Office of Inspector General
United States Department of State

ISP-I-19-10 | Office of Inspections | December 2018

Inspection of Embassy New Delhi and Constituent Posts, India

BUREAU OF SOUTH AND CENTRAL ASIAN AFFAIRS

HIGHLIGHTS
Office of Inspector General
United States Department of State

ISP-I-19-10

December 2018
OFFICE OF INSPECTIONS
Bureau of South and Central Asian Affairs

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What OIG Inspected

OIG inspected the executive direction, program and policy implementation, and resource management operations of Embassy New Delhi. The inspection included Consulates General Mumbai, Chennai, Hyderabad, and Kolkata.

What OIG Recommended

This report includes 39 recommendations. OIG made 35 recommendations to improve Mission India's operations. OIG also made one recommendation to the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs to address position classification; two to the Bureau of Overseas Buildings Operations to address facilities management issues; and one to the Bureau of South and Central Asian Affairs to establish clear roles for the supervision of the Kabul Support Unit.

In its comments on the draft report, the Department concurred with 36 recommendations and neither agreed nor disagreed with 3 recommendations. OIG considers all 39 recommendations resolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

What OIG Found

- The Ambassador, the Deputy Chief of Mission, and the Consuls General established clearly defined goals and priorities for Mission India. They effectively employed a wide variety of mechanisms to communicate and coordinate their activities across the spectrum of internal operations and external engagements with the Government of India and other stakeholders.
- Mission India generally implemented required processes and procedures in accordance with applicable laws and Department of State guidance. However, the embassy's internal review processes did not consistently identify management control deficiencies throughout the mission. The mission corrected more than 25 specific deficiencies during the on-site portion of OIG's inspection.
- Human capital management weaknesses, such as lack of training and accurate position descriptions, hindered operations, efficiency, and accountability throughout the mission.
- Staff vacancies, workload, and coordination challenges limited the North India Office's ability to fulfill its stated mission.
- Mission India had a history of making modifications to U.S. Government-owned buildings without first obtaining approval from the Bureau of Overseas Buildings Operations. A total of nine unapproved modifications, made between roughly 2004 and 2016, did not receive the benefit of a technical review to ensure the projects conformed to the Department's building codes.
- The mission developed and used local information technology applications without any required risk assessments and approvals.
- Spotlight on Success: The mission's Consular Section created innovative programs for planning and managing nonimmigrant visa adjudication.

CONTENTS

CONTEXT 1
EXECUTIVE DIRECTION 2
Tone at the Top and Standards of Conduct 2
Execution of Foreign Policy Goals and Objectives 3
Adherence to Internal Controls 5
Security and Emergency Planning 5
Developing and Mentoring Foreign Service Professionals 5
Executive Direction at Constituent Posts 6
POLICY AND PROGRAM IMPLEMENTATION 8
Political and Economic, Environment, Science and Technology Sections 8
Public Diplomacy 13
North India Office 18
Consular Affairs 19
RESOURCE MANAGEMENT 23
Financial Management 24
Human Resources 26
General Services Operations 27
Facilities Management 31
American Community Support Association 34
INFORMATION MANAGEMENT 34
RECOMMENDATIONS 40
PRINCIPAL OFFICIALS 51
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY 52
APPENDIX B: MANAGEMENT RESPONSES 53
ABBREVIATIONS 63
OIG INSPECTION TEAM MEMBERS 64

CONTEXT

With 1.3 billion people and a Gross Domestic Product of $9.4 trillion in 2017, India is the world's second most populous country, largest democracy, and fourth-largest economy. Policy reforms in the early 1990s prompted economic growth that has averaged more than 7 percent annually since 2008. Even so, more than 20 percent of the population remains impoverished and India ranks 131 of 188 countries in the United Nations' 2015 Human Development Index. Although agriculture accounted for 17 percent of Gross Domestic Product and nearly half of employment, the information technology (IT) sector was the largest private sector employer, reflecting India's position as a global hub for IT startups.

The United States and India are building a strategic partnership that spans cooperation in defense, regional security, counterterrorism, trade, energy, health, and people-to-people relationships. President Trump hosted Prime Minister Modi at the White House in June 2017, and the Secretaries of Defense and State visited India later that year. The 2017 U.S. National Security Strategy, for the first time, recognized India as a major defense partner. In the last 5 years, the United States has become India's second largest supplier of defense equipment. In 2017, nearly 1.2 million American visitors traveled to India, more than 166,000 Indian students were studying in the United States, and nearly 4 million Indian-Americans called the United States home. In 2017, the United States provided nearly $88 million in foreign assistance to India, of which $45 million was for health programs. More than 2,000 American companies operate in India. In 2016, bilateral trade reached a record $115 billion.

However, a growing economic relationship also has produced frictions. In its 2017 report,[1] the U.S. Trade Representative included India as one of 11 countries on its Special 301 Priority Watch List for weak protection of intellectual property that has harmed U.S. rights holders. Additionally, potential U.S. sanctions related to India's trade with Russia and Iran threatened to complicate the bilateral relationship.

The U.S. diplomatic mission in India consists of the embassy in New Delhi and consulates general in Mumbai, Chennai, Hyderabad, and Kolkata, employing more than 2,500 U.S. and foreign nationals. Several agencies are represented at the mission, including the U.S. Commercial Service, the Foreign Agriculture Service, and elements of the Departments of Defense, Justice, Homeland Security, Treasury, and Health and Human Services. At the time of the inspection, the Bureau of Overseas Buildings Operations (OBO) had allocated $1.1 billion to fund construction projects at the embassy and consulates general. This includes phase I of a new embassy compound in New Delhi, scheduled for completion in 2025, and construction of a new consulate compound in Hyderabad, scheduled for completion in 2021.[2]

The Government of India did not fully cooperate with the United States on a range of operational issues, from failing to approve the sale of Department of State (Department)

[1] 2017 Special 301 Report, Office of the United States Trade Representative.

[2] OBO replaced consulate general facilities in Mumbai in 2011 at a cost of $128 million and included projects to replace facilities in Chennai and Kolkata in its Top 80 building list.

properties, to denying new direct-hire positions and not issuing visas for official travel. The recent imposition of a goods and services tax on local purchases increased mission outlays, and the Indian Government has been slow to rebate amounts subject to diplomatic exemption. Severe air pollution is a major health concern that negatively affects morale and hampers recruitment efforts. U.S. direct hire staff in India receive a hardship differential of 20 to 25 percent, depending on location.

Embassy New Delhi also is responsible for managing informal U.S. relations with the Kingdom of Bhutan, which does not have diplomatic relations with the permanent members of the United Nations Security Council.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.[3] The companion classified inspection report discusses the mission's security program and issues affecting the safety of mission personnel and facilities, and certain aspects of the resource management program.

EXECUTIVE DIRECTION

OIG assessed leadership of Mission India on the basis of more than 200 interviews in New Delhi, Mumbai, Chennai, Hyderabad, and Kolkata and additional interviews in Washington that addressed questions on mission leadership; more than 900 questionnaires completed by U.S. and locally employed (LE) staff; and OIG's review of documents and observations of embassy and consulates general meetings and activities during the course of the inspection.

Tone at the Top and Standards of Conduct

The non-career Ambassador arrived in New Delhi in November 2017. He previously served as the Deputy Assistant to the President for International Economic Affairs, Deputy Director of the National Economic Council, and a senior member of the National Security Council staff. He also served as the Under Secretary for Industry and Security at the Department of Commerce and as the Deputy and Senior Adviser to the Deputy Secretary of State in previous administrations.

The Deputy Chief of Mission (DCM), a career member of the Senior Foreign Service, arrived in New Delhi in August 2016 and served as Chargé d'Affaires, ad interim, from January to November 2017. Prior to this assignment, she was Principal Deputy Executive Secretary in the Department's Executive Secretariat and had multiple domestic and overseas assignments.

OIG found that the Ambassador led this large, multi-agency mission in a professional, collegial, and collaborative manner consistent with the Department's leadership principles outlined in 3 Foreign Affairs Manual (FAM). Members of the country team and senior staff throughout the mission portrayed to OIG a positive view of the tone set by the Ambassador, praising his energy, approachability, engagement with all mission elements, and strategic thinking. They also spoke of his openness to ideas and feedback and his clear strategic vision. The leadership

[3] See Appendix A.

tone he set, as OIG observed in multiple meetings, animated a country team that worked together to tackle some of the most difficult and important issues in U.S. foreign relations.

Embassy staff consistently described the DCM as exemplifying the Department's leadership and management principles. Staff told OIG she was accessible, concerned about the community, and a constant communicator who provided feedback and direction. They spoke of their respect for her work during the 10 months she served as Chargé and, subsequently, in introducing a new ambassador to the embassy's organization and functions. Section and agency heads, with whom she regularly interacted in various settings, told OIG of her knowledge of their operations and the skill with which she participated in their events. OIG observed her command of foreign policy and mission operational issues as she conducted country team and senior staff meetings in the absence of the Ambassador.

Embassy staff told OIG that the Ambassador and the DCM modeled ethical standards. The Ambassador stressed to the country team the importance of completing financial disclosure declarations and mandatory ethics training. In town halls throughout the mission, he spoke to American and LE staff about his goals and the values he wanted in the mission: teamwork, openness to input, constant communication, security, and integrity and high ethical standards. He modeled ethical behavior by asking for briefings on regulations before accepting gifts and spending representational and official residence expense funds. OIG found no irregularities in the Ambassador's and the DCM's use of representational and official residence expense funds or in the gift register. The Ambassador also sought approval from OBO before making a change to his residence, as required by 15 FAM 641.

Equal Employment Opportunity

The Ambassador and the DCM both expressed their support for Department policies on Equal Employment Opportunity (EEO) and sexual harassment. In February 2018, the Front Office required all mission U.S. direct-hire employees to view the Department's video regarding sexual harassment and ensured that employees took mandatory EEO training. The Ambassador spoke out on EEO and sexual harassment in town halls and at country team meetings. He directed that a U.S. Agency for International Development program on sexual harassment be open to all embassy staff and provided supportive communications in remarks and emails about women's issues. OIG determined that the mission’s EEO and sexual harassment management notices were current. Notwithstanding these efforts, OIG identified two instances where EEO-related policies were not followed, as discussed in the Executive Direction and Consular sections of this report.

Execution of Foreign Policy Goals and Objectives

Officials in Washington, members of the country team, and senior staff throughout the mission portrayed to OIG a consistent view of the Ambassador’s knowledge of the issues and the region, engagement with Washington decision-making processes, focus on priorities, and concern for persuasive communication. OIG observed the Ambassador chairing country team and senior staff meetings, and took note of his probing questions, focus on solving problems, attention to persuasive messaging, and guidance to stay focused on strategic goals.

Shortly after his arrival in New Delhi, the Ambassador launched a strategic planning exercise with the country team to ensure that mission goals reflected the importance that the administration placed on India. He tasked the mission with identifying lines of action to support the overarching U.S. goal of strengthening and expanding the strategic partnership between the United States and India to promote an open, stable, and prosperous Indo-Pacific region. These were reproduced on laminated cards distributed throughout the mission to ensure that all American and LE staff had a common understanding of the strategy and goals. The Ambassador then initiated a process to update the mission's Integrated Country Strategy (ICS), his primary strategic leadership tool. During the inspection, the mission was in the process of gathering input from all agencies and consulates general to identify priority objectives and the actions necessary to achieve them during the next 3 years.

OIG found that the Ambassador was proactive across the extensive bilateral agenda, engaging Indian officials on defense issues, regional security, trade, consular issues, and impediments to U.S. mission operations. In his first 6 months, the Ambassador communicated his vision for the U.S.-India strategic partnership to Indian stakeholders in an inaugural policy speech. He also traveled within all five consular districts and to Bhutan and met with government officials, opposition figures, civil society representatives, and journalists. These efforts were consistent with his responsibilities under 2 FAM 113.1c(7) and (11), which require that chiefs of mission maintain close relations with host government officials and establish relations with leaders outside the power structure. Washington officials cited his role in securing an important defense sale and advancing security cooperation, laying the foundation for the first-ever meeting of the Secretaries of Defense and State and their Indian counterparts. The Ambassador advanced U.S. commercial interests by jointly leading the U.S. delegation to trade exhibitions in India and a delegation of Indian companies to an investment summit in the United States that facilitates investment in American projects.

The Ambassador participated in the Washington interagency policy process and held twice monthly calls with senior officials at the Department and the National Security Council. One hundred days into his tenure, and drawing again on his country team, he sent a message to the Secretary with recommendations on how to manage opportunities and challenges in U.S.-India relations.

The Ambassador and mission leadership at all levels communicated constantly to maintain unity of effort. Leadership stayed in regular communication through country team and senior staff meetings; biweekly calls between the DCM and consuls general; biweekly calls among the consuls general; twice monthly DCM-led video conferences with consuls general; monthly video conferences with First- and Second-Tour employees, mid-level officers, and LE staff committees; and quarterly gatherings of the consuls general with the Ambassador and the DCM. The Ambassador, DCM, minister counselors, and others visited the consulates general to foster a unified approach to both bilateral relations and routine operations.

Adherence to Internal Controls

OIG found that the mission completed the Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(5). The mission provided to OIG documentation indicating that embassy sections and consulates general reviewed internal controls and found no material weaknesses. During the inspection, OIG found deficiencies in end-use monitoring, grants management, selected consular activities, financial management, motor pool operations, facilities management, and information management. These issues are detailed in the Policy and Program Implementation and Resource Management sections of this report, as well as in the companion classified report.

Security and Emergency Planning

OIG's review of documentation and discussions with mission staff found that both the Ambassador and the DCM supported the mission's security program. The Ambassador reviewed and reissued 17 security directives in February 2018, consistent with 1 FAM 013.2b and 2 FAM 113.1c(5). He and the DCM participated in embassy emergency drills. The Regional Security Officer met with the DCM weekly and had ready access to both the DCM and the Ambassador, if needed. The DCM chaired meetings of the Emergency Action Committee, which, depending on the issue, the Ambassador attended.

Embassy staff told OIG that the Ambassador and the DCM fully supported the mission's emergency preparedness program. Although the scenario used in a crisis management exercise conducted in March 2018 did not require the Ambassador's participation, he nevertheless asked to be included so he would know what would be expected of him in an emergency. The Ambassador also stressed the need for emergency preparedness to U.S. citizens at a consular outreach event soon after his arrival; this was a first step in fulfilling the requirements in 2 FAM 113.1c(14) to advise, protect, and assist U.S. citizens.

In January 2018, the mission's Consular and Public Affairs Sections conducted a mission-wide crisis management exercise in which the DCM actively participated. However, OIG found that some consular officers were not fully aware or trained on their roles in crisis management related to U.S. citizens. OIG made a recommendation regarding this issue in the Consular section of this report.

Developing and Mentoring Foreign Service Professionals

Nearly one-third of the mission's American staff consisted of employees on their first or second Foreign Service assignments, making their professional development of critical importance to the mission and Foreign Service as a whole. The DCM oversaw the mission's First- and Second-Tour employee development program for 98 Department officers and specialists, as directed by 3 FAM 2242.4a. She led monthly digital video conference meetings that included First- and Second-Tour employees in the consulates general. These meetings covered topics ranging from performance evaluations, to bidding on future assignments, to other career issues raised by the employees. OIG also found that the Consuls General supported the DCM's efforts by mentoring and supporting employee development in the constituent posts.

Executive Direction at Constituent Posts

Given the size of the country, in both geography and population, the Consuls General played a critical leadership role in Mission India. Almost 40 percent of mission staff worked at the four constituent posts, and the Consuls General were in charge of staffs ranging from 183 in Kolkata to 391 in Mumbai. Based on OIG's interviews, observations, analyses, and review of documents, all the Consuls General (and in the case of Mumbai, the Deputy Principal Officer as well), set a positive and professional tone consistent with the Department's leadership and management principles.

