

UNCLASSIFIED



Office of Inspector General  
United States Department of State

---

ISP-I-19-21

Office of Inspections

May 2019

# Inspection of the Office of Foreign Missions

DOMESTIC OPERATIONS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-19-21

## What OIG Inspected

OIG inspected the Office of Foreign Missions' executive leadership, staffing and organizational structure, strategic planning, and information technology operations.

## What OIG Recommends

OIG made 13 recommendations to improve the office's operations, including 9 to address deficiencies in the development and deployment of information technology systems and information systems security.

In its comments on the draft report, the Department concurred with all 13 recommendations. OIG considers the recommendations resolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal written responses are reprinted in their entirety in Appendix B.

May 2019

OFFICE OF INSPECTIONS  
DOMESTIC OPERATIONS

## Inspection of the Office of Foreign Missions

### What OIG Found

- Department of State and other Federal agency officials praised the Office of Foreign Missions' acting Director for his expertise and institutional knowledge that enabled him to successfully use reciprocity to ensure U.S. mission staff serving overseas receive equivalent treatment as their foreign counterparts based in the United States. However, lengthy gaps in key leadership positions, including the Director and Deputy Director, overburdened the acting Director and contributed to deficiencies in internal management and communications.
- Development of The Office of Foreign Missions Information System (TOMIS) had been underway for two decades, at an approximate cost of \$48 million to date. Significant issues with TOMIS development, including an invalid authorization to operate, an inability to verify data accuracy, and inadequate user access controls, warrant urgent management attention.
- The Office of Foreign Missions had neither a strategic planning process nor a Functional Bureau Strategy.
- The office's organizational structure was not well aligned, resulting in an uneven workload and unclear lines of supervision.
- The contract administration for TOMIS did not comply with Department requirements.
- Standard operating procedures for fee collections did not meet Department procedures.

## CONTENTS

---

CONTEXT .....	1
EXECUTIVE DIRECTION .....	2
THE OFFICE OF FOREIGN MISSIONS INFORMATION SYSTEM .....	7
INFORMATION SECURITY .....	12
RESOURCE MANAGEMENT .....	13
RECOMMENDATIONS .....	15
PRINCIPAL OFFICIALS .....	19
APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY.....	20
APPENDIX B: MANAGEMENT RESPONSES.....	22
ABBREVIATIONS.....	27
OIG INSPECTION TEAM MEMBERS.....	28

## CONTEXT

---

The Office of Foreign Missions (OFM) was established pursuant to the Foreign Missions Act (FMA) of 1982 (22 U.S.C. 4301-4316), as amended. According to OFM's 2020 Bureau Resource Request, the office's principal objectives are to:

- Employ reciprocity to ensure equitable treatment for U.S. diplomatic and consular missions abroad and their personnel.
- Regulate the activities of foreign diplomatic missions in the United States to protect U.S. foreign policy and national security interests.
- Protect the American public from abuse of privileges and immunities by members of foreign missions.
- Provide services and assistance to the foreign missions community in the United States to ensure appropriate privileges, benefits, and services on a reciprocal basis.

