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Office of Inspector General  
United States Department of State

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ISP-I-19-16

Office of Inspections

June 2019

# Inspection of Embassy Libreville, Gabon

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-19-16

## What OIG Inspected

OIG inspected the executive direction, program and policy implementation, and resource management operations of Embassy Libreville. OIG also inspected embassy operations in São Tomé and Príncipe.

## What OIG Recommends

OIG made 28 recommendations: 1 to the Director General of the Foreign Service and Director of Human Resources to address a nepotism issue; 5 to improve embassy leadership; 2 to the Bureau of African Affairs to improve executive direction and to seek Department authorization to establish a post in São Tomé and Príncipe; 1 to the U.S. Agency for Global Media to improve physical security at its transmitting station in São Tomé; 1 to improve operations at the American Corner in São Tomé; 6 to improve foreign assistance grants and political/economic, public diplomacy, and consular operations; 9 to improve management operations; and 3 to improve information management operations.

In its comments on the draft report, the Department and the U.S. Agency for Global Media concurred with 25 recommendations and disagreed with 3. OIG considers 26 recommendations resolved and 2 unresolved. The Department's and the U.S. Agency for Global Media's responses to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's and the U.S. Agency for Global Media's formal written responses are reprinted in their entirety in Appendix B.

June 2019

OFFICE OF INSPECTIONS  
BUREAU OF AFRICAN AFFAIRS

## Inspection of Embassy Libreville, Gabon

### What OIG Found

- The Ambassador and the Deputy Chief of Mission did not set a positive and professional tone for Embassy Libreville and did not form an effective leadership team.
- The Deputy Chief of Mission may have violated anti-nepotism guidelines when he urged embassy staff to identify an embassy job for his spouse.
- Embassy Libreville has had an office in the island nation of São Tomé and Príncipe since 2001 that the Department of State has not formally authorized.
- The embassy did not comply with Department of State guidelines on acceptance of gifts, including gifts from a U.S. company for which the Ambassador engaged in commercial advocacy.
- The Ambassador reestablished diplomatic contact with the host government but did not formally report on his meetings with Government of Gabon officials and on his commercial advocacy for a U.S. firm. In addition, he did not integrate public diplomacy outreach and social media engagement into his efforts to advance U.S. goals.
- The embassy did not produce official cable reporting in accordance with Department guidance.
- The Ambassador and the Deputy Chief of Mission did not provide adequate guidance and direction to the American employees they supervised.
- The embassy did not have an ongoing management controls program and did not prepare its annual Chief of Mission Management Control Statement of Assurance in accordance with Department of State guidance.
- The lack of an adequate perimeter fence around the U.S. Agency for Global Media transmitting station in São Tomé created a potential hazard for the public.

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## CONTEXT

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The Gabonese Republic, a country slightly smaller than Colorado, is located in Central Africa, bordering the Atlantic Ocean at the equator between the Republic of the Congo and Equatorial Guinea. Its population of 1.8 million is spread in pockets throughout the country; the largest urban center is the capital, Libreville, located on the Atlantic coast. Following independence from France in 1960, El Hadj Omar Bongo Ondimba dominated the country's political scene from 1967 to 2009. His son, Ali Bongo Ondimba, succeeded him in power. Gabon's Constitutional Court upheld the results of a disputed 2016 election, which extended President Bongo's mandate to 2023.

Oil was discovered offshore in Gabon's waters in the early 1970s. Gabon's oil revenues have given it one of the highest per capita income levels in sub-Saharan Africa (an estimated \$19,200 in 2017), but because of corruption and high-income inequality, a large proportion of the population remains poor. Unemployment is especially prevalent among the large youth population.

Embassy Libreville also is responsible for U.S. relations with São Tomé and Príncipe, an island nation in the Gulf of Guinea that became independent from Portugal in 1975. São Tomé and Príncipe's economy is heavily dependent on the export of cacao, and its population of 204,000 has a per capita income of \$3,200. A U.S. Agency for Global Media (USAGM) transmitting station in the country's capital, São Tomé, had 1 U.S. direct-hire manager and 45 locally employed (LE) staff members. Embassy Libreville co-located three LE staff positions at the station, with a fourth embassy local employee embedded in the Ministry of Defense in São Tomé. All U.S. Government employees in São Tomé work under the authority of the Ambassador in Libreville.

Embassy Libreville's 2018-2022 Integrated Country Strategy (ICS) for Gabon and São Tomé and Príncipe focuses on advancing peace and security; boosting economic development, trade, and investment; strengthening the rule of law and capacity to govern; and protecting U.S. lives and interests. The bulk of U.S. security assistance in Gabon and São Tomé and Príncipe is directed at maritime security to boost military partner capabilities in the Gulf of Guinea.

At the time of the inspection, Embassy Libreville had 36 U.S. direct-hire positions, 116 LE staff members, and 8 eligible family member positions. Other agencies at the embassy included the Department of Defense and the Department of the Interior. The Department of State (Department) completed the new embassy compound, including the chancery, a warehouse, and other facilities, in 2012.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act.<sup>1</sup> A related classified inspection

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

report discusses the embassy's security program and issues affecting the safety of embassy personnel and facilities.

## **EXECUTIVE DIRECTION**

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OIG assessed Embassy Libreville's leadership on the basis of 73 interviews that included comments on Front Office performance; staff questionnaires; and OIG's review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

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

The Ambassador, a career member of the Senior Foreign Service, arrived in Gabon in March 2018 after an assignment as Associate Dean of the Department's Foreign Service Institute School of Professional and Area Studies. His previous assignments included management and political positions in Belize, Switzerland, and Afghanistan, and he served as Deputy Special Coordinator in the Office of the Haiti Special Coordinator. The Deputy Chief of Mission (DCM), a career Foreign Service officer, arrived in August 2017 after an assignment as director of the Minneapolis Passport Agency. His previous Department assignments included consular and management positions in Cote d'Ivoire, Afghanistan, South Africa, and Germany. He had served as a Peace Corps volunteer in Gabon.

#### ***Ambassador Did Not Set a Positive and Professional Tone for the Embassy***

OIG found that the Ambassador did not set a positive and professional tone for the embassy in accordance with Department leadership and management principles outlined in 3 Foreign Affairs Manual (FAM). In interviews with embassy staff, OIG found that the Ambassador's verbal outbursts created anxiety and impeded communication and embassy operations. The Ambassador told OIG that he was passionate and committed to improving embassy operations and advancing U.S. interests in Gabon but that he became increasingly frustrated when the staff did not appear to respond to his directives or keep him informed of significant developments. He also acknowledged that he sometimes cursed at employees. American and LE staff told OIG that they were reluctant to provide the Ambassador with complete information on developing situations, fearing they would receive a negative reaction if he did not like what he heard. Finally, OIG noted during the inspection that the Ambassador was in conflict with a key member of the embassy's security team over an issue that occurred 2 months before the inspection. This conflict resulted in an almost complete lack of communication between the Ambassador and this individual. In discussing the conflict with OIG, the Ambassador agreed that it was essential for embassy security that he take action to repair his relationship with the security team.

The Department's leadership and management principles require leaders to hold themselves to the highest standards of conduct and to be self-aware. OIG advised the Ambassador to take advantage of the Department's leadership and coaching programs. The Ambassador welcomed the advice, telling OIG that it was exactly the type of feedback he had hoped to obtain from the

inspection. He also committed to work on his tone with staff by moderating the volume of his voice and eliminating the use of profanities.

***Ambassador and Deputy Chief of Mission Did Not Form an Effective Leadership Team***

The Ambassador and the DCM did not form an effective leadership team, as described in 2 FAM 113.2, which requires the DCM to serve as alter ego to a chief of mission in coordinating mission activity to meet broad program needs. Specifically, OIG found that the Ambassador did not establish clear expectations for the DCM regarding his responsibilities to manage the embassy. For example, the two officers had not agreed on a work requirements statement for the DCM, which should have been prepared within 45 days of the Ambassador's arrival in March 2018, as required by 3 FAH-1 H-2815.1a(1). In discussing this issue with OIG, the Ambassador agreed that he had been remiss in not making it clear to the DCM what was expected of him. OIG also found that the Ambassador directly assigned tasks to LE staff members without informing the DCM or section chiefs. He told OIG his intent in doing this was to be personable, accessible, and aware of embassy operations. However, OIG found that the Ambassador was unaware that the practice frustrated supervisors. Embassy supervisors told OIG that although they often did not know about the assignments, the Ambassador subsequently would hold them accountable if the projects were not completed.

OIG found the DCM to be generally unengaged in embassy operations, unfamiliar with the work of the embassy's sections, and uninvolved in performance management, as discussed later in this report. The DCM told OIG that in the 6 months prior to the inspection, he had prioritized introducing the Ambassador to Gabon but that in the future he would turn his attention to embassy operations.

***Deputy Chief of Mission May Have Violated Anti-Nepotism Guidelines***

The DCM likely did not comply with the requirements of 3 FAM 8312 to avoid nepotism and the appearance of nepotism in all employment matters. Embassy staff told OIG that the DCM repeatedly urged them to identify an embassy job for his spouse, either by selecting her for an eligible family member position or by encouraging other embassy agencies to create a position for her. This conduct is inconsistent with Department policy. Guidelines in 3 FAM 8324 state that an employee must scrupulously insulate himself or herself from acts benefiting, affecting, or giving the appearance of benefiting or affecting a relative's career or responsibilities. The DCM denied to OIG that he had pressured anyone to create a position for his spouse or that he had made any comments to compel another embassy agency to hire his spouse. However, based on a review of documentation and interviews with embassy staff, OIG found that the DCM's actions to secure embassy employment for his spouse likely violated Department standards. Additionally, as discussed further in the Human Resources section of this report, his conduct negatively affected embassy operations, as embassy staff sought to avoid the issue entirely by not advertising to fill any vacant eligible family member positions.

