

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-19-15

Office of Inspections

March 2019

Inspection of Embassy Kigali, Rwanda

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-19-15

What OIG Inspected

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

What OIG Recommends

OIG made 10 recommendations to Embassy Kigali: 1 to bring the residential safety program into compliance with Department standards; 2 to improve the public diplomacy grants program; 3 to improve the oversight of the American Corners; 1 to improve consular crisis preparedness; and 3 to improve the information management program.

In its comments on the draft report, the embassy concurred with 9 recommendations and disagreed with 1 recommendation. OIG considers all 10 recommendations resolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal written response is reprinted in its entirety in Appendix B.

March 2019

OFFICE OF INSPECTIONS

BUREAU OF AFRICAN AFFAIRS

Inspection of Embassy Kigali, Rwanda

What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Kigali in a professional, positive, and inclusive manner. The Ambassador's public outreach was enhanced by his study and use of Kinyarwanda, the principal language of Rwandans.
- The embassy identified a major deficiency in the residential safety program with multiple hazardous electrical incidents at staff residences.
- The embassy did not manage the public diplomacy grants program in accordance with Department of State standards.
- The embassy did not ensure the American Corner at the Adventist University of Central Africa conformed to Department standards. The embassy also did not properly document property transferred to the two American Corners in Rwanda.
- The embassy's consular crisis preparedness program had deficiencies, including inadequate disaster assistance kits and a backlog in enrolling U.S. citizens in the Smart Traveler Enrollment Program.
- Spotlight on Success: The embassy's Coordination Office for the President's Emergency Fund for AIDS Relief successfully promoted cooperation among interagency stakeholders.
- Spotlight on Success: The embassy responded quickly and comprehensively to an Ebola outbreak in neighboring Democratic Republic of the Congo.

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.....	4
Security and Emergency Planning.....	4
Developing and Mentoring Foreign Service Professionals	5
POLICY AND PROGRAM IMPLEMENTATION	6
Political and Economic Section	6
Public Diplomacy	8
Consular Affairs	12
RESOURCE MANAGEMENT	13
INFORMATION MANAGEMENT	15
RECOMMENDATIONS	17
PRINCIPAL OFFICIALS	20
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	21
APPENDIX B: MANAGEMENT RESPONSES	22
ABBREVIATIONS	26
OIG INSPECTION TEAM MEMBERS	27

CONTEXT

The Republic of Rwanda is a primarily rural country located in Central Africa and bordered by the Democratic Republic of the Congo, Burundi, Uganda, and Tanzania. An estimated 12 million people live in Rwanda, a country slightly smaller than Maryland, making it one of Africa's most densely populated nations. Up to 1 million people, including approximately three-quarters of the Tutsi population and 26 embassy locally employed (LE) staff, were killed in a state-orchestrated genocide in 1994. The genocide ended later that year when a predominantly Tutsi army defeated the national army and Hutu militias.

Since the 1994 genocide, when Rwanda was in a state of complete political, economic, and social collapse, the country has made substantial progress. The economy has grown 6 to 8 percent annually since 2003. Despite such progress, the 2017 United Nations Human Development Index rated Rwanda 159 out of 188 countries in the survey, putting it among the world's poorest and least-developed countries. Annual per capita income is below \$750, and 75.3 percent of the labor force is reliant on farming. President Paul Kagame won re-election in August 2017 with a reported 98.8 percent of the vote. Human rights concerns center on government harassment, arrest, and abuse of political opponents and human rights advocates; security forces' disregard for the rule of law; and restrictions on the media and civil liberties. Additionally, continuing instability in neighboring Democratic Republic of the Congo and Burundi have resulted in almost 160,000 refugees fleeing into Rwanda.

The embassy's Integrated Country Strategy (ICS) focuses on advancing regional peace and security; boosting economic development, trade, and investment; improving human development; and expanding democracy, human rights, media freedom, and access to justice. The United States is Rwanda's largest bilateral donor, providing \$167.6 million in foreign assistance in FY 2018, including \$80.9 million to combat HIV/AIDS. The remainder funds programs to support agriculture; the President's Malaria Initiative; basic education; democracy, human rights, and governance; microenterprises; and water, sanitation, and hygiene.

At the time of the inspection, Embassy Kigali had 76 U.S. direct-hire employees: 40 worked for the Department of State (Department), and 36 worked for other agencies. Staffing also included 13 eligible family members and 268 LE staff members. It is located in a New Embassy Compound, completed in 2008, that includes the chancery, the Marine Security Guard Residence, and a support annex. The U.S. Agency for International Development (USAID), the Centers for Disease Control and Prevention (CDC), the Department of Defense (Defense Attaché Office and Office of Security Cooperation), and the Peace Corps are represented at the mission.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.¹ A related classified inspection report discusses the mission's security program and issues affecting the safety of mission

¹ See Appendix A.

personnel and facilities, sensitive findings related to the information management program, and certain aspects of the advocacy and analysis program.

EXECUTIVE DIRECTION

OIG assessed the embassy's leadership on the basis of 80 on-site interviews that included comments on Front Office performance; staff questionnaires; and OIG's review of documents and observations of meetings and activities during the course of the on-site inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in March 2018 after an assignment as the Chargé d'Affaires and Deputy Chief of Mission (DCM) of the U.S. Embassy in Addis Ababa, Ethiopia. The DCM, also a career Foreign Service Officer, arrived in August 2017 after a tour as a State Department Fellow in the U.S. Senate.

The Ambassador and the DCM set a positive, inclusive, and professional tone for the embassy consistent with Department leadership principles in 3 Foreign Affairs Manual (FAM) 1214. Embassy staff consistently told OIG that both were approachable, solicited input and feedback, supported operations and programs, and had clearly outlined the mission's priorities. Staff members spoke of the energy the Ambassador brought to leading the mission and said that his use of Kinyarwanda, Rwanda's principal language, created a favorable impression among LE staff and with the Rwandan public. The DCM's detail-oriented and decisive style complemented that of the Ambassador's in managing embassy operations, consistent with their roles as outlined in 2 FAM 113. Both evidenced a concern for LE staff interests and morale by meeting with them frequently, responding to their concerns, and soliciting their input. A survey the embassy conducted showed overall LE staff satisfaction was high and the LE staff felt respected.

The Ambassador named two Equal Employment Opportunity counselors and two LE staff liaisons, consistent with his responsibility in 3 FAM 1514.2 to provide equal opportunity in employment-related decisions. Equal Employment Opportunity information was posted throughout the embassy and the LE staff liaisons briefed the LE staff in Kinyarwanda. OIG found the Ambassador and the DCM considered diversity when reviewing Foreign Service candidates for embassy positions. Embassy staff told OIG that the Ambassador had directed the integration of language concerning gender issues and the rights of the disabled into the mission's ICS. In his introductory video posted on social media, delivered mostly in Kinyarwanda, the Ambassador spoke of his desire to expand access and inclusion for disabled persons and promoted advancement of women and girls.