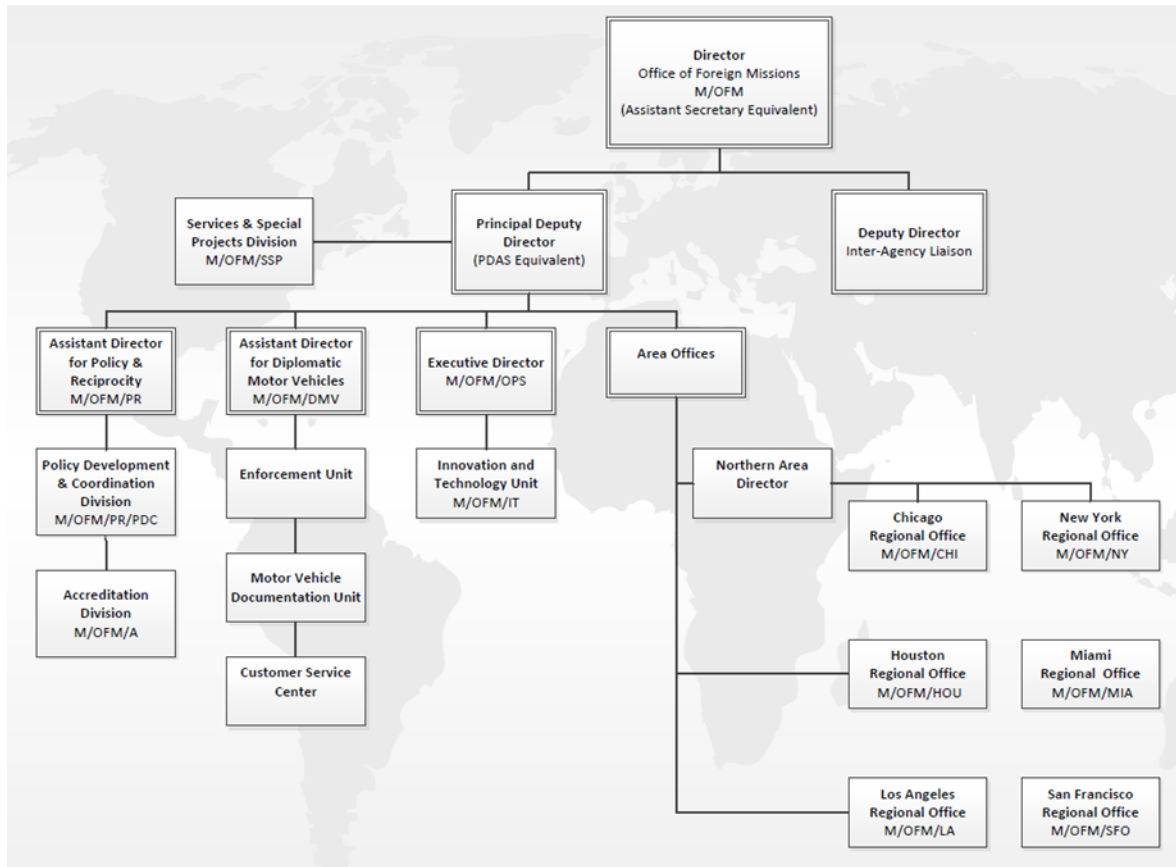
OFM is headquartered in Washington, D.C., and has regional offices in New York City, Chicago, Miami, Houston, Los Angeles, and San Francisco. OFM's mandate spans 195 foreign embassies and interest sections, 615 foreign consulates, and approximately 117,000 members of the foreign diplomatic community accredited to the United States, including diplomats accredited to international organizations such as the United Nations.

OFM headquarters primarily focuses on applying reciprocity to ensure U.S. mission staff serving abroad receive equitable or improved treatment as their foreign counterparts based in the United States. OFM headquarters also uses its authorities under the FMA in support of public safety requirements or foreign policy decisions. For example, OFM can expel foreign diplomatic personnel for acts such as driving under the influence of alcohol.

OFM headquarters also provides services to foreign missions and their members in the United States, such as determining eligibility for accreditation and attendant privileges; providing tax benefit cards, drivers licenses, and license plates; and approving duty-free purchases and the importation of tax- and duty-free goods. OFM's regional offices perform similar tasks in their assigned geographic region in addition to engaging in regional outreach and assisting regional foreign missions in emergencies. OFM's regional offices also coordinate with regional offices of the Department of State's (Department) Bureaus of Consular Affairs and Diplomatic Security, as needed.

Since its creation in 1982, OFM has changed institutional homes three times. It began in the Office of the Under Secretary for Management, moved to the Bureau of Diplomatic Security in 1996, and moved back to the Office of the Under Secretary for Management in 2014. Within the Department, OFM is considered to be a bureau equivalent, and its Director, who is subject to Senate confirmation, is equivalent to an Assistant Secretary. Additionally, as shown in the organizational chart below, OFM has a Principal Deputy Director position (equivalent to Principal Deputy Assistant Secretary), which was vacant at the time of the inspection, and a Deputy Director for Inter-Agency Liaison position, which was filled by a detailee. The four

headquarters offices—Policy and Reciprocity, Services and Special Projects, Diplomatic Motor Vehicles, and Operations—and the regional offices report through the Principal Deputy Director to the Director.