The Consuls General used a variety of mechanisms to communicate, collaborate, and plan with their staffs and to create an inclusive environment. They met with section and agency heads regularly, both in groups and individually. In meetings observed by OIG at all locations, they ensured that attendees had a chance to contribute and used staff comments to build consensus. The Consuls General supported the security for their consulates by, for example, participating in drills and leading Emergency Action Committee meetings.

OIG reviews of their calendars showed that the Consuls General maintained active schedules, including meetings with Indian Government officials, other diplomatic missions, U.S. citizens, and both U.S. and Indian business people to advance American interests. The Consuls General also made several trips—on their own and with the Ambassador—to locations in their consular districts to promote mission objectives. OIG's specific observations related to each of the four Consuls General, as well as the Deputy Principal Officer in Mumbai, are detailed below.

Consulate General Mumbai

In Mumbai, the Consul General and Deputy Principal Officer hosted biweekly town halls for all American employees, visited different consulate general sections, dined with staff in the cafeteria, held award ceremonies for LE staff, and participated in consulate general community activities. In addition to regular meetings with the LE Staff Committee, the Consul General hosted a series of events at his residence with small groups of LE staff members to hear their concerns. Representatives of U.S. trade promotion agencies told OIG that both the Consul General and the Deputy Principal Officer advocated for their programs and participated in trade-promotion activities in Mumbai, India's financial and business capital. The Consul General's calendar indicated more than 100 meetings with U.S. or Indian business figures and organizations and participation in 35 media and public affairs events between October 2017 and the time of the inspection. Demonstrating awareness of their security responsibilities for U.S. citizens in the consular district, both the Consul General and the Deputy Principal Officer attended meetings of the local Overseas Security Advisory Council. The Consul General also participated in biannual town halls for American citizens at which crisis preparedness was discussed.

However, Consulate General Mumbai did not follow Department guidance for reporting allegations of sexual assault involving chief of mission personnel outside the United States, as described in 3 FAM 1713.1-2a. Instead, it addressed the matter internally. OIG notified

the Bureau of Diplomatic Security's Office of Special Investigations, which is the "sole entity within DS that is authorized to conduct sexual assault investigations," according to 3 FAM 1712.2-1. Based on information from OIG, the Office of Special Investigations opened an investigation to review the original allegation and the conduct of the consulate's investigation. As a result, OIG did not make a recommendation to address this issue.

Consulate General Chennai

The Consul General in Chennai held biweekly collective strategy meetings with senior staff, visited different consulate general sections, and hosted periodic events at his residence for both American and LE staff. Employees at all levels told OIG the Consul General had a sincere and keen interest in their professional development. Staff also consistently said the Consul General modeled ethical behavior, and cited instances where he personally ensured that staff members acting inappropriately had been counseled or otherwise disciplined. The Consul General's personal involvement in Emergency Action Committee meetings and maintaining open communications with the consulate general community was particularly important given a recent turnover in the Regional Security Officer position and events that occurred before the Consul General's arrival—such as multiple natural disasters and large protests—where staff told OIG there had been inadequate communications from the consulate general on security and safety issues.

Consulate General Hyderabad

In Hyderabad, the Consul General interacted with the staff through consulate community events. In addition to her meetings with government and business officials, she also was active with social media and nongovernmental organizations as an advocate for U.S. positions on women's issues, such as gender equality, and anti-human trafficking activities. She made statements and appearances at events and activities on behalf of other U.S. agencies involved in development assistance, health care, and promotion of U.S. commercial activities. The Consul General also led the mission's efforts for the U.S. Government's role in the Global Entrepreneurs Summit—held in Hyderabad November 2017—which included participation by the Ambassador and a White House delegation. This was the Ambassador's first trip within India, and U.S. participation at the event was reported as a great success in highlighting America's entrepreneur-friendly business climate.

Consulate General Kolkata

The Consul General in Kolkata regularly held one of the weekly staff meetings in the separate American Center facility to ensure that those staff members felt included in consulate general affairs. The Consul General showed he valued his employees by actively participating in consulate general social activities and hosting staff events at his residence, such as retirement ceremonies for LE staff members. Employees consistently told OIG the Consul General modeled integrity. For example, LE staff cited the Consul General's direct role in counseling U.S. supervisors who exhibited unprofessional behavior. According to the Regional Security Officer, the Consul General's personal involvement in drills set a good example in encouraging widespread participation among consulate general staff.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Mission India's policy and program implementation through a review of the advocacy and analysis work performed by the embassy and consulates general Political and Economic, Environment, Science and Technology (EEST) Sections; the public diplomacy efforts of the Public Affairs Section; and related efforts of the North India Office. OIG also assessed American citizen and visa services provided by the Consular Section. OIG generally found the embassy and consulates general met Department requirements for policy and program implementation, with the exception of the issues described below.

Political and Economic, Environment, Science and Technology Sections

OIG reviewed the embassy and consulates general Political and EEST Sections' leadership and management, policy implementation, reporting and advocacy, Leahy vetting, grants, commercial promotion, and end-use monitoring functions. The two sections regularly engaged with Washington and collaborated well with the consulates general and other agencies. For example, ahead of planned travel by the Ambassador to the Chennai consular district, OIG observed coordination among the Political and EEST Sections and the consulate general to prepare briefing memos and speeches. Both sections developed strategic goals and steps for implementation, contributed to the Ambassador's strategic objectives for Mission India, and participated in the preparation of the new ICS. OIG found the mission's Political and EEST Sections to be in compliance with Department standards, with the exceptions noted below.

Reporting and Advocacy Supported Strategic Goals, Commercial Interests

OIG found that the mission's reporting and advocacy work supported mission goals and U.S. commercial interests. The embassy EEST Section engaged actively with U.S. companies and business groups and advanced U.S. commercial interests. For example, the section coordinated with the U.S. Commercial Service to resolve a threat to cancel a large government contract won by a U.S. firm. Washington officials praised the embassy Political Section for its support of the first U.S.-India terrorist designations dialogue, which represented an important step in formalizing counterterrorism cooperation.

Department offices and other agencies widely praised the mission's reporting for its quality, relevance, and usefulness, highlighting the Human Rights Report, reports on regional stability issues related to the administration's Indo-Pacific strategy and state elections, as well as trade, energy, environment, and digital issues. OIG reviewed 257 cables sent by the embassy and consulates general between October 2017 and April 2018, and found reporting to be relevant to mission strategic objectives, with extensive coverage across a range of pertinent issues. Washington consumers praised cables reflecting mission-wide contributions on the effect of major economic developments such as demonetization and a new goods and services tax. However, a few Department offices told OIG that the mission's heavy visitor workload and an

inability to replace departing staff due to the hiring freeze,[4] as well as the departure of personnel at the end of their tour of duty, constrained the mission's reporting and capacity to be proactive on certain issues. Section leaders acknowledged these concerns and told OIG they were taking steps to address them.

Political Officers Were Not Trained for Their Functional Roles

OIG found that political officers responsible for human rights, trafficking in persons, political-military affairs, counterterrorism, and nonproliferation did not take any functional training in these areas. Guidance outlined in 13 FAM 022.5(1), (4), and (7) states that it is the responsibility of managers and supervisors to determine the specific needs of employees and ensure they receive training for effective job performance. The guidance also states that employees should consider training that will enable them to improve present performance and prepare them for more responsible work. OIG determined that the officers did not take the training because they either were unaware that the Department's Foreign Service Institute offered courses or they had scheduling conflicts. The lack of training can diminish effectiveness in achieving mission goals.

> **Recommendation 1:** Embassy New Delhi should implement functional training plans for incumbent and incoming staff in the mission's Political Sections. (Action: Embassy New Delhi)

Embassy Did Not Comply With End-Use Monitoring Requirements

The embassy did not comply with end-use monitoring[5] requirements for equipment furnished to Indian law enforcement authorities by the Bureau of International Narcotics and Law Enforcement Affairs (INL). Specifically, the embassy was not conducting end-use monitoring checks as required, nor did it have an end-use monitoring plan or standard operating procedure to guide it in doing so. While INL closed its office in the embassy in 2008, it continued to provide equipment to Indian authorities until 2012, most of it in the northeast region near Bangladesh and Burma. However, citing the absence of INL staff, remote locations of the equipment, and associated travel expenses, in 2017, the embassy reported that it had not conducted any end-use monitoring inspections or monitoring by secondary methods, such as

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

[5] The Department requires the monitoring of certain property purchased with foreign assistance funds to ensure it is used for its intended purposes. In general, equipment valued at more than $2,500 or items designated as defense articles or dual-use items are subject to this requirement. End-use monitoring fulfills the requirements of Section 484(b) of the Foreign Assistance Act of 1961 and Section 40A of the Arms Export Control Act. See 22 U.S.C. § 2291(c) and 22 U.S.C. § 2785.

communications with end users.[6] OIG determined, however, that Consulate General Kolkata staff made periodic visits to the region where the equipment was delivered and could have performed inspections.

Mission India also did not have an end-use monitoring plan or standard operating procedure to guide the conduct of end-use monitoring checks or the disposal or retirement of monitored items. Such a plan or procedure would customize INL's guidance on end-use monitoring to make it specific to Mission India's operating environment and set forth "useful life" standards for the particular equipment, which included laboratory and computer equipment, provided to Indian authorities. OIG determined that staff turnover in the Political Section, along with unfamiliarity with end-use monitoring requirements, contributed to the embassy's non-compliance. The absence of any end-use monitoring checks as well as the lack of a Mission India-specific plan or standard operating procedure to guide the conduct of the checks weakens accountability and risks misuse of equipment that was provided to Indian authorities for a specific purpose.

> **Recommendation 2:** Embassy New Delhi, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should develop and implement an end-use monitoring plan to conduct required end-use monitoring checks in accordance with Department standards. (Action: Embassy New Delhi, in coordination with INL)

Regional Counterterrorism Coordinator Position Poorly Defined

The duties and responsibilities of the Counterterrorism Coordinator for South Asia, based at Embassy New Delhi, were not well defined, and they were not captured in a written position description. The senior-level position, one of six regional counterterrorism coordinators worldwide, reported to the Bureau of Counterterrorism and Countering Violent Extremism's Office of South and Central Asia and Near East. However, the bureau did not define its expectations for the position. According to the coordinator's work requirements statement, the incumbent was responsible for coordinating regional counterterrorism efforts, including overseeing $20 million in programs for India and Bangladesh. However, none of the bureau's regional foreign assistance programs specified a role for the coordinator, and he did not, in any event, supervise anyone with program management responsibilities. Although the Department's organizational objectives in 1 FAM 014.1 include effective use of Government resources and staff, these inaccurate work requirements and lack of a position description hinder effective use of the position. In addition, it is difficult to hold the incumbent accountable for particular results when the responsibilities of the position are themselves unclear.

> **Recommendation 3:** Embassy New Delhi, in coordination with the Bureau of Counterterrorism and Countering Violent Extremism and the Bureau of South and Central Asian Affairs, should prepare a position description for the regional counterterrorism coordinator position, number 10262001, that contains an accurate

[6] This report is required annually and, for 2017, Embassy New Delhi's report contained lists of equipment copied from previous years' reports, with a notation that no end-use monitoring was conducted for the listed equipment.

statement of responsibilities. (Action: Embassy New Delhi, in coordination with CT and SCA)

Embassy Did Not Fully Comply with Federal Assistance Requirements for Grant Documentation

OIG reviewed files for all six recent Political Section-managed foreign assistance grants,[7] with a total value of $535,359, and found the embassy had not complied with applicable Department administrative requirements.[8] OIG noted that the six grant files lacked key documentation[9] required by the Department's federal assistance rules. There was enough information provided by the post, however, for OIG to assess that the work called for in the grants was completed.[10] OIG advised the embassy to implement a standard operating procedure to aid compliance with federal assistance requirements should the section manage any grants in the future. In addition, of the six grant files OIG reviewed, the embassy had not administratively closed out the five that had expired. Federal guidelines[11] require closeout after activities have been completed or the period of performance has ended, in support of the Department's overall financial management. OIG advised the grants officer to perform the final administrative closeout of the grants in the grants database system. Because the grants officer was working to do the closeout at the time of the on-site portion of the inspection, OIG did not make a recommendation to address this issue.

Embassy's Leahy Vetting Met Key Department Requirements

The embassy conducted Leahy vetting[12] in accordance with key Department requirements. The embassy vetted 1,937 individuals and units in 2017, and 812 in 2018 (through May 12). Responsible personnel were trained to use the Department's Leahy vetting platform, the International Vetting and Security Tracking System. In addition, the embassy revised its standard operating procedure for Leahy vetting in May 2018 and obtained required approvals from the regional bureau, the Bureau of Democracy, Labor, and Human Rights, and the embassy Front Office.

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[7] Five of the six grants expired at the end of FY 2017; one continued through FY 2018.

[8] Federal Assistance Directive, October 2017, Chapter 2 (Pre-Federal Award Requirements); Chapter 4.D (Post Federal Award Requirements); and Federal Assistance Policy Directive, March 13, 2015, Chapter 2 (Pre-Federal Award Requirements and Contents of Federal Awards) and Chapter 3 (Post Federal Award Requirements).

[9] Omissions included: lack of pre-award documentation showing the basis for selection of the grantee and verification of eligibility; no budget; lack of risk assessments and monitoring plans; outdated or missing designations of Grants Officer Representatives (GOR); and missing documentation of GOR site visits.

[10] India's Ministry of Home Affairs put restrictions on one grant—awarded to the University of Maryland for $124,966 to cross-train Muslim clerics and security forces—which proved problematic. As a result, no funds were disbursed and no work was completed on the grant.

[11] Federal Assistance Directive, October 2017, Chapter 5 (Closeout); Federal Assistance Policy Directive, March 13, 2005, Chapter 3.07 (Post Federal Award Requirements – Closeout).

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

OIG found that in the 30 calendar days prior to May 12, 2018, the embassy did not meet the Bureau of Democracy, Labor, and Human Rights' required 10 working-day lead time for submitting vetting cases 60 percent of the time. These vetting requests without the necessary lead time lessen the bureau's efficiency and jeopardize the timely provision of assistance. Embassy staff told OIG they missed the deadlines because Indian authorities frequently submitted names of individuals or units late. That is, staff could not resolve this issue on their own but instead could only strive to manage the consequences of these delays. Because the embassy attempted to address the situation proactively by periodically reminding program offices and Indian counterparts of deadlines, OIG did not make a recommendation.

In 2017, a Department program office confirmed that one of its grantees in India failed to submit for vetting the names of 5,331 police officers it had trained in the previous 2 years. The Department put the grant on hold, conducted a review, and amended the award to deduct the cost of training undertaken without prior vetting. It also instituted a corrective action plan to strengthen oversight and regular check-ins with the grantee to ensure Leahy vetting is conducted. The embassy was not responsible for this incident because it had no role in managing the grant and had not been provided with names to be vetted. However, to reduce the risk of recurrence, OIG advised the embassy to notify grantees, immediately after a grant is awarded, of the Leahy vetting requirement and the embassy point of contact.

Embassy Did Not Provide Timely Updates on Delayed Export Control Checks

Embassy New Delhi did not provide timely status updates to the Department when it experienced delays in completing export control checks. The embassy took an average of 139 days to complete eight Blue Lantern[13] pre-license export control checks and one post-license pre-shipment check in FY 2017 and the first 5 months of FY 2018. This exceeded the requested 30 to 45 day time frame for completion. The embassy attributed these delays to difficulties in receiving responses from Indian importers. Lengthy delays in completing pre-license checks can be costly to U.S. exporters and foreign end-users and could harm U.S. competitiveness. Department Blue Lantern guidelines[14] also request embassies to notify the Department if more time is required to complete the checks and to provide regular status updates when checks are delayed. However, the Department reported that the embassy failed to provide regular status updates or respond in a timely way to email queries. During the inspection, the EEST Section developed and cleared with the Front Office a written standard operating procedure for handling Blue Lantern checks that includes steps for better communication with the Department. As a result, OIG did not make a recommendation to address this issue.