**Recommendation 1:** The Director General of the Foreign Service and Director of Human Resources should review whether anti-nepotism violations occurred at Embassy Libreville and, based on the results of its review, take appropriate action. (Action: DGHR)

***Embassy Did Not Comply with Department Guidelines on Acceptance of Gifts***

The embassy did not adhere to 2 FAM 960 guidelines regarding the solicitation and acceptance of gifts to the Department. Embassy staff told OIG that the embassy did not review the list of companies solicited for July 4<sup>th</sup> contributions to ensure that proposed donors were neither seeking substantial assistance from the embassy nor would be substantially affected by a pending or reasonably anticipated official action, as required by 2 FAM 962.8a(1). As a result, at least one company for which the Ambassador had actively advocated was solicited for a contribution. The Ambassador also accepted travel on an aircraft chartered by the same company without seeking concurrence of White House Counsel, as required by 2 FAM 962.12h. Failure to comply with these guidelines could create the appearance of partiality or favoritism on the part of the U.S. Government.

**Recommendation 2:** Embassy Libreville should comply with Department guidelines regarding the acceptance of gifts. (Action: Embassy Libreville)

***Deputy Chief of Mission Did Not File Financial Disclosure Forms as Required***

Since his arrival in Libreville in August 2017, the DCM had not filed a financial disclosure form, although guidelines in 11 FAM 611.3(2) specifically require DCMs to do so. The DCM told OIG that, based on OIG's inquiries, he took the ethics course online during the inspection and contacted the Department to find out how to submit a late financial disclosure form. As a result of the DCM's corrective actions, OIG did not make a recommendation to address this issue.

**Execution of Foreign Policy Goals and Objectives**

Embassy staff credited the Ambassador with renewing U.S. Government contact with Gabonese Government officials, who had cut off high-level contacts with U.S. officials following criticism of the disputed 2016 Gabon presidential election, thereby capitalizing on Gabon's desire to restore the relationship. OIG's review of the Ambassador's calendar for his first 6 months at the embassy found that he had fulfilled his responsibilities under 2 FAM 113.1c(7) to develop close relations with host government officials. The Ambassador also established relations with opposition leaders and with members of the diplomatic community. Embassy staff also credited the Ambassador with opening doors for them to work with Government of Gabon officials in the areas of security and wildlife trafficking.

***Embassy Did Not Produce Official Cable Reporting in Accordance With Department Guidance***

OIG found that the embassy did not produce official cable reporting in accordance with Department instructions and guidance. Specifically, OIG identified numerous instances where the Ambassador held substantive meetings with business leaders, host government officials, and other senior contacts, but he did not establish a routine practice of briefing his staff on the

results of his meetings. He also did not draft his own cables or take a note-taker to record the meetings for him. This resulted in cases where time-sensitive or important reporting was delayed or not generated. In one case, the embassy delayed its reporting of internal political developments that could impact U.S. operations and interests. In another example, the Ambassador's advocacy work on behalf of a major U.S. business was never reported.

In describing the reasons the Department has overseas missions, the FAM states the importance of substantive, timely reporting. Specifically, 2 FAM 411.2(3) outlines post's role in reporting economic and political developments in the locality in accordance with long-range U.S. interests. Furthermore, 2 FAM 113.1c(10) and other citations describe post responsibilities to report on significant political, economic, leadership, and societal developments occurring abroad. Finally, instructions in 2014 from the Deputy Secretary and in 2016 from the Under Secretary for Political Affairs further emphasize the importance of official cable reporting. The failure to produce official cable reporting limited the embassy's ability to coordinate with the Department and other Washington agencies on time-sensitive issues that could impact U.S. political, economic, consular, security and public affairs interests in Gabon and São Tomé.

**Recommendation 3:** Embassy Libreville should comply with Department instructions and guidance on reporting significant political, economic, and societal developments. (Action: Embassy Libreville)

### ***Embassy Staff Unaware of Integrated Country Strategy Goals***

OIG found that the Front Office did not clearly outline mission priorities. Many American and LE staff told OIG that they were unaware of Embassy Libreville's ICS goals. OIG advised the Ambassador to increase awareness of these goals throughout the embassy and to review progress with the staff on achieving them. Additionally, the Ambassador did not direct the public diplomacy staff to conduct activities that would support ICS goals. OIG advised the Ambassador to integrate public diplomacy outreach and social media engagement into his efforts to advance U.S. interests.

### ***Embassy Did Not Coordinate Commercial Advocacy Activities With Washington***

During the inspection, the Ambassador's efforts on behalf of a U.S. firm seeking an investment in Gabon resulted in the signature of an agreement between the company and the Government of Gabon. However, the embassy did not coordinate these activities with Washington in accordance with the standard operating procedures governing an existing Department of State-Department of Commerce partnership program for Embassy Libreville. OIG advised the Ambassador to report to the Department and other interested U.S. Government agencies on the embassy's commercial promotion activities. The Ambassador said the embassy would begin reporting on these activities when the economic-commercial officer position, vacant since April 2017, is filled.



## Adherence to Internal Controls

Embassy Libreville did not prepare its 2018 Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance, nor did it have an ongoing system of management controls. The Statement of Assurance, submitted to the Department on October 1, 2018, reported no significant deficiencies in the embassy's systems of management controls. However, the embassy could not provide OIG with documentation supporting this conclusion. In addition, the embassy limited its management control assessments primarily to the Management Section, contrary to guidance in 2 FAM 022.8c(3), which requires that all embassy sections conduct such assessments. The embassy told OIG this occurred because of the Department's late release of 2018 instructions and the short deadline to complete the assessments. OIG advised the embassy that management control assessments should be ongoing and that it is unnecessary to wait until receiving the instructions before initiating a thorough review. According to 2 FAM 022.7, chiefs of mission are responsible for developing and maintaining appropriate systems of internal control for their organization and for reviewing them on an ongoing basis to determine whether they are adequate and functioning as prescribed. Furthermore, the Government Accountability Office's *Standards for Internal Control in the Federal Government*<sup>2</sup> requires documentation of management control assessments and corrective actions. Without a comprehensive, ongoing system of internal controls, Embassy Libreville is at risk of failing to manage its activities and programs effectively, efficiently, economically, and with integrity.

**Recommendation 4:** Embassy Libreville should implement a process for maintaining an ongoing system of management controls, including preparing the annual Chief of Mission Management Control Statement of Assurance, in accordance with Department guidance. (Action: Embassy Libreville)

### ***Deputy Chief of Mission Did Not Review Nonimmigrant Visa Adjudications as Required***

The DCM did not review nonimmigrant visa adjudications in a timely manner, as required by Department guidelines. A Bureau of Consular Affairs analysis showed that from April 1 through June 15, 2018, the DCM reviewed nonimmigrant visa adjudications twice, with an average lag time of 90 days between the visa adjudications and the DCM's reviews. According to 9 FAM 403.12-1d, however, reviewing officers must review adjudications within 3 business days. The DCM had no explanation for this deficiency. Failure to review visa adjudications in a timely manner increases the risk of visa malfeasance or improper adjudications.

**Recommendation 5:** Embassy Libreville should require the Deputy Chief of Mission to review nonimmigrant visa adjudications in accordance with Department standards. (Action: Embassy Libreville)

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<sup>2</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government*, Sections 17.05 and 17.06 (GAO-14-704G, September 2014).

## **Security and Emergency Planning**

The Ambassador's leadership of Embassy Libreville's security program generally complied with the President's Letter of Instruction to Bilateral Chiefs of Mission to take full and direct responsibility for the security of the mission and its personnel. Embassy security personnel told OIG that the Ambassador and the DCM participated in drills, tests of the embassy's emergency and evacuation radio network, Emergency Action Committee (EAC) and other security-related meetings, and Marine Security Guard and local guard force recognition ceremonies and events. Shortly after his arrival, the Ambassador reviewed, revised, and reissued all security directives. Participation by American staff in the weekly checks of the emergency and evacuation radios located in embassy residences, conducted in accordance with 5 Foreign Affairs Handbook (FAH)-2 H-732.7, approached 100 percent after the embassy made a procedural change in October 2018. Finally, in July 2018, 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.

While the Ambassador and DCM largely attended to their security and emergency preparedness responsibilities, OIG noted two areas for improvement as detailed below.

### ***Embassy Did Not Conduct an Emergency Action Committee Meeting in Accordance With Department Standards***

The DCM, as chair of the embassy's EAC, did not fulfill some of his duties in accordance with 12 FAH-1 H-231b. For example, during the inspection, American citizens asked for embassy advice following news reports that raised security concerns. According to 2 FAM 113.1c(14), a chief of mission is responsible for advising U.S. citizens abroad, and 12 FAH-1 H-232b(11) states that the EAC is responsible for providing the Ambassador with informed and well-considered recommendations for any needed measures to ensure the health, safety, and security of the mission and private U.S. citizen population during developing and evolving situations. However, the DCM did not call a meeting of Embassy Libreville's EAC until 5 days after U.S. citizen inquiries regarding the potential crisis began. He did so at the urging of OIG, which noted the embassy's responsibility to communicate with U.S. citizens about issues that had potential for serious safety and security consequences. OIG observed the EAC meeting and noted that the DCM did not use the committee for its intended purpose, which was to have the members from various elements of the embassy contribute information, analysis, and expertise regarding the situation, as required in 12 FAH-1 H-232b(1). Rather, he told the participants what the embassy's message would be, which effectively shut down any information-sharing or discussion among the EAC members. OIG advised the DCM of the need to conduct EAC meetings in accordance with Department standards and he said he would do so in the future. Two weeks later, OIG observed the DCM's leadership of another EAC meeting, which aligned with Department requirements.

### ***Embassy's Process to Update the Emergency Action Plan Was Inadequate***

OIG found that Embassy Libreville's process to update its emergency action plan was inadequate. The DCM, as EAC chair, did not provide direction or deadlines to embassy staff for

updating the plan, as required by Department guidance. When OIG asked why he had yet to take such steps, the DCM replied that it was the Regional Security Officer's responsibility. Guidance in 12 FAH-1 H-721, however, states it is the responsibility of the EAC to complete emergency preparedness activities, and 12 FAH-1H-231b specifically states that the DCM chairs the EAC. OIG advised the DCM on the importance of his leading this process. As the updated plan was not yet due at the time of the inspection and the DCM indicated he would take the appropriate steps, OIG did not make a recommendation on this issue.

