



OIG

Office of Inspector General

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

ISP-I-17-26

Office of Inspections

May 2017

Inspection of Emergency Preparedness at Consulate General Hamilton, Bermuda

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

Summary of Review

The 2016 Atlantic hurricane season was the most active and costliest since 2012 and the deadliest since 2008. A total of 15 named storms—including 7 hurricanes, 4 of them major—affected or threatened U.S. diplomatic missions and U.S. citizens in the Caribbean basin and North Atlantic. Following this above-average season, OIG reviewed overall crisis preparedness at Consulate General Hamilton to assess its compliance with Department of State (Department) guidance on communication, planning, coordination, and training in such situations. OIG found the consulate general emphasized and engaged in coordinated emergency planning. OIG recommended that the consulate general conduct and record security drills and test emergency equipment in accordance with Department standards.

BACKGROUND

Bermuda is a 21-square-mile group of 138 islands and islets in the North Atlantic, with a population of nearly 65,000. Its location makes it vulnerable to hurricanes. According to the U.S. National Hurricane Center, an average of 10 named storms form in the Atlantic annually, six of which become hurricanes. Between 2014 and 2016, three hurricanes made landfall or passed over Bermuda. On October 13, 2016, Hurricane Nicole struck Bermuda as a Category 3 storm; the eye passed directly over the islands.

Consulate General Hamilton, a constituent post of U.S. Embassy London, had 3 U.S. direct-hire employees and 26 local staff members at the time of the inspection. In addition, 18 U.S. Customs and Border Protection employees work at a pre-clearance facility at the international airport. Security oversight is provided by the Regional Security Office at the U.S. Mission to the United Nations (USUN) in New York. Information management oversight is provided by the Department's Florida Regional Center in Fort Lauderdale.

FINDINGS

Leadership Emphasized Emergency Preparedness

OIG found that consulate general leadership prioritized safety and security of official and private American citizens and their families, in accordance with 2 Foreign Affairs Manual (FAM) 113.1 (c)(5). The Consul General participated in and encouraged staff compliance with mandatory drills of the emergency and evacuation radio network and ensured staff knew their roles in the event of a crisis. Consulate general staff also participated in host government-organized emergency preparedness exercises that addressed a variety of scenarios, including a tsunami and an airplane crash. The Consular Section maintained regular contacts with the local American citizen community and local tourist organizations.

During Hurricane Nicole in October 2016, the consulate general communicated with the Department, local authorities, and the U.S. citizen community. The Bureau of European and Eurasian Affairs praised the quality and timeliness of Consulate General Hamilton's communications and reporting on the hurricane's impact on post operations. The consulate

general's Emergency Action Committee submitted required reporting cables and followed its Emergency Action Plan procedures when it decided to shut operations from October 12 to 14, 2016. The consulate general operations resumed on October 17.

Emergency Action Plan Complete and Up To Date

The consulate general's Emergency Action Committee drafted a complete and up-to-date Emergency Action Plan in accordance with guidelines in 12 Foreign Affairs Handbook (FAH) -1 H-232. The Department's Bureau of Diplomatic Security and the Office of Emergency Management reviewed and approved the plan in March 2016.

The Emergency Action Plan addressed multiple threat scenarios, including hurricanes and tsunamis. It took into account host country personnel and resources, and discussed coordination with U.S. Department of Defense assets as required in the event of evacuation or other exigent circumstances. Consulate general personnel maintained regular contact with host country law enforcement and emergency response authorities and included them in consulate general crisis management exercises.

Consulate General Took Steps to Prepare for Hurricanes

Consulate general personnel expressed a high degree of confidence in the post's emergency preparation due, in particular, to the locally employed staff's significant experience in dealing with hurricanes as well as the host government's high degree of emergency preparedness. The consulate general's alternate command center was in a suitable location and had sufficient emergency ration supplies.

At the time of Hurricane Nicole, the Consular Section had neither a consular disaster handbook nor a disaster assistance kit, as suggested by 7 FAM 1814.1 and 7 FAM 1814.3. However, at the suggestion of the Regional Consular Officer in December 2016, the Consular Section established a disaster response kit of essential equipment and supplies, as well as a disaster preparedness and response handbook, to be used in a range of crisis scenarios.