OIG reviewed 1 year of vouchers for the embassy's representational and official residence expenses and found that they generally complied with Department guidelines. The embassy received and recorded gifts in accordance with the Department's guidance in 2 FAM 960, although OIG advised the embassy to review companies it had solicited for contributions to the Fourth of July representational event for potential conflicts of interest. The Ambassador and

the DCM paid their official residence staffs in a manner consistent with Department guidance in 3 FAM 3255.

Execution of Foreign Policy Goals and Objectives

The Ambassador led a collaborative effort that integrated input from all employees under chief of mission authority to develop a whole-of-government strategic plan that articulated U.S. Government priorities in Rwanda, as directed by 18 FAM 301.2-1b. Just after his arrival, the Ambassador solicited input and feedback from all mission elements, including LE staff, to begin development of the ICS, the embassy's primary strategic leadership tool. The Ambassador tied his activities explicitly to advancing the mission's four ICS goals. He briefed the ICS goals to all U.S. and LE staff in a town hall meeting and had the goals reproduced on laminated cards for employees to carry for easy reference. During the inspection, embassy staff gave the cards to a visiting eight-member congressional delegation and briefed the delegation on the goals and supporting activities.

The Ambassador fulfilled his responsibilities under 2 FAM 113.1 to develop close relations with host government officials, establish relations with leaders from all levels of society, maintain contact with international organizations, and attend and host representational events. In his first 6 months, he met 40 times with key Government of Rwanda officials, including the president; participated in 31 public diplomacy events; and visited U.S.-funded projects throughout the country. He also met with U.S. business representatives, hosted several congressional delegations, and developed a wide range of contacts in other foreign missions in Rwanda. The Ambassador told OIG that in order to have influence—and not just access—he must make clear to Rwandans that he cares about them, their culture, and other facets of the country. OIG observed the Ambassador working with 30 LE staff members engaged in aspects of public outreach to weave cultural awareness and remarks in Kinyarwanda into his outreach activities. Embassy staff credited the Ambassador with opening doors for them to work with Government of Rwanda officials.

The Ambassador maintained contact with the Department through biweekly video conferences. He also represented the embassy in weekly calls with the National Security Council regarding the Ebola crisis in Central Africa.

Spotlight on Success: PEPFAR Coordination Office Successfully Promoted Cooperation Among Interagency Stakeholders

The embassy's President's Emergency Fund for AIDS Relief (PEPFAR) Coordination Office successfully promoted cooperation among interagency stakeholders in Rwanda. The United States has invested nearly \$1.3 billion in Rwanda through PEPFAR since FY 2004, including \$80.9 million in FY 2018. The three-person office coordinated the efforts of the Department, USAID, CDC, and the Department of Defense to ensure that clearly defined lanes of responsibility reinforced efficiencies and managed resources. For example, USAID focused on commodities procurement as well as orphans and vulnerable children; CDC handled clinical services and prevention; and the Department of Defense targeted military-linked

communities and voluntary male circumcision.² The office also led the development of country operational plans that outlined program activities and succeeded in securing funding allocations for PEPFAR work in Rwanda. In addition, it led interagency meetings that promoted assessments of milestone achievements, such as progress toward United Nations-established goals to identify HIV prevalence, provide treatment, and measure success rates of viral suppression. Washington offices and the interagency community touted the PEPFAR Coordinating Office's role in promoting cooperative approaches in Rwanda and managing relations with the Government of Rwanda and the Office of the Global AIDS Coordinator in Washington.

Adherence to Internal Controls

The Ambassador and the DCM prepared the FY 2018 Annual Chief of Mission Management Controls Statement of Assurance in accordance with 2 FAM 022.7, which requires chiefs of mission to develop and maintain appropriate systems of management control of their organizations. The statement identified two deficiencies: the Department's slow processing of security clearances for eligible family members, which reduced U.S. oversight of embassy operations; and residential electrical hazards, as discussed in the resource management section of this report. Embassy staff told OIG that the Ambassador and the DCM reviewed internal control checklists prepared by embassy sections in support of the Statement of Assurance. However, the leadership's internal review process did not identify numerous significant deficiencies in the management of public diplomacy grants, as discussed in the public diplomacy section of this report.

The Ambassador and the DCM made it clear to embassy employees that waste, fraud, and mismanagement would not be tolerated and approved terminations of LE staff members who violated those principles. The DCM also directed all U.S. supervisory staff to complete the Foreign Service Institute's online course on LE staff performance management and evaluation in advance of the introduction of a merit-based pay system. During the inspection, the embassy conducted mandatory records management training to address issues discussed in the information management section of this report.

The DCM carried out regular reviews of the Consular Section chief's nonimmigrant visa adjudications, as required by 9 FAM 403.12.

Security and Emergency Planning

The Ambassador's leadership of the mission's security program was consistent with the President's Letter of Instruction to Bilateral Chiefs of Mission, which requires that they take full and direct responsibility for the security of the mission and its personnel. Embassy security staff told OIG that the Ambassador and the DCM fully supported the security program. Both led by example by participating in drills, meeting regularly with security personnel, and participating in

² The World Health Organization website in December 2018 stated: "There is compelling evidence that male circumcision reduces the risk of heterosexually acquired HIV infection in men by approximately 60 percent."

Marine Security Guard ceremonies and events. They were open to suggestions to improve the security program. Shortly after his arrival, the Ambassador reviewed, revised, and reissued several security directives, including one to all U.S. personnel mandating participation in the weekly checks of the emergency and evacuation radio network, in accordance with 5 Foreign Affairs Handbook (FAH)-2 H-732.7a. He also directed that all adult family members and dependents over the age of 8 learn how to use the radios. During the inspection, the DCM accepted an OIG suggestion that he personally follow up with embassy personnel who did not participate in radio checks. The DCM chaired the embassy's Emergency Action Committee, which reviewed potential risks that could affect the health, safety, and security of mission employees and resident U.S. citizens. The embassy submitted to the Department the annual review of the security memorandum of agreement between the Chief of Mission and the Department of Defense geographic combatant commander, as required by 2 FAH-2 H-116.4b.

During the inspection, the embassy took steps to improve its capacity to respond to emergencies and to fulfill the 2 FAM 113.1c(14) requirement to advise, protect, and assist U.S. citizens. The Emergency Action Committee reviewed the emergency action plan and briefed the country team on its contents at a meeting held at the alternative command center. The Consular Section completed creation of a network of U.S. citizen liaison volunteers. The embassy's crisis preparedness program is discussed further in the consular and information management portions of this report and in the companion classified report.

