



**Office of Inspector General**  
United States Department of State

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ISP-I-19-03

Office of Inspections

November 2018

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# Inspection of Embassy Dakar, Senegal

BUREAU OF AFRICAN AFFAIRS

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# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-19-03

## What OIG Inspected

OIG inspected the executive direction, program and policy implementation, and resource management operations of Embassy Dakar.

## What OIG Recommended

OIG made 19 recommendations to improve embassy operations and internal controls, including 4 recommendations to correct general services and facilities management issues and 10 recommendations to address information technology management issues.

In its comments on the draft report, Embassy Dakar concurred with 16 recommendations and disagreed with 3. OIG considers 17 recommendations resolved and 2 unresolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal written responses are reprinted in their entirety in Appendix B.

UNCLASSIFIED

November 2018

OFFICE OF INSPECTIONS

Bureau of African Affairs

## Inspection of Embassy Dakar, Senegal

### What OIG Found

- The Ambassador set a positive and professional tone for Embassy Dakar, clearly communicating mission priorities and strategic goals to embassy staff.
- The Ambassador promoted the strategic goal of assisting Senegal's political and economic development in order to make the country a more effective partner for the United States.
- Expanding engagement in Guinea-Bissau promoted U.S. interests but also posed challenges to the embassy's capacity for oversight and coordination.
- Internal controls for some general services and facility management functions did not comply with Department of State standards and procedures.
- Public diplomacy programs were integrated through physical and virtual platforms to promote a better public understanding of U.S. policy and to build relationships with Senegalese leaders, particularly among youth.
- The embassy continued to improve its management of foreign assistance and public diplomacy grants through deployment of the State Award Management System.
- Information systems security and telephone programs did not comply with Department requirements.

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# CONTENTS

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CONTEXT.....	1
EXECUTIVE DIRECTION .....	2
Tone at the Top and Standards of Conduct.....	2
Execution of Foreign Policy Goals and Objectives.....	4
Adherence to Internal Controls.....	5
Security of the Mission .....	5
Developing and Mentoring Foreign Service Leaders .....	5
POLICY AND PROGRAM IMPLEMENTATION.....	6
Political and Economic Sections .....	6
Guinea-Bissau .....	8
Public Diplomacy.....	9
Consular Affairs.....	11
RESOURCE MANAGEMENT .....	13
Financial Management.....	13
Human Resources Operations.....	13
General Services Operations .....	14
INFORMATION MANAGEMENT .....	15
RECOMMENDATIONS.....	20
PRINCIPAL OFFICIALS.....	26
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	27
APPENDIX B: MANAGEMENT RESPONSE .....	28
ABBREVIATIONS .....	34
OIG INSPECTION TEAM MEMBERS.....	35

## CONTEXT

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Located on the west coast of Africa between Guinea-Bissau and Mauritania, the Republic of Senegal is a country slightly smaller than South Dakota. Senegal also shares borders with The Gambia, Guinea, and Mali. The population (14.7 million) is concentrated in the west, with the capital, Dakar, anchoring a well-defined core area. Approximately 70 percent of the population resides in rural areas.

Mining, construction, tourism, fisheries, and agriculture are the primary sources of economic activity. Senegal is one of the world's poorest countries and relies heavily on donor assistance, remittances, and foreign direct investment. Senegal historically was a destination country for economic migrants, but in recent years, West African migrants more often use Senegal as a transit point to North Africa and sometimes illegally onward to Europe.

Senegal, one of the most stable democracies in Africa, gained independence from France in 1960 and was ruled by the Socialist Party until 2000. Aboudoulaye Wade of the Senegalese Democratic Party was elected president in 2000; he was followed by Macky Sall (Alliance for the Republic) in 2012. Sall's term runs until 2019. The Movement of Democratic Forces in the Casamance region has led a low-level separatist insurgency in southern Senegal since the 1980s, although an unofficial cease-fire has been in effect since 2012.

The country has a long history of participating in international peacekeeping and regional mediation organizations, including the African Union, Economic Community of West African States, the Organization of Islamic Cooperation, and the United Nations, where it held a non-permanent Security Council seat in 2016 and 2017. More than 3,000 Senegalese soldiers and police officers are deployed abroad in support of multilateral peacekeeping missions.

Senegal is an important partner for the United States in Africa, as the bilateral engagement between the two countries emphasizes shared democratic values, regional security, and economic development. The bilateral 2016 Defense Cooperation Agreement provides the United States with military access to Senegalese facilities and establishes a legal framework that allows the United States to respond quickly to regional threats. The United States provided a total of \$116 million in military and development assistance to Senegal in FY 2017.

Key priorities in the embassy's FY 2017-2020 Integrated Country Strategy (ICS), completed in December 2016, are:

- Advance democratic values through the rule of law, human rights, and good governance, and promote peace and security by helping Senegal respond to transnational threats.
- Support the Casamance peace process.
- Improve Senegal's capacity to contribute to multilateral peacekeeping missions.
- Promote Senegalese economic growth.
- Increase U.S. trade and investment with Senegal.

Embassy Dakar is the largest post in Francophone Africa. At the time of the inspection, the embassy had 180 U.S. direct-hire employees, 40 eligible family member employees, and 490 locally employed (LE) staff. The embassy houses 18 U.S. Government agencies and sub-agencies, including the Departments of Defense, Homeland Security, Justice, Health and Human Services, and Agriculture, as well as the U.S. Agency for International Development (USAID). All agencies also have extensive regional responsibilities, and Embassy Dakar's International Cooperative Administrative Support Services<sup>1</sup> platform provides regional administrative and logistical support to other embassies and U.S. Government entities in western Africa. The number of direct-hire U.S. Government employees assigned to Dakar increased by more than 20 percent in the 3 years prior to the inspection. The embassy compound was completed in 2013.

The Ambassador is accredited to the neighboring country of Guinea-Bissau, and Embassy Dakar is responsible for U.S. Government operations there through its Bissau Liaison Office.<sup>2</sup> One U.S. direct-hire employee based in Dakar directs the liaison office, which includes 14 LE staff members working in a commercial office building in Guinea-Bissau's capital, Bissau.

OIG evaluated the embassy's executive direction, policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.<sup>3</sup> A companion classified inspection report discusses the mission's security program and issues affecting the safety of mission personnel and facilities.

## **EXECUTIVE DIRECTION**

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OIG assessed leadership on the basis of on-site interviews that included comments on Front Office performance, staff questionnaires, and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

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

The Ambassador, a career member of the Senior Foreign Service, arrived in July 2017; he previously served as Ambassador to Burkina Faso. The Deputy Chief of Mission (DCM) arrived in August 2016; she previously served as Management Counselor at the embassy in Accra, Ghana.

OIG found that the Ambassador set a positive and professional tone for the embassy, consistent with Department of State (Department) leadership principles in 3 Foreign Affairs Manual (FAM) 1214. American and LE staff in interviews and surveys consistently told OIG that the Ambassador clearly communicated the mission's ICS priorities and the U.S. Government's overarching National Security Strategy goal of making the United States more secure and prosperous. He communicated these priorities at town halls, country team meetings, and in his initial meeting

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<sup>1</sup> The International Cooperative Administrative Support Services (ICASS) is the principal means by which the U.S. Government provides and shares the cost of common administrative support at diplomatic and consular posts overseas.

<sup>2</sup> The U.S. Embassy in Bissau ceased operations in 1998 due to civil unrest in the country.

<sup>3</sup> See Appendix A.

with OIG. The Ambassador also made clear that he expected all mission employees to be familiar with these priorities and be able to articulate how their work advances mission objectives.

Embassy staff consistently told OIG that the Ambassador was accessible and visible throughout the embassy. They described his habit of making “spot checks” around the embassy, including in the Consular Section waiting area; staff also noted his presence one day in the Marine Security Guard booth to greet staff as they arrived to work. Upon his arrival, the Ambassador visited each embassy section and property, including the warehouse and a sample of residential housing units. He attended social and recreational events with mission staff, and, for example, threw out the first pitch at the women’s softball tournament.