**Figure 1:** OFM Organizational Chart. Source: OFM.

OFM's FY 2018 operating budget was \$16.8 million, and it was composed of 93 Foreign Service and Civil Service positions and 15 third-party contractors who provide IT services for The Office of Foreign Missions Information System (TOMIS). However, at the time of the inspection, 22 of OFM's 93 positions were unfilled, a 23 percent vacancy rate. Within OFM, the Office of Policy and Reciprocity and the Office of Diplomatic Motor Vehicles had higher vacancy rates, with 40 and 39 percent vacancies, respectively. Furthermore, OFM's vacancies extended to leadership positions. Since 2017, OFM's acting Director also served as the acting Principal Deputy Director and as the Assistant Director for Policy and Reciprocity, his position of record.

## EXECUTIVE DIRECTION

OIG assessed OFM's leadership on the basis of 80 interviews that included comments on Front Office performance, a review of staff questionnaires and other documents, and observation of activities during the on-site portion of the inspection. At the time of the inspection, OFM's leadership team consisted of one individual, the triple-hatted acting Director. He was appointed as the Director of the Office of Policy and Reciprocity in 2010. He was then designated as OFM's

acting Principal Deputy Director in 2014, and, since January 2017, he has served as OFM's acting Director. With 17 years of experience in OFM, OIG found that he was the organization's institutional memory. OFM staff, as well as Department and other agency officials, told OIG that they admired the acting Director for his subject matter expertise, knowledge, tireless commitment, and dynamism.

The acting Director told OIG that his priority goal was to apply reciprocity as a tool to improve benefits and services to U.S. missions abroad and to regulate foreign missions in the United States. Based on information provided by OFM and according to Department officials, the acting Director was highly effective in persuading U.S. policy makers to support this priority and in using reciprocity to the benefit of the United States.

### ***Office of Foreign Missions Internal Management Suffered Because of Leadership Vacancies***

With just one person holding three leadership positions, OFM's successful implementation of reciprocity came at the expense of attention to OFM's internal operations in areas such as communication, strategic planning, and allocation of human resources. Guidance in 3 Foreign Affairs Manual (FAM) 1214 outlines the values the Department believes are important for all leaders to cultivate. These include developing and promoting attainable, shared short- and long-term goals with stakeholders; communicating with others internally; being able to offer and solicit constructive feedback; and cultivating staff talent to maximize strengths and mitigate mission-critical weaknesses.

OFM employees described the acting Director as overburdened and overwhelmed due to the breadth of his responsibilities. For example, requests for many decisions and approvals went to the acting Director, resulting in a bottleneck. Department officials who worked closely with OFM told OIG that OFM suffered from vacancies in critical positions at all levels. One official characterized OFM's work as always in "triage" mode, with no time to plan. Furthermore, OIG noted a number of issues resulting from leadership inattention to OFM's internal operations that are discussed throughout this report. OIG determined that the appointment of a temporary Principal Deputy Director to assist the acting Director was key to addressing these organizational challenges and to implementing Department internal management principles and functions.

**Recommendation 1:** The Office of Foreign Missions, in coordination with the Under Secretary for Management, should appoint a temporary Principal Deputy Director, until such time as a permanent Director is in place. (Action: OFM, in coordination with M)

### ***Front Office Communication With Employees Was Insufficient***

Many OFM employees told OIG that internal communication from the OFM Front Office was insufficient, untimely, or unclear. For example, the acting Director did not hold in-person meetings with staff working in his immediate office in the Department's Harry S Truman building, nor did he regularly visit staff working in the International Chancery Center (ICC),

which is approximately 5 miles from the Truman building.<sup>1</sup> Furthermore, he did not meet or speak on the phone with Regional Directors regularly. Regional Directors told OIG that regular one-on-one exchanges with the acting Director would help them be more effective in their positions by giving them the opportunity to share issues affecting their respective offices and ensuring they received pertinent guidance and information affecting their operations. In addition, OFM employees told OIG that they did not consistently receive notice of changes to policies and standard operating procedures, and sometimes foreign missions were notified of changes before OFM staff themselves. For example, the acting Director prepared a memorandum formally restructuring and rightsizing OFM's regional offices, but he sought no input from the Regional Directors. Furthermore, according to OFM employees, foreign missions received the memorandum notifying them of the changes, but the Regional Directors and their staff did not receive that information from the acting Director; instead, they first heard about the changes from the foreign missions.

