an electronic invoice delivery mailbox so vendors can email invoices directly to the Financial Management Office.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Sri Lanka's management policy and standard operating procedures for receipt and handling of invoices.

**Recommendation 6:** Embassy Colombo should enforce the requirement that sub-cashier supervisors complete unannounced cash verifications. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted the Class B cashier provided additional training to all sub-cashiers and American supervisors. Additionally, the Financial Management Officer and Class B Cashier adopted procedures which require cash verifications be conducted prior to sub-cashier replenishments.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of at least two of the most recent unannounced cash verifications.

**Recommendation 7:** Embassy Colombo should comply with Department guidance applicable to management of its bulk fuel supplies. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted that the embassy immediately implemented a Bulk Fuel Policy that conformed to Department standards. Additionally, on February 15, 2017, the two underground fuel tanks were permanently closed in preparation for the New Embassy Compound construction. The embassy now obtains all fuel services from commercial fuel stations and issued a new fuel policy that governs all fuel activities and conforms to Foreign Affairs Manual/Foreign Affairs Handbook standards.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the new fuel policy.

**Recommendation 8:** Embassy Colombo should evaluate and certify its Purchase Card Program. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. On December Embassy Colombo completed the 2016 Purchase Card Program certification on December 15, 2016.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the 2016 Purchase Card Program certification.

**Recommendation 9:** Embassy Colombo should establish a motor vehicle key control system. (Action: Embassy Colombo)

**Management Response:** In its March 28, 2017 response, Embassy Colombo concurred with this recommendation. It noted in November 2016, the Motor Vehicle Accountable Officer implemented a motor vehicle key control system.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the vehicle control key system.

## PRINCIPAL OFFICIALS

Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Atul Keshap	8/2015
Deputy Chief of Mission	Robert Hilton	6/2016
<b>Chiefs of Sections:</b>		
Management	Rachna Korhonen	7/2014
Consular	Sally Sternal	8/2013
Political	Kelly Billingsley	8/2015
Economic	Partha Mazumdar	9/2016
Public Affairs	James Russo	8/2016
Regional Security	Bjorn Sunde	8/2015
<b>Other Agencies:</b>		
Department of Defense	Robert Ross	6/2014
Office of Defense Cooperation	Wendy Ng	8/2016
US Agency for International Development	Andrew Sisson	7/2016
Department of Treasury	Anne Schwartz	8/2016

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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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 the Office of Inspector General (OIG) for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

### Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chairman of BBG, and Congress with systematic and independent evaluations of the operations of the Department and BBG. 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 uses a risk-based approach to prepare for each inspection; reviews pertinent records; reviews, circulates, and compiles the results of survey instruments, as appropriate; conducts 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 221 documented interviews. OIG also reviewed 668 documents and responses to 158 personal questionnaires.

## APPENDIX B: MANAGEMENT RESPONSES

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*Embassy of the United States of America*


*Colombo, Sri Lanka*

March 28, 2017

UNCLASSIFIED

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

THROUGH:   NEA/SCA-EX – Ned Alford

FROM:       Ambassador Atul Keshap 

SUBJECT:     Response to Draft OIG Report – Inspection of Embassy Colombo/SCA

Embassy Colombo and the Bureau of South and Central Asian Affairs (SCA) have reviewed the draft OIG Inspection report. OIG made nine recommendations to improve the embassy's public diplomacy and policy and program implementation, and motor pool, procurement, financial management, and information management operations.

Please find below the Embassy's responses to the OIG recommendations:

**OIG Recommendation 1:**

Embassy Colombo should require and train employees to transmit official record correspondence using State Messaging and Archive Retrieval Toolset (SMART) archive record emails, in accordance with Department guidance.

**Management Response:** Embassy Colombo accepts this recommendation. A Management Notice was circulated to inform all staff regarding the use official record correspondence and one-on-one training in the use of SMART is available for all employees.

**OIG Recommendation 2:**

Embassy Colombo should dispose of Political Section paper files in accordance with the Department's Foreign Records Disposition Schedules.

**Management Response:** Embassy Colombo accepts this recommendation. The Political Section has begun compliance by starting a records management project to retire or destroy documents based on the Department's Foreign Records Disposition Schedules. Steps taken since the inspection include the removal of obsolete reference materials, working files, and biographies contained in the Political Section safe and elsewhere in the office. The Section intends to have its collection of eligible records retired or destroyed by October 2017.

**OIG Recommendation 3:**

Embassy Colombo should establish a strategic planning process for Public Affairs Section (PAS) activities in accordance with Department standards.

**Management Response:** Embassy Colombo accepts this recommendation. Subsequent to the inspection, PAS Colombo submitted required Public Diplomacy Implementation Plans (PDIP) for Sri Lanka and the Maldives. Both plans have been accepted by the Office of the Under Secretary for Public Affairs and Public Diplomacy (R). As part of the PDIP process, PAS developed a strategic plan for management of PAS grants and the Notice of Funding Opportunity (NOFO) process to ensure that all funding activities clearly align with mission strategic goals.

PAS has also implemented monthly strategic communications planning meetings, chaired by the Embassy Spokesman and involving all relevant embassy elements, to align communication strategies, messaging, and audience outreach across the mission. PAS also recently commenced a monthly interagency working group with focus on Maldives to discuss current activities and upcoming programs.

**OIG Recommendation 4:**

Embassy Colombo should require supervisors to approve non-emergency overtime in advance.