OIG determined that the Ambassador and the DCM worked together effectively as a team. Country team members told OIG they understood the respective roles of the Ambassador and the DCM and found them accessible. OIG also found that the Ambassador clearly communicated his expectations to embassy sections and agencies. For example, he expected the Front Office to be kept apprised of relevant developments and reiterated this point at country team meetings.

The Ambassador promoted LE staff inclusion and participation in embassy activities. For example, he held a weekly meeting with LE staff to review political and economic developments and, at this meeting, he discussed his assessment of current events and embassy priorities and encouraged questions. The Ambassador also met with a half dozen randomly selected LE staff each week. The LE staff told OIG they were appreciative of the Ambassador's efforts.

OIG found that the Ambassador demonstrated a commitment to integrity and ethical values. Shortly after his arrival, he issued guidance detailing employee responsibilities and ethical conduct. The embassy maintained an active gift registry in accordance with Department guidance in 2 FAM 964 and cable 16 STATE 97388,<sup>4</sup> and the Ambassador made a point of being familiar with its operation.

### ***Equal Employment Opportunity Program Met Requirements***

The embassy's Equal Employment Opportunity (EEO) program met the requirements of 3 FAM 1514.2. EEO notices and references were posted in multiple embassy locations. The embassy’s two EEO counselors received the required training, after which they organized training sessions for the embassy’s six LE staff liaisons. The EEO liaisons told OIG that the embassy’s working environment was excellent. The LE staff committee also reported a positive work environment and identified no EEO issues.

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<sup>4</sup> Cable 16 STATE 97388, “Reporting Requirements for Official Donations and Gifts to the Department of State,” September 1, 2016.

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

The embassy developed its 2017-2020 ICS under the previous Ambassador during off-site strategy and planning conferences and included input from all embassy sections. The Department approved it in December 2016. Following his arrival, the current Ambassador held a mission-wide offsite session in October 2017 to review the ICS. As a result, the embassy revised some language but determined that the document did not require any significant policy changes.

OIG found that the Ambassador promoted the overarching ICS goal of assisting Senegal's political and economic development in order to make the country a more effective international partner for the United States. He addressed bilateral issues, including one that occurred during the OIG inspection—a sensitive repatriation issue that involved discussions with the Minister of Foreign Affairs and high-level Washington interlocutors. He fulfilled his responsibilities under 2 FAM 113.1 to develop close relations with Senegalese Government officials, establish relations with leaders from all levels of society, maintain contact with international representatives, and attend host-country representational events. Between his arrival in July 2017 and the inspection, he met with the President of Senegal three times and with numerous ministers. Representatives of other agencies in the embassy told OIG that the Ambassador raised their concerns with the Government of Senegal as needed. He began an ambitious program of visits to each of Senegal's 14 regions, meeting with regional political leaders, assessing the progress of U.S. foreign assistance projects, and generally making the United States visible throughout Senegal. At the time of the inspection, the Ambassador had visited eight regions. Embassy staff described his public outreach style as good-humored, on-message, and very successful.

### ***Regional Responsibilities and Coordination***

As an important regional platform for the United States in West Africa, Embassy Dakar is responsible for coordinating the embassy's 18 agencies and sub-agencies, all of which also have responsibilities in neighboring countries. The Bureau of African Affairs told OIG that the embassy's attractive working and living environment, central location, and talented LE staff, in the context of a stable political setting, will continue to increase the embassy's regional importance. Embassy Dakar's leadership generally welcomed this trend but told OIG that managing this process can, on occasion, be challenging due to the various agencies' differing regional responsibilities and priorities. The Ambassador made clear to agency heads that, under Chief of Mission authority, he must provide final approval for any increases in U.S. Government presence at the embassy.

The Ambassador participated in regular conference calls with the Bureau of African Affairs' Acting Assistant Secretary and with chiefs of mission in Africa to discuss bilateral and regional affairs. In addition, he reviewed military foreign assistance issues with the Defense Attaché and development assistance issues with the USAID Director.

## **Adherence to Internal Controls**

Embassy Dakar prepared its FY 2017 Annual Chief of Mission Management Control Statement of Assurance, submitted to the Department in August 2017, in accordance with 2 FAM 024. The Financial Management Officer and Management Officer coordinated the embassy's internal control review process and consulted with section heads for their input. The Ambassador reviewed the Statement of Assurance and consulted with the Management Section prior to approving it, in accordance with 2 FAM 022.7. The Statement of Assurance did not identify any significant deficiencies or material weaknesses.

However, OIG identified some internal control vulnerabilities in general services and information management, as discussed in the Resource Management section of this report. Furthermore, as detailed in the Consular Section of the report, the DCM did not comply with requirements to carry out regular reviews of the Consular Section chief's visa adjudications.

## **Security of the Mission**

OIG determined that the Ambassador conducted his security responsibilities in accordance with 12 Foreign Affairs Handbook (FAH)-1 H-721. He discussed security developments at country team meetings, and his guidance to the Regional Security Officer and mission employees emphasized that the mission must always be prepared for any security or emergency contingency. In addition, he hosted a town hall meeting in January 2018 for American citizens residing in Dakar. The DCM met weekly with the Regional Security Officer and chaired the Emergency Action Committee, which is responsible for embassy emergency preparedness. At the time of the inspection in spring 2018, the committee had met more than a dozen times since the beginning of the year. The embassy's security and emergency preparedness programs are discussed further in the companion classified report.

A revised chief of mission-combatant commander memorandum of understanding regarding the security responsibilities for certain Department of Defense personnel had been submitted to the Ambassador for his approval shortly before the inspection.

## **Developing and Mentoring Foreign Service Leaders**

The DCM and the USAID Deputy Director oversaw the mission's Early Career Mentoring program, which included 12 Department and 10 USAID first- and second-tour (FAST) employees, in accordance with 3 FAM 2242.4 and cable 15 STATE 23542.<sup>5</sup> Topics for the program's 2018 monthly meetings included a question and answer session with the Ambassador, a discussion with the Regional Medical Officer on workplace issues, and a debriefing on a FAST conference held at Embassy Accra. FAST employees also served as note takers for the weekly country team meetings on a rotating basis. OIG advised embassy leadership to conduct more Department-focused activities and to contact other embassies for ways to expand or enhance FAST employees' professional development opportunities.

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<sup>5</sup> Cable 15 STATE 23542, "Mentoring for a Stronger Department of State," March 5, 2015.

## POLICY AND PROGRAM IMPLEMENTATION

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OIG assessed Embassy Dakar's policy and program implementation through a review of the Political and Economic Sections' advocacy and analysis work; the Public Affairs Section's public diplomacy efforts; and the Consular Section's provision of American citizen and visa services. OIG found the embassy generally met Department requirements for policy and program implementation. However, OIG found deficiencies in Embassy Dakar's political, economic, public diplomacy, and consular programs, as described below.

### Political and Economic Sections

OIG reviewed the Political and Economic Sections' leadership, management, policy implementation, reporting and advocacy, refugee coordination, commercial promotion, Leahy vetting,<sup>6</sup> export control, and grants management. OIG determined that the operations reviewed generally complied with Department standards and policies, and the sections aligned their reporting and activities with ICS goals. Policy makers in the Department and other agencies told OIG that the reporting was useful and met their needs.

#### *Political and Economic Sections Supported Integrated Country Strategy Goals*

OIG found that the Political and Economic Sections worked to advance ICS goals. For instance, the Political Section worked to facilitate a settlement to end conflict in the Casamance, a region that has experienced a decades-long insurgency. Additionally, the section crafted a strategy to press the Senegalese Government to address the practice of child begging, which the Department defines as trafficking-in-persons. Washington end-users in the Department and other agencies told OIG that an embassy cable explaining the cultural and religious complexities of the issue was useful.<sup>7</sup> The Political Section also worked closely with the embassy's Consular Section and the Department of Homeland Security's Immigration and Customs Enforcement office to influence the Senegalese Government to accept charter flights of Senegalese citizens repatriated from the United States, a key priority of the administration.