Consulate General Did Not Document Lessons Learned

Consulate General Hamilton did not conduct a formal lessons learned review following Hurricane Nicole. OIG suggested the staff document its lessons learned and subsequent actions taken and make the information available to all personnel. The scheduled departure in summer 2017 of the two U.S direct-hire personnel with the most experience in crisis management made preserving institutional memory especially important. OIG also suggested the consulate general use the Department's crisis risk assessment tools to assess its vulnerability to and preparedness for emergencies other than hurricanes and to guide future planning and training.

Consulate General Did Not Conduct All Required Drills

The consulate general did not conduct two of the nine required emergency drills during 2016. OIG's review of the 2016 documented drills found that the consulate general did not conduct

bomb threat or internal defense drills. Department standards outlined in 12 FAH-1 H-765b and c, however, require missions to conduct each of the nine drills at least once a year and document the results. OIG found that these drills were not conducted in part because the USUN-based Regional Security Officer with oversight responsibilities did not ensure the consulate general understood its responsibility to conduct and properly document drills. Failure to do so increases the risk to the consulate general's emergency response capabilities.

Recommendation 1: The U.S. Mission to the United Nations should require Consulate General Hamilton to conduct and document all required emergency drills. (Action: Consulate General Hamilton)

(b) (7)(F)

(b) (7)(F)

The consulate general building is a converted residence sturdy enough to withstand a Category 3 hurricane. (b) (7)(F)

Emergency Communications

OIG found that the consulate general's emergency communications generally met Department requirements, but OIG identified two deficiencies in the required testing and maintenance of the high-frequency radio network, as described below.

These items are particularly important to remedy, as reviews of lessons learned from the Hurricane Odile and the Arab Spring crises¹ identified satellite phones and emergency radios as key communication tools during crisis events. The lessons learned highlighted the need to conduct regular testing and training exercises for communications equipment in advance of a potential crisis.

High-Frequency Radio Testing Not Performed

The consulate general had not tested the primary high-frequency radio² at the chancery or the off-site high-frequency radio at alternate command center since November 2016 due to competing priorities. Department standards in 5 FAH-2 H-723 require that the primary high-frequency radio at the chancery be tested weekly, and off-site radio equipment tested monthly,

¹ Department cable 2014 Mexico 7004, "Mission Mexico's Response to Hurricane Odile," October 29, 2014; Department cable 2011 State 121343, "Evacuation Lessons Learned from Arab Spring Posts," December 7, 2011.

² The high-frequency networks provide long-distance communication links to officials traveling in country, to Department missions in neighboring countries, and to military aircraft or ships in the vicinity, per 5 FAH-2 H-721.

to ensure the operational readiness of the equipment. If emergency communications equipment is not tested regularly, it may be inoperable during a crisis.

Recommendation 2: Consulate General Hamilton should test its high-frequency radio network in accordance with Department standards. (Action: Consulate General Hamilton)

Inoperable High-Frequency Radio at Alternate Command Center

OIG's review of the alternate command center found that the off-site high-frequency radio was inoperable and had not been maintained due to competing priorities. Department standards outlined in 5 FAH-2 H-741(a) require operational readiness of the high-frequency radio and state that service for the equipment should be coordinated with the Regional Information Management Center. High-frequency radios are critical to emergency communications and non-functioning equipment puts the safety and security of consulate personnel at risk in the event of a crisis.

Recommendation 3: Consulate General Hamilton, in coordination with the Regional Information Management Center in Ft. Lauderdale, should repair or replace the high-frequency radio at its alternate command center. (Action: Consulate General Hamilton, in coordination with RIMC Ft. Lauderdale)

Emergency and Evacuation Very High Frequency Radio Tested Bi-monthly

The consulate general tested the emergency and evacuation very high frequency radio network³ every other month. According to 5 FAH-2 H-732.4(a), all very high frequency radios must be tested biweekly or as directed by the chief of mission to ensure the operational readiness of equipment and competence of users. Moreover, Department guidance⁴ for the 2016 hurricane season emphasized the need to plan and regularly test emergency equipment in advance of hurricane season. OIG advised the consulate general to consider testing the very high frequency emergency and evacuation radio network more frequently, particularly during hurricane season.

³ Emergency and evacuation very high frequency networks typically consist of base stations, mobile radios in official vehicles, portable or hand-held units, and a repeater, per 5 FAH-2 H-732.2.

⁴ Department cable 2016 STATE 72266, "Hurricane Season Preparedness 2016," June 24, 2016.

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Consulate General Hamilton. Its complete responses can be found in the Appendix. The Department also provided technical comments that OIG incorporated, as appropriate into this report.