As set forth in 3 FAM 1214b(4), managers should communicate and express themselves clearly and effectively, be approachable and listen actively, solicit feedback from others, and be cognizant of the morale and attitude of their staff. Accordingly, OIG advised the acting Director to improve internal communication at OFM by holding regular individual calls or meetings with Regional Directors and in-person meetings with OFM staff in Washington. OIG also advised the acting Director to consider regularly working from OFM's offices at the ICC and holding meetings with regional staff when he travels to a regional office. The acting Director agreed to take these actions to improve communication within OFM.

### ***Office of Foreign Missions Lacked Processes to Encourage Collaboration***

OFM lacked processes to forge consensus among OFM's various offices through collaborative work. For example, employees told OIG they were not asked to participate in drafting standard operating procedures despite their subject matter expertise. Furthermore, OFM employees reported that they had limited input into the development of TOMIS, a system upon which their work depends. According to 3 FAM 1214(5), (7), and (9), leaders should foster an environment where fresh perspectives are encouraged, establish constructive working relationships, and encourage open dialogue and trust.

During the inspection, OIG also noted some internal discord among OFM's offices. For instance, many ICC employees told OIG they felt alienated, undervalued, and sometimes disparaged by headquarters staff. A 2017 Climate Survey of OFM, conducted by the Department's Office of Ombudsman, indicated similar concerns. OIG advised the acting Director to take steps to foster a sense of inclusivity among OFM staff and to seek a follow-up Climate Survey in 2019. The acting Director agreed to implement OIG's suggestions.

---

<sup>1</sup> OFM operations located at the International Chancery Center were the Division of Accreditations, Office of Diplomatic Motor Vehicles, and Office of Operations (which included IT operations).

### ***Office of Foreign Missions Lacked a Strategic Planning Process and Functional Bureau Strategy***

OFM did not have a strategic planning process to develop a Functional Bureau Strategy (FBS). Guidance in 18 FAM 301.1 outlines strategic planning direction and management and describes the Department's Managing for Results Framework. Additionally, 18 FAM 301.2-4(A)(B)(C) describes strategic planning requirements, and the Department's 2018 Bureau Strategy and Guidance Instructions provides planning instructions. Rather than developing an FBS to direct the organization's operations and priorities, however, OFM believed it sufficient to rely on a one-page 2015 strategy memorandum that reiterated the broad authorities and responsibilities contained in the FMA.

This approach does not fully comport with Department expectations. According to guidance from the Department's Bureau of Budget and Planning, an FBS communicates long-term policy goals and priorities, along with objectives, sub-objectives, and measurable goals by which to achieve them. A strategic planning process also provides a bureau or office with the opportunity to identify its strengths, weaknesses, opportunities, and external factors beyond its control. Additionally, Functional Bureau Strategies are living documents that should be reviewed periodically and adjusted to account for factors that affect the operating environment.

Prior to the inspection, OFM and Bureau of Budget and Planning officials met to discuss development of a strategic planning process for OFM; however, competing priorities and lack of focus by the OFM Front Office on the issue prevented further progress. During the inspection, the acting Director acknowledged the need and benefits of a planning process and an FBS, and he convened a strategic planning working group to map out first steps. Notwithstanding these efforts, without a strategic planning process and FBS, OFM was limited in its ability to achieve more effective and efficient operational and policy outcomes and provide greater accountability to stakeholders.

**Recommendation 2:** The Office of Foreign Missions should prepare a Functional Bureau Strategy, in accordance with Department standards. (Action: OFM)

### ***Organizational Structure Was Not Well Aligned***

IG found that OFM's organizational structure was not well aligned with operational needs and, as a result, workload allocations among OFM offices were uneven and roles and reporting chains of supervision among some employees and offices were unclear. The Government Accountability Office's *Standards for Internal Control in the Federal Government* Principle 3.01<sup>2</sup> states that management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives. However, as detailed below, OFM did not meet these organizational standards.

---

<sup>2</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government*, page 27 (GAO-14-704G, September 2014).