At the time of the inspection, the Economic Section was negotiating a Millennium Challenge Corporation compact for a major project in Senegal's power industry and was working with U.S. companies interested in developing Senegal's offshore petroleum deposits. The Economic Section also supported ICS goals in the health sector by participating in weekly meetings of the Global Health Security Agenda, chaired by the Centers for Disease Control and Prevention, and maintaining regular contact with the Regional Environmental Officer at the U.S. Embassy in Accra, Ghana.

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<sup>6</sup> The Leahy Amendment to the Foreign Service Act of 1961 prohibits the Department from furnishing assistance to foreign security forces if the Department received credible information that such forces have committed gross violations of human rights. See 22 USC 2378d.

<sup>7</sup> Cable 18 DAKAR 292, "Better Understanding Forced Child Begging in Senegal," February 9, 2018.

### ***Leahy Vetting Generally Conducted in Accordance with Department Standards, but Procedures Needed Updating***

From August 2017 until the time of the inspection, Embassy Dakar's Leahy unit vetted 771 individuals and security units for potential gross human rights abuses. OIG found that vetting was generally conducted in accordance with applicable laws and Department requirements. However, OIG found that the Political Section had difficulty providing required vetting information to the Bureau of Democracy, Human Rights, and Labor within the required 10 working-day timeframe, which necessitated last-minute requests for expedited processing. This was due to occasional malfunctions of the electronic system for Leahy vetting,<sup>8</sup> intermittent connectivity problems, errors made by system users, and the failure of Senegalese partners to provide data in a timely fashion. At the time of the inspection, the embassy was revising its Leahy vetting standard operating procedures to address these problems. To minimize the embassy's role in late submissions, OIG advised the Political Section to finish updating its procedure and ensure that all users were fully aware of Leahy vetting requirements.

### ***Export Control Check Not Completed***

OIG found that the embassy had an open Blue Lantern<sup>9</sup> request from 2016. The Economic Section explained to OIG the difficulties in obtaining end-use monitoring of the specific equipment in question, which only was available from a Germany-based U.S. contractor who visits Senegal periodically. The section kept the Bureau of Political-Military Affairs apprised of the issue. OIG advised the Economic Section to make expeditious efforts to obtain the needed end-use monitoring information in order to comply with the Blue Lantern request.

### ***Grant Award Information Not Entered Into Department Database***

OIG found that the Economic Section had not fully entered required Federal assistance records into the State Assistance Management System–Overseas database (SAMS), as mandated by Federal assistance guidance.<sup>10</sup> OIG reviewed all six active grants for FY 2017, four closed-out grants from FY 2016, and one FY 2017 terminated grant (total value of \$567,000). Although the SAMS files were largely complete, four files lacked a grants monitoring plan or evidence of monitoring. In five cases, the Grants Officer Representative designation letter was missing. In

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<sup>8</sup> The International Vetting and Security Tracking (INVEST) system is an internal Department database that contains the names of individuals or units nominated for U.S. training or assistance. Through this resource, the Department vets the individuals or units using governmental, nongovernmental, and media resources on human rights abuses in the relevant country.

<sup>9</sup> The Department's Blue Lantern program is mandated by Section 40A of the Arms Export Controls Act. Conducted through overseas U.S. missions, Blue Lantern targets defense-trade transactions based on specific risks and concerns, seeks to confirm their legitimacy through pre- and post-license checks, and verifies the bona fides of foreign consignees and end-users.

<sup>10</sup> Grants reviewed by OIG were subject to the Department's Federal Assistance Directive (issued May 20, 2017, revised October 1, 2017), the Federal Assistance Policy Directive (issued March 2015, revised January 2016) and the Procedural Guide for Grants and Cooperative Agreements to Non-Federal Entities Not Recognized as Foreign Public Entities (issued December 2015).

addition, close-out records for three Special Self-Help and Julia Taft grants were missing or incomplete.<sup>11</sup> OIG advised the section to address the filing and documentation deficiencies. Because the section began to address the missing documentation during the inspection, OIG did not make a recommendation.

## **Guinea-Bissau**

### ***More Resources Needed To Support Growing U.S. Engagement with Guinea-Bissau***

Embassy Dakar's most prominent regional responsibility—its engagement with Guinea-Bissau—was managed by an American liaison officer at the embassy and 14 LE staff at the Bissau Liaison Office. Key ICS priorities included enabling Guinea-Bissau to respond to transnational threats, such as drug trafficking, and promoting democratic values. The Ambassador and officials of the Bureau of African Affairs told OIG that the lack of a permanent U.S. diplomatic presence was a major constraint in promoting U.S. interests in Guinea-Bissau.

The Ambassador, a Portuguese speaker, frequently contacted senior officials, including Guinea-Bissau's President and Prime Minister, and had visited the Bissau Liaison Office three times since his arrival in Dakar. Both the Bureau of African Affairs and Embassy Dakar told OIG they believed that increased U.S. engagement in Guinea-Bissau supported their longer-term goal of reopening the embassy there. At the time of the inspection, Embassy Dakar was developing options for property and other logistical support for increased U.S. operations in Bissau. These included determining uses for the U.S. Government-owned properties, including the former chancery, which recently was razed due to structural deterioration.

OIG found that Embassy Dakar strongly supported U.S.-Guinea-Bissau engagement in the political, defense, economic, health, education, and local governance fields. The Department, USAID, the Centers for Disease Control and Prevention, and the Departments of Defense and Agriculture each managed programs in Guinea-Bissau from Dakar. Although the U.S. embassy closed in 1998, 16 countries—including several European and African nations, Cuba, China, and Russia—maintain embassies and 10 others have consulates in Bissau.

The embassy's Guinea-Bissau liaison officer, a Portuguese speaker in the Political Section, reported to the DCM. Despite infrequent air service between Dakar and Bissau, he traveled to Bissau approximately twice a month on visits of about four days each to meet contacts and oversee the LE staff. The embassy and the Bissau office also maintained contact through daily emails and weekly video conferences. In the six months prior to the inspection, the liaison officer prepared 21 cables on developments in Guinea-Bissau, which Washington end-users described to OIG as useful. The number of temporary duty visits by U.S. Government agencies increased as

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<sup>11</sup> Self-Help grants fund small-scale projects that are initiated and administered by the local community. Julia Taft grants fund small-scale projects that assist refugees, internally displaced persons, or vulnerable migrants.

the level of U.S.-Guinea-Bissau engagement grew. In 2013, U.S. Government personnel spent the equivalent of 96 days in Guinea-Bissau; in 2017, the number rose to about 120 days.<sup>12</sup>

Embassy Dakar recommended assigning a second Portuguese-speaking political officer in its 2020 Mission Resource Report in order to create a Guinea-Bissau Unit in Dakar. This would permit a nearly continuous physical presence of an American officer in Bissau to increase visibility and expand contacts and engagement with the government. It also would improve oversight and management of the Bissau LE staff, who were new to their jobs and lacked training and experience.

The Bureau of African Affairs told OIG that its goal of re-establishing an embassy in Guinea-Bissau was unlikely in the near term. Nonetheless, the embassy, in its Guinea-Bissau ICS, believed it necessary to cultivate a closer relationship with a country striving to emerge from political instability, corruption, and a reputation as a drug-trafficking center.

### ***Guinea-Bissau Public Diplomacy Assistant Did Not Report to Embassy Dakar Public Affairs Officer***

The Public Diplomacy Assistant in the Bissau Liaison Office did not report to the Public Affairs Officer in Embassy Dakar. Instead, the office's Management Assistant, a senior LE staff member who reported to the liaison officer in Dakar, supervised the Public Diplomacy Assistant. The Public Diplomacy Assistant position, filled in August 2017, is funded by public diplomacy funds, and the position description provides for "direction from the Public Affairs Officer in Dakar." In practice though, this direction consisted of a checklist of general tasks and working-level communication with the Public Affairs Section. This approach is inconsistent with the responsibilities of the Public Affairs Officer as outlined in 10-FAH-1 H-020, which include management of all Foreign Service and LE staff who have public diplomacy responsibilities and management of all public diplomacy resources country-wide. The current reporting arrangement limits the ability of Dakar's Public Affairs Officer to oversee the assistant and monitor his time management and job performance.