Recommendation 1: The U.S. Mission to the United Nations should require Consulate General Hamilton to conduct and document all required emergency drills. (Action: Consulate General Hamilton)

Management Response: In its May 15, 2017, response, the Bureau of European and Eurasian Affairs on behalf of Consulate General Hamilton concurred with this recommendation. The consulate general noted, as of the date of its comments, the annual bomb drill was the only outstanding drill and it would be completed by mid-May 2017. The consulate general also noted it regularly conducted required drills, but there were lapses in reporting the drills through the Security Management Console. All of the drills were updated in Security Management Console and verified by the U.S. Mission to the United Nations Regional Security Officer.

OIG Reply: OIG considers the recommendation resolved. Based on Department comments, OIG transferred action to Consulate General Hamilton, in coordination with U.S. Mission to the United Nations. The recommendation can be closed when OIG receives and accepts a documentation of all the required drills for calendar year 2017.

Recommendation 2: Consulate General Hamilton should test its high-frequency radio network in accordance with Department standards. (Action: Consulate General Hamilton)

Management Response: In its May 15, 2017, response, the Bureau of European and Eurasian Affairs on behalf of Consulate General Hamilton concurred with this recommendation. The consulate general noted that for a period of time the high-frequency radio was inoperable, but it has since been repaired and tested. Testing is done on a quarterly basis, to correspond to the Information Management Officer's routine visits.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the high-frequency radio test.

Recommendation 3: Consulate General Hamilton, in coordination with the Regional Information Management Center in Ft. Lauderdale, should repair or replace the high-frequency radio at its alternate command center. (Action: Consulate General Hamilton, in coordination with RIMC Ft. Lauderdale)

Management Response: In its May 15, 2017, response, the Bureau of European and Eurasian Affairs on behalf of Consulate General Hamilton concurred with this recommendation. The consulate general noted that the radio was tested and fully operational.

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OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the most recent radio testing.

APPENDIX A: OBJECTIVES, 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.

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 consistent with Section 209 of the Foreign Service Act of 1980. Because OIG uses a risk-based approach to target its inspection resources on high-risk areas, this inspection focused on Consulate General Hamilton's emergency preparedness. The objectives for this targeted inspection were to determine if Consulate General Hamilton had developed, coordinated, and tested an emergency response plan to address a range of emergency situations, in particular natural disasters, and if so, if any such plan complied with applicable Department guidelines.

The inspection included a review of Consulate General Hamilton's Emergency Action Plan and consular preparedness documentation. OIG reviewed electronic responses to a brief questionnaire designed for U.S. and locally employed staff with assigned roles in emergency preparedness and crisis management. The onsite portion of the inspection used physical examination and interviews to assess the consulate general's emergency preparedness posture.

In conducting inspections, OIG 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 23 documented interviews. OIG also reviewed 76 documents and 19 responses to personal questionnaires. OIG used professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

Scott Boswell (Team Leader), John Bush, and Eric Chavera conducted this inspection.

APPENDIX B: MANAGEMENT RESPONSES



United States Department of State

Washington, D.C. 20520

May 15, 2017

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

FROM: EUR – John A. Heffern, Acting Assistant Secretary

SUBJECT: Response to Draft OIG Report – Inspection of Consulate General
 Hamilton

EUR has reviewed the draft OIG Inspection report. We offer the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: The U.S. Mission to the United Nations (USUN) should require Consulate General Hamilton to conduct and document all required emergency drills. (Action: USUN)

Management Response: Per 12 FAH-1 H-722, the post’s emergency action committee (EAC) is responsible for ensuring designated incident commanders have the time, tools, and participation necessary to carry out their duties, one of which is the scheduling and execution of drills (H-723). In addition to the EAC’s responsibility for designating incident commanders, 12 FAM 423.5(d) (10) makes the post security officer (PSO) responsible for “formulating and coordinating emergency plans and conducting drills.” The PSO for Consulate General Hamilton is the Management Officer. The Regional Security Officer (RSO) USUN assists the PSO with general security assistance and constituent post oversight for Consulate General Hamilton’s physical security programs. Diplomatic Security (DS) requests that action for Recommendation 1 be re-assigned to Consulate General Hamilton.

Post confirms that the only outstanding drill to be done is the annual bomb drill which post will complete by mid-May. While post regularly conducts required drills, there have been lapses in reporting the completed drills and results through the Security Management Console (SMC). This issue has been resolved and all drills have been updated in SMC and verified by USUN RSO.