Specifically, OIG noted that shifts in workload were not accompanied by a commensurate realignment of personnel and redefinition of office functions. For example, in part due to their proximity to OFM leadership, employees in the OFM Front Office assumed many responsibilities that had been assigned previously to employees who were located at the ICC, which, as noted previously, is several miles from OFM headquarters. The simultaneous decision by OFM leadership to shift greater responsibilities to the regional offices resulted in some ICC employees, most notably in the Division of Accreditations, being underutilized. For example, the responsibility of drafting diplomatic notes and resolving some property issues shifted from the Division of Accreditations to other OFM offices. This decline in workload responsibilities in the Division of Accreditations led to morale issues and resignations. It also led to a misuse of personnel resources. At the time of the inspection, OIG determined that the workload with the Division of Accreditations decreased to the point where most of the division's eight employees no longer had sufficient work to occupy a full 8-hour work day. Additionally, OIG noted that incremental improvements in IT systems reduced the time it took employees in the Division of Accreditations to perform tasks. However, they were not given new duties to perform.

At the same time that some OFM employees did not have enough work, others, particularly those in the OFM Front Office, had more work than they could complete. Even though OFM Front Office staff told OIG morale was high, some staff reported that they worked 10 or more hours daily. This was a result of the added responsibilities that had previously been assigned to other OFM offices as well as special projects.

Finally, OIG found that some OFM employees who were not formally designated as supervisors took on supervisory roles and responsibilities. For example, OIG observed Front Office staff providing instruction to ICC staff who were not under their supervisory authority. In some cases, this caused confusion that resulted in conflicting guidance being communicated to OFM customers, including foreign missions. Failure to establish clear lines of supervisory responsibility leads to confusion among employees and risks inefficiencies, duplication of effort, or failure to complete tasks as needed.

To address the problems OIG identified, OFM would benefit from an organizational assessment to better align staffing to workload; eliminate any duplication of effort; and achieve a balance among meeting mission needs, delivering efficient service, and managing employees effectively. Such an assessment should also review and clarify supervisory reporting lines within the organizational structure to ensure that OFM operates most efficiently.

**Recommendation 3:** The Bureau of Human Resources, in coordination with the Office of Foreign Missions, should conduct an organizational assessment of the Office of Foreign Missions and implement any recommendations resulting from the assessment. (Action: DGHR, in coordination with OFM)

## THE OFFICE OF FOREIGN MISSIONS INFORMATION SYSTEM

---

OFM uses its IT system, TOMIS, to regulate services for foreign missions. This regulation includes decision-making regarding diplomatic accreditation and diplomatic privileges and benefits; management of diplomatic property; regulation of diplomatic vehicles; imposition of penalties for legal infractions (including expulsion from the United States); approval of tax benefit cards; and approval of importation of duty-free goods. TOMIS also extracts data from the Bureau of Consular Affairs Consular Consolidated Database to assist OFM in verifying information regarding foreign mission personnel. In addition to OFM, the Department's Office of Protocol, the Bureau of Diplomatic Security's Command Center in Washington, and other U.S. Government agencies use TOMIS for their operations.

The development of TOMIS began in the early 1990s, and the first version of the system (referred to as TOMIS I) was deployed in 1998, which enabled OFM staff to enter information into the system and create records. TOMIS II was deployed in 2003, with the aim of creating a single web-based system to process requests for services and create records; however, this goal was not achieved due to technical complications. The eGOV system was also deployed in 2003; foreign missions use this system to provide information to OFM to adjudicate and determine benefits. In 2011, OFM began development of TOMIS III with the goal of creating a unified, integrated IT platform to support the full range of OFM operations. Once TOMIS III was in place, OFM planned to take both TOMIS I and TOMIS II out of service. However, at the time of the inspection, OFM had not implemented all features of TOMIS III, and no single version of TOMIS housed all OFM modules. As a result, OFM employees used elements of all three TOMIS systems—none of which were integrated—to carry out their functions.

A further complicating factor is the fact that four different contractors have been involved in the development of TOMIS. From 2006<sup>3</sup> to 2018 alone, 13 contracting officer's representatives (COR) and 2 contracting officers have overseen the development of TOMIS. As of September 2018, OFM had spent approximately \$48 million to build and develop TOMIS, but it has still not been fully deployed. Therefore, at the time of the inspection, OFM continued to administer the contract for TOMIS development and administration.