**Recommendation 1:** Embassy Dakar should formalize a reporting and oversight relationship between the Embassy's Public Affairs Officer and the Public Diplomacy Assistant at the Bissau Liaison Office. (Action: Embassy Dakar)

## **Public Diplomacy**

OIG reviewed the full range of the Public Affairs Section's operations, including media outreach, exchanges, English language programs, social media accounts, and American Spaces.<sup>13</sup> The section used its Public Diplomacy Implementation Plan, coordinated among different program

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<sup>12</sup> The number of temporary duty employees in Guinea-Bissau spiked in 2015, to 1,356 days, as the result of an influx of Centers for Disease Control and Prevention and military personnel to cope with the Ebola epidemic.

<sup>13</sup> American Spaces are Department-operated or -supported public diplomacy facilities that host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives. Embassy Dakar manages spaces in Dakar (American Center), Thies, Louga, and Ziguinchor in Senegal, and in Bissau (American Corners).

units, and its physical and virtual platforms to integrate activities that contributed to ICS goals of promoting good governance, educational opportunity, and regional stability. In collaboration with other embassy sections and agencies, it used programs, grants, and outreach to promote a better public understanding of U.S. policy and to build relationships with Senegalese leaders, particularly youth leaders. The section also supported activities in Guinea-Bissau that pursued similar objectives with new audiences there. OIG found that the section's operations generally complied with Department requirements, with the exceptions noted below.

***Section Managed Grants and Implemented Electronic Database in Accordance with Department Directives***

OIG reviewed the 10 Public Affairs Section FY 2016-2018 federal assistance awards (out of a total of 53 grants) that exceeded \$24,000 each (the total value was \$659,000 and constituted 68 percent of funds awarded). OIG found that the section appropriately awarded all 10 grants reviewed. At the time of the inspection, the embassy was updating its annual program statement and soliciting additional proposals for competition. In April 2017, the section reviewed its grant files, inserted any missing documents that could be found, and noted deficiencies that could not be corrected. This review took place as the section began implementing SAMS using the Department's standard operating procedures to prevent further deficiencies. During the first year of implementation, SAMS users shared lessons learned and arranged in-house training, which addressed previous file management deficiencies. OIG found that staff named or renamed uploaded documents according to standardized terminology, applied metadata to link files to the standard checklist, and mastered more complex operations such as merging two funding sources into one award.

***Section Continued to Administer FY 2014 Non-Public Diplomacy Grant***

In reviewing FY 2016-2018 public diplomacy awards, OIG identified one grant issued in FY 2014 that had not yet been completed or closed out. This grant had, at most, a tenuous connection to public diplomacy.<sup>14</sup> In March 2015, the Under Secretary for Public Diplomacy and Public Affairs instructed, via cable 15 STATE 22048,<sup>15</sup> that Public Affairs Sections should only administer grants with an intrinsic public diplomacy function. The Office of the Procurement Executive reiterated this prohibition in its October 2017 Federal Assistance Directive (Chapter 1.D.2.d). The Public Affairs Officer and the Grants Officer Representative described to OIG their attempts to move the project toward completion and outlined plans for close out without further extensions. They also told OIG that the section no longer would administer non-public diplomacy grants. OIG advised the section to bring this grant to closure in accordance with these plans.

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<sup>14</sup> The grant was made under the Trans-Sahel Counterterrorism Partnership for construction of a facility to reach at-risk youth with messages countering violent extremism. It had been amended seven times, the last being a three-month no-cost extension until May 31, 2018. Although the section managed public diplomacy grants with a countering violent extremism component, construction support by itself has a tenuous connection to public diplomacy. At the time of the award, however, Public Affairs was the only embassy section with grants management capacity.

<sup>15</sup> This was restated in cable 17 STATE 2408, "Grant Policies for Public Diplomacy Officers Remain Unchanged," January 10, 2017.

## Consular Affairs

OIG's review of the embassy's consular operations, including American citizen services, immigrant and nonimmigrant visas, management controls, communications and outreach, crisis preparedness, and fraud prevention programs, found that the Consular Section generally met Department standards. However, OIG found deficiencies in training, consular management, and congressional communications, as detailed below.

The Consular Section in Dakar provided the full range of American citizen services and nonimmigrant and immigrant visa services. In addition to Senegal, the section provided all consular services for Guinea-Bissau and immigrant visa services for Mali, Mauritania, Guinea, and The Gambia. At the time of the inspection, the section also offered nonimmigrant visa and American citizen services to Mauritania and The Gambia, due to months-long gaps in the assignments of full-time consular officers at Embassies Nouakchott and Banjul. Dakar's Consular Section handled this additional workload with reduced staffing. The senior LE staff member retired early in 2018, and her replacement was on extended leave; in addition, two of four eligible family member positions had been vacant since 2017. Section officers also noted the difficulty inherent in handling consular services for people of so many different nationalities, given the differences in culture, language, and documentation. In order to address workload issues, OIG advised the section on the importance of using Bureau of Consular Affairs management and analysis tools<sup>16</sup> to improve their operations, possible ways to speed visa applications, and methods to improve processing of Consular Reports of Birth Abroad.

### *American Consular Staff Lacked Adequate Training*

OIG found that newly arrived American staff did not receive adequate training. American officers described having only a few days in which to observe interviews before beginning to interview full time, and no other training was provided. The section's "training manual"—which had a detailed checklist for embassy in-processing and background notes on local culture and section operations—did not, in fact, detail training requirements. Department guidance outlines the responsibility of consular managers to hold regular training.<sup>17</sup> Failure to provide adequate training can lead to errors in adjudication and inefficient operations. Training is also necessary to maintain employee proficiency, effectiveness, and customer service.

**Recommendation 2:** Embassy Dakar should implement a training plan for newly arrived American staff in the Consular Section, in accordance with Department standards. (Action: Embassy Dakar)

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<sup>16</sup> The Bureau of Consular Affairs has a suite of management tools called "1CA," described in 9 FAM 601.1-1 through 9 FAM 601.1-3.

<sup>17</sup> 7 FAH-1 H-242c(3), 7 FAH-1 H-645.2, and cable 09 STATE 80775, "The Consular Manager's Role in Cultivating Leaders," August 4, 2009.

### ***Nonimmigrant Visa Adjudication Reviews Not Completed***

OIG found that not all supervisors consistently reviewed the required 10 percent of visa issuances and 20 percent of visa denials, as required in 9 FAM 403.9-2(D) and 9 FAM 403.10-3(D)(1).<sup>18</sup> Although the section chief frequently adjudicated nonimmigrant visas, her direct supervisor, the DCM, did not conduct the required percentage of reviews. Regular reviews of visa adjudications are an important management tool to maintain the highest professional standards of adjudications and ensure uniform and correct application of Department standards.

**Recommendation 3:** Embassy Dakar should conduct nonimmigrant visa adjudication reviews in accordance with Department standards. (Action: Embassy Dakar)

### ***Responsiveness to Congressional Correspondence Did Not Meet Department Standards***

The Consular Section did not comply with Department standards to respond to congressional inquiries in a timely, thorough, and accurate way.<sup>19</sup> OIG found that the section, which received approximately eight congressional inquiries weekly, frequently responded late or not at all to those inquiries. In addition, the responses were often neither clear nor informative. The section chief said an eligible family member handled this work in the past; however, at the time of the inspection, the position was vacant. The section assigned and trained an LE staff member to answer the inquiries, although doing so was not part of her regular duties. Furthermore, the section did not have a spreadsheet or other tool to keep track of responses. Failure to provide timely and informative responses to congressional inquiries creates additional work because of the need to address repeated requests and moreover presents a poor image of the Department.

**Recommendation 4:** Embassy Dakar should comply with Department standards for responses to congressional inquiries. (Action: Embassy Dakar)

### ***Consular Appointment System Was Not Being Used Effectively***

The Consular Section did not manage its appointment system effectively, which resulted in long lines of nonimmigrant visa applicants early in the morning. This occurred because the section scheduled all appointments for 7:00 to 7:30 a.m. Visa applicants waited in line on the street, sometimes in inclement weather, until admitted into the Consular Section where they again waited to be interviewed, sometimes much later in the morning. Guidance in 7 FAH-1 H-263.5 states that appointments should be staggered so as to avoid overwhelming security screening and waiting facilities. Section staff told OIG they previously spaced appointments throughout the morning, but applicants did not comply with the appointment times. The section had not,

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<sup>18</sup> The Department updated and moved the guidance to 9 FAM 403.12-1b in July 2018.