Spotlight on Success: Embassy Response to Ebola Threat Was Quick and Comprehensive

Embassy Kigali responded quickly and comprehensively to the August 1, 2018, notification of an Ebola outbreak in bordering eastern Democratic Republic of the Congo. The next day, the DCM, acting as Chargé, met with a CDC and USAID team to assess the situation, and the Consular Section sent a health alert to U.S. citizens enrolled in the consular alert system. The DCM then launched twice weekly Ebola meetings with the core interagency team composed of staff from CDC, USAID, and various embassy sections. The embassy also began sending cable updates to the Department and participating in a weekly interagency call with the National Security Council, and kept staff advised of significant developments. The Ambassador met with the Rwandan Minister of Health to advocate for improved host government communication and coordination. The Ambassador also toured an Ebola treatment center on the border and engaged with the British High Commission to discuss joint advocacy to the Government of Rwanda regarding Ebola preparedness. The DCM tested the Health Unit's readiness by presenting with Ebola symptoms in an unannounced drill.

Developing and Mentoring Foreign Service Professionals

The DCM oversaw the embassy's First- and Second-Tour (FAST) employee development program, as directed by 3 FAM 2242.4. FAST employees commented favorably to OIG concerning the DCM's involvement in the program, which is intended to give entry-level personnel a wide variety of diplomatic skills. In the 12 months prior to the inspection, the DCM provided the FAST employees guidance on diplomatic protocol, interagency cooperation, U.S. and LE staff collaboration, and change management. The Ambassador spoke to the group about his confirmation process and his vision for U.S.-Rwandan relations. The employees hosted two

events at the DCM's residence, one of which was for mid-level diplomats from other diplomatic missions. In addition, a FAST employee served as emcee for the embassy's Fourth of July event. OIG discussed with the Ambassador and the DCM the possibility of developing a similar program to build leadership and supervisory skills of mid-level employees, as the Department has suggested.³

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Kigali's policy and program implementation through a review of the Political/Economic Section's advocacy and analysis work, the Public Diplomacy Section's public diplomacy activities, and the Consular Section's consular operations. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions noted below.

Political and Economic Section

OIG's review of the Political/Economic Section's leadership and management, policy implementation, reporting and advocacy, Leahy vetting, end use monitoring, commercial promotion, and foreign assistance grants found they complied with Department requirements. The staff collaborated with other embassy sections, regional offices, and the Washington interagency community to advance ICS goals. Additionally, Political/Economic Section personnel managed an active flow of nearly 50 visitors or delegations from January to October 2018, including two Congressional visits during the month of the OIG inspection.

Political/Economic Section Pursued Policy Objectives

OIG found that the Political/Economic Section conducted outreach, advocacy, and activities to advance the embassy's political and economic ICS objectives. For example, the section organized, in coordination with international partners, an elections monitoring mission for the 2018 parliamentary elections. Embassy officials observed voting procedures and raised issues with host government authorities. The section also worked with the interagency community in Washington to engage host government authorities on trade-related components of the African Growth and Opportunity Act, including restrictions imposed by Rwandan authorities that involved the import of second-hand clothing from the United States. OIG reviewed 140 reporting cables covering the first 9 months of 2018 and, based on guidance contained in 2 FAM 113.1c (10) and (11), found the embassy could improve the content of its cables by sourcing more information from outside the capital, consolidating spot reports into a single weekly cable, and expanding analysis to better reach Department and interagency audiences. During the on-site portion of the inspection, OIG discussed with the Political/Economic Section chief opportunities to improve post's reporting. She told OIG she would incorporate this feedback in future section reporting.

³ Cable 15 STATE 96434, "Promoting Professional and Leadership Development for Mid-Level Foreign Service Employees," August 14, 2015.

Embassy Conducted Leahy Vetting in Accordance with Department Standards

OIG identified no major concerns with Embassy Kigali's processing of Leahy vetting checks.⁴ The Political/Economic Section issued a March 2018 standard operating procedure for processing interagency clearance for training, equipment, and assistance requiring Leahy vetting. Although host government delays in identifying suitable candidates for training led the embassy to submit some Leahy vetting requests after the Department's deadline of a required minimum 10 days of lead time, Washington offices told OIG the volume of such submissions was low. Embassy personnel raised with Rwandan Government officials the issue of delays in identifying training candidates. They also established earlier nomination deadlines to reduce the number of late Leahy vetting submissions.

Embassy Conducted End Use Monitoring in Accordance with Requirements

Embassy Kigali managed its end use monitoring requirements in accordance with legislative requirements.⁵ The embassy conducted regular monitoring of equipment that was provided to the Rwandan Government in 2011 and 2012 under the Foreign Military Sales program. In September 2018, the Bureau of International Narcotics and Law Enforcement Affairs donated an armored personnel carrier to the Rwandan Government.⁶ The embassy designated the Regional Security Officer to conduct end use monitoring of this equipment; during the inspection, he was coordinating with the Department to finalize monitoring arrangements.

Expanded Grants Management Program Reinforced Mission Objectives

The Political/Economic Section managed a grants portfolio that supported ICS strategies. OIG reviewed all 19 grants, totaling \$1,453,100, and found that the Political/Economic Section fulfilled Federal Assistance Directive requirements.⁷ The section issued 10 grants under the Ambassador's Special Self-Help program and the Julia Taft Refugee Fund⁸ awards to support

⁴ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department 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.

⁵ The Department requires that certain property purchased with foreign assistance funds be monitored 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 Chapter 3A, Section 40A of the Arms Control Act. See 22 USC 2785.

⁶ Washington offices and embassy personnel interviewed by OIG identified no other U.S.-provided equipment or activities subject to or undergoing monitoring at the time of the inspection.

⁷ The Department of State Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department when administering Federal financial assistance. See 1 FAM 212.2.

⁸ The Ambassador's Special Self-Help program is a grass-roots assistance program that allows embassies to respond quickly to local requests for small community-based development projects. The program is intended to allow the Ambassador to respond directly to requests from local communities for assistance with small community projects that have immediate effect, fall outside the structure of other established assistance projects, and further mission policies and objectives. The Julia Taft Refugee Fund is intended to meet gaps in refugee assistance needs that are not addressed by the Office of the United Nations High Commissioner for Refugees, other international

local and refugee community projects. Three additional \$250,000 grants aligned with ICS objectives for financial transparency, disability rights, and combating malnutrition. The remaining six grants supported rural economic growth, human rights, wildlife conservation, and plans to counter violent extremism. Following a case of grantee fraud in 2017, the section instituted safeguards—including host government verification of the local registration of certain categories of grantees and additional financial reporting for small grant recipients—that built on Federal Assistance Directive requirements. In discussions with OIG, Department offices praised the section’s management of the grants program.

Public Diplomacy

OIG reviewed the Public Diplomacy Section’s strategic planning, grants administration, and media engagement, as well as activities at the three American Spaces,⁹ which are guided by 10 FAM 380. OIG found that public diplomacy activities generally met Department standards and aligned with ICS goals that promoted a better public understanding of U.S. policy and the bilateral relationship. However, the section did not meet certain Department public diplomacy program requirements, as described below.