Hamilton’s Net Control Station (NCS) is located in Kingston, Jamaica. If Hamilton cannot reach NCS Jamaica to conduct radio checks, post should attempt to conduct radio checks with RIMC Florida.

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OIG Recommendation 2: Consulate General Hamilton should test its high-frequency radio network in accordance with Department standards. (Action: Consulate General Hamilton)

Management Response: For a period, the Consulate's main HF radio was inoperative as a result of a storm and required replacement parts by RIMC Florida; the radio is fully functional and has been tested. Due to the absence of a cleared American Management Post Security Assistant since June 2016, post has been conducting high-frequency radio network tests on a quarterly basis when the Information Management Officer conducts his routine visits. When the new assistant is brought on board in the near future, post will resume weekly testing, per Department standards.

OIG Recommendation 3: Consulate General Hamilton, in coordination with the Regional Information Management Center in Ft. Lauderdale, should repair or replace the high-frequency radio at its alternate command center. (Action: Consulate General Hamilton, in coordination with RIMC Ft. Lauderdale)

Management Response: The high-frequency radio at the alternate command center is fully operational and has been tested. The only problem identified was that the radio was not plugged in. The household staff has been advised that the outlet for the radio should be used solely for radio operations and not shared for other purposes. This recommendation has been resolved and post will continue to work closely with RIMC Ft. Lauderdale to address any future issues.

The point of contact for this memorandum is Alicia Davis, EUR-IO/EX Post Management Officer.

Attachments:

- Tab 1 – U.S. Consulate General Hamilton Response
- Tab 2 – Bureau of Diplomatic Security Response
- Tab 3 – Regional Information Management Center (RIMC) Response

Approved: EUR: John A. Heffern

Drafted: EUR-IO/EX/PMO – Alicia Davis, x7-3813; cell 202-374-3320

Cleared: EUR-IO/EX: HTownsend
EUR-IO/EX: WMcDuffy OK
EUR-IO/EX/SPMO: DPedroso OK
CG Hamilton: MKoenig OK
USUN: KGreenblatt OK
DS See Tab 2
RIMC See Tab 3



United States Department of State

Washington, D.C. 20520

April 24, 2017

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THRU: EUR – John A. Heffern, Acting Assistant Secretary

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

FROM: Mary Ellen Koenig, Consul General Hamilton

SUBJECT: Response to Draft OIG Report – Inspection of EUR/Hamilton

U.S. Consulate General Hamilton has reviewed the draft OIG Inspection report. We offer the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: The U.S. Mission to the United Nations should require Consulate General Hamilton to conduct and document all required emergency drills. (Action: USUN)

Management Response: At this point, the only outstanding drill to be done is the annual bomb drill which post will complete by mid-May. While post regularly conducts required drills, there have been lapses in reporting the completed drills and results through the Security Management Console (SMC). This issue has been resolved and all drills have been updated in SMC and verified by USUN RSO.

OIG Recommendation 2: Consulate General Hamilton should test its high-frequency radio network in accordance with Department standards. (Action: Consulate General Hamilton)

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Management Response: For a period, the Consulate's main HF radio was inoperative as a result of a storm and required replacement parts by RIMC Florida; the radio is fully functional and has been tested. Due to the absence since last June of a cleared American Management Post Security Assistant, post has been conducting high-frequency radio network tests on a quarterly basis when the Information Management Officer conducts his routine visits. When the new assistant is brought on board in the near future (pending outstanding security clearance), post will resume weekly testing, per Department standards.

OIG Recommendation 3: Consulate General Hamilton, in coordination with the Regional Information Management Center in Ft. Lauderdale, should repair or replace the high-frequency radio at its alternate command center. (Action: Consulate General Hamilton, in coordination with RIMC Ft. Lauderdale)

Management Response: The high-frequency radio at the alternate command center is fully operation and has been tested. The only problem identified was that the radio was not plugged in. The household staff has been advised that the outlet for the radio should be used solely for radio operations and not shared for other purposes.

The point of contact for this memorandum is Management Officer Linda Rosalik.

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United States Department of State

Washington, D.C. 20520

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May 3, 2017

INFORMATION MEMO TO INSPECTOR GENERAL LINICK – OIG

FROM: DS – Bill A. Miller, Acting

SUBJECT: Bureau of Diplomatic Security Response to the Inspection of Emergency Preparedness at Consulate General Hamilton, Bermuda (ISP-I-17-26), April 2017

DS recognizes that the U.S. Mission to the United Nations (USUN) is the action office to the below recommendation; however, would like to provide the following comment to recommendation 1 of the subject report.