<sup>19</sup> Guidance in 9 FAM 601.7-1 states that "Congressional inquiries should be answered within two or three working days." In addition, 9 FAM 601.7 states that replies to visa correspondence should be complete and accurate, while 7 FAH-1 H-441a states that inefficient correspondence "wastes time, causes delays, frays nerves, projects a poor public image, and creates more work by leaving questions unanswered, thus generating yet more work." Guidance in 7 FAH-1 H-842.4 also states "Post should log the receipt of and action on all congressional inquiries."

however, tried other adjustments to appointment times that could address the situation. OIG advised the Consular Section to experiment with different approaches to scheduling.

## RESOURCE MANAGEMENT

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OIG reviewed Embassy Dakar's internal controls in the Financial Management, Human Resources, General Services, Facilities Management, and Information Management Sections, and in the health unit and the employee association. OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, except as noted below.

### Financial Management

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

The embassy paid official residence staff salaries for the Ambassador and the DCM via electronic funds transfer. This practice violates 3 FAM 3257a, which requires the principal officer or the household manager to pay the official residence staff directly. An August 2017 OIG report made two recommendations to the Department to address this issue.<sup>20</sup> In response to OIG's recommendations, the Department reported that direct payments to official residence expenses staff—via embassy cashier, electronic funds transfers, or in cash directly from an embassy cashier—would be discontinued, and the Department would update its policy guidance accordingly. As a result, OIG did not make a recommendation in this report.

### Human Resources Operations

#### *Official Residence Staff Member Was a Direct-Hire Embassy Employee*

The Chief of Mission's Residence Manager was a direct-hire embassy employee, contrary to 3 FAH-1 H-3252.2a and 3 FAM 3251.3, which require that the principal officer employ official residence staff. All responsibilities related to oversight, compensation, and local benefits are likewise the responsibility of the principal officer. Having official residence staff as direct-hire employees of the embassy could create legal risk for the U.S. Government with respect to local labor laws and practices.

**Recommendation 5:** Embassy Dakar should eliminate the direct-hire Residence Manager position. (Action: Embassy Dakar)

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<sup>20</sup> OIG, *Compliance Follow-up Review: Department of State Has Not Implemented Recommendations Pertaining to Official Residence Expense Staff Salaries* (ISP-C-17-32, August 2017).

## General Services Operations

### *Embassy Lacked an Annual Acquisition Plan*

Embassy Dakar did not have an annual acquisition plan for procuring supplies and services. Federal Acquisition Regulation 7.102(a) requires acquisition planning to be performed for all purchases. Without an annual acquisition plan, the embassy cannot determine optimal contracting methods, increase competition, or achieve potential cost savings. In this case, acquisition planning could have prevented the embassy from spending \$86,000 on excess tools, \$40,000 on an unused industrial washer and dryer, and \$80,000 on unused building scaffolding between January 2016 and May 2017. Embassy staff told OIG they were looking into ways to recoup some of the funds through sales or auctions. In addition, better oversight of contracting needs could have prevented the embassy from committing an unauthorized commitment of approximately \$189,000 for mail services. The unauthorized commitment, which the Department ratified in April 2017, was caused in part by the embassy's failure to resolicit a mail services contract as a result of competing priorities and heavy workloads.

**Recommendation 6:** Embassy Dakar should implement an annual acquisition plan. (Action: Embassy Dakar)

### *Internal Control Deficiencies in Fuel Operations*

The embassy's Accountable Property Officer did not conduct spot checks of residential fuel deliveries. Instead, an LE staff member oversaw fuel deliveries. According to 14 FAM 411.2-2a-c, the Accountable Property Officer is responsible for the custody, care, and safekeeping of all property under embassy control and must personally conduct periodic, unannounced spot counts of expendable and nonexpendable property, including fuel. The lack of a compliant monitoring program increases the risk of fuel theft and inaccurate deliveries.

**Recommendation 7:** Embassy Dakar should conduct oversight of residential fuel operations in accordance with Department guidelines. (Action: Embassy Dakar)

### *Inaccurate Automated Fuel System Readings*

Department standards in 14 FAH-1 H-815.4a-c outline requirements for fuel tank calibration. Even after efforts to address this issue, however, the embassy's Building Automated Systems Fuel Management System did not provide accurate readings of fuel levels. In August 2017, the employee responsible for overseeing fuel operations discovered inconsistencies between the fuel management system readings and the actual amount of fuel being delivered. In response, the embassy installed a fuel flow meter at the bulk refueling inlet to verify the actual amount of fuel delivered and, in March 2018, a U.S. technician recalibrated the system. However, inconsistent readings occurred again several weeks later. Inconsistent readings of fuel quantities increases the risk of fuel theft and inaccurate deliveries. The embassy had neither the trained staff nor the equipment required to calibrate the fuel management system; hence, OIG advised the embassy to continue monitoring fuel levels and request that a technician regularly recalibrate the system.

### ***Motor Pool Did Not Adhere to the Motor Vehicle Safety Management Policy***

OIG found that while LE staff drivers complied with safety training and medical clearances, incidental (self-drive) American drivers did not. As stated in 14 FAM 432.4c(1) and (2), embassies that employ professional drivers or authorize incidental operators<sup>21</sup> to self-drive official vehicles must implement the Department's Overseas Motor Vehicle Safety Management Program. In addition, all U.S. Government agencies under Chief of Mission authority must comply with these requirements for their professional drivers and incidental operators. However, only 3 of 19 incidental drivers from other agencies received driver safety training. OIG found that embassy management was not enforcing the motor vehicle safety policy. Inadequate compliance with motor vehicle safety policies can lead to accidents and increase the risk of liability to the embassy.

**Recommendation 8:** Embassy Dakar should implement a corrective action plan to bring all professional and incidental drivers into compliance with the Department's Overseas Motor Vehicle Safety Management Program. (Action: Embassy Dakar)

### ***Unauthorized Garaging of Official Vehicles***

OIG found that incidental American drivers garaged or parked official vehicles at their residences without prior specific authorization from the Chief of Mission, as required by 14 FAM 436.4 and the Mission Motor Vehicle Policy. OIG found that the embassy did not enforce this requirement. As set forth in this FAM section, absent prior approval, official vehicles should be parked overnight on an embassy compound for security, accountability, and safekeeping purposes. Existing practices increase the risk of liability to the embassy.

**Recommendation 9:** Embassy Dakar should require that all official vehicles be garaged and parked in compliance with Department standards. (Action: Embassy Dakar)

## **INFORMATION MANAGEMENT**

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OIG reviewed classified, unclassified, and dedicated internet network (DIN) operations; physical protection of information technology (IT) assets; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services. OIG determined that Information Management staff met the day-to-day computing and communications needs of the embassy, with a focus on customer service. However, OIG also found deficiencies in the implementation of effective information security and program management, as detailed below and in the companion classified report.

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

The embassy's unclassified and classified Information Systems Security Officers (ISSO) did not use the Department's ISSO checklist, as required by 5 FAH-11 H-116, and thus did not perform

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<sup>21</sup> Employees other than professional drivers who are authorized to operate an official vehicle incidental to their primary job.

all information systems security duties. As a result, OIG found access control and configuration management issues in the unclassified and classified systems operations. These weaknesses included inconsistent system auditing for malicious activity, unencrypted laptop computers, inactive user accounts, outdated antivirus software on dedicated internet network systems, and servers that were not configured to Bureau of Diplomatic Security standards. OIG determined that these problems occurred because embassy management did not allow ISSOs sufficient time to perform their duties. OIG identified similar issues at other embassies and Department entities and issued a management assistance report in May 2017 that highlighted widespread failures to perform ISSO duties.<sup>22</sup> In a subsequent Department cable, the Bureau of Information Resource Management stated that embassy management needed to work with ISSOs to ensure performance of their duties by prioritizing resources to ensure that cybersecurity needs were met and documented.<sup>23</sup> In this case, competing priorities and a lack of prioritization of cybersecurity needs led to non-performance of these duties, which put the security of the Department's computer systems at risk.