Embassy Did Not Manage Grants Program in Accordance with Department Standards

The embassy did not manage the public diplomacy grants program in accordance with Department standards. OIG reviewed all 40 active public diplomacy grants, issued from May 2017 to September 2018, totaling \$495,423.¹⁰ Grants files lacked many of the required documents, including the application for Federal assistance, risk assessments and monitoring plans,¹¹ and verifications that recipients were not excluded from doing business with the U.S. Government.¹² None of the grants OIG reviewed used an open competition or a merit review panel, as recommended in Department guidance.¹³ Furthermore, none of the completed grants

organizations, or non-governmental organizations receiving U.S. Government funding. Programs are designed to address one-time needs that can be supported by projects of up to \$25,000.

⁹ American Spaces are public diplomacy facilities owned or operated by the Department. They host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives. One of the three American Spaces is the American Center at the embassy. The other two are American Corners operated in partnership with universities in Kigali and in the Rubavu District of the Western Province of Rwanda.

¹⁰ One grant reviewed by OIG was subject to the Department’s Federal Assistance Policy Directive (dated January 14, 2016) and the Procedural Guide for Grants and Cooperative Agreements to Non-Federal Entities Not Recognized as Foreign Public Entities (dated December 31, 2015). On May 20, 2017, the Office of the Procurement Executive consolidated these two documents into a single Federal Assistance Directive. The other grants were subject to this revised, consolidated guidance or newer revisions.

¹¹ OIG previously identified a global pattern of this deficiency in its *Management Assistance Report: Improved Oversight Needed to Standardize the Use of Risk Assessments and Monitoring Plans for Overseas Grants* (ISP-17-33, July 2017).

¹² Of the 40 grants reviewed, 29% did not contain the application for Federal assistance (5 files did not require the application), 45% did not contain risk assessments or monitoring plans in the grants files, and 35% did not contain verifications that recipients were not excluded from doing business with the U.S. Government.

¹³ The Federal Assistance Directive states that assistance awards generally must be competed in a full and open manner, but allows for certain exceptions, which may apply to these grants. Even in those circumstances, the

had any close-out documentation. However, the embassy provided sufficient information for OIG to determine that the work called for in the grants was underway or completed.

The Public Diplomacy Section's Grants Officers stated they were unaware of some of the requirements for issuing grants, despite the training they received.¹⁴ As a result, OIG concluded that the section failed to identify and mitigate risk, monitor program implementation, evaluate program results, and ensure accountability for public diplomacy resources. OIG advised the embassy to provide supplementary training for all section Grants Officers and Grants Officer Representatives, which the embassy agreed to do. Failure to properly administer grants risks the misuse or waste of U.S. Government funds.

Recommendation 1: Embassy Kigali should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Kigali)

Section Improperly Used a Grant to Pay for Locally Employed Staff Training

The Public Diplomacy Section used a grant issued to a private organization to conduct leadership training in Rwanda to also pay for separate training of LE staff members. However, according to the Federal Assistance Directive,¹⁵ a contract is the proper instrument to pay for LE staff training. OIG found that the Grants Officer incorrectly believed that writing one grant that included both grant and contract duties would be more efficient than writing the two separate orders to the same contractor. OIG advised the Public Diplomacy Section to work with the Management Section to remove the incorrect funding from the grant. During the inspection, the section withdrew the cost of the LE staff training portion of the grant. As a result, OIG did not make a recommendation to address this issue.

Failure to Administer Grant In Accordance with Department Standards Increased the Risk of Fraud

The Public Diplomacy Section did not properly award, monitor, or document a grant to the American Corner at the Adventist University of Central Africa (AUCA) in Kigali, increasing the risk of fraud. The \$113,279 grant—written in 2016 and still in force at the time of the inspection—was intended to cover the costs to remodel the AUCA American Corner. OIG found that the grant's file lacked the following key documentation required by the Department's Federal Assistance Directive:

directive says a merit review panel is a best practice and should be conducted. See Department of State, Federal Assistance Directive, Chapter 2, Sections F and G (October 2018).

¹⁴ All grants officers must possess the minimum qualifications necessary to obtain a warrant and subsequently update their training every 3 years to ensure that Federal awards issued by the Department comply with applicable laws and regulations. The successful completion of specific training courses, with the appropriate number of hours, is required to obtain a Certificate of Appointment as a grants officer, according to the Department's Federal Assistance Directive (October 2018).

¹⁵ Federal Assistance Directive (October 2018), Chapter 2, Section A, "Select the Appropriate Instrument," pages 23-24.

- A mandatory checklist for ensuring required documents are included in the grant file.
- Documentation of competitive processes or justification for a sole-source award.
- A required check of the System for Award Management¹⁶ to ensure the recipient was not excluded from doing business with the U.S. Government.
- Documentation of performance of risk management procedures.
- Monitoring and performance reporting.
- A written Grants Officer Representative designation memo.
- Documentation of potential conflicts of interest.

In addition, the file included terms and conditions for fixed-amount award grants, although the grant is actually a cooperative agreement requiring different terms and conditions. Furthermore, the terms and conditions referred to a “project officer” as the “grants officer representative,” but the person named had never held such a warrant. This conflicts with Department standards, which require a warranted grants officer representative on all Federal grants above \$100,000 and that grants files include accurate terms and conditions.¹⁷

OIG also found that the grant’s file lacked the required detailed expenditures of funds or sufficient documentation of AUCA’s expenses. At the time of the inspection, AUCA had received 70 percent of the grant funds, or \$79,295, for which it prepared only a minimally descriptive budget without sufficient detail to determine whether the expenses were allowable. AUCA used its own contractors to perform work on the Corner, but the file did not document the supervision of the contractors, as required by the Federal Assistance Policy Directive, Chapter 1.07.¹⁸

Grants Officers and Grants Officer Representatives cited a lack of training or background knowledge regarding the State Assistance Management System Overseas¹⁹ and said they were unaware of the paperwork requirements, although all had taken the required training. The failure of the Public Diplomacy Section to administer grants in accordance with Department standards increases the risk of fraud or misuse of U.S. Government funds. Due to the problems with this grant, as described above, OIG questions \$79,295 in public diplomacy grants expenditures.

Recommendation 2: Embassy Kigali should verify and document that grant recipient American Corner at the Adventist University of Central Africa in Kigali was eligible to receive

¹⁶ The System for Award Management (SAM.gov) is the system for entities, including potential federal assistance awardees, to register to do business with the U.S. Government. The site also can be used to determine whether an entity is excluded, suspended, or debarred from receiving Federal grants, contracts, or other forms of Federal financial and non-financial assistance and benefits.