[13] Blue Lantern is a Department-managed end-use monitoring program established to implement the Arms Export Control Act and International Traffic in Arms Regulations. Blue Lantern verifies the legitimacy of export transactions covered by the United States Munitions List. In order to detect and deter illegal and unauthorized arms transfers, the Department may request embassy officers to conduct inquiries with foreign government and business representatives and make site visits. 22 U.S.C. § 2785.

[14] Blue Lantern Guidebook, August 2016, "Blue Lantern Reporting."

Public Diplomacy

Mission India's Public Affairs Section is the Department's largest overseas public diplomacy operation, as measured by staffing levels. It has 24 Foreign Service officers and 169 LE staff members, with an FY 2018 budget of more than $7.6 million. The section used a diverse range of tools and programs to advance ICS objectives. Its "India Strategic Framework," updated annually, informed the allocation of resources for grants and major program activities. OIG found the Minister Counselor for Public Affairs effectively coordinated mission-wide public diplomacy efforts through frequent contact with senior public diplomacy staff at all five locations, as well as through semiannual strategic planning meetings.

OIG reviewed the section's leadership, strategic planning, reporting, grants administration, American Spaces, media engagement, and educational and cultural programs, which generally aligned with mission priorities and complied with Department standards. However, OIG identified several deficiencies in resource management and made specific observations on areas for improvement, as noted below.

Inaccurate Position Descriptions Hindered Performance Management and Organizational Reforms

OIG found a consistent mission-wide pattern of inaccurate public diplomacy LE staff position descriptions. Half of all public diplomacy LE staff who responded to OIG's survey reported their position descriptions did not accurately describe their work responsibilities. The Public Diplomacy officer responsible for managing the LE staff estimated that 80 percent of the position descriptions for those staff members were inaccurate. In some cases, the embassy had not reviewed the position descriptions in more than a decade. Moreover, interviews with LE staff and OIG's review of documents revealed multiple instances where substantive changes to an employee's duties were made only verbally or by email. Others reported to OIG that substantive changes to responsibilities were made with little or no explanation to the incumbent or others who were affected.

According to 3 FAM 7313.1(4), managers and supervisors are responsible for ensuring that LE staff position descriptions adequately and accurately reflect currently assigned duties and responsibilities, and that positions are structured to accomplish mission objectives efficiently and effectively. Without accurate documentation of LE staff responsibilities, supervisors were unable to objectively evaluate performance, address deficiencies, and ensure optimal operational structure and staffing to accomplish mission objectives effectively and efficiently. OIG interviews with LE staff revealed varying levels of confusion, anxiety, and resentment that harmed morale and hampered internal coordination. The lack of clarity on staff roles and responsibilities also undermined the section's senior leadership's efforts to implement organizational reforms, especially at the American Spaces as discussed below. These conditions cumulatively diminished the value of the Department's investment in the mission's public diplomacy LE staff, whose salaries and benefits collectively totaled $3.3 million in FY 2017.

OIG attributed this issue to several factors. First, successive American supervisors neglected to make accurate position descriptions a priority. Additionally, since 2014, Public Diplomacy officers worldwide were discouraged from reclassifying positions pending implementation of the Public Diplomacy Locally Employed Staff Initiative, an effort by the Department's Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs to modernize and update public diplomacy positions globally.[15] At the time of inspection, however, Mission India had yet to be scheduled for implementation of the initiative, which is projected to take 3 years to complete worldwide. Given the importance of this issue, it is not appropriate to continue postponing needed revisions and updates to position descriptions. The concerns noted above relating to a potential lack of accountability and confusion will only become more pronounced with further delay.

> **Recommendation 4:** The Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs, in coordination with Embassy New Delhi and the Bureau of South and Central Asian Affairs, should update all public diplomacy position descriptions by implementing the Public Diplomacy Locally Employed Staff Initiative at Mission India in FY 2019. (Action: R/PPR, in coordination with Embassy New Delhi and SCA)

Lack of Annual Plan Resulted in Unmet Training Needs

The lack of a documented process for setting and funding training priorities prevented Public Affairs Section leadership from maximizing available resources to meet training needs. Based on responses to OIG's personnel questionnaires, only half of the section's LE staff believed they had sufficient training to do their jobs. Likewise, section leadership told OIG that not all LE staff members had the requisite skills to meet current section needs, especially in the fast-changing administrative and digital/visual media fields. Despite allocating $100,000 for training in FY 2017, the section did not have a plan to use those funds and had spent only about half of the amount at the time of the inspection. Furthermore, the section did not maintain training records or plans for its employees. According to guidance in the Public Affairs Officer Handbook,[16] the Public Affairs Officer is responsible for assuring that all staff have access to appropriate training. Without appropriate information and planning, managers were unable to ensure that all employees received the training they needed.

> **Recommendation 5:** Embassy New Delhi should implement an annual training plan to prioritize and fund mission-wide training needs for all Public Affairs Section positions. (Action: Embassy New Delhi)

[15] In July 2014, the Office of Policy, Planning, and Resources for the Under Secretary of Public Diplomacy and Public Affairs began a comprehensive review of overseas public diplomacy functions and structures, as well as LE staff position descriptions. Known as the Public Diplomacy LE Staff Initiative, it produced position descriptions reflecting shifts in the global public diplomacy operating environment over the past two decades. Launched as a pilot program in July 2017, the bureau fully implemented it at 5 of 172 overseas missions as of June 2018.

[16] Public Affairs Officer Handbook, "Working Within the Embassy," Version 1.0, May 2017.

Limited Staff Travel Hampered Contact Development

Limited travel by section staff outside the mission's host cities hampered public diplomacy outreach and contact development. Section personnel consistently cited this frustration in interviews with OIG, saying that the lack of personal contact with current figures in the media and other sectors in interior cities within their districts left them less prepared to effectively support Front Office travel or to identify potential new program partners for policy priorities. For example, the LE press assistant with lead responsibility for Urdu media had not visited the region's major Urdu media centers since 2013. None of the five mission LE alumni program coordinators traveled within their districts during FY 2017 or the first half of FY 2018 to engage exchange program alumni. The limited outreach travel also affected the geographic diversity of exchange program participants. The Bureau of Educational and Cultural Affairs instructs missions to nominate candidates for its International Visitor Leadership Program who reflect the diversity of the host nation, including geographic locations. However, only 10 percent of the 48 program candidates nominated in FY 2018 from the embassy's large consular district came from outside the city of New Delhi.

Section leadership prioritized travel linked specifically to grant programs approved through the annual strategic planning process, as well as support for ambassadorial or consul general travel. Although OIG considers that strategic focus commendable, the section underestimated the travel funding needed for ongoing individual and institutional contact development that was unrelated to current grant programs. For example, a single trip to the Mumbai district's American Corner in Ahmedabad consumed nearly one-third of Consulate General Mumbai's FY 2018 public diplomacy annual discretionary travel allocation of $3,000. After OIG brought the funding imbalance to the attention of section leadership, they revised FY 2019 financial targets to include new line item allocations for outreach travel and increased funding for those purposes by $92,000, an amount that was split evenly across the five Public Affairs Sections.

Impact of SPAN Magazine Not Measured

The embassy did not conduct audience research prior to converting its magazine, *SPAN*, into a mainly digital publication. Launched in 1960, *SPAN* is produced by the Public Affairs Section in English, Hindi, and Urdu to highlight U.S.-India connections on themes of mission interest. The 2011 OIG inspection of Mission India[17] recommended that the embassy "convert *SPAN* magazine to an interactive electronic version, taking into account the concomitant personnel and budget ramifications of the change." In response, the section reduced print copies by two-thirds and cut the annual budget almost in half. The section maintained a *SPAN* website and in September 2017 launched a Facebook page that had approximately 363,000 followers by spring 2018. After outsourcing printing and delivery of residual print copies, the section in FY 2018 transferred the eight LE staff members previously responsible for those tasks to the Information Management Section to provide mission-wide printing services.

While OIG recognized *SPAN*'s implementation of the 2011 recommendation, it found the embassy did not have clearly defined targets and metrics. Section management had not

[17] OIG, *Inspection of Embassy New Delhi and its Constituent Posts* (ISP-I-11-39A, June 2011).

conducted any formal market or audience research for *SPAN* since 2010. Guidance in 10 FAH -1 H-063.2a calls on overseas missions to identify target audiences in order to accomplish goals and conduct research to identify specific audiences accessible via social media. Without a data-driven orientation for *SPAN*, the section could not be sure it was reaching its target audiences with content that most effectively met mission goals.

> **Recommendation 6:** Embassy New Delhi, in coordination with the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs and the Bureau of International Information Programs, should develop audience and impact metrics for the Public Affairs Section's magazine, *SPAN*. (Action: Embassy New Delhi, in coordination with R/PPR and IIP)

SPAN Magazine Operation Not Integrated into Digital Media Activities

The Public Affairs Section did not integrate the *SPAN* operation into its overall media activities. *SPAN* staff had no regular interaction with the public diplomacy digital media team on content sharing and development, nor was *SPAN* mentioned in the section's Social Media Strategy or Public Diplomacy Implementation Plan. According to 10 FAH-1 H-061, an overarching strategic plan for social media engagement is essential to ensure that a mission's resource commitment aligns with Department priorities. Without integrating *SPAN* into the mission's broader social media outreach efforts, the Public Affairs Section risked wasting or duplicating media engagement resources and missing opportunities to synchronize its message among its different content development and delivery platforms.

> **Recommendation 7:** Embassy New Delhi should integrate *SPAN* into the Public Affairs Section's broader digital media activities. (Action: Embassy New Delhi)

American Spaces Transitioned as Outreach Platforms but Challenges Remained

OIG found that Mission India's six American Spaces[18] conducted policy-relevant activities that advanced ICS goals. OIG visited five of the six spaces—the mission's American Centers in New Delhi, Mumbai, Kolkata, and Chennai and the American Corner in Hyderabad—and determined they generally met or exceeded Department requirements, as defined by the Bureau of International Information Programs' *Standards for American Spaces*.[19]

To varying degrees, the five spaces took steps to transition from a focus on traditional library services to outreach and interactive programming, consistent with bureau guidance in its "Vision of a Modern American Space." Stakeholders in Washington and Mission India consistently praised the Embassy New Delhi-based Regional Public Engagement Specialist for the quality of her consultation visits, guidance, and training to facilitate this transition. The

[18] 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. Their activities fall under five core areas: English language learning, alumni engagement, educational advising, information about the United States, and community outreach.

[19] OIG did not visit the American Corner in Ahmedabad, which is covered by Consulate General Mumbai.

American Center in New Delhi worked with the Department's Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs to commission a study of center visitor demographics to help them better tailor programs toward engaging priority audiences. The resulting findings contributed to the decision to create new program space, and also to establish on its premises the Nexus Startup Hub, a business incubator and mentoring program for emerging entrepreneurs.

OIG found that inaccurate LE staff position descriptions, discussed earlier in this report, negatively affected the four U.S. Government-owned American Centers, especially Consulate General Kolkata's American Center. Specifically, OIG found that LE staff currently classified as library clerks performed duties either outside their position descriptions or at the direction of LE staff outside of their supervisory chains. In addition, OIG interviews suggested the library clerks were significantly less familiar than American and senior LE colleagues with the mission's rationale and strategy for changing the focus of American Spaces operations to outreach and interactive programming. According to 1 FAM 014.2(7), managers should ensure employee ownership and involvement when instituting organizational change. OIG discussed with the Regional Public Engagement Specialist and the Minister Counselor for Public Affairs ways to ensure inclusivity at all levels as the mission's American Spaces continue to evolve.

Public Diplomacy Grants Administration Complied with Standards, but Expanded Oversight Needed to Sustain Excellence

OIG reviewed all 33 FY 2017 public diplomacy grants and cooperative agreements greater than $25,000 (totaling $3.9 million) and found them to be in full compliance with the Department's Federal Assistance Directive. A November 2016 Department review of grant files described the embassy's Public Affairs Section as "a model post in terms of their oversight of Federal assistance."[20] OIG observed several best practices, such as a weekly coordinating conference call among all public diplomacy GORs, a quarterly dashboard that helped the section track the progress of grants and meet deadlines, and templates that brought a consistent and thorough approach to pre-award phase reviews and GOR close-out memos.

At the time of the inspection, however, no public diplomacy officers at any of the four consulates general were certified as Grants Officers or GORs. The public diplomacy officer in New Delhi served as Grants Officer for all grants mission-wide, supported by LE staff GORs at each post. Although such centralized coordination from New Delhi worked well under the incumbent and fostered uniform adherence to Department requirements, OIG advised that greater back-up oversight capacity would help ensure the grants program's sustained excellence. Guidance in 10 FAH-1 H-032a advises posts to have more than one warranted Grants Officer to ensure adequate oversight over the grants program. Section leadership concurred and committed to implementing OIG's suggestion that each consulate general have at least one public diplomacy officer with Grants Officer training to provide appropriate oversight of LE staff GORs and the grants executed in their consular district.

[20] Grants Review Evaluation and Assistance Training Report, Embassy New Delhi, November 2016 (page 3), conducted by the Bureau of Administration, Office of the Procurement Executive, Federal Assistance Division.

North India Office

The embassy established the North India Office (NIO) in June 2015 to strengthen U.S.-India engagement in northern India. A separate unit located at Embassy New Delhi, NIO manages U.S. Government outreach to sub-national governments and more than 355 million Indian citizens (28 percent of the country's total population) in seven northern states and union territories, including India's National Capital Region. The office consisted of four officers, two professional associates, and six LE staff members. After her arrival in August 2017, the office's Director led the process of preparing a mission statement and work plan aligned with the mission's strategic goals. She also chaired a monthly NIO working group to foster coordination with other embassy sections and agencies.

Staff Vacancies, Workload, and Coordination Challenges Limited North India Office's Performance

OIG found that staff vacancies, workload, and coordination challenges limited NIO's ability to fulfill its stated mission. At the time of the inspection, three of the office's six LE staff positions and both professional associate positions were vacant. The office was in the process of recruiting for the LE staff vacancies at the time of the inspection. OIG also noted an imbalance in the office's structure, which had five LE staff members assigned to public diplomacy but only one LE staff position dedicated to both political and economic affairs. This latter position had been vacant since February 2018, but during the inspection the Director conducted interviews to fill this position. Two of the three public diplomacy LE staff members responsible for outreach did not travel outside the National Capital Region, which limited engagement in most of the NIO's geographic area of responsibility. In addition, one NIO public diplomacy LE staff member worked exclusively on programs at the New Delhi American Center, rather than conducting outreach in the office's geographic area of responsibility.

OIG found that the delegation of ancillary responsibilities to NIO staff also limited the office's ability to fulfill its stated mission. The embassy assigned ancillary duties in the Political Section to NIO's sole Political Officer. Such duties included acting as control officer for visits, coordinating the mission's preparation of congressionally mandated annual Human Rights and International Religious Freedom reports, and serving as Grants Officer or GOR for awards unrelated to NIO's areas of responsibility. In addition, during the inspection the NIO Director served as the embassy's ICS coordinator, a triennial and months-long mission-wide planning exercise involving all sections and agencies. OIG also noted that after the NIO's Political Officer's departure in June 2018, the position would become an entry level one-year rotation, which could weaken the office's ability to sustain working relationships with North Indian contacts.

In addition, NIO personnel and embassy stakeholders described to OIG uneven levels of collaboration and information sharing. For example, NIO officers attended weekly staff meetings held by the Public Affairs, Political, and EEST Sections, but the Political Section had attended only one of NIO Working Group's previous five meetings. OIG encouraged embassy

leadership to clarify NIO roles and responsibilities in a manner that facilitates collaboration and coordination with other sections and agencies.