**Recommendation 10:** Embassy Dakar should require that Information Systems Security Officers perform information systems security officer duties, in accordance with Department standards. (Action: Embassy Dakar)

### ***Ineffective Active Directory Groups Management Created Security Risk***

Embassy Dakar did not maintain its Active Directory<sup>24</sup> security and distribution groups for its unclassified and classified computer networks in accordance with 12 FAH-10 H-112.5-2(1-3) and 12 FAH-10 H-112.1-1a(2-3). As a result, OIG found instances of user accounts with elevated access privileges or access to information they did not need to perform their duties. This occurred, at least in part, because Information Management staff did not develop standard operating procedures for checking and maintaining Active Directory security and distribution groups. Such groups are used to manage access to information and computer resources to ensure information is distributed to, or accessed by, the intended personnel. Failure to accurately maintain these groups increases the risk of a security breach, especially if a group has inappropriately been given administrative privileges. During the inspection, section staff began standardizing Active Directory access controls but had yet to complete written documentation needed to manage the process.

**Recommendation 11:** Embassy Dakar should implement a standard operating procedure to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Dakar)

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<sup>22</sup> OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

<sup>23</sup> Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

<sup>24</sup> Active Directory captures properties of users, groups, computers, servers, printers, network shares, and additional systems information.

### ***Embassy Lacked Local Information Technology Configuration Control Board***

Embassy Dakar did not have an active local IT configuration control board, as required in 5 FAM 115.6-2a, and therefore lacked accurate hardware and software inventories for its networks. Local IT configuration control boards are responsible for keeping a list of all approved IT components in an embassy's inventory. Although the Regional Computer Security Officer in 2016 found that the embassy had a local board, OIG found no evidence that it was active. OIG found that this occurred due to a lack of management oversight. Without accurate hardware and software inventories, the Information Management Section could not assure proper implementation of IT security controls to protect its networks.

**Recommendation 12:** Embassy Dakar should establish its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Dakar)

### ***Embassy Lacked Approval and Baselines for Dedicated Internet Network Components***

Embassy Dakar did not approve hardware and software operating on its DINs or configure these components to Department baseline standards, as required in 5 FAM 872.3c and d. The 2016 Regional Computer Security Officer assessment report recommended that the embassy identify and approve all DIN components. However, OIG found that the embassy did not implement the recommendation due to a lack of management oversight. The lack of approved hardware and software inventories and baseline standards left the embassy's DINs at risk for intrusion.

**Recommendation 13:** Embassy Dakar should inventory, baseline, and approve the information technology hardware and software operating on its dedicated internet networks. (Action: Embassy Dakar)

### ***Lack of Management Oversight for Dedicated Internet Networks***

The embassy did not effectively support and maintain its DINs as required in 5 FAM 872.1a, due to a lack of management oversight. As a result, OIG found unmonitored DIN laptop computers with outdated antivirus software. The absence of proper DIN oversight by embassy management created security vulnerabilities from unmonitored and unprotected systems.

**Recommendation 14:** Embassy Dakar should implement standard operating procedures for supporting and maintaining dedicated internet networks. (Action: Embassy Dakar)

### ***Embassy Did Not Have Service Level Agreement for Dedicated Internet Networks***

The embassy did not establish a service level agreement to outline the roles and responsibilities of the Information Management staff and DIN customers, as required in Department cable 08 STATE 110378.<sup>25</sup> The Regional Computer Security Officer also recommended that the embassy

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<sup>25</sup> Cable 08 STATE 110378, "Corrected Guidance: Post Management of Dedicated Internet Networks (DINS) for Information Resource Centers," October 15, 2008.

establish this agreement in the 2016 assessment report. Because of a lack of management oversight, however, this recommendation was not adopted, and, as a result, section staff was unable to establish a baseline for DIN components and assign network-monitoring responsibilities. Moreover, the absence of proper DIN oversight and a service level agreement created security vulnerabilities from unmonitored systems.

**Recommendation 15:** Embassy Dakar should develop a service level agreement between the Information Management Section staff and dedicated internet network customers that defines the services provided and the roles and responsibilities of the user. (Action: Embassy Dakar)

### ***Inadequate Telephone Call Accounting System***

The embassy did not have a properly configured telephone call accounting system for office telephones. In addition, the embassy lacked procedures to accurately bill sections for monthly telephone services and identify and seek repayment for unapproved personal telephone charges, as required in 5 FAM 527a-c. Rather than reviewing monthly charges to determine whether outgoing calls were official, the embassy paid invoices in bulk as a utility. OIG also found that the embassy billed sections and agencies according to relative usage instead of using accurate billing rates to develop the bills for outgoing call charges. These procedures limited the embassy's ability to maintain internal control over the Department's telephone expenses.

**Recommendation 16:** Embassy Dakar should implement procedures to accurately bill embassy sections and employees for monthly telephone services. (Action: Embassy Dakar)

### ***Knowledge Management Process for Documenting Information Management Operations Lacking***

Embassy Dakar lacked knowledge management procedures to ensure reliable documentation and historical information for managing section programs. According to 5 FAM 867, Information Management Section managers must maintain such documentation for all aspects of computer support and operations to ensure continuity and consistency. The embassy's Information Programs Center implemented the robust use of a digital "notebook" to record all aspects of computer support and IT operations, a practice that enhanced continuity for its staff. Through the use of this central digital "notebook," center staff documented procedures, project status updates, and steps to aid in system troubleshooting. In addition to sharing notebooks to facilitate multi-user collaboration, each staff member maintained an individual notebook to effectively record work activities. The Information Programs Center's use of this digital notebook provided the ability to organize and quickly search notes, which helped save time when encountering repeat network problems and enabled the staff to work more efficiently.

However, OIG found instances where section managers in other program areas were unable to provide information on the status of their operations. For example, managers could not readily access historical records of Active Directory group names that did not comply with Department standards or security patch procedures for a non-standard server. OIG also found inconsistent

systems maintenance recordkeeping across multiple programs, including network, telephone, and radio systems. In addition, OIG found a lack of standard operating procedures for pouch operations and system backups as well as for incident response. OIG determined that, although embassy officials were aware of these deficiencies, the section did not focus on correcting them. The absence of reliable information adversely affects internal control and diminishes the effectiveness of Information Management Section programs.

**Recommendation 17:** Embassy Dakar should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its Information Management programs. (Action: Embassy Dakar)

### ***Inadequate Information Technology Contingency Planning***

Section managers did not test the unclassified and classified IT contingency plans, as required by 12 FAH-10 H-232.3-1b(1-3), due to competing priorities. Department guidelines require management to test IT contingency plans annually for effectiveness and to determine the mission's readiness to execute them during unplanned system outages or disruptions. Inadequate contingency plan testing prevents managers from mitigating the risk of system and service disruptions.

**Recommendation 18:** Embassy Dakar should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: Embassy Dakar)

### ***Information Technology Contingency Plan Training Not Conducted***

The embassy did not conduct initial and annual refresher IT contingency training for employees with responsibilities in these areas. According to 12 FAH-10 H-232.2-1, embassy management must ensure that such IT contingency training is provided based on employees' roles and responsibilities. Section managers did not conduct this training because they did not have a current classified IT contingency plan prior to the OIG inspection and were unaware of the requirement. Failure to complete required training impedes the embassy's ability to effectively and appropriately respond to unplanned systems outages or disruptions.

**Recommendation 19:** Embassy Dakar should implement a plan for conducting initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Dakar)

## 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 Dakar. The embassy's complete responses can be found in Appendix B. The embassy also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** Embassy Dakar should formalize a reporting and oversight relationship between the Embassy's Public Affairs Officer and the Public Diplomacy Assistant at the Bissau Liaison Office. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a formalized reporting and oversight relationship between Embassy Dakar's Public Affairs Officer and the Public Diplomacy Assistant at the Bissau Liaison Office.