¹⁷ Department of State, Federal Assistance Policy Directive, Chapter 1.05-C., page 21 (January 14, 2016).

¹⁸ Federal Assistance Policy Directive, Chapter 1.07, page 28 (January 14, 2016).

¹⁹ The State Assistance Management System Overseas, or SAMS Overseas, is the Department’s program name for the systems that cover the four phases of the Federal Assistance Lifecycle as outlined by Office of Management and Budget guidelines—pre-award, award, post-award, and closeout—and capture the data essential for overseeing, administering, monitoring, and reporting Department-wide Federal assistance.

\$79,295 in public diplomacy funds and that the funds were used for the intended purpose. If the recipient is deemed ineligible or funds were not used for the intended purpose, Embassy Kigali should recover the funds in accordance with the grant agreement. (Action: Embassy Kigali)

Embassy Paid American Corner Salary Costs, Contrary to Terms of Agreement

The Public Diplomacy Section paid the salary of the American Corner Coordinator at AUCA in Kigali, contrary to a 2015 memorandum of understanding between the embassy and AUCA. According to the memorandum, AUCA is responsible for paying the coordinator's salary. However, less than a year after signing the memorandum, the section issued a grant to AUCA to build and furnish the Corner, which included a \$12,000 line item to cover the first year of the coordinator's salary. Section employees present at the memorandum's signing told OIG that AUCA signed the agreement knowing it did not intend to pay the coordinator's salary and that the then-Public Affairs Officer wrote the grant to cover the costs despite having signed the memorandum of understanding. In 2017, the section wrote a new \$24,000 grant to continue paying the salary for 2 additional years, from June 2018 to May 2020. Guidance in 10 FAM 387.1c (1) defines an American Corner as being governed by a memorandum of understanding. However, Embassy Kigali did not enforce the terms of the agreement, instead issuing \$36,000 in grants to AUCA to pay the coordinator's salary.

Recommendation 3: Embassy Kigali should stop paying the salary of the American Corner coordinator at the Adventist University of Central Africa in Kigali, seek reimbursement from the grantee, and put funds of up to \$36,000 to better use. (Action: Embassy Kigali)

American Corner in Kigali Did Not Conform to Department Standards

The American Corner at AUCA in Kigali did not conform to Bureau of International Information Programs Standards for American Spaces outlined in 10 FAM 387.2a, b, and c(1-3). It also did not conform to many of the requirements for a priority space,²⁰ a Department designation that allows the embassy to request additional funding. Specifically, according to the Regional Public Engagement Specialist,²¹ the number and quality of programs fell short of what would be expected from a modern space. In addition, the embassy did not hold the host institution accountable to the terms of the memorandum of understanding, including encouraging all segments of the population to access the American Corner, ensuring sufficient bandwidth for all patrons to access the internet. OIG concluded that the embassy did not properly prioritize programming and management at the American Corner, which resulted in misunderstandings and misinterpretations of the role of each of the partners following changes in embassy and AUCA staffing. Without enhanced programming, management oversight by embassy staff, and cooperation with the local partner, the embassy could not ensure the American Corner fulfilled

²⁰ Cable 16 STATE 105960, "American Spaces Prioritization Biennial Review Results," September 23, 2016, designated the American Corner at AUCA in Kigali as a "priority space."

²¹ The Regional Public Engagement Specialist serves Rwanda and eight additional countries. The position is assigned to the Public Diplomacy Section in Kigali and supervised by the Public Affairs Officer. The incumbent traveled to the American Spaces in Rwanda and noted his observations in a trip report.

its purpose as a strategic venue for public diplomacy programming to advance U.S. foreign policy objectives.

Recommendation 4: Embassy Kigali should comply with Department standards for management of the American Corner at the Adventist University of Central Africa in Kigali. (Action: Embassy Kigali)

Embassy Did Not Document or Inventory Property Transferred to American Corners

Embassy Kigali transferred equipment and materials such as furnishings, electronics, and books to the American Corners in Kigali and Rubavu but did not document or inventory the items, as required by the Federal Assistance Directive. When the Department acquires property on behalf of an eligible recipient, a property grant that includes a full inventory and instructions for disposition and maintenance of the property is the formal mechanism to document the transfer.²² OIG determined that the Public Diplomacy Section managers' lack of familiarity with Department requirements led to this oversight. Failure to appropriately account for property increases the risk of its loss, theft, or destruction and could result in significant financial loss to the U.S. Government.

Recommendation 5: Embassy Kigali should use property grants to document all property transferred by the Public Diplomacy Section to the American Corners in Kigali and Rubavu. (Action: Embassy Kigali)

Consular Affairs

OIG reviewed the full range of consular operations, including American citizen services, the fraud prevention program, nonimmigrant visa (NIV) and immigrant visa services, consular management controls, and consular crisis preparedness. OIG found that due to its small size (two American officers, one eligible family member, and two LE staff members), all section employees were trained in all aspects of consular operations. During staffing shortages, the officers regularly performed hands-on tasks routinely done by LE staff members. The Consular Section processed 4,907 NIV applications in FY 2017. In 2016, the Bureau of Consular Affairs authorized the embassy to process immigrant visas, and in FY 2017, the embassy handled 368 such applications. The embassy terminated one LE staff member for cause during the inspection, and the section chief asked the Bureau of Consular Affairs to provide temporary duty support until the embassy could hire a replacement.

In one particularly noteworthy practice, the section consolidated NIV interviews by language preference to increase efficiency. Approximately 20 percent of NIV applicants speak only Kinyarwanda, Rwanda's principal language. The Consular Section previously scheduled appointments without reference to the applicants' preferred language, causing LE staff members to constantly interrupt their regular tasks to interpret for adjudicating officers. To address this issue, the Consular Section consolidated all Kinyarwanda visa interviews on

²² Federal Assistance Directive (October 2018), Section J, Part 1, page 103.

Thursday afternoons. The change made morning visa interviews, which included only applicants who spoke English or French, more efficient and enabled the section to provide quicker and more focused service to all applicants.

Overall, OIG found that Embassy Kigali's Consular Section generally met Department standards, except as noted below. OIG also advised the section on minor issues concerning communications and correspondence, case and records management, consular systems, and management and leadership.

Consular Crisis Preparedness Program Did Not Meet Department Standards

The embassy's consular crisis preparedness program did not meet some Department standards. Specifically OIG identified the following deficiencies in planning for a consular crisis:

- The Consular Section's disaster assistance kits²³ were incomplete and did not meet Department standards in 7 FAM 1814.3-3 and 7 FAM 1815. For example, the kits lacked basic office supplies, consular forms, and some equipment. Additionally, both laptop computers designated to be used in the disaster assistance kits were inoperable, and only one of two satellite phones functioned.
- The Consular Section failed to process more than 850 U.S. citizen enrollments in the Smart Traveler Enrollment Program²⁴ as required by 7 FAM 043 Appendix B(1). As a result, those citizens would not have received embassy messages in a crisis. The section began processing these enrollments when OIG brought the issue to management's attention. Additionally, OIG advised the section to develop a schedule to ensure future enrollments are processed quickly, which it agreed to do.