According to 1 FAM 014.1, to ensure the most effective use of government resources, any new organizational structure in the Department should strive to achieve a proper balance among mission needs, efficiency of operations, and effective employee utilization. In addition, 3 FAM 7313.1 states that managers and supervisors of LE staff are responsible for structuring organizations and positions to accomplish mission objectives efficiently and effectively.

> **Recommendation 8:** Embassy New Delhi should conduct a review of the North India Office structure, staffing, and performance to determine whether it is sufficiently resourced and appropriately structured to carry out its stated mission, and implement any recommended changes resulting from the review. (Action: Embassy New Delhi)

Consular Affairs

Mission India constitutes one of the four largest consular operations in the world in terms of workload, staffing, and budget, according to the Bureau of Consular Affairs. The mission's five consular sections processed more than 1.2 million nonimmigrant visas (NIV) in FY 2017, the third-largest amount globally, including 72 percent of H-1B visas and 29 percent of L-1 visas issued worldwide.[21] Students accounted for more than 47,000 visa issuances in FY 2017, the second-largest number in the world after Mission China. At the time of the inspection, Embassy New Delhi and Consulate General Mumbai shared immigrant visa services, processing 24,933 immigrant visa applications in FY 2017. At the time of the inspection, the mission was in the process of moving most immigrant visa services from the embassy to Consulate General Mumbai, and expected to finish consolidation by the end of 2018. The embassy plans to retain immigrant visa services for adoptions, refugees, and certain U.S. Government employees.

Mission India's consular sections provided services to a community of U.S. citizens, both residents and visitors, which the embassy estimated to be as many as 785,620 in 2018. According to the embassy, factors affecting American citizen services included a growing population of U.S. citizen children born to parents studying or working in the United States. Embassy New Delhi also provided American citizen services in the Kingdom of Bhutan, where consular officers planned visits approximately twice annually.

OIG determined that the Minister Counselor for Consular Affairs and the consular managers throughout Mission India provided strong leadership and management of resources, both personnel and budgetary. They improved operations by moving toward consolidation of immigrant visa processing, and provided assessments of current and future staffing needs, which the Department used to add positions to meet growing workloads. Officers, consular

[21] According to 9 FAM 402.10-4(B), the H-1B classification applies to an alien who is coming temporarily to the United States to perform services in a specialty occupation. Guidance in 9 FAM 402-12-2 states that the L-1 nonimmigrant classification permits international companies to temporarily transfer qualified employees to the United States for the purpose of improving management effectiveness, expanding U.S. exports, and enhancing competitiveness in markets abroad.

fellows, eligible family members, and LE staff collaborated effectively across the mission to provide the full array of consular services.

OIG's review of consular operations included American citizen services, fraud prevention programs, nonimmigrant and immigrant visa services, training, crisis preparedness, communications and outreach, and internal controls. OIG noted several innovative practices that enhanced consular efficiency and effectiveness, two of which are highlighted below. OIG concluded that Mission India's consular operations and programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, except as described below.

Consular Procedures Were Not Standardized Mission-wide

The Minister Counselor oversaw mission-wide consular operations in accordance with 7 FAH-1 H-135 guidance to bring cohesion to the five consular sections and ensure uniform and correct application of Department standards. To this end, he traveled quarterly to each consulate general to meet with consular personnel, held a weekly video conference with the constituent Consular Section chiefs, and spoke with them individually by phone each week. In addition, Mission India's consular sub-section managers kept in regular contact via email and video conferences, and other personnel participated in annual workshops that addressed specific topics, such as fraud prevention.

Despite this frequent communication and robust information-sharing, OIG found that Mission India's consular team lacked mission-wide policies and practices for many aspects of its operations. For instance, the mission did not have common training and professional development programs; mission-wide templates for correspondence; and universal criteria for referring visa cases to fraud prevention units. The Minister Counselor recognized that harmonized processes would improve consistency among consular sections and increase efficiency. At the time of the inspection, all consular sections used standard operating procedures for American citizen services, and efforts were underway to draw up policies covering NIV services. OIG advised the Minister Counselor to establish additional standardized policies and templates for other aspects of consular programs.

Uneven Distribution of Supervisory Responsibilities

While Mission India's Consular Sections generally had the appropriate number of managers, as defined by the Bureau of Consular Affairs' Overseas Consular Section Staffing Models, assignment of managers did not always conform with the models. For instance, Consulate General Chennai had a dedicated deputy consular chief, a position not in the staffing models. Consulate General Mumbai had a deputy American citizen services chief who spent most of his time on other functions. In addition, all consular sections except New Delhi had managerial level officers heading consular information units, which handled correspondence, outreach, and other ancillary functions. However, some NIV units, which had the largest workloads, were minimally staffed with managers. For instance, Consulates General Mumbai and Chennai each had one NIV unit chief and a deputy (both deputy positions were vacant at the time of the inspection) to oversee 20 and 17 consular First- and Second-Tour personnel, respectively. These

numbers of supervised personnel exceeded those provided in Bureau of Consular Affairs staffing models. As a result, OIG found that NIV managers often had only minimal time to provide feedback, coaching, and guidance to their subordinates. OIG advised the Minister Counselor to realign supervisory staffing throughout the mission in accordance with the staffing models to provide a more even distribution of managerial responsibilities.

Consular Records Lacked Organization and Maintenance

Mission India's Consular Sections did not maintain files and records in a systematic and organized manner so that information could be accurately and quickly retrieved, as required by 7 FAH-1 H-451. In addition, at Embassy New Delhi and Consulate General Mumbai, OIG found these files, housed in electronic shared and network drives, included unprotected individual case files containing personally identifiable information. Guidance in 5 FAM 469.4c(1) does not permit such information to be stored electronically in a way that makes it accessible to employees without a "need to know." In addition, 7 FAH-1 H-453 charges consular supervisors to organize, maintain, and dispose of consular records in accordance with Department standards, including records disposition schedules. During the inspection and on OIG advice, Consular Sections in New Delhi and Mumbai removed almost all personally identifiable information from electronic shared drives or password protected the information to prevent unauthorized access. In addition, all consular sections throughout the mission began to address file organization and maintenance.

Embassy New Delhi Revised Interview Practices Regarding Celibate Hindu Priests

In order to accommodate a Hindu organization whose priests took a vow that included not speaking to women, Embassy New Delhi agreed to the organization's requests that priests applying for visas be interviewed only by male consular officers. The embassy did so in an effort to respect local traditions and deflect criticism from the group and its supporters in the United States and India that would undercut the mission's efforts to promote interfaith dialogue. However, female officers objected to this practice, expressing their belief that it was discriminatory.[22] After OIG brought the female officers' concerns to their attention, consular managers formulated a new policy to have a male member of the Hindu group serve as interpreter for its priests if the interviewing officer is a woman, and clarified with the Department that this arrangement is legally acceptable.

Consular Sections Did Not Meet Department Standards for Crisis Preparedness

While Mission India's Consular Sections conducted crisis preparedness training and exercises, many consular employees told OIG they did not know what their roles might be in a crisis. In addition, most were unfamiliar with the contents of a disaster assistance kit that contains the supplies, equipment, and information a consular officer would need to function off-site in an emergency. These deficiencies are inconsistent with 7 FAM 1812.5 and 7 FAM 1814.3, which provide guidance for consular crisis preparedness in these specific areas to ensure the section is

[22] Under Title VII of the Civil Rights Act of 1964, employment decisions, including assignments of specific tasks, cannot be made on the basis of an employee's gender.

able to effectively manage an emergency situation. Failure to properly prepare for a crisis could put U.S. citizens at risk during an emergency. OIG noted that Consulate General Chennai had piloted a crisis management training program for consular personnel and encouraged other consular managers to consider expanding its use mission-wide.

> **Recommendation 9:** Embassy New Delhi should comply with the Department standards for crisis preparedness. (Action: Embassy New Delhi)

Consulate General Chennai Did Not Use its Fraud Prevention Unit to Address H and L Visa Fraud

Consulate General Chennai's NIV unit, and not its Fraud Prevention Unit, researched and analyzed potential fraud in H and L visa applications. According to 7 FAH-1 H-943, Fraud Prevention Units are responsible for evaluating and assessing potential fraud and analyzing fraud patterns, and for entering and tracking cases in the Enterprise Case Assessment System, a specialized application. Failure to take advantage of the expertise of a fraud unit could affect the section's ability to properly screen and analyze cases and identify fraud trends. In addition, Enterprise Case Assessment System access outside the Fraud Prevention Unit's purview diminishes the confidentiality of personally identifiable and fraud information and increases the risk of misuse of that data.

The Bureau of Consular Affairs instructed the consulate general to transfer H and L visa fraud research and analysis to its Fraud Prevention Unit and to restrict system access to unit employees by May 2019. At the time of the inspection, Consulate General Chennai managers had initiated that process.

Line-of-Sight Was Limited in Embassy New Delhi

Consular managers at Embassy New Delhi could not visually monitor the work of the consular staff at windows on either side of the section, a key internal control. The Immigrant Visa Unit's windows are located around a corner from the consular managers' office area, as is part of the NIV unit. The inability of supervisors to see these workspaces is inconsistent with guidance in 7 FAH-1 H-281e, which states that "the essential element of 'line-of-sight' is the ability of cleared American supervisors to physically observe work areas." Given the configuration of the work space—two relatively long and narrow areas with no space for an American officer's desk—OIG determined that a closed-circuit TV monitoring system could provide the required line-of-sight. The lack of line-of sight of these work areas from the officers' office area increases the risk of malfeasance.

> **Recommendation 10:** Embassy New Delhi should provide a closed-circuit TV monitoring system or other means to enable consular managers to visually observe activities at nonimmigrant and immigrant visa windows within the Consular Section. (Action: Embassy New Delhi)

Consulate General Kolkata's Consular Local Staff Position Descriptions Were Inaccurate

Position descriptions for consular LE staff at Consulate General Kolkata were inaccurate and incomplete. For example, they did not encompass all the major tasks that the visa assistants

executed daily and did not account for the increased complexity and volume of work. According to 3-FAH-2 H-443.1, the official in charge of an organizational unit is responsible for keeping position descriptions up to date and the human resources or other American official charged with the personnel function is responsible for ensuring that the position classifications are current. In addition, 3-FAH-2 H-443.3 requires officials to review position descriptions annually. Inaccurate position descriptions can lead to incorrect position grade levels and can hinder supervisors' ability to hold employees accountable for their performance.

> **Recommendation 11:** Embassy New Delhi should update the position descriptions for consular locally employed staff at Consulate General Kolkata in accordance with Department standards. (Action: Embassy New Delhi)

Spotlight on Success: Business Travel Program Increased Efficiencies in Visa Application Processing

Consulate General Mumbai's Consular Section collaborated with the U.S. Commercial Service to promote meetings, incentives, conferences, and exhibition travel by Indian business people to the United States. The Consular Section used preliminary meetings with companies and their travel management representatives to discuss the purpose of the group's travel, qualifications for participation, details on expenses covered by the companies, and other group information that improved the efficiency of the visa interview process. This coordination enabled Consulate General Mumbai to better manage group interview scheduling, provided greater context during interviews, and helped facilitate adjudication determinations.

Spotlight on Success: Mission Staffing, Planning, and Visa Demand Tracking System

Consulate General Hyderabad's Consular Section created a Microsoft Excel-based system called the Consular Operations Breakdown for Resource Allocation, or COBRA, to determine how staffing affects NIV workload and scheduling. By combining current and anticipated staffing data and historical and projected workloads, COBRA calculates how many NIV appointments can be scheduled based on available staffing and predicts appointment wait times. In use by all of Mission India, COBRA assists managers to plan staffing and scheduling needs at particular points in time. During the inspection, Mission India used COBRA to prepare metrics-based requests for temporary duty staffing to manage personnel gaps during the summer busy season.

RESOURCE MANAGEMENT

OIG reviewed internal control systems in the Financial Management, Human Resources, General Services, Facilities Management, and Information Management Sections, and in the employee association. OIG found that the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, except as described below. In addition, during the inspection, Mission India corrected a number of deficiencies, as noted below.

Financial Management

OIG identified five internal control deficiencies in the Financial Management Sections of the embassy and consulates general, which the mission corrected during the inspection:

- Resolved 411 of 412 unprocessed transactions listed in the Department's Financial System's Unprocessed Transaction Report dated May 7, 2018, in accordance with 4 FAM 251.7.
- Cleared personal value-added tax refunds totaling $100,920 placed in the Suspense Deposit Abroad Account, in accordance with 4 FAH-3 H-322c(2).
- Required Consulate General Kolkata's Principal Officer to pay official residence expense staff directly from a personal account, in accordance with 3 FAM 3257a, rather than the cashier making the payments via electronic funds transfer.
- Required cashier supervisors mission-wide to conduct unannounced, random cashier reconciliations, in accordance with the June 2017 Department's Cashier User Guide, Section 13.2(1), rather than on a predictable schedule.
- Required consulate general cashier supervisors to schedule alternate cashiers to work as acting principal cashier two to three times per month, instead of only during periodic absences of the principal cashier. This is in accordance with the June 2017 Department's Cashier User Guide, Section 3.6.

Remaining Unreconciled Balances in the Suspense Deposit Abroad Account

The Financial Management Section had an unreconciled balance totaling $65,772 in the Suspense Deposit Abroad account with transactions dating back to March 2018. According to 4 FAH-3 H-322c(2), authorized transactions put into a clearing account should be cleared as quickly as possible, preferably within 30 days. No transaction amount should be in the clearing account for a period exceeding 60 days. The financial staff had not cleared the Suspense Deposit Account because of other priorities. Without timely reconciliation, the mission cannot use funds deposited in the Suspense Deposit Account for other purposes.

> **Recommendation 12:** Embassy New Delhi should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines, and put funds of $65,772 to better use. (Action: Embassy New Delhi)

The Financial Management Section cleared most of the transactions held in the Suspense Deposit Abroad account after June 4, 2018, including $50,752 from auctions held in March and April 2018.

Overdue Travel Advances

As of June 4, 2018, the Department's financial system open advance report showed 39 overdue travel advances totaling $52,385 for Mission India, approximately 7 of which were more than 30 days overdue. According to 4 FAM 465.1, each traveler is required to submit an expense report (voucher or claim) within 5 business days from the travel ending date to account for the

travel performed and for the related authorized costs. If travelers do not submit their vouchers on time, the Financial Management Section is responsible for debt collection, as outlined in 4 FAM 492.1. Section staff told OIG that the overdue travel advances occurred because travelers did not submit their vouchers on time despite receiving reminders. It was also difficult for financial staff to enforce compliance with Department standards given the large number of travelers and because of other priorities. Overdue travel advances represent a loss of funds to the Department if they remain uncollected, and the mission could put to better use any funds collected by clearing overdue travel advances.

> **Recommendation 13:** Embassy New Delhi should clear overdue travel advances in accordance with Department guidelines, and put funds up to $52,385 to better use. (Action: Embassy New Delhi)

Only One of Fifteen Information Management Positions Were Programmed to International Cooperative Administrative Support Services

OIG found that International Cooperative Administrative Support Services[23] (ICASS) funded only 1 of Mission India's 15 Information Management U.S. direct-hire positions, even though the section provided support to other agencies. The Department paid for the remaining 14 positions, even though the mission estimated that some Information Management staff allocated more than 50 percent of their time to ICASS services. Furthermore, with the recent implementation of the Annual Inventory Modernization program, the Department delegated to the Information Management Section management of IT equipment, which is an ICASS function and thus should be paid for through ICASS.