**Recommendation 2:** Embassy Dakar should implement a training plan for newly arrived American staff in the Consular Section, in accordance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a training plan for newly arrived American staff in the Consular Section, in accordance with Department standards.

**Recommendation 3:** Embassy Dakar should conduct nonimmigrant visa adjudication reviews in accordance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that nonimmigrant visa adjudication reviews are conducted in accordance with Department standards.

**Recommendation 4:** Embassy Dakar should comply with Department standards for responses to congressional inquiries. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dakar complies with Department standards for responses to congressional inquiries.

**Recommendation 5:** Embassy Dakar should eliminate the direct-hire Residence Manager position. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar disagreed with this recommendation. The embassy noted it will immediately ensure official residence staff are not supervised by any U.S. Government employee other than the employer. The embassy will also reclassify the Residence Manager position description to remove all supervisory duties.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the direct-hire Residence Manager position does not have supervisory responsibilities for official residence staff.

**Recommendation 6:** Embassy Dakar should implement an annual acquisition plan. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an implemented annual acquisition plan.

**Recommendation 7:** Embassy Dakar should conduct oversight of residential fuel operations in accordance with Department guidelines. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that oversight of residential fuel operations are conducted in accordance with Department guidelines.

**Recommendation 8:** Embassy Dakar should implement a corrective action plan to bring all professional and incidental drivers into compliance with the Department's Overseas Motor Vehicle Safety Management Program. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a corrective action plan to bring all professional and incidental drivers into compliance with the Department's Overseas Motor Vehicle Safety Management Program.

**Recommendation 9:** Embassy Dakar should require that all official vehicles be garaged and parked in compliance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all official vehicles are garaged and parked in compliance with Department standards.

**Recommendation 10:** Embassy Dakar should require that Information Systems Security Officers perform information systems security officer duties, in accordance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

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

**Recommendation 11:** Embassy Dakar should implement a standard operating procedure to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a standard operating procedure to manage Active Directory groups for Embassy Dakar's classified and unclassified networks in accordance with Department standards.

**Recommendation 12:** Embassy Dakar should establish its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

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

**Recommendation 13:** Embassy Dakar should inventory, baseline, and approve the information technology hardware and software operating on its dedicated internet networks. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dakar inventoried, baselined, and approved the information technology hardware and software operating on its dedicated internet networks.

**Recommendation 14:** Embassy Dakar should implement standard operating procedures for supporting and maintaining dedicated internet networks. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of standard operating procedures for supporting and maintaining dedicated internet networks.

**Recommendation 15:** Embassy Dakar should develop a service level agreement between the Information Management Section staff and dedicated internet network customers that defines the services provided and the roles and responsibilities of the user. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation. The embassy noted a target compliance date of December 31, 2018.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a service level agreement between the Information Management Section staff and dedicated internet network customers that defines the services provided and the roles and responsibilities of the user.

**Recommendation 16:** Embassy Dakar should implement procedures to accurately bill embassy sections and employees for monthly telephone services. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of procedures to accurately bill embassy sections and employees for monthly telephone services.

**Recommendation 17:** Embassy Dakar should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its Information Management programs. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of knowledge management procedures for Embassy Dakar's Information Management programs.

**Recommendation 18:** Embassy Dakar should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar disagreed with this recommendation. The embassy stated it conducts information technology contingency plan testing on both networks on a regular basis by restoring data from backup. The embassy also noted that twice in the past year it had performed full system shutdown and startup exercises on both networks to verify functionality, document procedures, and train relevant staff.

**OIG Reply:** OIG considers the recommendation unresolved. OIG acknowledges that the embassy did restore data from both networks on a regular basis. However, restoring data from backup alone does not meet Department requirements for testing of the contingency plan. Additionally, at the time of the inspection, the embassy was not able to provide documentation that it tested the information technology contingency plans in accordance with Department guidance. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dakar tested the information technology contingency plans for unclassified and classified networks in accordance with Department guidance.

**Recommendation 19:** Embassy Dakar should implement a plan for conducting initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Dakar)

**Management Response:** In its November 1, 2018, response, Embassy Dakar disagreed with this recommendation. The embassy stated that the information technology contingency plan documents reviewed by the OIG inspector were relatively new, and, as a result, the embassy could not show annual testing of prior plans. However, the embassy acknowledged that there are areas where it could improve and enhance training documentation and planned to do that going forward.

**OIG Reply:** OIG considers the recommendation unresolved. As noted in its response, Embassy Dakar was not able to provide information technology contingency plan documentation. The recommendation can be closed when OIG receives and accepts documentation of a plan for conducting initial and annual refresher training for employees with information technology contingency planning responsibilities.

## PRINCIPAL OFFICIALS

Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Tulinabo Mushingi	7/17
Deputy Chief of Mission	Martina Boustani	8/16
<b>Chiefs of Sections:</b>		
Management	Todd Whatley	8/17
Consular	Patricia Neary	7/16
Political	John T. Ice	7/16
Economic	James Garry	7/16
Public Affairs	Matthew Miller	7/17
Regional Security	Christopher Tremann	8/16
<b>Other Agencies:</b>		
Defense Attaché	Scott Morgan	8/15
Legal Attaché	Keith Bethke	6/17
U.S. Agency for International Development	Lisa Franchett	8/14
Centers for Disease Control and Prevention	Michael Kinzer	8/15
National Institutes of Health	Fatoumata Bathily	8/16
Federal Bureau of Investigation	Keith Bethke	6/17
Drug Enforcement Administration	Jared Gustin	12/17
Office of Overseas Prosecutorial Development, Assistance and Training (OPDAT)	Gayle Malone	10/17
Federal Aviation Administration	Grady Stone	9/15
Foreign Agricultural Service	Joshua Lagos	1/17
Department of the Treasury	Michael Scarlatos	2/15
Transportation Security Administration	Gary Pleus	1/16
Immigration and Customs Enforcement	Donna Chabot	5/13
Peace Corps	Cheryl Faye	7/14

**Source:** Embassy Dakar

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted between March 19 and August 3, 2018, 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 of State and the U.S. Agency for Global Media (USAGM).

### **Objectives and Scope**

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and the USAGM. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; 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, circulates, and compiles the results of survey instruments, as appropriate; conducts interviews with Department and on-site personnel; observes daily operations; and reviews the substance of the report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG uses professional judgment, along with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

In conducting this inspection, OIG conducted 161 interviews in Washington and at Embassy Dakar, and reviewed 185 questionnaires completed by American and locally employed staff.

## APPENDIX B: MANAGEMENT RESPONSE

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November 1, 2018

UNCLASSIFIED

THRU: Bureau of African Affairs – EX Director Ben Dille

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

FROM: Embassy Dakar – Ambassador Tulinabo Mushingi

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Dakar

Embassy Dakar has reviewed the draft OIG Inspection report. We provide the following comments in response to the recommendations provided by OIG:

**Recommendation 1:** Embassy Dakar should formalize a reporting and oversight relationship between the Embassy’s Public Affairs Officer and the Public Diplomacy Assistant at the Bissau Liaison Office. (Action: Embassy Dakar PAS)

**Response:**

Post agrees with the recommendation and proposes modifying the position description of the Public Diplomacy Assistant at the Bissau Liaison Office to indicate the incumbent is rated by the Bissau Liaison Officer and reviewed by the Public Affairs Officer in Dakar. The position description would maintain language indicating the PD Assistant operates with direction from the PAO in Dakar and would add language noting the PAO is responsible for managing and administering all PD resources in Guinea-Bissau, to include things such as grants and overtime requests, etc. (Note: PAO in Dakar currently signs all forms for overtime, and all grants are administered from Dakar.)

**OIG Recommendation 2:** Embassy Dakar should implement a training plan for newly arrived American staff in the Consular Section, in accordance with Department standards. (Action: Embassy Dakar Consular)

**Response:**

Post agrees with the recommendation. The Consular Section has drafted a new plan with significant improvements for training incoming American officers. The new plan is now being implemented upon arrival of new American staff.