## **Developing and Mentoring Foreign Service Professionals**

### ***Ambassador, Deputy Chief of Mission Failed to Establish Work Requirements for American Personnel***

Neither the Ambassador nor the DCM followed Department guidelines regarding completion of work requirements for American staff. Specifically, at the time of the inspection, the Ambassador and the DCM had not established written work requirements for any of their subordinates within 45 days of the beginning of the rating cycle, as required by 3 FAH-1 H-2815.1a(1). Developing work requirements ensures that both the supervisor and subordinate participate in the process to develop a mutual understanding of the expectations for the subordinate's work and how it aligns with the embassy's goals and priorities. The DCM told OIG he was unfamiliar with Foreign Service performance management requirements because, in his previous assignment, he had only supervised Civil Service employees. Failure to establish work requirements in a timely manner disadvantages employees and can harm operations. Without clear expectations set at the beginning of the performance cycle, employees risk not understanding how to meet or exceed their supervisor's expectations to achieve organizational objectives.

**Recommendation 6:** Embassy Libreville should comply with Department standards for establishing work requirements for American staff. (Action: Embassy Libreville)

### ***Ambassador and Deputy Chief of Mission Did Not Provide Adequate Guidance and Direction to American Employees***

In addition to a lack of established work requirements, the Ambassador and the DCM did not provide adequate day-to-day guidance and direction to the American employees they directly supervised. For example, OIG found the DCM canceled scheduled monthly meetings with the Public Affairs Officer and failed to reschedule them. He also did not provide clear guidance on priorities to the Political/Economic Section chief, who was overwhelmed with work demands due to a long staffing gap in the section. In addition, although the DCM is an experienced consular officer, he did not provide guidance to the Consular Section chief, who was on her first tour as a consular manager. The Ambassador agreed with OIG that the DCM did not provide guidance and direction to his direct reports. The Ambassador also acknowledged, however, that he did not provide clear guidance and direction to the DCM. Guidelines in 3 FAM 1214b(3) and (8) require leaders to provide clear and concise guidance, as well as to encourage personal and professional development through mentoring, coaching, and other opportunities. Inadequate guidance can impede employees' professional development.

**Recommendation 7:** The Bureau of African Affairs should require the Ambassador and the Deputy Chief of Mission to comply with Department guidelines for providing guidance to the American employees they supervise. (Action: AF)

***Employees Commented Favorably on First- and Second-Tour Employee Program***

The DCM oversaw the embassy's First- and Second-Tour employee development program as directed by 3 FAM 2242.4. The employees in the program, who did not directly report to the DCM, commented favorably to OIG on the DCM's involvement in the program, which focused on bringing in speakers from outside the embassy. OIG encouraged the employees and the DCM to expand the range of activities to ensure the employees develop a wide variety of diplomatic skills.

**São Tomé and Príncipe**

OIG found deficiencies with the operations in São Tomé and Príncipe and with Embassy Libreville's support of those operations. Many of the deficiencies stemmed from the fact that the Department never formally established the office. Consequently, neither the Department nor the embassy addressed issues involving oversight, public diplomacy programs, consular support, and security. These issues are discussed below and in the Consular Affairs section of this report and in the companion classified report.

***Embassy Established São Tomé and Príncipe Office Without Department Authorization***

Embassy Libreville established an office in São Tomé and Príncipe without the required Department authorization. The embassy began hiring LE staff for the office in 2001 and acquired and equipped office space co-located with the USAGM transmitting station in São Tomé. Department guidance in 2 FAM 411 states that the final decision to open, close, or change the status of a consular post, consular agency, branch, or special office is made by the Under Secretary for Management.

The Department's Official List of Offices Opened or Closed, maintained by the Bureau of Human Resources, dates back to 1970 and does not include an office in São Tomé and Príncipe. Officials from the Bureau of Human Resources told OIG that the São Tomé office had no official post status. Officials in the Bureau of African Affairs said they were aware of the office, but neither the bureau nor the embassy could provide OIG with any evidence that the Department had formally authorized it.

The failure in 2001 to follow the established process for opening an overseas office, combined with more than 15 years of both Department and embassy officials authorizing activities and directing resources to an office that did not officially exist in Department records, contributed to the office's shortcomings in oversight, safety, consular activities, and security and management controls discussed throughout this report.

**Recommendation 8:** The Bureau of African Affairs should follow Department guidelines to seek authorization to establish an office in São Tomé and Príncipe. (Action: AF)

***Perimeter Fence at São Tomé U.S. Agency for Global Media Facility Created Safety Issue***

The perimeter fence at the São Tomé USAGM transmitting station did not prevent public access to the property. The station manager told OIG the perimeter fence, which consists of barbed wire approximately 3 feet high, does not provide a sufficient deterrent to local residents who picnic in the open fields around the antennas. According to 15 FAM 962e, transmitting antennas are environments with a high potential for mishaps or occupational illnesses. Guidance in 15 FAM 963d moreover requires Department employees to investigate and assess an environment they believe constitutes a hazard to health or safety. Failure to address this issue could pose a hazard for members of the public who access the station grounds.

**Recommendation 9:** U.S. Agency for Global Media, in coordination with Embassy Libreville and the Bureau of Overseas Buildings Operations, should improve the perimeter fence around the transmitting station in São Tomé. (Action: USAGM, in coordination with Embassy Libreville and OBO)

***American Corner in São Tomé Did Not Meet Department Standards***

OIG visited the embassy's American Corner<sup>3</sup> in São Tomé and found it contained outdated equipment and resources, such as cassette tapes, and lacked sufficient programming.<sup>4</sup> The embassy's memorandum of understanding with the host institution, the University of São Tomé and Príncipe, expired in June 2017 and had yet to be renewed. According to the expired memorandum, the Corner should remain open to the public for at least 20 hours a week. However, OIG found that the Corner was closed most of the time. A sign posted on the Corner door directed visitors to another room to obtain the key to open the Corner, and the coordinator told OIG he rarely went into the Corner unless someone made an appointment in advance.<sup>5</sup> Embassy Libreville knew of these problems but did not make addressing them a priority. These deficiencies increased the risk that the American Corner in São Tomé would not meet mission goals.

**Recommendation 10:** Embassy Libreville should comply with Department standards in managing the American Corner in São Tomé. (Action: Embassy Libreville)

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<sup>3</sup> American Corners are partnerships with host-country institutions and are governed by a memorandum of understanding between the institution and a U.S. embassy or consulate. Embassy Libreville closed the American Corner in Port Gentil, Gabon, in August 2018 and planned to officially open a Corner in Libreville in November or December 2018, after the end of the on-site portion of this inspection.

<sup>4</sup> The Bureau of International Information Programs' Office of American Spaces, "The Standards for American Spaces," January 1, 2016, contains guidance to embassies and consulates on the standards of services and programs that American Spaces should offer.

<sup>5</sup> The coordinator is a University of São Tomé and Príncipe professor whose job description included managing the American Corner.

## POLICY AND PROGRAM IMPLEMENTATION

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OIG assessed Embassy Libreville's policy and program implementation through a review of the Political/Economic Section's advocacy and analysis work, the management of foreign assistance grants, 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/Economic Section**

OIG reviewed the Political/Economic Section's policy implementation, reporting and advocacy, and Leahy vetting,<sup>6</sup> and found the section's operations generally conformed to Department requirements. However, OIG identified two deficiencies, as discussed below.

#### ***Embassy Frequently Missed Deadlines for Required Reports***

OIG reviewed Embassy Libreville's eight annual Department-required reports for 2018 and found the embassy only met its deadline on the Human Rights Report.<sup>7</sup> In addition, the embassy missed all deadlines for the seven annual reports OIG reviewed for São Tomé and Príncipe. As discussed in the Executive Direction section of this report, the Front Office did not give clear guidance on priorities to the Political/Economic Section chief, which contributed to the missed reporting deadlines. The embassy's failure to meet these internal annual deadlines increases the risk that the Department will not meet its reporting obligations to Congress.

**Recommendation 11:** Embassy Libreville should issue annual Department-required reports in accordance with Department guidance. (Action: Embassy Libreville)

#### ***Embassy's Leahy Vetting Was Not Timely***

The embassy failed to meet Department guidelines for timely submissions of Leahy vetting requests to identify potential human rights abuses. Specifically, between November 20, 2017, and September 15, 2018, OIG found that 297 (92 percent) of the embassy's 324 Leahy vetting request submissions did not comply with the timeliness requirements in the Department's 2017 Leahy Vetting Guide. Embassy staff told OIG the slow response by Gabonese military officials to embassy information requests contributed to the failure in meeting processing timelines. During the inspection, the embassy updated its Leahy vetting standard operating procedures, including extending the period for the Gabonese military to respond, and received approval for

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

<sup>7</sup> The eight required annual reports for Gabon OIG reviewed are: The Human Rights Report; the International Religious Freedom Report; Trafficking in Persons Report; the Department of Labor's annual Findings on the Worst Forms of Child Labor; the Fiscal Transparency Review; the report on Investment Disputes and Settlements; the update on the African Growth and Opportunity Act; and the E.N.D. Wildlife Trafficking Strategy. Embassy Libreville is required to submit the same reports for São Tomé and Príncipe except the E.N.D. Wildlife Trafficking Strategy.

the new procedural template and its revised timelines from the Department. As a result, OIG did not make a recommendation to address this issue.