This is a concern OIG has identified in other inspections, and has its roots in changes made to the Information Management Section's work over time. Unlike other U.S. direct-hire management positions that deliver support services—such as general services, human resources, and financial management—ICASS did not capture the cost of Department-funded Information Management positions when it began in 1997. To address this disparity, in June 2010, the Office of Management Policy, Rightsizing, and Innovation advised some embassies to convert at least one of their U.S. direct-hire positions to ICASS.[24] However, Department standards support converting additional Department-funded Information Management positions to ICASS. Pursuant to 6 FAH-5 H-341.9,[25] ICASS costs should include salaries and benefits of all the U.S. direct-hire and LE staff who deliver services to other agencies, overhead associated with those staff, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at posts with multiple U.S. direct-hire Information Management officers, the

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

[24] Office of Management Policy, Rightsizing, and Innovation Information Memorandum, "Uniform ICASS Treatment of IM American Positions," June 2010.

[25] See 6 FAH-5 H-341.9-1(B), 6 FAH-5 H-341.9-2(B), and 6 FAH-5 H-341.9-3(B).

first position is paid through the Department's Diplomatic and Consular Program funding, while the second one is always ICASS. Where there are more than two Information Management officers, the post should determine an appropriate mix of program- and ICASS-funded positions. Failure to reprogram additional positions to ICASS means the Department's Diplomatic and Consular Program budget would continue to subsidize most of the costs for other agencies. OIG estimated the Department could recover $81,331 per position annually in funds put to better use by converting additional Information Management positions to ICASS.[26]

> **Recommendation 14:** Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of $81,331 per position to better use. (Action: Embassy New Delhi, in coordination with SCA and CGFS)

Human Resources

Regional Support Office Positions Required Unnecessary Hindi Language Ability

Embassy New Delhi hosted two regional support offices. The first is a Regional Classification Center that classifies LE staff positions for the Bureau of Near Eastern Affairs and Bureau of South and Central Asian Affairs posts. The second is a Kabul Support Unit that provides IT help desk services, primarily for the Department's Sensitive But Unclassified, or OpenNet, network, to Embassy Kabul. Although neither office supports Mission India, the LE staff position descriptions required Hindi language ability. OIG, however, determined that Hindi language skills were not required to provide support to its customers in Kabul or at non-India posts in the region. In accordance with 3 FAM 7313.1(4), managers and supervisors of LE staff are responsible for ensuring that their position descriptions adequately and accurately reflect currently assigned duties and responsibilities. Unnecessary local language requirements may exclude otherwise qualified applicants, such as eligible family members, from applying for these LE staff positions. During the inspection, the embassy, in coordination with Regional Classification Center Riyadh, removed the Hindi language requirement from the Regional Classification Center LE staff position descriptions. However, removal of the Hindi language requirement from the Kabul Support Unit LE staff position was still pending.

> **Recommendation 15:** Embassy New Delhi should remove the Hindi language requirement from the Kabul Support Unit locally employed staff position descriptions. (Action: Embassy New Delhi)

[26] Relying on Department-provided figures, OIG estimated the Department could recover $81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of $268,419 and the worldwide average percentage of time U.S. direct-hire IM staff support other agencies of 30.3 percent ($268,419 x 0.303 = $81,331).

Embassy Had Not Updated its Locally Employed Staff Handbook Since 2010

The embassy had not updated its LE Staff Handbook since 2010.[27] The embassy acknowledged to OIG that several handbook sections provided incorrect or outdated information that deviated from local labor law. Standards in 3 FAH-2 H-133.5b(1) state that new employees need accurate and complete information about the conditions of their employment and what is expected of them. The embassy told OIG that a lengthy internal editing process contributed to the delay in completing the handbook update. Without accurate policies and procedures, supervisors and LE staff could make incorrect personnel decisions, and LE staff might not receive the benefits and due process to which they are entitled.

> **Recommendation 16:** Embassy New Delhi should update its locally employed staff handbook in accordance with Department standards. (Action: Embassy New Delhi)

Post Hardship Surveys Were Overdue in Kolkata and Hyderabad

Consulates General Kolkata and Hyderabad did not submit their post hardship differential survey by the required deadlines.[28] Department of State Standardized Regulation 920 establishes a schedule for submitting post hardship survey every 2 years. According to the Bureau of Administration's Office of Allowances website, Consulate General Kolkata's survey was due in January 2016 and Consulate General Hyderabad's was due in October 2017. However, at the time of the inspection neither post had submitted their surveys. Management staff at both consulates general stated that they were unaware of the deadlines. Failure to submit hardship surveys to the Bureau of Administration increases the risk of overpayments or underpayments to U.S. Government employees.

> **Recommendation 17:** Embassy New Delhi should submit all hardship differential surveys to the Bureau of Administration in accordance with Department standards. (Action: Embassy New Delhi)

General Services Operations

OIG identified several internal control deficiencies in the General Services Offices of the embassy and consulates general, which the mission corrected during the inspection:

- Embassy New Delhi reviewed the mission-wide motor vehicle policy, in accordance with 14 FAM 432.5 and brought mission-wide controls over keys for official vehicles into compliance with 14 FAM 436.3c.

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[27] LE Staff handbooks are written rules and regulations governing recruitment and employment at diplomatic missions. They should reference but not unnecessarily repeat the mission's local compensation plan and should contain policy on other relevant human resources issues, such as promotions, discipline, probation, and evaluation procedures and policies, and ethical conduct codes.

[28] Hardship differential provides additional compensation to staff for service at places in foreign areas where conditions of environment differ substantially from those in the continental United States and warrant additional compensation as a recruitment and retention incentive.

- Consulate General Mumbai provided driver safety training to five of its chauffeurs as required in 14 FAM 432.4c(2).
- Consulate General Hyderabad brought its fuel coupon program into compliance with 14 FAH-1 H-814.3-2 and established a property survey board as required in 14 FAM 416.5-2b(1).

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

Embassy New Delhi did not comply with elements of the Department's overseas motor vehicle safety standards. Three chauffeurs who drove armored vehicles did not receive armored vehicle training, as required in 12 FAM 389b. Two incidental (self-drive) drivers did not receive driver safety training as required in 14 FAM 432.4c(2), nor did they receive the medical certifications before driving official vehicles as required in 14 FAM 432.4c(4)(b). OIG found 96 instances, over 14 weeks, where drivers exceeded the 10-hour per day limit on driving shifts. In some instances, drivers worked up to 18 hours per day. Guidance in 14 FAM 432.4c(3), 15 FAM 957.3(4), and the Department's Overseas Motor Vehicle Safety Management Program delineate limits on the maximum number of hours a driver is allowed to work. These internal control deficiencies occurred because of a lack of management oversight. Failure to enforce these standards increases the risk of injury to drivers, passengers, and the public, as well damage to U.S. Government property.

> **Recommendation 18:** Embassy New Delhi should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department overseas motor vehicle safety requirements. (Action: Embassy New Delhi)

Some Official Vehicles Did Not Meet Minimum Safety Standards

Between FY 2012 and FY 2014, Consulates General Hyderabad and Kolkata both purchased four vehicles that did not meet minimum safety standards. Specifically, some light trucks and passenger vehicles did not have air bags. According to 14 FAM 432.1b, however, all passenger vehicles and light trucks purchased after October 1, 2009, by the Department, overseas posts, or any U.S. Government agency under chief of mission authority for official use overseas must meet the requirements specified in the Federal Motor Vehicle Safety Standards guide, including driver and front passenger air bags. This oversight occurred because management staff was unaware of this requirement. Operating vehicles that do not meet minimum safety standards puts drivers and passengers at increased risk of injury and loss of life.

> **Recommendation 19:** Embassy New Delhi should bring its motor vehicle fleet into compliance with Department standards. (Action: Embassy New Delhi)

Consulate General Hyderabad Did Not Monitor Operating Costs of its Official Vehicles

Consulate General Hyderabad had not monitored the operating costs of its official vehicles since September 2017. Specifically, the motor pool manager did not review and sign the monthly fleet summary report, as required by 14 FAH-1 H-816.1-2, or the monthly fuel and oil consumption report, as required by 14 FAH-1 H-814.2-2, due to competing priorities. These

monthly reports include useful information about fuel and oil consumption, vehicle repairs, and kilometers driven. For example, significant changes in fuel or oil consumption could be an indicator of unresolved mechanical issues or theft of fuel. This internal control weakness increases the risk of mismanagement and theft.

> **Recommendation 20:** Embassy New Delhi should review its fleet reports in accordance with Department standards. (Action: Embassy New Delhi)

Nonexpendable Property Transfers to Residences Were Not Documented

According to Integrated Logistics Management System[29] property metrics, the embassy and consulates general did not consistently document nonexpendable property transfers to residences for FY 2016 and FY 2017.[30] Guidance in 14 FAM 416.3 requires that property transfers be documented and signed for by the resident, and that the signed forms be maintained in residential inventory files. This process allows the embassy and consulates general to track changes to the original inventory that is prepared when an employee first moves into a residence. Guidance in 14 FAM 414.5 states the accountable property officer must ensure that effective internal requisitioning and issuing procedures to document nonexpendable property transactions are established and enforced. Embassy and consulates general staff were unable to provide a reason for the lack of transfer documentation. This deficiency is an internal management control weakness that increases the risk of theft.

> **Recommendation 21:** Embassy New Delhi should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy New Delhi)

Consulate General Kolkata Did Not Use the Department-Approved Property Record System to Track Facilities Management Expendable Supplies

Consulate General Kolkata did not track facilities management expendable supplies, such as electrical switches, pipes, hoses, nuts, and bolts, in the Integrated Logistics Management System. Instead, staff maintained a separate paper log to document inventory and issuance of expendable supplies for the Facilities Management Section. As stated in 14 FAM 414.2-1a(2), the Integrated Logistics Management System is the Department-approved property record system for expendable supplies. Guidance in 14 FAM 414.5 requires the accountable property officer to ensure that effective internal requisitioning and issuing procedures are established and enforced, including the use of form DS-583 to document the issuance and return of expendable supplies. Consulate general staff told OIG that before the current Management Officer arrived, the facilities management staff was made responsible for the facilities

[29] The Integrated Logistics Management System (ILMS) is an integrated web-based system that encompasses all of the Department supply chain functions in one system. ILMS is designed to upgrade Department supply chain management by improving operations in areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

[30] Embassy New Delhi did not document 22.80 percent of its transfers of nonexpendable property to embassy residences. Consulates General Chennai, Hyderabad, Kolkata, and Mumbai, respectively, did not document 64.65 percent, 13.49 percent, 97.40 percent, and 38.48 percent of these transfers.

management expendable supplies inventory, which totaled $109,410. The facilities management staff did not, however, use the Integrated Logistics Management System. Instead, they removed the expendable supplies from the Integrated Logistics Management System and tracked the supplies using the facility management paper log system, a departure from Department guidance. Failure to use the Department-approved property record system increases, for example, the risk of theft.

> **Recommendation 22:** Embassy New Delhi should bring expendable supplies management into compliance with Department standards. (Action: Embassy New Delhi)

Consulate General Kolkata Incurred 176 Unauthorized Commitments Totaling $596,927

From August through December 2017, Consulate General Kolkata incurred 176 unauthorized commitments totaling $596,927. According to 14 FAM 215a, an unauthorized commitment occurs when a contractual agreement is made that is not binding on the U.S. Government because the official who made the agreement lacked the requisite authority to do so. Generally, only warranted contracting officers, acting within the limits of their warrants or acting upon specific authorization from the Bureau of Administration's Office of the Procurement Executive, may sign acquisition agreements. Here, the unauthorized commitments occurred because one officer, who received a temporary warrant during a staffing gap, continued to approve procurements from August to December 2017 after his warrant expired and a new contracting officer arrived at post. Pursuant to 14 FAM 215e, a designated individual may under some circumstances convert an unauthorized commitment to a legal contract by "ratifying" the commitment in question. The head of a post's contracting activity may ratify actions up to $1,000, but the Procurement Executive must ratify actions exceeding $1,000. Unauthorized commitments may result in personal liability for the individual who made the commitment; moreover, vendors may be at risk of not receiving payment for services performed and goods delivered.

> **Recommendation 23:** Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of Administration, should ratify all unauthorized commitments in accordance with Department standards. (Action: Embassy New Delhi, in coordination with SCA and A)

Foreign Per Diem Rates Were Out of Date for New Delhi and Mumbai

Foreign per diem rates for New Delhi and Mumbai were out of date. According to the Bureau of Administration, Embassy New Delhi had not submitted a hotel and restaurant report since 2011.[31] Consulate General Mumbai last submitted its report in 2008. Department of State Standardized Regulations section 074.2 states that all agencies having responsibility to prepare and submit reports shall provide complete, accurate, and supportable information in the biennial hotel and restaurant reports. The embassy and consulate general staffs were unaware

[31] The Department uses Hotel and Restaurant Reports to determine the appropriate U.S. Government per diem allowance.

that their foreign per diem rates were outdated. Failure to submit reports on a timely basis could result in overpayment, or underpayment, to U.S. Government personnel.

> **Recommendation 24:** Embassy New Delhi should submit its hotel and restaurant reports to the Bureau of Administration. (Action: Embassy New Delhi)

Facilities Management

OIG identified fire protection and safety, health, and environmental management program deficiencies, which the Facilities Management Sections at the embassy and consulates general corrected during the inspection:

- Embassy New Delhi and Consulates General Mumbai, Kolkata, and Chennai issued management notices advising residential occupants of their responsibility to check residential fire extinguishers and smoke detectors on a monthly basis, as required in 15 FAM 841b and 15 FAM 842b.
- Embassy New Delhi and Consulate General Mumbai inspected fire extinguishers and updated extinguisher tags located in Government-owned buildings, as required in 15 FAM 842a.
- Consulate General Chennai requested the OBO Office of Fire Protection's assistance with mitigating fire and life safety risk in 18 units in non-high-rise residential buildings, in accordance with OBO's Fire Protection Guide Section E-1.

Fire Protection Program Did Not Fully Comply with Department Standards

OBO's Office of Fire Protection inspection team visited Mission India in July 2017 and identified 194 deficiencies. The mission corrected 145 of the deficiencies, with 49 still pending at the time of the inspection. OIG advised the mission to correct the remaining fire deficiencies.

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

OIG identified three elements of the mission's safety, health, and environmental management program that did not comply with Department standards:

- Post Occupational Safety and Health Officers (POSHOs) at Consulates General Chennai, Hyderabad, and Kolkata did not perform the required safety inspections. Guidance in 15 FAM 962c requires the POSHO to inspect all office work areas annually and "increased-risk"[32] areas and operations twice a year.
- Consulate General Chennai's POSHO did not conduct the required safety training. According to 15 FAM 965a, the POSHO will ensure that management officials receive an orientation and other learning experiences that enable them to meet their safety and

[32] According to 15 FAM 962e, an increased risk work area is a workplace or environment with a high potential for mishaps or occupational illnesses, including activities involving machines, electrical or electronic functions, construction, maintenance, and repair.

occupational health responsibilities. In addition, 15 FAM 965d states that the POSHO will ensure that a safety and occupational health orientation is provided for all new employees, and that specialized safety, health, and environmental management training related to the work performed by particular employees is provided.

- Consulate General Hyderabad's POSHO had not convened a safety, health, and environmental management meeting since 2015. Guidance in 15 FAM 933.2a requires each post with more than 25 employees to establish a post safety, health, and environmental management standing committee, which should meet at least semiannually.

Staff at the consulates general told OIG the deficiencies occurred because of their unfamiliarity with OBO standards related to the safety, health, and environmental management program. These issues should be corrected, as the lack of inspections, training, and meetings increases the risk of injury and loss of life.