**Recommendation 3:** Embassy Dakar should conduct nonimmigrant visa adjudication reviews in accordance with Department standards. (Action: Embassy Dakar Consular)

**Response:**

Post agrees with the recommendation. All non-immigrant visa adjudication reviews are being done according to Department standards.

**Recommendation 4:** Embassy Dakar should comply with Department standards for responses to congressional inquiries. (Action: Embassy Dakar Consular)

**Response:**

Post agrees with the recommendation. We are now compliant with Department standards for congressional inquiries.

**OIG Recommendation 5:** Embassy Dakar should eliminate the direct-hire Residence Manager position. (Action: Embassy Dakar HR)

**Response:**

Post disagrees with the recommendation. Post will immediately ensure no further direct supervision of ORE staff by any USG employee other than the employer. Post will proceed to rewrite the position description of the current Residence Manager by stripping out all supervisory duties and have the position reclassified.

**OIG Recommendation 6:** Embassy Dakar should implement an annual acquisition plan. (Action: Embassy Dakar GSO)

**Response:**

Post agrees with the recommendation. GSO will work with FMC to generate an acquisition plan with each relevant section and agency in the Embassy during the fiscal year budgeting process (October/November 2018). GSO will then have quarterly meetings with Embassy sections and agencies to follow up with items on the acquisition plan.

**OIG Recommendation 7:** Embassy Dakar should conduct oversight of residential fuel operations in accordance with Department guidelines. (Action: Embassy Dakar GSO)

**Response:**

Post agrees with the recommendation. GSO developed and implemented an SOP for residential fuel operation oversight in May 2018. Under the SOP, the Accountable Property Officer participates in and spot checks the residential fuel distribution process. GSO is currently utilizing the services of an EFM RSO on LWOP, currently working in the Embassy as a Management Assistant, to provide regular oversight using the new SOP.

**OIG Recommendation 8:** Embassy Dakar should implement a corrective action plan to bring all professional and incidental drivers into compliance with the Department's Overseas Motor Vehicle Safety Management Program. (Action: Embassy Dakar GSO)

**Response:**

Post agrees with the recommendation. With the support of the Front Office, GSO plans to reach out to each section and agency in the embassy to generate a consolidated and comprehensive list of Embassy professional and incidental drivers. GSO will then work with the Front Office to ensure that each driver is fully compliant with the Overseas Motor Vehicle Safety Management Program.

**OIG Recommendation 9:** Embassy Dakar should require that all official vehicles be garaged and parked in compliance with Department standards. (Action: Embassy Dakar GSO)

**Response:**

Post agrees with the recommendation. GSO will work with each agency and section in the embassy to ensure that either (1) vehicles are garaged and parked on embassy property when not in use or (2) MOUs are set-up granting COM approval for any vehicles that need to be garaged at private residences. The ambassador announced to Country Team that no GOVs are to be garaged at residences without a signed memo on file.

**OIG Recommendation 10:** Embassy Dakar should require that Information Systems Security Officers perform information systems security officer duties, in accordance with Department standards. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. ISSOs are required to perform their information systems security officer duties, although the prolonged hiring freeze contributed to excessive demands on the ISSOs at post. Post plans to mitigate excessive workload issues by requesting assistance from the Department to monitor those systems which can be monitored off-site. Most of the information systems security officer duties could be done remotely by Regional ISSOs or domestic IRM personnel.

**OIG Recommendation 11:** Embassy Dakar should implement a standard operating procedure to manage its Active Directory groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. We have implemented documented procedures for account creation and maintenance in accordance with Department Standards on both OpenNet and ClassNet.

**OIG Recommendation 12:** Embassy Dakar should establish its local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. Post has established a local Information Technology Configuration Control Board. The charter, change requests and meeting minutes are being posted to our SharePoint site.

**OIG Recommendation 13:** Embassy Dakar should inventory, baseline, and approve the information technology hardware and software operating on its dedicated internet networks. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. We have installed the Department's licensed dedicated internet network (DIN) management utility to inventory and baseline our DIN. Per 5 FAM 872.1, Post Management officer has approved the DINs established at post. And, per 5 FAM 872.3, all hardware and software has ITCCB or local ITCCB approval.

**OIG Recommendation 14:** Embassy Dakar should implement standard operating procedures for supporting and maintaining dedicated internet networks. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. In conjunction with Recommendation 13, we have implemented a standard operating procedure for establishing, approving, and maintaining dedicated internet networks.

**OIG Recommendation 15:** Embassy Dakar should develop a service level agreement between the Information Management Section staff and dedicated internet network customers that defines the services provided and the roles and responsibilities of the user. (Action: Embassy Dakar IRM)

**Response:**

Post agrees with the recommendation. The effort to establish service level agreements is underway. We anticipate having these agreements in place with all involved by December 31, 2018.

**OIG Recommendation 16:** Embassy Dakar should implement procedures to accurately bill embassy sections and employees for monthly telephone services. (Action: Embassy Dakar FMO)

**Response:**

Post agrees with the recommendation but suggests changes to the preceding language to more accurately represent past practice:

The embassy did not have a properly configured telephone call accounting system for office telephones. In addition, the embassy lacked procedures to accurately bill sections for monthly telephone services and identify and seek repayment for unapproved personal telephone charges,

as required in 5 FAM 527(a)-(c). The embassy paid invoices as a utility using spot checks to address expensive calls rather than systematically reviewing monthly charges to determine whether outgoing calls were official. OIG also found that the embassy billed sections and agencies according to relative usage instead of using accurate billing rates to develop the bills for outgoing call charges. These procedures limited the embassy's ability to maintain internal control over the Department's telephone expenses.

Follow-up Action: Post plans to use sample international call destinations from previous billing to work with the local monopoly telecom provider to determine accurate billing rates. Post will then establish and implement procedures consistent with the current management procedure with regard to office review of calls and billing of personal calls. *Spot checks will continue to be done on relative amounts and offices/lines with large bills.* This results in behavior changes toward the less-expensive options. In addition, direct international dialing capability was removed from conference rooms and other public spaces.

**OIG Recommendation 17:** Embassy Dakar should implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to its Information Management programs. (Action: IRM; Coordinating Office: MGT)

**Response:**

Post agrees with the recommendation. Solid knowledge management procedures for capturing, sharing, transferring, and retaining information is a goal we all strive for and continuously work on. We are very pleased that OIG supports the use of OneNote and we will extend our initial pilot of it in IPC to the remaining sections in IRM.

**OIG Recommendation 18:** Embassy Dakar should test the information technology contingency plans for unclassified and classified networks in accordance with Department guidance. (Action: IRM)

**Response:**

Embassy Dakar disagrees with Recommendation 18.

Post conducts ITCP testing on both networks on a regular basis by restoring data from backup. In addition, on two separate occasions this past year, in coordination with various Washington offices, we performed full system shutdown and startup exercises testing our ability to recover from zero power and/or the need to substantially relocate operations were performed on both OpenNet and ClassNet to verify functionality, document procedures, and train relevant staff.

Information Assurance (IA) states in its ITCP guidance that "It is not required to conduct a parallel or full-interrupt exercise." Post would also add that it does not possess redundant failover architecture that would be necessary to facilitate a more substantial level of testing in a non-destructive manner. Post recognizes there are areas where we can improve and enhance our ITCP testing documentation and will work to do that going forward.

**OIG Recommendation 19**: Embassy Dakar should implement a plan for conducting initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: IRM)

**Response:**

Embassy Dakar disagrees with Recommendation 19.

For both enclaves, the ITCP documents reviewed by the OIG inspector were relatively new. OpenNet had undergone a recent migration to the Enterprise Converged Platform (ECP) architecture warranting a new IT Contingency Plan, which was in place prior to the inspection. ClassNet similarly had undergone some changes, and a new ITCP was in place, with documentation showing that all relevant IRM personnel had reviewed the new plan. It is correct that we could not show annual testing of prior plans. Post recognizes there are areas where we can improve and enhance our ITCP training documentation and will work to do that going forward.

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## ABBREVIATIONS

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DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
SAMS	State Assistance Management System—Overseas
USAID	U.S. Agency for International Development

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