## Foreign Assistance

### ***Embassy Did Not Properly Manage Foreign Assistance Grants***

Embassy Libreville did not manage its foreign assistance grants in accordance with Department standards. From February 1, 2017, to September 30, 2018, the embassy administered 34 grants to entities in both Gabon and São Tomé and Príncipe totaling \$358,015.<sup>8</sup> OIG reviewed 21 of the grant files (total value \$272,600), including all grants in which the U.S. Government share of funding was more than \$8,000. Fourteen of the grants reviewed had been completed, while work was ongoing for the remaining seven grants. OIG found that many grant files lacked required documents, including risk assessments and monitoring plans.<sup>9</sup> In addition, there was no documentation in these same files showing that the embassy made the required check of the System for Award Management<sup>10</sup> to ensure the recipient was not excluded from doing business with the U.S. Government. The embassy also had not entered the information it did have into the State Assistance Management System Overseas system<sup>11</sup> in a timely manner, as required. Furthermore, files for the completed grants did not include close-out documentation. All of the files reviewed also lacked documentation of transfer of responsibilities to a certified grants officer when the former grants officer left Gabon. Due to these deficiencies with the 21 grants reviewed, OIG questions \$272,600 in foreign assistance expenditures.

These deficiencies were exacerbated by the grants officers' and grants officer representative's unfamiliarity with the documentation requirements in place at the time the grants were issued.<sup>12</sup> OIG advised the employees on federal assistance policy requirements, including proper procedures to close out grants, and suggested they reconsider issuing grants if the

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<sup>8</sup> All but one of the grants reviewed were part of the Ambassador's Special Self-Help fund, which provides small grants to assist community development projects and aims to improve basic economic or social conditions in local communities. The other, a cooperative agreement valued at \$84,000, promoted training in São Tomé and Príncipe on elections and human rights.

<sup>9</sup> 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).

<sup>10</sup> 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.

<sup>11</sup> Office of the Procurement Executive, Federal Assistance Directive, Chapter 1 (May 2017) and cable 16 STATE 127862, "Deployment and Mandatory Use of the Overseas State Assistance Management System (SAMS Overseas) for Federal Financial Assistance," November 30, 2016.

<sup>12</sup> 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.

responsible officers cannot devote sufficient time to their oversight duties. Failure to properly administer grants risks the misuse or waste of U.S. Government funds.

**Recommendation 12:** Embassy Libreville should verify and document that grant recipients were eligible to receive \$272,600 in foreign assistance funds and that the funds were used for the intended purpose. If the recipients are deemed ineligible or funds were not used for the intended purpose, Embassy Libreville should recover the funds in accordance with the grant agreements. (Action: Embassy Libreville)

## **Public Diplomacy**

OIG found that the Public Diplomacy Section's strategic planning, knowledge management, section leadership, and cultural programs generally met Department requirements. However, OIG identified deficiencies in media planning and grants administration, as discussed below.

### ***Embassy Lacked Media Strategies***

Embassy Libreville did not have strategies for engaging the media or the public as required by 10 FAH-1 H-063.1. For example, although the embassy used Facebook and Twitter to engage local audiences, it did not have an overarching strategy for developing, implementing, and evaluating public diplomacy strategies for mission initiatives. Additionally, the Ambassador and the Public Affairs Officer did not meet to develop a strategy that would build upon past programming to maintain and reinforce an effective dialogue with foreign audiences. As a result of this lack of coordination, the Public Diplomacy Section had no advance notice of at least one major, pre-planned Ambassadorial press engagement. Without comprehensive strategies for traditional and social media outreach that are integrated with Front Office priorities, the embassy cannot adequately link content to mission objectives or measure return on the embassy's investment of time and resources.

**Recommendation 13:** Embassy Libreville should implement strategies for engaging with the media and using social media, as required by Department standards. (Action: Embassy Libreville)

### ***Embassy Internal Mission Media Policy Was Out of Date***

The embassy last updated its internal media policy, which establishes standard operating procedures for engaging journalists, in 2015. According to the Department's Public Affairs Officer Handbook, officers should establish and distribute such a policy upon arrival in country to ensure intra-embassy coordination in managing media relations. Failure to regularly circulate updated guidelines can compromise consistency in public messaging, especially in an emergency. During the inspection, OIG advised the Public Affairs Officer to update the internal mission media policy. She did so and disseminated the document to all mission personnel in November 2018. As a result, OIG did not make a recommendation to address this issue.



### ***Public Diplomacy Grants Management Did Not Comply With Department Standards***

OIG reviewed the Public Diplomacy Section's three grants, issued between February 2017 and September 2018 and totaling \$5,100. OIG found the grant files lacked documentation of risk assessments and monitoring plans, required monitoring visits, and closeout reports, as required by Department guidance.<sup>13</sup> In addition, none of the three grants had been entered correctly into the Overseas State Assistance Management System. OIG found that some required actions, including monitoring visits, had been completed but incorrectly documented. After OIG raised these issues, the Public Diplomacy Section worked with the grantees to prepare or correct the necessary documents and then upload them to the State Assistance Management System, thus correctly closing out the three files. As a result, OIG did not make a recommendation to address this issue.

### **Consular Affairs**

OIG reviewed the Consular Section's implementation and oversight of consular operations, including leadership, American citizen services, crisis preparedness, management controls, visa services and processing, and anti-fraud programs. The Consular Section, which consisted of a section chief, one First- and Second-Tour officer, and two LE staff members, processed 3,381 nonimmigrant visa and 49 immigrant visa applications, 61 passport applications, and 1 application for a Consular Report of Birth Abroad in FY 2017. The two American officers met weekly to review nonimmigrant issuance and refusal rates and the week's more complicated cases, as recommended by the Bureau of Consular Affairs' guidance on making "data driven decisions."

In general, OIG found that all programs complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions noted below. OIG also advised the section on minor issues concerning case management, nonimmigrant visa referrals, cash accountability, and outreach programs.

### ***Consular Crisis Preparedness Plans Did Not Meet Department Standards***

The embassy's consular crisis preparedness plans did not meet Department standards in 7 FAM 1811c and 7 FAM 071a, which require the embassy to have an American Liaison Network.<sup>14</sup> The Consular Section chief attributed the delay in switching from the previous warden system to the new American Liaison Network to a reluctance by prospective American citizen volunteers to sign the new mandatory memorandum of agreement, which was more detailed than the agreement used under the warden system. In addition, the section chief had yet to have

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<sup>13</sup> One grant was subject to the 2016 Federal Assistance Policy Directive and the 2015 Procedural Guide for Grants and Cooperative Agreements to Non-Federal Entities Not Recognized as Foreign Public Entities. The other two grants were subject to the revised 2017 Federal Assistance Directive or newer revisions.

<sup>14</sup> In 2018, the Department replaced its warden system with the American Liaison Network, a country-based network of volunteers composed of representatives from key U.S. citizen constituencies, including faith groups, business communities, retirees, and students. The American Liaison Network facilitates regular two-way communication between embassies and U.S. citizen constituencies abroad on topics such as security, health, voting, and travel.

substantive discussions regarding crisis planning within the embassy or with the Government of Gabon. Guidance in 7 FAM 1811-1813 provides considerable direction to consular officers in planning for consular crisis management, including instructions to use the country team and Emergency Action Committee meetings to ensure other sections are well versed in the consular role in a crisis. The guidance also instructs the consular section chief to obtain host country emergency contingency plans and lists of local contacts who will be involved in a crisis. Failure to meet crisis preparedness requirements puts U.S. citizens and embassy employees at risk in a major crisis.

**Recommendation 14:** Embassy Libreville should update its consular crisis preparedness plans in accordance with Department standards. (Action: Embassy Libreville)

***Embassy's Backup Consular Officer Plan Inadequate***

The embassy did not have an adequate plan to provide a backup to the Consular Section chief when the embassy loses its second consular officer position in summer 2019.<sup>15</sup> At the time of the inspection, the Political/Economic Section chief was the embassy's only officially designated backup consular officer. However, it is unlikely this officer would have the time to assist with consular operations during most foreseeable crisis situations. OIG advised the embassy Front Office that it needed to identify another officer as the backup consular officer and request training for that officer if necessary. The Front Office agreed, and OIG therefore did not make a recommendation to address this issue.

***Consular Officers Lacked Line of Sight of Consular Cashier's Booth***

Consular officers could not visually monitor the work of the consular cashier, a key internal control. The location of the consular cashier window within the cashier booth made it impossible to monitor the cashier's activities without standing directly in front of the window. According to 7 FAH-1 H-282(24), consular sections should have a cashier booth that allows line-of-sight supervision, while 7 FAH-1 H-281e states that effective line of sight allows officers and supervisors to easily monitor operations, enabling cleared American supervisors to physically observe work areas. The lack of line of sight of the cashier's booth increases the risk that cashier malfeasance could occur without a manager's knowledge. OIG concluded the only practical solution that would address this concern would be for the embassy to install a closed-circuit TV monitoring system.

**Recommendation 15:** Embassy Libreville should install a closed-circuit TV monitoring system or other means to enable consular managers to observe the activities within the consular cashier's booth. (Action: Embassy Libreville)

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<sup>15</sup> Based on workload projections, the Bureau of Consular Affairs planned to eliminate the Consular Section's First- and Second-Tour officer position when the incumbent completes her assignment in 2019.

### ***Consular Staff Improperly Entered Consular Cashier Booth***

Consular employees improperly entered the consular cashier booth to access consular files and equipment stored there. According to 4 FAH-3 H-393.4.3a and b, access to the consular cashier booth should be limited in order to properly safeguard funds. The section chief was unaware of the requirement and removed the files and equipment during the inspection. She also agreed to issue a policy directive to the staff stating that only equipment and files related to cashiering could be stored in the booth. Because of these actions, OIG did not make a recommendation on this issue.

### ***Embassy's Consular Internet Pages Did Not Meet Department Standards***

The embassy did not properly maintain its consular internet pages. OIG found that the pages provided conflicting information in English and French and did not provide information in Portuguese, the language of São Tomé and Príncipe. According to 7 FAH-1 H-833a, embassies should maintain their websites to ensure the information is up-to-date, clear, and accurate and presented in the local language or languages in addition to English. The Consular Section chief told OIG that she prioritized other issues over updating the pages. A lack of accurate and up-to-date information on the consular internet pages risks causing delays for people seeking emergency assistance from the embassy.