Recommendation 25: Embassy New Delhi, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's safety, health, and environmental management deficiencies and bring the program into full compliance with Department standards. (Action: Embassy New Delhi, in coordination with OBO)

Mission India Modified Government-Owned Buildings Without Obtaining Approval from the Bureau of Overseas Buildings Operations

OIG found that Mission India had a history of making modifications to U.S. Government-owned buildings without first obtaining the required OBO approval. In its 2011 inspection report,[33] OIG noted two unapproved construction projects. First, the embassy constructed a second floor on an existing building (property X01021) in 2005. Second, Consulate General Kolkata divided an apartment into two units: an apartment and a community recreation center (properties X29001 and X9999, respectively).[34] For both projects, OIG found that the embassy did not request that OBO conduct a technical review to ensure the projects conformed to Department building codes, nor did it obtain a building permit from OBO before proceeding with construction, as required in 15 FAM 641. OIG recommended that the embassy submit the project drawings to OBO to obtain the required approval retroactively, which the embassy did in July 2011 (property X01021) and October 2011 (properties X29001 and X9999.) However, at the time of the current inspection, the embassy did not have any approval on file for the two projects.

During the current inspection, OIG found several more unapproved modifications to U.S. Government-owned buildings, all of which occurred before the arrival of the mission's current Facilities Management Officers. Specifically:

[33] OIG, ISP-I-11-39A, June 2011.

[34] It was unclear when the project to divide the apartment into was completed. However, it must have been prior to March 2011, which is when OIG's inspection team visited Kolkata and observed the completed project.

- Sometime in the 2004-2005 timeframe, Consulate General Kolkata subdivided two large residential units into four smaller residential units (properties X9990, X9991, X9992, and X9993).
- Sometime in the 2014-2016 timeframe, Consulate General Mumbai reduced the size of the cafeteria/driver breakroom located in the General Services Office Annex (property R1012) to increase the size of the fitness center. Around the same time, Consulate General Mumbai reconfigured the storage area located in the service Compound Access Control building (property R1007) into a drivers' break room.

According to guidance in 15 FAM 641b(2) and b(4), actions that require prior OBO approval include: interior alterations affecting public spaces or materially affecting space functions or design; and replacement of, or alterations to, roof structure, including placing or erecting any structures, equipment, or devices on the roof. These unapproved modifications occurred because prior mission leadership, particularly Facilities Management Officers, disregarded OBO standards. OIG found that the mission's current Senior Facility Manager was aware of the problem and during the on-site portion of the inspection, began taking corrective action by initiating the permitting and approval process with OBO for property number X01021 in New Delhi. OIG made the recommendations below to ensure that the project drawings for the unapproved modifications made to the other eight impacted U.S. Government-owned properties are similarly submitted to OBO, and that OBO completes its technical review for all nine submissions and works with the embassy to resolve any concerns it has with the modifications.

Recommendation 26: Embassy New Delhi should submit design plans to the Bureau of Overseas Buildings Operations for the unapproved modifications to property numbers X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata, and R1007 and R1012 in Mumbai. (Action: Embassy New Delhi)

Recommendation 27: The Bureau of Overseas Buildings Operations should conduct a technical review of the design plans for property numbers X01021 in New Delhi; X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata; and R1007 and R1012 in Mumbai, in accordance with Department standards, and work with Embassy New Delhi to remedy any modifications that OBO is unable to retroactively approve. (Action: OBO, in coordination with Embassy New Delhi)

No Access Control on Upper Floor of the On-Compound Warehouse

Consulate General Mumbai's on-compound warehouse lacked adequate access control. Staff had uncontrolled access to the warehouse via a second floor entrance. According to 14 FAM 413.7a(8), access to a warehouse must be limited to those persons who have a need to enter. Consulate General Mumbai believed that the uncontrolled access was due to a design flaw and planned to install a metal grille to secure the second floor entrance. Lack of access control increases the risk of theft and loss of U.S. Government resources.

Recommendation 28: The Bureau of Overseas Buildings Operations, in coordination with Embassy New Delhi, should install access controls for Consulate General Mumbai's on-compound warehouse, in accordance with Department standards. (Action: OBO, in coordination with Embassy New Delhi)

American Community Support Association

OIG identified one internal control deficiency—lack of bonding insurance as required by 6 FAM 533—which the American Community Support Association corrected during the inspection.

Embassy New Delhi Did Not Have a Contract to Procure Fuel from the American Community Support Association for its Official Vehicles

Embassy New Delhi did not use a contract to procure fuel from the American Community Support Association for its official vehicles. Federal Acquisition Regulation Subpart 41.2(b) states that except for acquisitions at or below the simplified acquisition threshold, agencies shall acquire utility services by a bilateral written contract.[35] Federal Acquisition Regulation Subpart 3.6(a) also states a contracting officer shall not knowingly award a contract to a U.S. Government employee or to a business concern or other organization owned or substantially owned or controlled by one or more Government employees, unless granted an exception. The management staff was unaware of these regulations. The embassy's current method of procuring fuel is a potential internal control risk.

Recommendation 29: Embassy New Delhi should bring its method and procedures for procuring fuel from the American Community Support Association into compliance with the Federal Acquisition Regulation. (Action: Embassy New Delhi)

INFORMATION MANAGEMENT

The Information Management Section supports the information processing and communication needs of Embassy New Delhi and the four consulates general. OIG reviewed classified, unclassified, and dedicated internet computer operations; physical protection of IT resources; classified communication security; emergency communication preparedness; radio and telephone programs; and mail and pouch services. In addition to these services, OIG also reviewed the Kabul Support Unit, a helpdesk operation supporting Embassy Kabul from Embassy New Delhi's Information Management Section. The Information Management Officer, who is responsible for the mission-wide operation, effectively promoted collaboration across the mission through regular digital video conferences and on-site visits. OIG found the mission implemented most required information management and security controls, in accordance with Department polices and applicable laws, except as noted below.

During the inspection, the Information Management Section began correcting issues that OIG identified. Specifically:

[35] Utility service includes electricity, natural or manufactured gas, water, sewage, thermal energy, chilled water, steam, hot water, or high temperature hot water.

- Embassy New Delhi monitored and disabled inactive unclassified and classified user accounts as required by 12 FAH-10 H-112.1-1f.
- Embassy New Delhi also limited users' access only to the information necessary to accomplish their assigned tasks, per 12 FAH-10 H-112.5-2(1).
- Embassy New Delhi and Consulates General Mumbai and Chennai established processes to prevent systems administrators from storing systems passwords online as required by 12 FAH-10 H-132.4-2(8).
- The Counter-Intelligence Working Group approved the remote access program throughout the mission in accordance with 12 FAH-10 H-174.1a, b.
- Embassy New Delhi revised its procedures for issuing mobile devices to include adequate internal control for effective and efficient use, per 5 FAM 121.1-7a.
- Consulate General Kolkata required escorted access for LE staff to the telephone switch room in accordance with 12 FAH-6 H-651.5-6.

Regional Information Systems Security Officer Duties Were Unclear

Mission India's Information Management Officer did not delineate the roles and responsibilities of the embassy Regional Information Systems Security Officer (ISSO) and those of the ISSOs at the consulates general, as outlined in 5 FAM 121.1. The lack of clear roles and responsibilities weakened the ISSOs' ability to perform the required regular monitoring and reviewing duties efficiently and consistently. Additionally, the Regional ISSO did not provide guidance on routine duties to ISSOs at the consulates general. As a result, OIG found multiple information security deficiencies, such as unassessed and unauthorized applications, improper password storage, personally identifiable information stored on shared folders, unmonitored dedicated internet networks, and noncompliant classified and unclassified user accounts.

> **Recommendation 30:** Embassy New Delhi should establish roles and responsibilities for the mission's Information Systems Security Officers in accordance with Department standards. (Action: Embassy New Delhi)

Embassy-Developed Applications Lacked Security Risk Assessment and Authorization

Embassy New Delhi section managers developed and installed applications on the Department's Sensitive But Unclassified network (OpenNet) without conducting a security assessment or obtaining an authorization to operate from the Bureau of Information Resource Management, as required by 12 FAH-10 H-310. OIG found 13 locally developed applications, four externally hosted websites, and a Microsoft SharePoint server operating without security assessments and authorization at Embassy New Delhi. Two of the locally developed applications collected and stored personally identifiable information on the Department's OpenNet system, while two of the externally hosted websites had collected and transmitted embassy employees' personally identifiable information across the internet for a period of 3 years. At OIG's request and to minimize the risk of privacy breach, section managers stopped using the externally hosted websites and started the process to conduct the security

assessment and obtain the authorization to operate for the two other applications processing personally identifiable information. Additionally, managers began evaluating which of the locally developed applications could be replaced with available Department products. Section staff told OIG that they did not conduct risk assessments because they were focused on meeting customer business needs and did not have standard operating procedures for developing applications. Without security assessments or an authorization to operate, the embassy could not ensure the programs had the appropriate level of security controls to protect the confidentiality, integrity, and availability of Department information.

> **Recommendation 31:** Embassy New Delhi should complete a security assessment and obtain an authorization to operate for each locally developed application in accordance with Department standards. (Action: Embassy New Delhi)

> **Recommendation 32:** Embassy New Delhi should implement a standard operating procedure for application development. (Action: Embassy New Delhi)

Unmanaged Dedicated Internet Networks Created Cybersecurity Risk

Section managers did not inventory, document, or monitor the mission's dedicated internet networks in accordance with 5 FAM 872.3. OIG found unapproved network devices connected to the networks at Embassy New Delhi and Consulates General Mumbai and Hyderabad. Furthermore, the section did not consistently document the networks' hardware and software baseline configurations, as required by 5 FAM 872.3. A lack of ISSO oversight and monitoring contributed to these issues. Failing to inventory, configure, and monitor dedicated internet networks increases their vulnerability to cyber-attacks.

> **Recommendation 33:** Embassy New Delhi should implement standard operating procedures to inventory, manage configurations, and monitor the mission's dedicated internet networks in accordance with Department standards. (Action: Embassy New Delhi)

Kabul Support Unit Lacked Adequate Supervision

The Kabul Support Unit, operating in Embassy New Delhi's Information Management Section, did not have adequate supervision to ensure that the unit's activities were effective, efficient, and economical, as required in 2 FAM 021.1a-b. The Bureau of South and Central Asian Affairs and Embassy Kabul established the unit at Embassy New Delhi to minimize the number of Information Management personnel at Embassy Kabul. The unit, with three LE staff members and three contract personnel, provides remote help desk support to Embassy Kabul for the Department's OpenNet system. At the beginning of the inspection, the Bureau of South and Central Asian Affairs personnel told OIG that there were plans to expand the unit's services to other posts, such as Iraq and Pakistan.

A March 2016 Service Level Agreement between Embassy Kabul and Embassy New Delhi guided the unit's operations but did not define supervisory responsibilities, a gap that led to confusion regarding staff oversight. OIG found that because the unit lacked effective supervision, it did

not institute adequate management controls or comply with required information security standards. For example, the staff worked 8 hours a day with no lunch break, contrary to 3 FAM 2333.1-1(8); used personal cellphones for internet access in the chancery, contrary to 12 FAH-10 H-152.4(1 and 5); and lacked management guidance and development plans required throughout 5 FAM 121.1b(3 and 7). Without clearly defined and designated oversight responsibilities, supervisors cannot establish effective management controls.

> **Recommendation 34:** The Bureau of South and Central Asian Affairs, in coordination with Embassy Kabul and Embassy New Delhi, should revise the Service Level Agreement to establish clear roles for the supervision of the Kabul Support Unit. (Action: SCA, in coordination with Embassy Kabul and Embassy New Delhi)

Consolidation of Print and Graphics Units Made Without Adequate Planning

In 2015, Embassy New Delhi started to consolidate its Public Affairs and Information Management Sections' print and graphics units in an effort to eliminate duplicative operations and reduce costs, in accordance with 1 FAM 125.2-3(2). However, OIG determined that the consolidation lacked adequate planning, as required by 18 FAM 301.4-2(3-6), in order to achieve its objectives. For example, the embassy did not have a project plan outlining goals and objectives, milestones, and monitoring activities to determine whether the intended cost savings objective was met. Thus, when the embassy merged the administrative and funding platforms of the two sections' print and graphics units in October 2017, the two units continued to perform duplicative services, such as printing, laminating, binding, and graphics designing. This absence of a project plan, including a cost-benefit analysis to guide the consolidation, undermined the embassy's effort to eliminate duplicative services and operate a streamlined print and graphics operation.

> **Recommendation 35:** Embassy New Delhi should implement a detailed plan that includes a cost-benefit analysis to consolidate its two print and graphics operations. (Action: Embassy New Delhi)

Management Responsibilities for the Centralized Classified Networks Were Unclear

Embassy New Delhi provided centralized classified network support to Consulates General Hyderabad and Kolkata. However, the embassy did not define or assign network management responsibilities to the embassy and each consulate general's Information Management staff. Although the intent of the centralized network was to alleviate the network management responsibilities at the two consulates general, it lacked clear assignments of responsibilities for data security, ISSO monitoring, user account management, data backup and recovery, systems backup and recovery, and emergency destruction, as required by 5 FAM 826. This, in turn, created potential vulnerabilities, such as incomplete security reviews of electronic folders, inconsistent monitoring of user accounts, and inadequate planning of systems outages.

> **Recommendation 36:** Embassy New Delhi should assign roles and responsibilities for management of the centralized classified networks. (Action: Embassy New Delhi)

Lack of Knowledge Management Process Created Information Gaps

Embassy New Delhi and Consulates General Mumbai and Hyderabad lacked consistent and current operational documentation and historical information for managing Information Management programs. According to 5 FAM 876, managers must maintain documentation for all aspects of computer support and operations to ensure continuity and consistency. However, OIG found inconsistencies in IT operations records, standard operating procedures, and systems maintenance and operation log-keeping in Embassy New Delhi and Consulate General Hyderabad. While Consulate General Mumbai had relevant standard operating procedures, its documents were unorganized. For example, in some instances, multiple versions of working files were stored in personal or in folders with unrelated topics. Competing customer support priorities left the staff with minimal time to standardize the sections' operational documentation. The absence of consistent and current information affects internal control and managers' ability to effectively manage Information Management programs.

> **Recommendation 37:** Embassy New Delhi should develop and implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to the mission's information management programs, in accordance with Department standards. (Action: Embassy New Delhi)

Information Technology Contingency Planning Did Not Meet Department Standards

Embassy New Delhi and Consulate General Hyderabad did not complete and test classified and unclassified IT contingency plans, respectively, as required by 12 FAH-10 H-232.3-1b(1-3). Department guidelines require management to develop and test IT contingency plans annually for effectiveness and to determine readiness to execute them during unplanned system outages or disruptions. Inadequate contingency planning and testing prevents section managers from mitigating the risk of system and service disruptions.

> **Recommendation 38:** Embassy New Delhi should annually test the information technology contingency plans for the unclassified and classified networks in the embassy and Consulate General Hyderabad in accordance with Department standards. (Action: Embassy New Delhi)

Information Technology Contingency Plan Training Not Conducted

Embassy New Delhi and Consulate General Hyderabad did not conduct initial and annual refresher IT contingency training for employees with those responsibilities. According to 12 FAH-10 H-232.2-1, management must ensure that such training is delivered to employees based on their IT contingency planning roles and responsibilities, as defined in the IT contingency plans. The staff did not conduct the training because they lacked completed plans. Failure to meet these requirements impedes the mission's ability to effectively respond to unplanned systems outages or disruptions.

> **Recommendation 39:** Embassy New Delhi should implement a plan to conduct initial and annual refresher information technology contingency training for employees with

information technology contingency planning responsibilities in the embassy and Consulate General Hyderabad. (Action: Embassy New Delhi)

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy New Delhi; the Bureau of Overseas Buildings Operations; the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs; and the Bureau of South and Central Asian Affairs. The Department's complete responses[36] can be found in Appendix B. The Department also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy New Delhi should implement functional training plans for incumbent and incoming staff in the mission's Political Sections. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of functional training plans for incumbent and incoming staff in the mission's Political Sections.

Recommendation 2: Embassy New Delhi, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should develop and implement an end-use monitoring plan to conduct required end-use monitoring checks in accordance with Department standards. (Action: Embassy New Delhi, in coordination with INL)

Management Response: In its December 17, 2018, response, Embassy New Delhi 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 end-use monitoring plan that complies with Department standards.