The consular chief told OIG that the delays in instituting a thorough crisis preparedness program were due to the gap between consular chiefs and competing priorities in summer 2018. Notwithstanding these explanations, these concerns should be addressed, as failure to meet crisis preparedness requirements puts U.S. citizens and U.S. embassy employees at risk in a major crisis.

Recommendation 6: Embassy Kigali should implement a consular crisis preparedness program in accordance with Department standards. (Action: Embassy Kigali)

RESOURCE MANAGEMENT

OIG reviewed Embassy Kigali's operations in financial management, human resources, general services, facilities management, information management and the health unit. OIG found that the Management Section generally implemented required processes and procedures in

²³ A disaster assistance kit is a large attaché case or other suitable sturdy container filled with the supplies, equipment, and information a consular officer might need to function off-site in an emergency situation.

²⁴ The Smart Traveler Enrollment Program is a free service that allows U.S. embassies or consulates to contact American citizens traveling or living abroad and send them up-to-date security notices.

accordance with applicable laws and Department guidance, except in the residential safety program, as described below. In addition, during the inspection the embassy corrected one deficiency related to excess expendable supply stock, which is also detailed below.

Residential Safety Program Did Not Meet Department Standards

Embassy Kigali's residential safety program did not meet Department standards. At the time of the inspection, the Post Occupational Health and Safety Officer had not certified 40 of the embassy's 68 residences for occupancy. Department standards in 15 FAM 252.5 and 15 FAM 971 require the embassy to inspect and document residential properties prior to leasing or acquisition and to certify, prior to occupancy, that they meet the Department's safety, health, and environmental management requirements. In addition, guidance in 15 FAM 842a requires the embassy to properly administer a maintenance program for fire extinguishers in all residential units occupied by U.S. Government personnel.

This lack of compliance with Department standards was further exacerbated by multiple hazardous electrical incidents at embassy residences. For example, in April 2018, a child required medical treatment after coming into contact with an inadvertently electrified metal pipe at a residence. In addition, during the inspection, an electrical fire destroyed the electrical supply cables to a residence. Previous electrical fires had resulted in minor damages at other residences. Moreover, although the embassy had properly placed fire extinguishers in residential units, it was unable to provide to OIG any documentation that facility management staff had administered a maintenance program for these fire extinguishers.

OIG found that the embassy's leadership team was taking these problems seriously. For example, the Ambassador had identified the residential safety program as a significant deficiency in the September 2018 Chief of Mission Management Control Statement of Assurance. Additionally, the new Facility Manager, who arrived in July 2018, was working with the Bureau of Overseas Buildings Operations to improve its residential safety program. As a result of the Facility Manager's efforts, the bureau sent an American electrician with its International Maintenance Assistance Program to the embassy for 4 weeks to train the facility management staff on Department electrical safety standards. However, OIG determined that more needed to be done to bring the residential safety program into full compliance with Department standards. Failure to implement a fully compliant residential safety program increases the risk of injury and loss of life to residents and visitors.

Recommendation 7: Embassy Kigali, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to bring the residential safety program into compliance with Department standards. (Action: Embassy Kigali, in coordination with OBO)

Embassy Maintained Excess Expendable Supply Stock

The embassy maintained excess maintenance and motor pool expendable supply stock, such as motor oil, oil filters, pipes, and lightbulbs. At the time of the inspection, the embassy had issued

only 45 percent of the maintenance expendable supply inventory and 62 percent of the motor pool expendable supply inventory in the previous 12 months. Guidance in 14 FAH-1 418.1 recommends that inactive items be removed from the stock program. During the inspection, the embassy began implementing management controls to prevent procurement of excessive quantities of rarely used items and to dispose of excess supplies. Therefore, OIG did not make a recommendation to address this issue.

INFORMATION MANAGEMENT

OIG reviewed classified, unclassified, and dedicated internet network operations; physical protection of information technology (IT) assets; emergency communication preparedness; radio and telephone programs; and mail and pouch services. OIG determined that the Information Management programs and services met the day-to-day computing and communications needs of the embassy, with the exception of the deficiencies cited below.

Embassy Records Management Program Did Not Comply with Department Standards

Embassy Kigali did not conduct its records management program in accordance with Department standards. OIG found files dating to the 1990s in the warehouse and other embassy locations. Guidance in 5 FAM 414.5 requires the embassy to implement and administer Department records policies, standards, systems, and procedures, including guidance in 5 FAM 414.8 to preserve documentary materials or regularly dispose of them according to Department schedules. These deficiencies occurred due to a lack of oversight by embassy managers. The embassy started taking steps to improve its administration of the records management program during the inspection by conducting mandatory training sessions for U.S. direct-hire personnel. These steps are important, as without an effective records management program, the embassy risks not identifying for archiving important data for research and historical insights into policy analysis and decision-making.

Recommendation 8: Embassy Kigali should implement standard operating procedures to archive or dispose of documentary materials in accordance with Department standards.
(Action: Embassy Kigali)

Information Systems Security Officer Reviews Were Not Documented

Embassy Kigali's Information Systems Security Officer (ISSO) did not record information system audits or complete the Department's ISSO checklist. Guidance in 12 FAM 632.5a requires the ISSO to maintain information system audit records, which should include system maintenance logs and system operation logs. In addition, 12 FAH-10 H-122.5-2 requires the ISSO to conduct monthly reviews of randomly selected accounts to ensure users are not processing information above the authorized classification level for the computer system or otherwise engaging in security related anomalies or suspicious activity. OIG issued a Management Assistance Report

in 2017²⁵ that identified the need to enforce the performance of ISSO duties by overseas information management personnel in accordance with Department standards. In a subsequent cable,²⁶ the Department directed embassy management to work with ISSOs to ensure performance of their duties by prioritizing resources to make sure that cybersecurity needs were met and documented.

OIG determined that the embassy's Information Management personnel had not prioritized cybersecurity needs, which led to non-performance of these duties. Without regularly scheduled ISSO reviews and documented records, Department networks are vulnerable to potential unauthorized access and malicious activity.

Recommendation 9: Embassy Kigali should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Kigali)

Radio Network Lacked Full Reception Coverage at the Alternate Command Center

OIG's review of the alternate command center found that its high-frequency radio had limited reception coverage. Department standards in 5 FAH-2 H-742a require emergency radio equipment to be operationally ready and, if necessary, coordinate service for the equipment with the appropriate Regional Information Management Center (located in Johannesburg for Embassy Kigali). Embassy personnel told OIG they lacked the technical expertise to resolve the problem. This concern should be addressed, as poor radio reception puts the safety and security of embassy personnel at increased risk in the event of a crisis.