**Recommendation 16:** Embassy Libreville should update its consular internet pages to ensure the information complies with Department standards. (Action: Embassy Libreville)

### ***Embassy Lacked Consular Information at Public Entrance to Consular Section***

A signboard at the Consular Section's public entrance did not provide any information about consular services, such as office hours and holiday schedules, emergency after-hours phone numbers, and the embassy's internet address. Guidance in 7 FAH-1 H-263.8b, however, states that consular sections should use outside signs to provide directions and current information. Embassy employees said the signboard had been empty since the embassy moved into the facility in 2012. The section chief told OIG she was unaware of the requirement to keep the signboard updated. Without providing accurate and up-to-date information at the section's public entrance, there may be delays for people seeking emergency assistance. OIG did not make a recommendation because the Consular Section posted the necessary information during the inspection.

## **RESOURCE MANAGEMENT**

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OIG reviewed the embassy's operations in financial management, human resources, general services, and facilities management. Embassy staff repeatedly stated to OIG that the lack of cleared American administrative support personnel, lengthy delays in filling vacancies in LE staff positions, and poor performance by LE staff hindered the Management Section's performance. OIG's observations and findings are detailed below.

## Human Resources

### ***Embassy Did Not Advertise Eligible Family Member Positions***

At the time of the inspection, the embassy had four vacant eligible family member positions that it had not advertised. In addition, another family member was due to transfer within a month, but the embassy had not advertised for a replacement. Management staff told OIG they were reluctant to advertise any eligible family member positions because they feared pressure to select the DCM's spouse for one of the positions. (This is discussed in more detail in the Executive Direction section.) OIG advised the embassy to advertise and to comply with Department standards if the DCM's spouse applies for the vacant positions. Failure to advertise eligible family member positions hindered the embassy's operational efficiency.

### ***Embassy Did Not Address Locally Employed Staff Performance Issues***

OIG found that supervisors did not address poor performance by some LE staff members in several embassy sections. The American supervisors of these local employees acknowledged to OIG that they had not addressed long-standing performance issues through counseling and the performance improvement process, as required in the Department's Locally Employed Staff Performance Management Policy Guidebook. The supervisors told OIG that they had not had time to start corrective actions after identifying performance problems. Failure to address poor performance posed an internal control risk for the embassy and exacerbated the difficulties faced by American supervisors in fulfilling their responsibilities.

**Recommendation 17:** Embassy Libreville should address poor performance by locally employed staff in accordance with Department standards. (Action: Embassy Libreville)

### ***Embassy Did Not Use the Department's Electronic Recruitment Application***

The embassy did not implement the Department's web-based Electronic Recruitment Application (ERA) and instead used a manual process for recruiting and hiring LE staff. ERA automates the recruitment process, allowing human resources staff to efficiently identify qualified candidates from large pools of applicants while maintaining internal controls. Although the Department authorized Embassy Libreville to use ERA in February 2018, after it completed training and set up procedures, the embassy did not do so. The Management Officer told OIG that the embassy had delayed ERA implementation pending the arrival of a new Human Resources Officer, which occurred immediately before the inspection. Based on OIG's advice, the embassy said it planned to begin using ERA soon after the inspection ended.

### ***Special Immigrant Visa Program Did Not Meet Department Standards***

The embassy's standard operating procedures for the Special Immigrant Visa program and its management notice regarding the program were out of date. The Special Immigrant Visa program allows LE staff members with at least 15 years of "faithful service" to apply for immigrant visas for themselves and their spouses and children if the LE staff member meets criteria set forth in 9 FAM 502.5-3(C)(2) criteria. The embassy issued its management notice for

the Special Immigrant Visa program in 2013, but the Department most recently updated the program's guidance in 9 FAM 502.5-3 in October 2018. Updating the embassy's Special Immigrant Visa program instructions and procedures in writing promotes greater operational effectiveness. The Consular Section chief told OIG she had not had time to focus on this issue. Without updating and publicizing the Special Immigrant Visa program and revising the standard operating procedures, LE staff may not be aware that they can apply for a benefit for which they are eligible by law.

**Recommendation 18:** Embassy Libreville should update its management notice on the Special Immigrant Visa program and revise its standard operating procedures on the program in accordance with Department standards. (Action: Embassy Libreville)

### ***Embassy Provided Unauthorized Housing to Local Employee***

The embassy provided housing on the Chief of Mission Residence compound to an LE staff driver and his family, although the embassy's local compensation plan did not provide for any housing benefits for employees. According to 3 FAM 7521, all benefits to LE staff must be specifically authorized in the local compensation plan. Embassy staff told OIG the embassy provided the housing because the driver was required to work long hours. Providing a form of compensation to only one employee could lead to a perception by other employees of unfair treatment and undermine the legitimacy of the local compensation plan.

**Recommendation 19:** Embassy Libreville should comply with its local compensation plan and cease providing housing for a locally employed staff member at the Chief of Mission Residence compound. (Action: Embassy Libreville)

## **General Services**

### ***Embassy Improperly Paid Customs Fees on Diplomatic Shipments***

The embassy paid customs fees imposed by the Government of Gabon in contravention of Article 36 of the Vienna Convention on Diplomatic Relations and guidance in 2 FAM 240, which requires the receiving state (Gabon) to grant diplomatic missions an exemption from customs duties. Embassy staff told OIG the Gabon customs office imposed a 3 percent fee based on the estimated value of the shipments and that the embassy had been paying these fees for decades. The embassy was unaware of the exemption on customs fees for diplomatic missions. OIG concluded that, because the embassy did not track customs fee payments, it would be impossible to attempt to recoup these charges from the host government. Failure to obtain an exemption from custom fees increases the embassy's operating costs and violates the principle of reciprocity in diplomatic relations.

**Recommendation 20:** Embassy Libreville should cease paying customs fees for U.S. diplomatic shipments to the Government of Gabon. (Action: Embassy Libreville)

### ***Embassy Did Not Implement Some Motor Vehicle Program Management Controls***

The embassy did not implement some motor vehicle program management controls required by Department standards. Specifically:

- The embassy did not monitor actual operating costs of official vehicles, as required by 14 FAH-1 H-816.1-2 and 14 FAH-1 H-814.2-2. For example, from October 1, 2017, through October 29, 2018, motor vehicle records showed that no fuel had been used by the motor pool despite the fact that the embassy used official vehicles every day and procurement records showed that fuel had been purchased.
- The embassy mechanic performed maintenance and repairs on personal vehicles owned by American employees on the embassy compound in violation of 28 Code of Federal Regulations Section 45.4(a).
- The embassy did not control access to motor vehicle keys, as required by 14 FAM 436.3c.

Insufficient oversight by embassy management resulted in a lack of comprehensive management controls in the motor pool, increasing the risk of theft or unauthorized use of official vehicles and exposing the embassy to potential liability.

**Recommendation 21:** Embassy Libreville should implement management controls for its motor vehicle program in accordance with Department standards. (Action: Embassy Libreville)

### ***Embassy Did Not Consistently Document Property Transfers to Residences***

In a review of Integrated Logistics Management System property records,<sup>16</sup> OIG found that the embassy failed to record 28.8 percent of its nonexpendable property transfers to residences from October 2016 through April 2018. Guidance in 14 FAM 416.3a requires the embassy to document property transfers, occupants to sign for receipt of the property, and the embassy to maintain signed forms in residential inventory files. OIG's discussions with embassy staff indicated that they did not understand property transfer procedures. Failure to document nonexpendable property transactions increases the risk of property loss.

**Recommendation 22:** Embassy Libreville should document all nonexpendable property transfers in accordance with Department standards. (Action: Embassy Libreville)

### ***Embassy Maintained Excess Expendable Supply Stock***

The embassy maintained excess office and maintenance expendable supply stock, such as envelopes and fuel and oil filters, contrary to Department guidance. At the time of the inspection, the embassy had issued only 62 percent of its expendable supply inventory in the

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<sup>16</sup> The Integrated Logistics Management System is an integrated web-based system that encompasses all of the Department supply chain functions in one system.

previous 12 months. Guidance in 14 FAH-1 H-418.1 recommends that inactive items be removed from the stock program. Prior to the inspection, embassy staff began to comprehensively review supply stocks, however, the embassy's failure to monitor its expendable supply inventory resulted in wasted Government resources through the procurement of unnecessary items that deteriorated in Libreville's harsh environmental conditions. This issue should be addressed on an ongoing basis.

**Recommendation 23:** Embassy Libreville should implement management controls to reduce its expendable supply stock in accordance with Department standards. (Action: Embassy Libreville)

## **Facilities Management**

### ***Embassy's Residential Safety Program Did Not Meet Department Standards***

The embassy's residential safety program did not meet Department standards. OIG's inspection of five residences found the embassy had not installed ground-fault circuit interrupters for all outlets near sinks, as required by 15 FAM 971.1(6). In addition, although the embassy properly placed fire extinguishers in residential units, facilities management staff did not inspect and service the fire extinguishers annually, as required by 15 FAM 842a. The embassy told OIG it was experiencing lengthy delays in filling vacant Facilities Management LE staff positions, which impeded its ability to bring its residences into full compliance with Department standards. Notwithstanding this explanation, the issue should be addressed, as failure to implement a fully compliant residential safety program increases the risk of injury to residents and visitors.

**Recommendation 24:** Embassy Libreville should bring its residential safety program into full compliance with Department standards. (Action: Embassy Libreville)

## **Financial Management**

### ***Embassy Lacked Required Procedures for Employee Accounts Receivable***

The embassy did not have procedures to record and track employee receivables, such as charges for internet service, personal phones, unofficial use of motor pool services, or automobile fuel, as required by 4 FAM 033.2-6 and 4 FAM 232.1-2 through 1-7. Several Management Section offices issued bills and instructed employees to pay the embassy cashier without informing the cashier or the Financial Management Office, leaving the Financial Management Office unable to ensure bills were actually paid. Without a system to record and track employee receivables, the embassy was at risk of not collecting all funds that should be reimbursed to the U.S. Government.

**Recommendation 25:** Embassy Libreville should implement procedures to accurately record and track employee receivables as required by Department standards. (Action: Embassy Libreville)

## INFORMATION MANAGEMENT

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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 identified a few administrative noncompliance issues, including dedicated internet network registration and other administrative requirements, which it advised the Information Management staff to correct. Overall, however, OIG determined that Embassy Libreville's Information Management programs and services met the day-to-day computing and communications needs of the embassy, with the exceptions noted below.