Recommendation 1: The U.S. Mission to the United Nations should require Consulate General Hamilton to conduct and document all required emergency drills.

DS Comment (05/XX/17): Per 12 FAH-1 H-722, the post’s emergency action committee (EAC) is responsible for ensuring designated incident commanders have the time, tools, and participation necessary to carry out their duties, one of which is scheduling and execution of drills (H-723). Additionally, 12 FAH-1 H-244 lists the responsibilities of the specifically designated incident commanders, among which for the bomb incident commander (H-244.1) and internal defense incident commander (H-244.4) is conducting the necessary training and drills. In their emergency action plan (EAP), Consulate General Hamilton has the management officer designated as the incident commander for bombs, and the Consul General as the incident commander for internal defense. Finally, per 16 State 113534, the Chair of the EAC is required to certify that all drills have been conducted. This is accomplished as part of the annual certification of the EAP and emergency preparedness activities.

In addition to the EAC’s responsibility for designating incident commanders, 12 FAM 423.5(d)(10) makes the post security officer (PSO) responsible for “formulating and coordinating emergency plans and conducting drills.” The PSO for Consulate General Hamilton is the management officer. The regional security officer (RSO) USUN assists the PSO with general security assistance and constituent post oversight for Consulate General Hamilton’s security programs.

DS requests that action for Recommendation 1 be re-assigned to Consulate General Hamilton

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Approved: DS – Bill. A. Miller ()

Analyst: DS/MGT/PPD – N. Owens

Cleared: M –
EUR-IO/EX –
DS/DSS – C. Schurman (ok)
DS/EX – W. Terrini (ok)
DS/EX/MGT – B. Black (ok)
DS/MGT/PPD – M. Scherger (ok)
DS/MGT/PPD – D. O'Neill (ok)
DS/IP – G. Hays (ok)
DS/IP/SPC – D. Sparrowgrove (ok)
DS/IP/EUR – JOtto (ok)



Regional Information Management Center
 Florida Regional Center
 4000N Andrews Ave
 Fort Lauderdale, FL 33309

MEMORANDUM

TO: OIG

FROM: Kenneth Carlsen,

SUBJECT: OIG Hamilton additional information ISP-I-17-26

Below is additional information from the findings of Hamilton's OIG inspection ISP-I-17-26 as regards to recommendations.

Recommendation Two

Recommendation 2: Consulate General Hamilton should test its high-frequency radio network in accordance with Department standards. (Action: Consulate General Hamilton)

***** RIMC Radio Branch Chief Response *****

RIMC Florida Radio renews its offer as an alternative means to conduct radio checks to all Department of State posts and all United States government entities within High Frequency radio range. Normally, someone is always manning RIMC Florida Radio shop during normal hours. RIMC Florida Radio routinely conducts radios checks with US Army Fort Huachuca; Foreign Service Institute in Arlington, VA; and WHA posts. All Department of State posts should attempt to conduct radio checks with their Net Control Station (NCS). In Hamilton's case, their NCS is located in Kingston, Jamaica. If Hamilton cannot reach NCS Jamaica, then they should attempt to conduct HF radio checks with RIMC Florida.

Recommendation Three

Recommendation 3: Consulate General Hamilton, in coordination with the Regional Information Management Center in Ft. Lauderdale, should repair or replace the high-frequency radio at its alternate command center. (Action: Consulate General Hamilton, in coordination with RIMC Ft. Lauderdale)

***** RIMC Radio Branch Chief Response *****

RIMC Florida Radio dispatched a radio technician to post on 27 March 2017 and addressed all radio issues at post as noted in 17 HAMILTON 34. Coordination between post and RIMC was difficult for troubleshooting and triage of the HF radio systems at post. Once that hurdle was passed, then it was the coordination of sending bill-of-materials to post.

Moreover, Radio Florida's Radio Branch Chief discussed with Radio Programs Branch Chief on placing Hamilton on an upgrade schedule to provide a higher power radio of 500Watts from

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125Watts with better antennas systems. A HF radio upgrade should provide better communications with New York, Washington, DC, Kingston, and Fort Lauderdale.

If anybody has any further comments and questions, feel free to contact RIMC Florida Radio's Branch Chief, Ken Carlsen, carlсенkj@state.gov.

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WPEAOmbuds@stateOIG.gov