Recommendation 10: Embassy Kigali, in coordination with the Bureau of Information Resource Management, should review high-frequency radio coverage at the embassy's alternate command center and remedy reception coverage problems. (Action: Embassy Kigali, in coordination with IRM)

²⁵ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

²⁶ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

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 Kigali. The embassy's complete responses can be found in Appendix B.²⁷ The embassy also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Kigali should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the public diplomacy grants program complies with Department standards.

Recommendation 2: Embassy Kigali should verify and document that grant recipient American Corner at the Adventist University of Central Africa in Kigali was eligible to receive \$79,295 in public diplomacy funds and that the funds were used for the intended purpose. If the recipient is deemed ineligible or funds were not used for the intended purpose, Embassy Kigali should recover the funds in accordance with the grant agreement. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation. The embassy noted an expected completion date of July 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that grant recipient American Corner at the Adventist University of Central Africa was eligible to receive \$79,295 in public diplomacy funds and that the funds were used for the intended purpose or the recovery of the funds.

Recommendation 3: Embassy Kigali should stop paying the salary of the American Corner coordinator at the Adventist University of Central Africa in Kigali, seek reimbursement from the grantee, and put funds of up to \$36,000 to better use. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali disagreed with this recommendation. The embassy noted that it received approval from the Regional Public Engagement Specialist and the Bureau of International Information Programs to fund the American Corner coordinator's salary in FY 2016 and again in FY 2017. However, the embassy did not update the 2015 memorandum of understanding with the Adventist University of Central Africa to reflect this change in funding source. Therefore, the embassy does not agree

²⁷ The issuance of this report was delayed due to the lapse in OIG's appropriations that occurred from 11:59 p.m. December 21, 2018, through January 25, 2019.

with seeking reimbursement from the grantee. The embassy also stated that it will close the American Corner at the Adventist University of Central Africa in May 2019, and, at that time, it also will close the salary grant.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy closed the American Corner coordinator's salary grant.

Recommendation 4: Embassy Kigali should comply with Department standards for management of the American Corner at the Adventist University of Central Africa in Kigali. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation. The embassy noted it plans to close the American Corner in Kigali in May 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kigali complies with Department standards for management of the American Corner at the Adventist University of Central Africa.

Recommendation 5: Embassy Kigali should use property grants to document all property transferred by the Public Diplomacy Section to the American Corners in Kigali and Rubavu. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts the property grants used to document all property transferred by the Public Diplomacy Section to the American Corners in Kigali and Rubavu.

Recommendation 6: Embassy Kigali should implement a consular crisis preparedness program in accordance with Department standards. (Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kigali implemented a consular crisis preparedness program in accordance with Department standards.

Recommendation 7: Embassy Kigali, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to bring the residential safety program into compliance with Department standards. (Action: Embassy Kigali, in coordination with OBO)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the corrective action plan to bring the residential safety program into compliance with Department standards.

Recommendation 8: Embassy Kigali should implement standard operating procedures to archive or dispose of documentary materials in accordance with Department standards.
(Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the standard operating procedures to archive or dispose of documentary materials in accordance with Department standards.

Recommendation 9: Embassy Kigali should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards.
(Action: Embassy Kigali)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation.

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

Recommendation 10: Embassy Kigali, in coordination with the Bureau of Information Resource Management, should review high-frequency radio coverage at the embassy's alternate command center and remedy reception coverage problems. (Action: Embassy Kigali, in coordination with IRM)

Management Response: In its March 20, 2019, response, Embassy Kigali concurred with this recommendation. The embassy noted an expected completion date of April 2019.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Kigali remedied the high-frequency radio reception coverage problems at the alternate command center.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Peter Vrooman	3/2018
Deputy Chief of Mission	Richard Michaels	8/2017
Chiefs of Sections:		
Management	Robert Hommowun	8/2017
Consular	Bethany Milton	6/2018
Political/Economic	Beth Smith	6/2018
Public Affairs	Marissa Rollens ²⁸	8/2018
Regional Security	Buford Pate	8/2018
Other Agencies:		
Defense Attaché	Lt. Col. Jason Farmer	5/2016
Office of Security Cooperation	Maj. Christian Numba	8/2017
U.S. Agency for International Development	Leslie Marbury, Acting ²⁹	7/2017
Centers for Disease Control and Prevention	Gene MacDonald	12/2014
Peace Corps	Keith Hackett	4/2017

Source: Embassy Kigali

²⁸ Marissa Rollens arrived in Kigali as the Deputy Public Affairs Officer in July 2016. She was reassigned as the Public Affairs Officer effective August 2018.

²⁹ Leslie Marbury arrived in Kigali in January 2017. She became the Acting Director of USAID in July 2017.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted September 4 to December 6, 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 the Office of Inspector General (OIG) for the Department 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 and U.S. interests are 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 surveys and compiles the results, 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 233 interviews and reviewed responses to 47 personal questionnaires.

APPENDIX B: MANAGEMENT RESPONSES



*Embassy of the United States of America
Kigali, Rwanda*

March 20, 2019

UNCLASSIFIED

THRU: AF – Benjamin Dille, Executive Director

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

FROM: Embassy Kigali – Peter H. Vrooman, Ambassador

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

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

OIG Recommendation 1: Embassy Kigali should bring the public diplomacy grants program into compliance with Department standards. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. The Embassy implemented the recommendation by providing supplementary training for the Public Affairs Section's two Grants Officers and four Grants Officer Representatives (completed February 2019), instituting biweekly trainings for all Grants Officers and Grants Officer Representatives, launching an interagency grants review panel, and revising the section's standard operating procedures for grants management.

OIG Recommendation 2: Embassy Kigali should verify and document that grant recipient American Corner at the Adventist University of Central Africa in Kigali was eligible to receive \$79,295 in public diplomacy funds and that the funds were used for the intended purpose. If the recipient is deemed ineligible or funds were not used for the intended purpose, Embassy Kigali should recover the funds in accordance with the grant agreement. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. The Embassy is implementing the recommendation by verifying that there is no adverse information about the Adventist University of Central Africa in Kigali in SAM.gov. The Public Affairs Section received in

February the required receipts and financial documents related to the renovation of the American Space and is reviewing them to ensure funds were used for the intended purpose. If funds were not used for the intended purpose, the Embassy will seek to recover the funds in accordance with the grant agreement. The expected completion date is July 2019.