### ***Embassy Did Not Establish a Local Information Technology Configuration Control Board***

The embassy did not establish a local Information Technology Configuration Control Board to govern all systems equipment operated on the embassy's network. Department standards in 5 FAM 862.1a state that an embassy that maintains its own IT systems, as does Embassy Libreville, must establish a local control board to ensure that the hardware, software, and network components installed on the local area network do not adversely affect existing infrastructure. Information Management staff were aware of this requirement but had not given priority to establishing an embassy board. The lack of a local IT Configuration Control Board can put Department computer systems at risk for outages, loss of information, and damage to computer equipment.

**Recommendation 26:** Embassy Libreville should establish a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Libreville)

### ***Inoperable High-Frequency Radios at Embassy and Alternate Command Center***

The two high-frequency radios at the embassy and the alternate command center were inoperable, contrary to Department standards in 5 FAH-2 H-742a. Non-functioning equipment could prevent the embassy from communicating in the event of an emergency or crisis. The Information Management staff, which lacked the expertise to repair the high-frequency radios, contacted the Regional Information Management Center in Johannesburg during the inspection for assistance. Because the center had shipped new radios to Embassy Libreville, OIG did not make a recommendation to address this issue.

### ***Information Systems Security Officer Activities Did Not Meet Department Standards***

Embassy Libreville's Information Systems Security Officer (ISSO) did not record information system audits or complete reviews included in the Department's ISSO checklist. This is contrary to Department policy. Guidance in 12 FAM 632.5a requires the ISSO to maintain information system audit records, which should include reviews of 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 activities. OIG issued a Management Assistance Report in May 2017<sup>17</sup> 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,<sup>18</sup> 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.

Nonetheless, OIG determined that the Information Management staff had not prioritized cybersecurity needs, which led to them not performing these duties. Without regularly scheduled ISSO reviews and documented records, Department networks are vulnerable to potential unauthorized access and malicious activity.

**Recommendation 27:** Embassy Libreville should require the Information Systems Security Officer to perform and document information systems security duties in accordance with Department standards. (Action: Embassy Libreville)

***Embassy Lacked Standard Operating Procedures for Records Management***

Embassy Libreville did not have standard operating procedures to effectively manage its records. Guidance in 5 FAM 414.5 requires the embassy to implement and administer Department records policies, standards, systems, and procedures. The embassy's records policies and procedures also should adhere to guidance in 5 FAM 414.8, which requires the embassy to preserve documentary materials or regularly dispose of them according to schedules. During the inspection, OIG found boxes of documents in the warehouse dating back to 2013 that had not been reviewed for appropriate disposition. Without an effective records management program, the embassy risks not archiving important data for research and historical insights into policy analysis and decision-making.

**Recommendation 28:** Embassy Libreville should implement standard operating procedures for a records management program that complies with Department standards. (Action: Embassy Libreville)

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

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

## RECOMMENDATIONS

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OIG provided a draft of this report to Department and U.S. Agency for Global Media stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Libreville, the Bureau of African Affairs, the Director General of the Foreign Service and Director of Human Resources, and the U.S. Agency for Global Media. The Department's and the U.S. Agency for Global Media's complete responses can be found in Appendix B. The Department and the U.S. Agency for Global Media also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** The Director General of the Foreign Service and Director of Human Resources should review whether anti-nepotism violations occurred at Embassy Libreville and, based on the results of its review, take appropriate action. (Action: DGHR )

**Management Response:** In its May 29, 2019, response, the Director General of the Foreign Service and Director of Human Resources disagreed with this recommendation. The Director General of the Foreign Service and Director of Human Resources noted that no further action is necessary as the Deputy Chief of Mission has left the Department.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the employee involved no longer works for the Department.

**Recommendation 2:** Embassy Libreville should comply with Department guidelines regarding the acceptance of gifts. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville disagreed with this recommendation. The embassy noted that the travel was not provided as a gift and that travel orders were issued for the Ambassador to accompany Board of Directors members to observe the offshore drilling site by helicopter and return by commercial aircraft. The embassy also noted that actions taken by the Ambassador and embassy staff to facilitate access of a U.S. company to the appropriate Gabonese Government officials were consistent with the guidance provided in 2 Foreign Affairs Manual 962.8 that the entity was not "...seeking substantial assistance from post (e.g., nonroutine consular assistance or nonroutine commercial advocacy or assistance) nor would be substantially affected by a pending or reasonably anticipated post official action...."

**OIG Reply:** OIG considers the recommendation unresolved. Notwithstanding the embassy's rationale, the Ambassador's acceptance of travel on an aircraft chartered by a company for which the Ambassador actively advocated could create the appearance of partiality or favoritism on the part of the U.S. Government. Furthermore, Department standards in 2 Foreign Affairs Manual 962.12h state, "In general, full-time executive branch presidential appointees, including ambassadors, may not travel on aircraft or use overnight accommodations owned, chartered, or maintained by a company primarily for its use if the

company is regulated or doing business with the Department. While exceptions to this rule do exist for certain types of travel, the White House Counsel generally must authorize such exceptions.” The recommendation can be closed when OIG receives and accepts documentation of Embassy Libreville’s compliance with Department guidelines regarding the acceptance of gifts.

**Recommendation 3:** Embassy Libreville should comply with Department instructions and guidance on reporting significant political, economic, and societal developments. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville disagreed with this recommendation. The embassy noted it complies with reporting guidance and dispatched cables and communications on significant political, economic, and societal developments through every channel available despite a severely depleted formal reporting staff.

**OIG Reply:** OIG considers the recommendation unresolved. During the inspection, OIG identified numerous instances where the Ambassador did not report the results of substantive meetings with business leaders, host government officials, and other senior contacts. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville is reporting on significant political, economic, and societal developments.

**Recommendation 4:** Embassy Libreville should implement a process for maintaining an ongoing system of management controls, including preparing the annual Chief of Mission Management Control Statement of Assurance, in accordance with Department guidance. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a process for maintaining an ongoing system of management controls, including preparing the annual Chief of Mission Management Control Statement of Assurance, in accordance with Department guidance.

**Recommendation 5:** Embassy Libreville should require the Deputy Chief of Mission to review nonimmigrant visa adjudications in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Deputy Chief of Mission reviews nonimmigrant visa adjudications in accordance with Department standards.

**Recommendation 6:** Embassy Libreville should comply with Department standards for establishing work requirements for American staff. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville established work requirements for American staff.

**Recommendation 7:** The Bureau of African Affairs should require the Ambassador and the Deputy Chief of Mission to comply with Department guidelines for providing clear and concise guidance to the American employees they supervise. (Action: AF)

**Management Response:** In its June 3, 2019, coordinated response with Embassy Libreville, the Bureau of African Affairs concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Ambassador and the Deputy Chief of Mission comply with Department guidelines for providing clear and concise guidance to the American employees they supervise.

**Recommendation 8:** The Bureau of African Affairs should follow Department guidelines to seek authorization to establish an office in São Tomé and Príncipe. (Action: AF)

**Management Response:** In its June 3, 2019, coordinated response with Embassy Libreville, the Bureau of African Affairs concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an authorization to establish an office in São Tomé and Príncipe.

**Recommendation 9:** U.S. Agency for Global Media, in coordination with Embassy Libreville and the Bureau of Overseas Buildings Operations, should improve the perimeter fence around the transmitting station in São Tomé. (Action: USAGM, in coordination with Embassy Libreville and OBO)

**Management Response:** In its June 5, 2019, response, the U.S. Agency for Global Media concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the U.S. Agency for Global Media improved the perimeter fence around the transmitting station in São Tomé.

**Recommendation 10:** Embassy Libreville should comply with Department standards in managing the American Corner in São Tomé. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation. The embassy noted that, in May 2019, it decided to close the American Corner in São Tomé and seek a more engaged host institution in a more central location.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville complies with Department standards in managing the American Corner in São Tomé.

**Recommendation 11:** Embassy Libreville should issue annual Department-required reports in accordance with Department guidance. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of annual Department-required reports issued in accordance with Department guidance.

**Recommendation 12:** Embassy Libreville should verify and document that grant recipients were eligible to receive \$272,600 in foreign assistance funds and that the funds were used for the intended purpose. If the recipients are deemed ineligible or funds were not used for the intended purpose, Embassy Libreville should recover the funds in accordance with the grant agreements. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation. The embassy noted an expected completion date of August 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of either the eligibility of the grant recipients and that the funds were used for the intended purpose or the recovery of the funds.

**Recommendation 13:** Embassy Libreville should implement strategies for engaging with the media and using social media, as required by Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville implemented strategies for engaging with the media and using social media.

**Recommendation 14:** Embassy Libreville should update its consular crisis preparedness plans in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville updated its consular crisis preparedness plans in accordance with Department standards.

**Recommendation 15:** Embassy Libreville should install a closed-circuit TV monitoring system or other means to enable consular managers to observe the activities within the consular cashier's booth. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville 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 Embassy Libreville installed a closed-circuit TV monitoring system within the consular cashier's booth.

**Recommendation 16:** Embassy Libreville should update its consular internet pages to ensure the information complies with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation. The embassy noted it does not have a staff member with the language skills to translate pages into Portuguese or a staff member who is proficient in website design. The embassy plans to seek additional resources from the Bureau of Consular Affairs to fully address this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville updated its consular internet pages to ensure the information complies with Department standards.

**Recommendation 17:** Embassy Libreville should address poor performance by locally employed staff in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that poor performance by locally employed staff is addressed in accordance with Department standards.

**Recommendation 18:** Embassy Libreville should update its management notice on the Special Immigrant Visa program and revise its standard operating procedures on the program in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an updated management notice and revised standard operating procedures on the Special Immigrant Visa Program.