Recommendation 3: Embassy New Delhi, in coordination with the Bureau of Counterterrorism and Countering Violent Extremism and the Bureau of South and Central Asian Affairs, should prepare a position description for the regional counterterrorism coordinator position, number 10262001, that contains an accurate statement of responsibilities. (Action: Embassy New Delhi, in coordination with CT and SCA)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

[36] Embassy New Delhi submitted its original response on December 10, 2018. The embassy submitted a revised response on December 17, 2018, to reflect input from Embassy Kabul on Recommendation 34. In addition, Embassy New Delhi coordinated its response with the Bureau of South and Central Asian Affairs. The Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs cleared the embassy's response to Recommendation 4.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a position description for the regional counterterrorism coordinator position that contains an accurate statement of responsibilities.

Recommendation 4: The Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs, in coordination with Embassy New Delhi and the Bureau of South and Central Asian Affairs, should update all public diplomacy position descriptions by implementing the Public Diplomacy Locally Employed Staff Initiative at Mission India in FY 2019. (Action: R/PPR, in coordination with Embassy New Delhi and SCA)

Management Response: In their December 17, 2018, response, Embassy New Delhi and the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs concurred with this recommendation. In a separate email response, the office noted that full implementation of the recommendation will take up to 8 months, beginning in fall 2019 and extending into 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the implemented Public Diplomacy Locally Employed Staff Initiative at Mission India.

Recommendation 5: Embassy New Delhi should implement an annual training plan to prioritize and fund mission-wide training needs for all Public Affairs Section positions. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation. The embassy noted a target compliance date of December 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi implemented an annual training plan for all Public Affairs Section positions.

Recommendation 6: Embassy New Delhi, in coordination with the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs and the Bureau of International Information Programs, should develop audience and impact metrics for the Public Affairs Section's magazine, *SPAN*. (Action: Embassy New Delhi, in coordination with R/PPR and IIP)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of audience and impact metrics for the Public Affairs Section's magazine, *SPAN*.

Recommendation 7: Embassy New Delhi should integrate *SPAN* into the Public Affairs Section's broader digital media activities. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of *SPAN*'s integration into the Public Affairs Section's broader digital media activities.

Recommendation 8: Embassy New Delhi should conduct a review of the North India Office structure, staffing, and performance to determine whether it is sufficiently resourced and appropriately structured to carry out its stated mission, and implement any recommended changes resulting from the review. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi implemented changes to ensure that the North India Office is sufficiently resourced and appropriately structured.

Recommendation 9: Embassy New Delhi should comply with the Department standards for crisis preparedness. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy New Delhi's compliance with Department standards for crisis preparedness.

Recommendation 10: Embassy New Delhi should provide a closed-circuit TV monitoring system or other means to enable consular managers to visually observe activities at nonimmigrant and immigrant visa windows within the Consular Section. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi neither agreed nor disagreed with this recommendation. The embassy requested additional time for its Regional Security Office, in consultation with the Bureau of Diplomatic Security, Directorate of International Programs, to determine whether the Department of State allows for closed-circuit television coverage of internal work spaces. The embassy also noted that, while the consular windows are in use, per 7 Foreign Affairs Handbook-1 H-281e, consular managers periodically walk around to physically observe the work areas that lack direct line of sight.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that consular managers are visually able to observe activities at nonimmigrant and immigrant visa windows within the Consular Section.

Recommendation 11: Embassy New Delhi should update the position descriptions for consular locally employed staff at Consulate General Kolkata in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation. The embassy noted a target compliance date of December 2018.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated position descriptions for consular locally employed staff at Consulate General Kolkata.

Recommendation 12: Embassy New Delhi should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines, and put funds of $65,772 to better use. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi reconciled transactions in the Suspense Deposit Abroad account in accordance with Department guidelines.

Recommendation 13: Embassy New Delhi should clear overdue travel advances in accordance with Department guidelines, and put funds up to $52,385 to better use. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi cleared the overdue travel advances.

Recommendation 14: Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of $81,331 per position to better use. (Action: Embassy New Delhi, in coordination with SCA and CGFS)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Information Management positions reprogrammed to International Cooperative Administrative Support Services-funded positions.

Recommendation 15: Embassy New Delhi should remove the Hindi language requirement from the Kabul Support Unit locally employed staff position descriptions. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Kabul Support Unit locally employed staff position descriptions do not contain a Hindi language requirement.

Recommendation 16: Embassy New Delhi should update its locally employed staff handbook in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated locally employed staff handbook.

Recommendation 17: Embassy New Delhi should submit all hardship differential surveys to the Bureau of Administration in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi 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 that Embassy New Delhi submitted all hardship differential surveys to the Bureau of Administration.

Recommendation 18: Embassy New Delhi should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department overseas motor vehicle safety requirements. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation. The embassy noted a target compliance date of December 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department overseas motor vehicle safety requirements.

Recommendation 19: Embassy New Delhi should bring its motor vehicle fleet into compliance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi's motor vehicle fleet complies with Department standards.

Recommendation 20: Embassy New Delhi should review its fleet reports in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi reviewed its fleet reports in accordance with Department standards.

Recommendation 21: Embassy New Delhi should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

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

Recommendation 22: Embassy New Delhi should bring expendable supplies management into compliance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that expendable supplies management complies with Department standards.

Recommendation 23: Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of Administration, should ratify all unauthorized commitments in accordance with Department standards. (Action: Embassy New Delhi, in coordination with SCA and A)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all unauthorized commitments have been ratified in accordance with Department standards.

Recommendation 24: Embassy New Delhi should submit its hotel and restaurant reports to the Bureau of Administration. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation. The embassy noted a target compliance date of January 2019.

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

Recommendation 25: Embassy New Delhi, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's safety, health, and environmental management deficiencies and bring the program into full compliance with Department standards. (Action: Embassy New Delhi, in coordination with OBO)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the plan to bring the mission's safety, health, and environmental management program into compliance with Department standards.

Recommendation 26: Embassy New Delhi should submit design plans to the Bureau of Overseas Buildings Operations for the unapproved modifications to property numbers X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata, and R1007 and R1012 in Mumbai. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi submitted design plans

to the Bureau of Overseas Buildings Operations for the unapproved modifications in Kolkata and Mumbai.

Recommendation 27: The Bureau of Overseas Buildings Operations should conduct a technical review of the design plans for property numbers X01021 in New Delhi; X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata; and R1007 and R1012 in Mumbai, in accordance with Department standards, and work with Embassy New Delhi to remedy any modifications that OBO is unable to retroactively approve. (Action: OBO, in coordination with Embassy New Delhi)

Management Response: In its December 14, 2018, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations reviewed the design plans for properties in Kolkata and Mumbai, and worked with Embassy New Delhi to remedy any unapproved modifications.

Recommendation 28: The Bureau of Overseas Buildings Operations, in coordination with Embassy New Delhi, should install access controls for Consulate General Mumbai's on-compound warehouse, in accordance with Department standards. (Action: OBO, in coordination with Embassy New Delhi)

Management Response: In its December 14, 2018, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of access controls for Consulate General Mumbai's on-compound warehouse that comply with Department standards.

Recommendation 29: Embassy New Delhi should bring its method and procedures for procuring fuel from the American Community Support Association into compliance with the Federal Acquisition Regulation. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi's method and procedures for procuring fuel from the American Community Support Association comply with the Federal Acquisition Regulation.

Recommendation 30: Embassy New Delhi should establish roles and responsibilities for the mission's Information Systems Security Officers in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi established roles and responsibilities for the mission's Information Systems Security Officers in accordance with Department standards.

Recommendation 31: Embassy New Delhi should complete a security assessment and obtain an authorization to operate for each locally developed application in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi neither agreed nor disagreed with this recommendation. The embassy noted the Information Services Center halted all new application development, as well as further development of existing applications. The Information Services Center is migrating non-compliant applications to standard operating environment tools, such as Access, Excel, or other approved platforms.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy no longer develops local applications and the non-compliant applications were migrated into Department-approved platforms.

Recommendation 32: Embassy New Delhi should implement a standard operating procedure for application development. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi neither agreed nor disagreed with this recommendation. The embassy noted that it now conducts application development only on standard operating environment tools.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an implemented standard operating procedure for application development or that standard operating environment tools are used.

Recommendation 33: Embassy New Delhi should implement standard operating procedures to inventory, manage configurations, and monitor the mission's dedicated internet networks in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of implemented standard operating procedures to inventory, manage configurations, and monitor the mission's dedicated internet networks.

Recommendation 34: The Bureau of South and Central Asian Affairs, in coordination with Embassy Kabul and Embassy New Delhi, should revise the Service Level Agreement to establish clear roles for the supervision of the Kabul Support Unit. (Action: SCA, in coordination with Embassy Kabul and Embassy New Delhi)

Management Response: In its December 17, 2018, response coordinated with the Bureau of South and Central Asian Affairs and Embassy Kabul, the embassy noted that all three entities 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 revised Service Level Agreement to establish clear roles for the supervision of the Kabul Support Unit.

Recommendation 35: Embassy New Delhi should implement a detailed plan that includes a cost-benefit analysis to consolidate its two print and graphics operations. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation. The embassy noted a target compliance date of March 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a detailed plan that includes a cost-benefit analysis to consolidate the embassy's two print and graphics operations.

Recommendation 36: Embassy New Delhi should assign roles and responsibilities for management of the centralized classified networks. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi 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 that Embassy New Delhi assigned roles and responsibilities for management of the centralized classified networks.

Recommendation 37: Embassy New Delhi should develop and implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to the mission's information management programs, in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi 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 that Embassy New Delhi implemented knowledge management procedures for the mission's information management programs.

Recommendation 38: Embassy New Delhi should annually test the information technology contingency plans for the unclassified and classified networks in the embassy and Consulate General Hyderabad in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi tested the information technology contingency plans for the unclassified and classified networks at Embassy New Delhi and Consulate General Hyderabad in accordance with Department standards.

Recommendation 39: Embassy New Delhi should implement a plan to conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities in the embassy and Consulate General Hyderabad. (Action: Embassy New Delhi)

Management Response: In its December 17, 2018, response, Embassy New Delhi concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy New Delhi conducted information technology contingency training for appropriate employees at the embassy and Consulate General Hyderabad.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Kenneth Juster	11/2017
Deputy Chief of Mission	Mary Kay Carlson	8/2016
Constituent Posts:		
Consulate General Kolkata	Craig Hall	8/2015
Consulate General Mumbai	Edgard Kagan	8/2017
Consulate General Hyderabad	Katherine Hadda	10/2016
Consulate General Chennai	Robert Burgess	8/2017
Chiefs of Sections:		
Management	Michael Phillips	6/2017
Consular	Joseph Pomper	10/2015
Political	Mark Tesone	8/2015
Economic, Environment, Science and Technology	Rob Garverick	9/2017
Public Affairs	Jeffrey Sexton	8/2016
Regional Security	Greg Levin	8/2017
North India Office	Ariel Pollock	8/2017
Other Agencies:		
Foreign Agricultural Service	Jeanne Bailey	3/2018
Defense Attaché Office	David Brigham	5/2017
Office of Defense Cooperation	Robert Ogden	6/2015
Department of Justice	Ashish Sawkar	6/2015
Drug Enforcement Administration	Mark Frederick	8/2017
Federal Aviation Administration	Thomas Miller	8/2016
Department of the Treasury	Malachy Nugent	10/2017
Department of Health and Human Services	Preetha Rajaraman	10/2017
Department of Homeland Security	Erik Aubin	6/2013
U.S. Commercial Service	Patrick Santillo	9/2016
Library of Congress	Laila Mulgaokar	1/2003
U.S. Agency for International Development	Mark White	3/2017

Source: Embassy New Delhi

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 19 to August 14, 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 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.

For this inspection, OIG conducted more than 200 interviews in New Delhi, Mumbai, Chennai, Hyderabad, and Kolkata and additional interviews in Washington; and analyzed more than 900 questionnaires completed by U.S. and locally employed staff.

APPENDIX B: MANAGEMENT RESPONSES

Embassy of the United States of America
New Delhi, India

December 17, 2018

UNCLASSIFIED

THRU: SCA – Alice Wells, Senior Bureau Official

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

FROM: New Delhi – Kenneth I. Juster, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy New Delhi

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Embassy New Delhi has reviewed the draft OIG Inspection report. We provide the following feedback to address errors of fact contained in the report:

Statement 1: "More than 600 American companies operate in India." *Page 1, Para 2*

Proposed Correction: "More than 2,000 American companies operate in India." *Source: uniworldonline.com*

We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1: Embassy New Delhi should implement functional training plans for incumbent and incoming staff in the mission's Political Sections. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy is in the process of developing a training plan for incumbent staff for 2019. Funds permitting, this plan includes functional training for current staff, including three LES to attend Political Tradecraft courses offered in January, March, and September 2019.

OIG Recommendation 2: Embassy New Delhi, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should develop and implement an end-use monitoring plan to conduct required end-use monitoring checks in accordance with Department standards.

Management Response: Embassy New Delhi accepts the recommendation. Conducting required end-use-monitoring checks in remote parts of India is dependent on staff and

resources for travel. We will engage with INL during a mid-December visit to discuss this issue and identify potential resources and staffing. We will work with our consulates to coordinate end-use-monitoring elements in their limited travel to these difficult to reach areas of India.

OIG Recommendation 3: Embassy New Delhi, in coordination with the Bureau of Counterterrorism and Countering Violent Extremism and the Bureau of South and Central Asian Affairs, should prepare a position description for the regional counterterrorism coordinator position, number 10262001, that contains an accurate statement of responsibilities. (Action: Embassy New Delhi, in coordination with CT and SCA)

Management Response: Embassy New Delhi accepts this recommendation. The CT bureau has been working to better define the responsibilities of its six counterterrorism coordinators around the world. We consult with the CT bureau on this effort.

OIG Recommendation 4: The Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs, in coordination with Embassy New Delhi and the Bureau of South and Central Asian Affairs, should update all public diplomacy position descriptions by implementing the Public Diplomacy Locally Employed Staff Initiative at Mission India in FY 2019. (Action: R/PPR, in coordination with Embassy New Delhi and SCA)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy is already working with R/PPR on a time frame to implement the Locally Employed Staff Initiative, which is scheduled for the Fall of 2019.

OIG Recommendation 5: Embassy New Delhi should implement an annual training plan to prioritize and fund mission-wide training needs for all Public Affairs Section positions. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy is preparing a training plan to prioritize Mission-wide training priorities. However, as training requirements for a large number of local employed positions will be defined when the implementation of the Locally Employed Staffing Initiative is completed, PAS India will be able to address only a limited number of training needs this fiscal year. Accordingly, implementation will begin in 2019, with a target completion in 2020.

OIG Recommendation 6: Embassy New Delhi, in coordination with the Office of Policy, Planning, and Resources for Public Diplomacy and Public Affairs and the Bureau of International Information Programs, should develop audience and impact metrics for the Public Affairs Section's magazine, *SPAN*. (Action: Embassy New Delhi, in coordination with R/PPR and IIP)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy will work with R/PPR and IIP to develop audience and impact metrics for the Public Affairs Section's magazine, *SPAN*. This recommendation is expected to be completed in FY 2019.

OIG Recommendation 7: Embassy New Delhi should integrate SPAN into the Public Affairs

Section's broader digital media activities. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy will develop a plan to integrate SPAN in the Public Affairs Section's broader digital media activities. Implementation of this recommendation will begin in Spring of 2019.