OIG Recommendation 3: Embassy Kigali should stop paying the salary of the American Corner coordinator at the Adventist University of Central Africa in Kigali, seek reimbursement from the grantee, and put funds of up to \$36,000 to better use. (Action: Embassy Kigali)

Management Response: Embassy Kigali disagrees with the recommendation. Per the Regional Public Engagement Specialist (REPS) and IIP, American Spaces designated as a “Priority Space” allow for payment of American Corner Coordinator salaries. The then-Information Resource Officer (now known as REPS) negotiated an MOU in 2015 between the Adventist University of Central Africa in Kigali and the Embassy. The Public Affairs Section subsequently requested funding support for the Coordinator salary in the FY16 Funds Request from IIP, which the IRO and IIP both approved. A similar request for two-year salary support was submitted in FY17 and again approved by the REPS and IIP. The Embassy acted in accordance with guidance and approval from the REPS and IIP. Similarly, the University acted in accordance with both Embassy-issued grants for salary support by hiring a full-time Coordinator. The Embassy failed to update the 2015 MOU to reflect the change in funding source for the Coordinator salary and the REPS’ and IIP’s approvals. The Embassy, therefore, does not agree with seeking reimbursement from the grantee.

The Public Affairs Section notified the Adventist University of Central Africa in Kigali in February 2019 of its decision to close the American Corner in May 2019. The Embassy will terminate the grant according to procedures in the Federal Assistance Directive. The expected completion date for closure of the coordinator’s salary grant is May 2019.

OIG Recommendation 4: Embassy Kigali should comply with Department standards for management of the American Corner at the Adventist University of Central Africa in Kigali. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. In September 2018, the Public Affairs Section sent the American Corner Coordinator to “Level 1” training for American Spaces and observed increased programming at the American Corner in Kigali. The Public Affairs Section, including the REPS, sought monthly meetings beginning August 2018 with Adventist University of Central Africa leadership. University leadership frequently canceled meetings, or University decision-makers would be absent. Due to the University’s lack of commitment to perform as a Priority Space, the Embassy decided to close the American Corner in Kigali. The expected completion date for closure is May 2019.

OIG Recommendation 5: Embassy Kigali should use property grants to document all property transferred by the Public Diplomacy Section to the American Corners in Kigali and Rubavu. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. The Embassy implemented the recommendation by documenting in November 2018 all property transferred by the Public Affairs Section to the American Corner in Kigali and executing a property grant for those materials in January 2019. The terms of the property grant will enable the Embassy to recover these items when the American Corner in Kigali closes in May 2019. Embassy will use property grants to document all future property transfers to the American Corner in Rubavu.

OIG Recommendation 6: Embassy Kigali should implement a consular crisis preparedness program in accordance with Department standards. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. The Consular Section implemented this recommendation by updating its disaster assistance kits in October 2018 to include missing items. As of March 2019, the Embassy identified a back-up laptop to use until receipt of a replacement flyaway kit laptop anticipated in April 2019. The Embassy in October 2018 decommissioned the nonfunctional satellite phone, tested the remaining phone, and identified additional satellite phones for use in an emergency. The Consular Section processed all pending U.S. citizen enrollments into the Smart Traveler Enrollment Program in October 2018 and now processes them on a daily basis.

The Embassy held a consular crisis management exercise (CME) with Citizen Liaison Volunteers in December 2018, as well as incorporated additional consular content into the FSI-proctored CME to be held in March 2019. The Embassy conducted additional training in December 2018 and March 2019 for newly-hired consular staff focused on crisis preparedness.

OIG Recommendation 7: Embassy Kigali, in coordination with the Bureau of Overseas Buildings Operations, should implement a corrective action plan to bring the residential safety program into compliance with Department standards. (Action: Embassy Kigali, in coordination with OBO)

Management Response: Embassy Kigali concurs with the recommendation. The Embassy is implementing the recommendation by developing a plan to inspect and correct all residential property concerns identified by the OIG and to complete the issuance of Post Occupational Health and Safety Officer (POSHO) certificates for each residence. As of March 2019, the Embassy had issued certificates for 20 additional residences and plans to continue at the rate of ten properties per month until all residences have a POSHO certificate, anticipated in July 2019.

The Embassy intends to request OBO provide a team of up to six American master electricians to assist Locally Employed (LE) staff in making residence repairs, provide on-the-job training for Post's LE Staff, and ensure residential electrical systems are safe. The expected completion date will depend on availability of electricians from the International Maintenance Assistance Program.

OIG Recommendation 8: Embassy Kigali should implement standard operating procedures to archive or dispose of documentary materials in accordance with Department standards. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the substance of this recommendation. The Embassy's Records Management Officer implemented the recommendation by informing the entire Embassy community via email in October 2018 of Department guidance on the importance of records disposal and maintenance procedures. The Records Management Officer held a training for all State Americans in November 2018.

The Records Management Officer worked with GSO Warehouse to identify files and records that should be disposed of or properly tracked for future disposal. The review of these archived documents was completed in January 2019 and the appropriate records retirement actions taken. The Embassy will publish a Management Notice to remind staff not to forget stored records in the future.

OIG Recommendation 9: Embassy Kigali should require that Information Systems Security Officers perform information systems security duties in accordance with Department standards. (Action: Embassy Kigali)

Management Response: Embassy Kigali concurs with the recommendation. The Information Management Officer (IMO) implemented this recommendation by providing guidance to the primary Information Systems Security Officer (ISSO) in October 2018 outlining which tasks are high, medium, and low priority to better prioritize the ISSO's time. All ISSO work is now documented in a monthly record email to the IMO. The ISSO incorporated procedural updates in December 2018 to record the information system audits and the completion of ISSO checklists.

OIG Recommendation 10: Embassy Kigali, in coordination with the Bureau of Information Resource Management, should review high-frequency radio coverage at the embassy's alternate command center and remedy reception coverage problems. (Action: Embassy Kigali, in coordination with IRM)

Management Response: Embassy Kigali concurs with the recommendation. The Embassy consulted with Regional Information Management Center during their team's November 2018 visit, and it was determined that radio operations are within normal standards but could be improved by raising the HF antenna several meters. The Embassy began the process of raising the antenna. The Embassy and IRM determined in November 2018 that Post One/Chancery coverage is operating normally. The expected completion date is April 2019.

The point of contact for this memorandum is DCM Richard Michaels.

ABBREVIATIONS

AUCA	Adventist University of Central Africa
CDC	Centers for Disease Control and Prevention
DCM	Deputy Chief of Mission
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
NIV	Nonimmigrant Visa
PEPFAR	President's Emergency Fund for AIDS Relief
USAID	U.S. Agency for International Development

OIG INSPECTION TEAM MEMBERS

Peter Prahar, Team Leader
Thomas Furey, Team Manager
Pasquale Capriglione
Theodore Coley
Darren Felsburg
Jonathan Floss
Dolores Hylander
Karen Stanton
Eric Watnik
Gregory Winstead



HELP FIGHT

FRAUD, WASTE, AND ABUSE

1-800-409-9926

www.stateoig.gov/HOTLINE

If you fear reprisal, contact the
OIG Whistleblower Coordinator to learn more about your rights.

WPEAOmbuds@stateoig.gov