**Management Response:** Embassy Colombo accepts this recommendation. On November 10, 2016, the Financial Management Section reissued the Embassy's Overtime Work Policy and Procedures. In addition, the main timekeeper has communicated this requirement directly to all timekeepers within the Embassy and provided training on how to ensure the form is properly filled out upon submission. Post management has also stressed this requirement at Country Team and Senior Staff level meetings to ensure all American supervisors are aware of their responsibilities.

**OIG Recommendation 5:**

Embassy Colombo should enforce the requirement that only the designated billing office receive invoices.

**Management Response:** Embassy Colombo accepts this recommendation. The Management Officer has directed all Management section employees to follow the established procedures and guidance and to refuse receipt of invoices from vendors. On December 1, 2016, the Financial Management Office (FMO) section established an electronic invoice delivery mailbox ([colomboinvoices@state.gov](mailto:colomboinvoices@state.gov)) so that vendors can email invoices directly to FMO. Vendors are using this mailbox to provide invoices directly to FMO.

**OIG Recommendation 6:**

Embassy Colombo should enforce the requirement that sub-cashier supervisors complete unannounced cash verifications.

**Management Comments:** Embassy Colombo accepts this recommendation. The Class B cashier has provided additional trainings to all new sub-cashiers and American supervisors to facilitate this requirement. Additionally, the Class B cashier provided training for all sub-cashiers on the use of COAST and post's cash management policies. Together, the FMO and the Class B cashier have adopted and enforced stronger procedures which halt sub-cashier replenishments unless all required cash verifications are conducted as required.

**OIG Recommendation 7:**

Embassy Colombo should comply with Department guidance applicable to management of its bulk fuel supplies.

**Management Response:** Embassy Colombo accepts this recommendation. Post immediately complied with this recommendation by creating and implementing a comprehensive Bulk Fuel Policy that conformed to all relevant FAM/FAH regulations. Furthermore, on February 15, 2017, due to the New Embassy Compound (NEC) construction, the two underground fuel tanks were shut down permanently, ending Post's use of on-site bulk fuel. Post now obtains all fuel services from commercial fuel station. Post published a new Fuel Policy on February 2, 2017, that governs all fuel activities and conforms to relevant FAM/FAH regulations.

**OIG Recommendation 8:**

Embassy Colombo should evaluate and certify its Purchase Card Program.

**Management Response:** Embassy Colombo accepts this recommendation. Post completed the 2016 annual purchase card program certification on December 15, 2016.

**OIG Recommendation 9:**

Embassy Colombo should establish a motor vehicle key control system.

**Management Response:** Embassy Colombo accepts the recommendation. In November 2016, the Motor Vehicle Accountable Officer (MVAO) implemented a motor vehicle key control system. All motor vehicle keys are kept in a locked box and distribution of keys is recorded in a vehicle key control log which is kept by the motor pool supervisor, who is the MVAO's designee.

The point of contact for this memorandum is DCM Robert Hilton.

## APPENDIX C: FY 2016 STAFFING AND FUNDING BY AGENCY

Agency	U.S. Direct-hire Staff	U.S. Locally Employed Staff	Foreign National Staff	Total Staff <sup>a</sup>	Funding (\$)
<b>Department of State</b>					
Diplomatic & Consular Programs	18	4	9	31	2,015,641
ICASS	10	13	370	393	6,875,044
MRV	3	2	7	12	514,354
Public Diplomacy	4	1	15	20	1,432,656
Diplomatic Security	5	2	13	20	827,399
Marine Security	8	0	4	12	149,000
Representation	0	0	0	0	44,748
Overseas Buildings Operations	8	1	3	12	1,607,812
Broadcasting Board of Governors	4	0	49	53	2,714,044
<b>Subtotal</b>	<b>60</b>	<b>23</b>	<b>470</b>	<b>553</b>	<b>16,180,698</b>
<b>Department of Defense</b>					
Defense Attaché Office	6	0	1	7	251,932
Foreign Assistance (IMET)					500,000
Office of Defense Cooperation	1	0	3	4	188,350
Foreign Assistance – Sri Lanka					1,430,800
Foreign Assistance – Maldives					1,776,100
<b>Subtotal</b>	<b>7</b>	<b>0</b>	<b>4</b>	<b>11</b>	<b>4,147,182</b>
<b>Department of Homeland Security</b>					
Customs and Border Protection	2	0	1	3	156,780
<b>Subtotal</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>156,780</b>
USAID	9	0	24	33	27,483,621
Library of Congress	0	0	2	2	100,463
Treasury	1	0	0	1	96,000
EXBS Foreign Assistance					380,000
<b>Subtotal</b>	<b>10</b>	<b>0</b>	<b>26</b>	<b>36</b>	<b>27,680,084</b>
<b>Total</b>	<b>77</b>	<b>23</b>	<b>501</b>	<b>603</b>	<b>48,164,744</b>

<sup>a</sup> Authorized positions

**Source:** Generated by OIG from data provided by the Department.

## ABBREVIATIONS

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ATA	Anti-Terrorism Assistance
DCM	Deputy Chief of Mission
Department	Department of State
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
GORs	Grants Officer Representatives
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
LE	Locally Employed
NEC	New Embassy Compound
USAID	U.S. Agency for International Development

## OIG INSPECTION TEAM MEMBERS

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Peter A. Prahar, Team Leader

Scott Boswell, Deputy Team Leader

Calvin Carlsen

Stephen Dodson

Renee Earle

Darren Felsburg

Daniel Gershator

Dolores Hylander

Richard Kaminski

Joseph Talsma

Alexandra Vega



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Office of Inspector General • U.S. Department of State • P.O. Box 9778 • Arlington, VA 22219