**Recommendation 19:** Embassy Libreville should comply with its local compensation plan and cease providing housing for a locally employed staff member at the Chief of Mission Residence compound. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville complied with its local compensation plan.

**Recommendation 20:** Embassy Libreville should cease paying customs fees for U.S. diplomatic shipments to the Government of Gabon. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville ceased paying customs fees for U.S. diplomatic shipments to the Government of Gabon.

**Recommendation 21:** Embassy Libreville should implement management controls for its motor vehicle program in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville implemented management controls for its motor vehicle program.

**Recommendation 22:** Embassy Libreville should document all nonexpendable property transfers in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

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

**Recommendation 23:** Embassy Libreville should implement management controls to reduce its expendable supply stock in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville implemented management controls to reduce its expendable supply stock.

**Recommendation 24:** Embassy Libreville should bring its residential safety program into full compliance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation. The embassy noted an expected completion date of August 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville's residential safety program complies with Department standards.

**Recommendation 25:** Embassy Libreville should implement procedures to accurately record and track employee receivables as required by Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of procedures to accurately record and track employee receivables.

**Recommendation 26:** Embassy Libreville should establish a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville 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 Embassy Libreville established a local Information Technology Configuration Control Board in accordance with Department standards.

**Recommendation 27:** Embassy Libreville should require the Information Systems Security Officer to perform and document information systems security duties in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Libreville's Information Systems Security Officer performs information systems security duties in accordance with Department standards.

**Recommendation 28:** Embassy Libreville should implement standard operating procedures for a records management program that complies with Department standards. (Action: Embassy Libreville)

**Management Response:** In its June 3, 2019, response, Embassy Libreville concurred with this recommendation. The embassy noted an expected completion date of June 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of standard operating procedures for a records management program that complies with Department standards.

## PRINCIPAL OFFICIALS

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Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Joel Danies	3/2018
Deputy Chief of Mission	Randall Merideth	8/2017
<b>Chiefs of Sections:</b>		
Management	Keiji Turner	5/2017
Consular	Natalie Peterson	8/2017
Political/Economic	Diana Costa	4/2017
Public Affairs	Melissa Cotton	7/2016
Regional Security	Christopher McVay	9/2017
<b>Other Agencies:</b>		
Department of Defense		
Defense Attaché	Lt. Col. Charles Barton	7/2017
Office of Security Cooperation	LCDR Jason Bruce	11/2015
Department of Interior		
U.S. Fish and Wildlife Service	Russell Stanford	2/2017
U.S. Agency for Global Media Station in São Tomé and Príncipe		
Deputy Station Manager	Kurt Tuckerman	9/2016

**Source:** Embassy Libreville

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from September 4, 2018, to February 28, 2019,<sup>1</sup> in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by OIG for the Department and the 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 180 interviews and reviewed responses to 17 personal questionnaires.

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<sup>1</sup> This work was delayed because of the lapse in OIG's appropriations that occurred from 11:59 p.m. December 21, 2018, through January 25, 2019.

## APPENDIX B: MANAGEMENT RESPONSES

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June 3, 2019

UNCLASSIFIED

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

THROUGH:    AF - Tibor Nagy

FROM:         Embassy Libreville – Samuel R. Watson, Chargé d’Affaires, a.i.

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

Embassy Libreville has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG. Ambassador Joel Danies provided the responses for recommendations 2 and 3:

**OIG Recommendation 1:** The Director General of the Foreign Service and Director of Human Resources should review the reports of anti-nepotism violations at Embassy Libreville and, based on the results of its review, take appropriate action. (Action: DGHR)

**OIG Recommendation 2:** Embassy Libreville should comply with Department guidelines regarding the acceptance of gifts. (Action: Embassy Libreville)

***Management Response:*** *The actions taken by the Ambassador and Embassy staff to facilitate access of a U.S. company to the appropriate Gabonese Government Officials were consistent with the guidance provided in 2 FAM 962.8 that the entity was not “...seeking substantial assistance from post (e.g., nonroutine consular assistance or nonroutine commercial advocacy or assistance) nor would be substantially affected by a pending or reasonably anticipated post official action....” This company had contributed in previous years towards Post Fourth of July events. Travel orders were issued for the Ambassador to accompany Board of Directors members to observe offshore drilling site by helicopter and return by commercial aircraft in keeping with his regular duties to promote U.S. economic development, the travel was not provided as a gift.*

**OIG Recommendation 3:** Embassy Libreville should comply with Department instructions and guidance on reporting significant political, economic, and societal developments. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville disagrees with Recommendation 3. Embassy complies with reporting guidance and dispatched cables and communications on significant political, economic, and societal developments through every channel available at Post in spite of a severely depleted formal reporting staff. The critical events during that period were reported in timely and informative means. Embassy reported on significant economic and security events related to trafficking in animal parts and Gabon's participation in UN peacekeeping operations.

**IG Recommendation 4:** Embassy Libreville should implement a process for maintaining an ongoing system of management controls, including preparing the annual Chief of Mission Management Control Statement of Assurance, in accordance with Department guidance. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. The embassy has implemented the recommendation. The Front Office has stressed the importance of ensuring appropriate management controls with each section chief. The Front Office has designated the management officer as post management control officer. That officer is working with the Front Office to ensure that the annual Chief of Mission Management Control Statement of Assurance will be prepared in a timely manner in accord with Department standards.

**IG Recommendation 5:** Embassy Libreville should require the Deputy Chief of Mission to review nonimmigrant visa adjudications in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. The embassy has implemented the recommendation by ensuring that the DCM reviews nonimmigrant visa applications in a timely manner in accord with Department standards.

**IG Recommendation 6:** Embassy Libreville should comply with Department standards for establishing work requirements for American staff. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. The embassy has implemented the recommendation by ensuring that all supervisors establish work requirements in a timely manner in accordance with Department standards.

**IG Recommendation 7:** The Bureau of African Affairs should require the Ambassador and the Deputy Chief of Mission to comply with Department guidelines for providing clear and concise guidance to the American employees they supervise. (Action: AF)

**Management Response:** The Bureau concurs with this recommendation. The Chargé conveys clear and concise guidance to staff both in weekly country team meetings and in weekly meetings with section and agency heads and at other times as needed.

**IG Recommendation 8:** The Bureau of African Affairs should follow Department guidelines to seek authorization to establish an office in São Tomé and Príncipe. (Action: AF)

**Management Response:** *The Bureau concurs with this recommendation, and is working with relevant Department stakeholders to pursue authorization to regularize its presence in Sao Tome.*

**OIG Recommendation 9:** Embassy Libreville, in coordination with the Bureau of Overseas Buildings Operations and the U.S. Agency for Global Media, should improve the perimeter fence around the Voice of America transmitting station in São Tomé to comply with Department standards. (Action: Embassy Libreville, in coordination with OBO and USAGM)

**OIG Recommendation 10:** Embassy Libreville should comply with Department standards in managing the American Corner in São Tomé. (Action: Embassy Libreville)

**Management Response:** *Embassy Libreville concurs with the recommendation. The Public Affairs Section removed all outdated equipment and resources from the American Corner in São Tomé (STP) in February 2019; however, the issues of a lack of sufficient programming and irregular hours remained. In March 2019, University of São Tomé and Príncipe (USTP), chose to not sign a new memorandum of understanding and refused to pay for a coordinator for the space as required in the memorandum of understanding. After conferring with the Regional Public Engagement Specialist, Embassy Libreville decided in May 2019 to close the current STP American Corner and seek a more engaged host institution in a more central location.*

**OIG Recommendation 11:** Embassy Libreville should issue annual Department-required reports in accordance with Department guidance. (Action: Embassy Libreville)

**Management Response:** *Embassy Libreville concurs with the recommendation. The embassy has implemented the recommendation by submitting all reports on time or with approved extensions since the November 2018 OIG inspection. Despite the protracted vacancy in the Economic Officer position, the Political Chief reviews deadlines with the Front Office on a regular basis and continues to prepare political and economic reports in a timely manner for both Gabon and Sao Tome.*

**OIG Recommendation 12:** Embassy Libreville should verify and document that grant recipients were eligible to receive \$272,600 in foreign assistance funds and that the funds were used for the intended purpose. If the recipients are deemed ineligible or funds were not used for the intended purpose, Embassy Libreville should recover the funds in accordance with the grant agreements. (Action: Embassy Libreville)

**Management Response:** *Embassy Libreville concurs with the recommendation. Embassy Libreville continues to review grant files to verify grant eligibility and to ensure that all files contain required documents in compliance with the Foreign Assistance Directive. The embassy expects to complete this process by August 2019. Embassy staff have completed two site visits in Gabon and six site visits in Sao Tome of grantees since November 2018.*

**OIG Recommendation 13:** Embassy Libreville should implement strategies for engaging with the media and using social media, as required by Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. To clarify strategy, focus engagement, and provide clear guidance, the Public Affairs Section created two documents, "Requesting PAS Media Assistance" and a "Society Media Strategy." The Chargé d'Affaires a.i. and Public Affairs Officer meet weekly to discuss strategy and ensure that programming and media interaction is well integrated with Front Office priorities and Mission objectives.

**OIG Recommendation 14:** Embassy Libreville should update its consular crisis preparedness plans in accordance with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with this recommendation. The embassy now has additional Citizen Liaison Volunteers who have signed the State Department Memorandum of Agreement and is seeking to expand further the American Liaison Network. The embassy plans to have an embassy-wide crisis management exercise before the end of the calendar year. In conjunction with that exercise, the Consular Section will brief other embassy staff on the role of the Consular Section in responding to crises. The embassy will also include a discussion of consular roles in times of crisis in its orientation sessions for new officers. In addition, the Consular Section will continue to discuss consular roles as appropriate during Country Team and Emergency Action Committee meetings. The Consular Section has begun work to initiated meetings with host government officials responsible for coordinating the host country's response to emergencies. Through these meetings, the Consular Section will seek to understand host country emergency contingency plans and to expand its database of local contacts who might be of assistance during a crisis.