OIG Recommendation 8: Embassy New Delhi should conduct a review of the North India Office structure, staffing, and performance to determine whether it is sufficiently resourced and appropriately structured to carry out its stated mission, and implement any recommended changes resulting from the review. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and has already begun to address staffing and structure of the North India Office. The Office has developed a strategic plan for FY-19 to advance the Mission India Integrated Country Strategy (ICS) goals in northern India. The Office will review performance progress quarterly throughout FY-19 as part of the broader ICS review process and report those findings to the Executive Office.

OIG Recommendation 9: Embassy New Delhi should comply with the Department standards for crisis preparedness. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Mission India consular sections are in the process of updating orientation and training manuals to ensure that all consular employees are aware of their respective post's crisis preparedness plans and resources. Mission India consular sections are adopting Consulate General Chennai's crisis preparedness training program for all consular employees to develop the skills needed during a crisis. This will be completed by early 2019. Mission India crisis preparedness efforts are ongoing, including a recent Consulate General Mumbai-organized Mission-wide Consular Crisis Exercise in November 2018, with participation from all five posts and other sections and agencies.

OIG Recommendation 10: Embassy New Delhi should provide a closed-circuit TV monitoring system or other means to enable consular managers to visually observe activities at nonimmigrant and immigrant visa windows within the Consular Section. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi requests additional time for the Regional Security Office, in consultations with Diplomatic Security International Programs in Washington, to determine whether the Department of State allows for closed-circuit television coverage of internal work spaces. Embassy New Delhi notes that this workspace is not being used with the frequency that it once was as the majority of immigrant visa processing has been consolidated in Mumbai. While the windows are in use, as per 7 FAH-1 H-281e, consular managers periodically walk around to physically observe the work areas that lack direct line of sight.

OIG Recommendation 11: Embassy New Delhi should update the position descriptions for consular locally employed staff at Consulate General Kolkata in accordance with Department standards.

Management Response: Embassy New Delhi accepts the recommendation. All position descriptions for Consulate General Kolkata consular section locally employed staff have been updated in accordance with Department standards. The Regional Classification Center completed their certification of the updated position descriptions on December 4. Post is now collecting signatures on the updated position descriptions and will be completed by December 12.

OIG Recommendation 12: Embassy New Delhi should reconcile transactions in the Suspense Deposit Abroad account in accordance with Department guidelines, and put funds of $65,772 to better use. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and the Financial Management Center (FMC) is developing a new Standard Operating Procedure (SOP) to facilitate the clearing of Suspense Deposit Abroad (SDA) account deposits as quickly as possible, in compliance with 4 FAH-3 H-322c(2). This SOP will be circulated to Mission stakeholders, including the General Services and Budget & Finance offices at the Embassy and the Consulates General, in December 2018. Following the June 2018 inspection, FMC had reduced the SDA account balance to $9,654. Unfortunately, due to the nature of the SDA account, deposits received from outside entities may contain incomplete information requiring follow-up from non-responsive parties, creating a condition that prevents all deposits from always being cleared within 60 days.

OIG Recommendation 13: Embassy New Delhi should clear overdue travel advances in accordance with Department guidelines, and put funds up to $52,385 to better use. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and the Financial Management Center is preparing a new Mission-wide Management Notice to remind employees of the mandatory requirement to submit their completed travel vouchers within five business days of completing travel. The Management Notice, which will be published in December 2018, will communicate reduced tolerance for late voucher submissions and identify new collection procedures for repayment of outstanding advances, including potential repayment from personal funds, if a timely voucher is not submitted.

OIG Recommendation 14: Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of the Comptroller and Global Financial Services, should reprogram additional Diplomatic and Consular Program-funded Information Management positions to International Cooperative Administrative Support Services-funded positions in order to put funds of $81,331 per position to better use. (Action: Embassy New Delhi, in coordination with SCA and CGFS)

Management Response: Embassy New Delhi accepts the recommendation. Subject to ICASS Council approval, the Embassy will coordinate with the NEA/SCA budget office on the movement of one FP-04 Information Management Specialist position in New Delhi from Program to ICASS funding. Due to the need to obtain post-level ICASS Budget Committee and ICASS Council approval and the fact that the FY19 fiscal year has already started, this change will be accomplished in the FY20 ICASS budget.

OIG Recommendation 15: Embassy New Delhi should remove the Hindi language requirement from the Kabul Support Unit locally employed staff position descriptions. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Post removed the Hindi language requirement from the Kabul Support Unit locally employed staff position descriptions on November 27, 2018.

OIG Recommendation 16: Embassy New Delhi should update its locally employed staff handbook in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Post updated the locally employed staff handbook in accordance with Department standards and published it on October 11, 2018.

OIG Recommendation 17: Embassy New Delhi should submit all hardship differential surveys to the Bureau of Administration in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Consulate General Hyderabad submitted its hardship differential survey on September 4, 2018. Consulate General Kolkata's hardship differential will be submitted by December 31, 2018.

OIG Recommendation 18: Embassy New Delhi should require that all chauffeurs and incidental drivers under Chief of Mission authority comply with applicable Department overseas motor vehicle safety requirements. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy is implementing a schedule to train all drivers in Smith System Safe Driver Training by 2020. The Embassy will also work with RSO and DS to provide training for armored vehicles. By March 2019, those drivers who are presently out-of-compliance will complete Medical and POSHO training. Post will ensure all drivers have medical certifications and review the physical examination schedule quarterly and comply with the 10-hour duty rule by December 2018.

OIG Recommendation 19: Embassy New Delhi should bring its motor vehicle fleet into compliance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. The Embassy is purchasing vehicles that meet the Department's vehicle safety standards for both passenger and utility vehicles. Vehicles that do not meet the safety standards are being auctioned off.

OIG Recommendation 20: Embassy New Delhi should review its fleet reports in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Since July 2018,

the Embassy's motorpool supervisor has been reviewing, monitoring, and signing the monthly fleet summary report. This is documented in the monthly analytics report, which is reviewed by the U.S. direct-hire General Services Officer.

OIG Recommendation 21: Embassy New Delhi should document nonexpendable property transfers in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. As of May 2017, the Embassy has been using the DS-584 prior to pick-ups and delivery and, since March 2018, the Embassy has been using the iPhone scanners for all DS-584 simplified transactions furniture movements. If this technology is not available, GSO staff will produce the DS-584 in advance based on the submitted My Services request.

OIG Recommendation 22: Embassy New Delhi should bring expendable supplies management into compliance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Consulate Kolkata integrated all Facilities Management Expendable Supplies into the Integrated Logistics Management System (ILMS) in August 2018. The Embassy's Property Section now tracks and distributes all expendable supplies through the official ILMS system.

OIG Recommendation 23: Embassy New Delhi, in coordination with the Bureau of South and Central Asian Affairs and the Bureau of Administration, should ratify all unauthorized commitments in accordance with Department standards. (Action: Embassy New Delhi, in coordination with SCA and A)

Management Response: Embassy New Delhi accepts the recommendation. Consulate General Kolkata is working with the Bureau of South and Central Asian Affairs and the Bureau of Administration on ratifying all unauthorized commitments. On November 7, 2018, a revised ratification package was sent to the Post Management Officer for review and approval.

OIG Recommendation 24: Embassy New Delhi should submit its hotel and restaurant reports to the Bureau of Administration. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Management will conduct a hotel and restaurants market survey and submit it to the Bureau of Administration for approval by January 2019.

OIG Recommendation 25: Embassy New Delhi, in coordination with the Bureau of Overseas Buildings Operations, should implement an action plan to resolve the mission's safety, health, and environmental management deficiencies and bring the program into full compliance with Department standards. (Action: Embassy New Delhi, in coordination with OBO)

Management Response: Embassy New Delhi accepts the recommendation and is working with the Consulates and OBO's Safety, Health and Environmental Management Division to develop plans to comply with Department safety standards.

OIG Recommendation 26: Embassy New Delhi should submit design plans to the Bureau of Overseas Buildings Operations for the unapproved modifications to property numbers X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata, and R1007 and R1012 in Mumbai. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and initiated coordination with OBO on November 28, 2018 regarding New Delhi's, Kolkata's, and Mumbai's unapproved modifications.

OIG Recommendation 27: The Bureau of Overseas Buildings Operations should conduct a technical review of the design plans for property numbers X01021 in New Delhi; X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata; and R1007 and R1012 in Mumbai, in accordance with Department standards, and work with Embassy New Delhi to remedy any modifications that OBO is unable to retroactively approve. (Action: OBO, in coordination with Embassy New Delhi)

Management Response: The Embassy accepts the recommendation and initiated coordination with OBO on November 28, 2018 regarding New Delhi's, Kolkata's, and Mumbai's unapproved modifications.

OIG Recommendation 28: The Bureau of Overseas Buildings Operations, in coordination with Embassy New Delhi, should install access controls for Consulate General Mumbai's on-compound warehouse, in accordance with Department standards. (Action: OBO, in coordination with Embassy New Delhi)

Management Response: The Embassy accepts the recommendation and initiated coordination with OBO and Mumbai on November 29, 2018 regarding access control to the compound's warehouse.

OIG Recommendation 29: Embassy New Delhi should bring its method and procedures for procuring fuel from the American Community Support Association into compliance with the Federal Acquisition Regulation. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and is working with the American Community Support Association Board and the Department's Office of Commissary and Recreation Affairs, and Office of Procurement Executive to obtain an exception to the Federal Acquisition Regulations.

OIG Recommendation 30: Embassy New Delhi should establish roles and responsibilities for the mission's Information Systems Security Officers in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. On May 8, the Embassy created Assistant Information Systems Security Officer (ISSO) accounts and IRM personnel were instructed to provide ISSO oversight roles on our various different Networks (Classified and Unclassified). Consulate ISSOs take an active role with required ISSO duties at their sites. The Regional ISSO provides cybersecurity consultative services, advice, coordination, and oversight for the Mission networks. Note: IRM Mission India ISSO

coverage consists of a Regional ISSO as well as ISSOs and Alternate-ISSOs in New Delhi and our four Consulates.

OIG Recommendation 31: Embassy New Delhi should complete a security assessment and obtain an authorization to operate for each locally developed application in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Because the onsite expertise required to conduct Assessment and Authorization (A&A) is not a viable option, the Information Services Center (ISC) has halted all new application development, as well as modifications to existing applications. The ISC is migrating non-compliant applications to the Standard Operating Environment (SOE) tools, such as Access, Excel, or other approved platforms.

OIG Recommendation 32: Embassy New Delhi should implement a standard operating procedure for application development. (Action: Embassy New Delhi)

Management Response: The ISC conducts application development only on SOE tools (see response for OIG Recommendation 31).

OIG Recommendation 33: Embassy New Delhi should implement standard operating procedures to inventory, manage configurations, and monitor the mission's dedicated internet networks in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and completed implementation in May 2018. New Delhi's dedicated internet networks (DIN) are both registered and follow required Department standards. Pursuant to the Embassy's Standard Operation Procedure, all existing hardware and software used on the Embassy's DIN's have been properly vetted through the Local Configuration Control Board (LCCB) or Department's Configuration Control Board (ITCCB). Devices and/or applications must be approved by our LCCB or the Department's ITCCB before purchase.

OIG Recommendation 34: The Bureau of South and Central Asian Affairs, in coordination with Embassy Kabul and Embassy New Delhi, should revise the Service Level Agreement to establish clear roles for the supervision of the Kabul Support Unit. (Action: SCA, in coordination with Embassy Kabul and Embassy New Delhi)

Management Response: Embassy New Delhi, Embassy Kabul, and the SCA bureau accept the recommendation and have revised the Service Level Agreement to establish clear roles for the supervision of the Kabul Support Unit. We anticipate signature of the SLA by December 31, 2018.

OIG Recommendation 35: Embassy New Delhi should implement a detailed plan that includes a cost-benefit analysis to consolidate its two print and graphics operations. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation. Global Publishing Solutions (GPS) Manila inspected and made the recommendation in 2009 to consolidate the print and graphics operations of Information Management and Public

Diplomacy (PD). PD made the same determination in 2016, and the process of consolidation was already in progress prior to the

OIG visit to New Delhi in 2018. Post will provide a detailed plan of the benefits of consolidation by the end of first quarter 2019.

OIG Recommendation 36: Embassy New Delhi should assign roles and responsibilities for management of the centralized classified networks. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and will draft a Memorandum of Understanding for roles and responsibilities for the Consulates with regard to the classified network centralized in New Delhi. This action will be completed by December 31, 2018.

OIG Recommendation 37: Embassy New Delhi should develop and implement knowledge management procedures for capturing, sharing, transferring, and retaining information related to the mission's information management programs, in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and has already begun to draft standard operating procedures (SOPs) to implement knowledge management procedures for capturing, sharing, transferring, and retaining information for IT programs. ISC has reorganized/streamlined its shared folder, and is regularly updating the SOP to reflect any changes. This process will be completed by December 31, 2018.

OIG Recommendation 38: Embassy New Delhi should annually test the information technology contingency plans for the unclassified and classified networks in the embassy and Consulate General Hyderabad in accordance with Department standards. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and will put in place an SOP for performing the Information Technology Contingency Plan (ITCP) test annually. ITCP unclassified New Delhi was tested in 2017. Concurrent ITCP classified tests in New Delhi and Consulates General Hyderabad and Kolkata will begin in February 2019. Consulates General Chennai and Mumbai are up-to-date on their annual testing.

OIG Recommendation 39: Embassy New Delhi should implement a plan to conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities in the embassy and Consulate General Hyderabad. (Action: Embassy New Delhi)

Management Response: Embassy New Delhi accepts the recommendation and will draft the SOP to cover the initial and annual refresher ITCP training (at both the Embassy and Consulate General Hyderabad) by the end of first quarter 2019.

The point of contact for this memorandum is Michael Phillips, Management Counselor.

UNCLASSIFIED

United States Department of State
Washington, D.C. 20520

UNCLASSIFIED
MEMORANDUM

DEC 14 2018

TO: OIG/ISP – Ms. Sandy Lewis

FROM: OBO/RM – Jeffrey Reba (Acting) 12/14/18

SUBJECT: OBO's Comments to Draft OIG Report –Embassy New Delhi and Constituent Posts

Below are OBO's comments for Recommendations 27 and 28 of the draft OIG inspection report for which OIG designated OBO as the action authority

OIG Recommendation 27: The Bureau of Overseas Buildings Operations should conduct a technical review of the design plans for property numbers X01021 in New Delhi; X9990, X9991, X9992, X9993, X9999, and X29001 in Kolkata; and R1007 and R1012 in Mumbai, in accordance with Department standards, and work with Embassy New Delhi to remedy any modifications that OBO is unable to retroactively approve. (Action: OBO, in coordination with Embassy New Delhi)

OBO Comments: OBO agrees with recommendation and it will conduct technical review of design documents for unapproved modifications to the properties in New Delhi, Kolkata, and Mumbai. To date, no permits or retroactive approval have been issued because plans have either not been provided by Post, or Post has not responded to technical comments, which was the case for New Delhi ACSA 2nd Story Addition (documents received March 2012). Once Post provides documents for review, OBO will comply with standard review and permitting timelines for each project--two weeks for review and, upon receipt of satisfactorily corrected documents, two weeks for permit approval.

OIG Recommendation 28: The Bureau of Overseas Buildings Operations, in coordination with Embassy New Delhi, should install access controls for Consulate General Mumbai's on-compound warehouse, in accordance with Department standards. (Action: OBO, in coordination with Embassy New Delhi)

OBO Comments: OBO concurs with the recommendation and will support Post in selecting an appropriate means of restricting access to the warehouse.

The point of contact for this memo is Amy Gertsch.

ABBREVIATIONS

DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
EEST	Economic, Environment, Science and Technology
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
GOR	Grants Officer Representative
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
INL	Bureau of International Narcotics and Law Enforcement Affairs
ISSO	Information Systems Security Officer
LE	Locally Employed
NIO	North India Office
NIV	Nonimmigrant Visa
OBO	Bureau of Overseas Buildings Operations
POSHO	Post Occupational Safety and Health Officer

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