**OIG Recommendation 15:** Embassy Libreville should install a closed-circuit TV monitoring system or other means to enable consular managers to observe the activities within the consular cashier's booth. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with this recommendation. The Consular Section ordered a camera and monitor based upon discussion during the OIG inspection. The equipment has arrived and the Consular Section has submitted a work order for its installation which is expected to be completed by July 2019.

**OIG Recommendation 16:** Embassy Libreville should update its consular internet pages to ensure the information complies with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with this recommendation. The embassy has begun to update the content of consular internet pages but will require additional resources to fully address this recommendation. While the embassy recognizes the importance of up-to-date information, the Consular Section does not have a staff member with the language skills to translate website pages into Portuguese or a staff member who is proficient in website

*modification and design. As the American consular staff is about to be cut by 50%, the embassy will seek additional resources from the Bureau of Consular Affairs to address this recommendation. The completion date will depend on the availability of those resources and appropriate experts to update the internet pages.*

## **MANAGEMENT**

**OIG Recommendation 17:** Embassy Libreville should address poor performance by locally employed staff in accordance with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with this recommendation. The Front Office discusses staff performance with supervisors in weekly meetings. The embassy conforms to the processes established in the Performance Management Policy Guidebook. The Office of Human Resources (HR) has continued to provide assistance to supervisors seeking to address less than satisfactory performance when necessary through Performance Improvement Plans (PIPs). During the 2017-2018, performance rating period, nearly 7% of local employees were placed on Performance Improvement Plans (PIP). From November 2018 until the present, supervisors with the assistance of HR have placed three employees on PIPs. Furthermore, one LE Staff employee was terminated due to poor performance. In March 2019, the HR Office conducted an informative session for the local employees to reiterate Mission management expectations for performance standards. The HR office reviewed the indications and effects of poor performance as prescribed in the HR/OE policy guidebook and the possible HR actions resulting from continuous ineffective performance. The HR office explained the use of PIPs as a tool to correct poor performance.

**OIG Recommendation 18:** Embassy Libreville should update its management notice on the Special Immigrant Visa program and revise its standard operating procedures on the program in accordance with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. The Human Resources and Consular sections authored an updated Special Immigrant Visa program referencing 9 FAM 502.5-2. The program includes updated procedures, worksheets, and required forms. This was published as Management Policy 2019-04 on January 24, 2019.

**OIG Recommendation 19:** Embassy Libreville should comply with its local compensation plan and cease providing housing for a locally employed staff member at the Chief of Mission Residence compound. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. Management informed the locally employed staff member of requirements of the local compensation plan. The employee moved off the Chief of Mission Residence compound and into a private home in late January 2019.

**OIG Recommendation 20:** Embassy Libreville should cease paying customs fees for U.S. diplomatic shipments to the Government of Gabon. (Action: Embassy Libreville)



**Management Response:** Embassy Libreville concurs with the recommendation. The embassy is actively working with the Tax and Customs section of the Office of Foreign Missions (OFM) which is assessing these charges and will determine the appropriate next step.

**OIG Recommendation 21:** Embassy Libreville should implement management controls for its motor vehicle program in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation and is implementing measures for greater management controls. In coordination with the Management Section, the General Services Officer is procuring GPS trackers for greater oversight of government vehicles. Other management controls include the installation of a key watcher to secure all vehicle keys, safety and conduct training for motor pool drivers, the review of State Department motor vehicle policy, and an update to the embassy's motor vehicle policy, which was published in May 2019. In coordination with the General Services Officer and Motor Pool Supervisor, the section is improving the ILMS data inputs to improve its oversight of operating costs, fuel consumption, and vehicle utilization.

**OIG Recommendation 22:** Embassy Libreville should document all nonexpendable property transfers in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. Working with guidance received from the Office of Logistics Management, the warehouse section implemented greater management controls to document the transfer of non-expendable property. This includes an increase in the frequency of spot checks by GSO, MO, and FM. The General Services Office section has periodic meetings with the Facilities Management section to ensure the use of the DS-584 Nonexpendable Property Transaction form.

**OIG Recommendation 23:** Embassy Libreville should implement management controls to reduce its expendable supply stock in accordance with Department standards. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. Working with guidance received from the Office of Logistics Management, the warehouse team reviewed items in excess and has already identified and created a disposal plan. The team will continue to organize expendables and dispose of dead stock over the coming months. The warehouse section recently completed an auction and will schedule a second auction before the end of FY2019. To date, they reduced approximately half of the dead stock.

**OIG Recommendation 24:** Embassy Libreville should bring its residential safety program into full compliance with Department standards. (Action: Embassy Libreville)

**Management Response:** Embassy Libreville concurs with the recommendation. Fire extinguisher inspections and testing have been added to the residential preventive maintenance program. All annual inspections are now up to date and reoccurring Work Orders (WO) have been created

*to ensure future compliance. 10-milliampere GFCIs to supplement the existing 30-milliampere protection are in the Embassy's possession and are being installed now. Post will be fully compliant with the GFCI guidelines by the end of August 2019.*

**OIG Recommendation 25:** Embassy Libreville should implement procedures to accurately record and track employee receivables as required by Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. Beginning in November 2018, the Budget and Finance (B&F) section collaborated with the General Services Office (GSO) and the Information Resources Management (IRM) section to track employee receivables (bills). At the end of the month, the accountant reviews the collections processed by the cashier to ensure that bills were paid. If a bill remains unpaid, the accountants alert the employee of a pending bill of collection and request prompt payment. The B&F section will bring the situation to the attention of the FMO and/or employee supervisor. This is a fully implemented process as of May 2019. The B&F section also now tracks the repayment of travel advances on a monthly basis and notifies customers of delinquent accounts as of May 2019.

**OIG Recommendation 26:** Embassy Libreville should establish a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. To ensure the integrity of Department of State networks, Libreville IRM will form by the end of July 2019 a local virtual ITCCB to monitor, approve, and regulate the purchase of Post-specific equipment or software. Once established, changes to the network will require approval from the IMO, ISSO, and RSO at a minimum prior to being formally submitted to the Washington-based ITCCB for final approval.

**OIG Recommendation 27:** Embassy Libreville should require the Information Systems Security Officer to perform and document information systems security duties in accordance with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. Libreville IRM will appoint by the end of July 2019 a primary and secondary ISSO for each respective network to perform the necessary random sample auditing of workstations and user accounts to ensure compliance with DS-established security compliance guidelines. To ensure consistency, these results will be delivered to the IMO and Management Officer in a regular report.

**OIG Recommendation 28:** Embassy Libreville should implement standard operating procedures for a records management program that complies with Department standards. (Action: Embassy Libreville)

***Management Response:*** Embassy Libreville concurs with the recommendation. Libreville IRM in cooperation with all other stakeholders is developing an appropriate plan by the end of June

*2019 to manage and appropriately archive existing records in accord with Department standards. This effort includes:*

- *Leveraging existing technology platforms to more easily organize, catalog, and archive digital records.*
- *Reducing physical paper holdings of records by digitizing copies and/or disposing retired documents in accordance with Department of State records disposition schedules.*
- *Providing employee training on appropriate records keeping practices and procedures.*

Approved: Embassy Libreville – Samuel R. Watson, Chargé d’Affaires, a.i. (ok)

Drafted: Embassy Libreville – Samuel R. Watson, Chargé d’Affaires, a.i. (ok)

Cleared: AF/EX – Benjamin Dille (ok)  
AF/FO – Geeta Pasi ( )  
AF/FO – Elizabeth Fitzsimmons ( )



**United States Department of State**

*Washington, D.C. 20520*

UNCLASSIFIED

May 29, 2019

MEMORANDUM

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

FROM:        DGHR – Phil Lussier, Deputy Assistant Secretary

SUBJECT:     Compliance Response to Recommendation 1: Inspection of Embassy Libreville,  
              Gabon (ISP-I-19-16)

The Bureau of Human Resources reviewed the draft OIG inspection report. We provide the following comments in response to the recommendation provided by the OIG:

**Recommendation 1:** The Director General of the Foreign Service and Director of Human Resources should review whether anti-nepotism violations occurred at Embassy Libreville and, based on the results of its review, take appropriate action. (Action: DGHR)

**Management Response:** DGHR does not concur with the recommendation. The individual in question has left the Department, so no further action is necessary.

The point of contact for this memorandum is Stephanie McFadden O'Neill. She can be reached at [ONeills2@state.gov](mailto:ONeills2@state.gov).

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U.S. AGENCY FOR  
GLOBAL MEDIA

UNITED STATES  
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330 Independence Avenue SW | Washington, DC 20237 | usagm.gov

June 5, 2019

To:            OIG – Sandra Lewis, Assistant Inspector General for Inspections  
From:         John Lansing – CEO and Director, USAGM  
Subject:       Response to Draft OIG Report – Inspection of Embassy Libreville, Gabon

The U.S. Agency for Global Media has reviewed the draft OIG inspection report, and provides the following comments in response to the recommendation related to the agency:

**OIG Recommendation 9:** USAGM should improve the perimeter fence around the transmitting station in Sao Tome. (Action: USAGM)

**Management Response:** Thank you for the opportunity to comment on the Office of Inspector General’s draft report: Inspection of Embassy Libreville, Gabon.

The USAGM agrees in concept with the recommendation and proposes to improve perimeter access control by adding new fencing within the antenna field. USAGM recognizes that the growth of population in the town abutting the transmitting station has led to increased encroachment on station grounds, and enhanced fencing is required to discourage pedestrian access.

The Sao Tome station has roughly 1.4-miles of boundary currently protected by a barbed-wire fence. Additional to this is more than 2-miles of unprotected coast line. The USAGM performed a security assessment of this site in 2018, as part of USAGM’s ongoing world-wide security survey. Pursuant to the 2018 security assessment, the Agency staff drafted an initial plan and statement of work (SOW) to upgrade the station’s fencing. USAGM will prioritize this project, and anticipate completing this project within 18-months of identification of availability of funds.

## ABBREVIATIONS

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DCM	Deputy Chief of Mission
ERA	Electronic Recruitment Application
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
USAGM	U.S. Agency for Global Media

## OIG INSPECTION TEAM MEMBERS

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