As described below, OIG found significant issues with the development of TOMIS that warrant urgent management attention. These issues include (1) the lack of a fully implemented systems development lifecycle methodology for TOMIS, (2) an invalid authorization to operate for the system, (3) the inability to track TOMIS-related problems reported by OFM employees, (4) the lack of mechanisms to verify the accuracy of TOMIS data, and (5) poor management of permissions and roles for employees to gain access to TOMIS. Finally, OIG determined that OFM did not monitor the TOMIS contractor's performance in accordance with Department guidance.

---

<sup>3</sup> The Department's Bureau of Administration, Office of Acquisitions Management, did not have information for events earlier than 2006.

### ***Office of Foreign Missions Did Not Implement a Systems Development Lifecycle Methodology***

OIG determined that the lack of a fully implemented systems development lifecycle methodology—specifically, the Department’s “Managing State Projects” methodology—hindered the development of TOMIS III.<sup>4</sup> This framework ensures management oversight of the systems development process and that the systems operations are in accordance with information security policies and procedures. According to guidance in 5 Foreign Affairs Handbook (FAH)-5 H-212a(1-5), the Managing State Projects methodology should be used for IT systems development and must be used for IT projects with an estimated cost of \$500,000 or greater, that exceed 1 year, and/or are considered by Department management to be highly visible, among other criteria. As noted above, TOMIS met all three requirements.

Department guidance in 5 FAH-5 H-213c(6-14) defines nine phases of system development to ensure project success. For example, in the first phase, the project team identifies user requirements, including operational needs and schedule requirements. The team also examines, prioritizes, and documents the interests of management, system administrators, and end-users within a requirements verification traceability matrix.<sup>5</sup> The seventh and eighth phases in Managing State Projects require the preparation for system deployment and performance verification to confirm the system is ready for user operation. Successful completion of the phases concludes with users validating and documenting their user acceptance review.

OFM used an agile<sup>6</sup> development methodology for TOMIS III development, but OIG found the following deficiencies in OFM’s approach:

- OFM did not use a defined process to gather user requirements. Not all Washington staff were included in identifying requirements for their respective TOMIS modules, and regional offices were not consulted at all to define their requirements for the latest TOMIS III version. As a result, the TOMIS system did not reflect the needs of different OFM offices.
- OFM did not maintain a requirements verification traceability matrix. As a result, OFM IT staff were unable to trace TOMIS development efforts to a specific identified requirement.
- OFM did not conduct formal user acceptance testing and reviews. OFM IT staff sent notices to office staff asking them to test developed modules; however, staff were not given consistent timeframes or advance notice of these requests. OFM staff told OIG

---

<sup>4</sup> The systems development lifecycle is a framework for developing, maintaining, and replacing information technology systems. “Managing State Projects” is a type of this methodology.

<sup>5</sup> The requirements verification traceability matrix defines the operational, technical, and logistical requirements for the system. It establishes top-level requirements and is used to ensure that these requirements “flow down” to—i.e., are integrated into—the design.

<sup>6</sup> Using an agile software development approach, requirements and solutions evolve through the collaborative effort of cross-functional teams and end user(s). The approach advocates adaptive planning, evolutionary development, early delivery, and continual improvement, and it encourages rapid and flexible response to change.

that they were not provided sufficient time for testing and that some modules were moved to production without testing.

The lack of a properly implemented Managing State Projects methodology significantly delayed the completion of TOMIS III. Consequently, OFM staff used all three versions of TOMIS simultaneously to complete their work because no single version housed all OFM modules.

During the inspection, OFM began a change control board process<sup>7</sup> for identifying TOMIS requirements. This process ensures appropriate oversight and approval for any modifications to the system. OFM issued a charter for the control board and informed staff of the new process. The charter defined the steps to be taken to identify a requirement and have it added to the development schedule. The charter also stated that the change control board process would be the primary change instrument for all OFM applications and systems. Notwithstanding these efforts, without a defined system development methodology in place, OFM will continue to lack a single operable information system that fully meets its needs and risk unnecessary spending on further system development.

**Recommendation 4:** The Office of Foreign Missions should implement the Managing State Projects methodology for The Office of Foreign Missions Information System development, in accordance with Department standards. (Action: OFM)

***Office of Foreign Missions Lacked a Valid Authorization to Operate for TOMIS***

OFM has not had a valid authorization to operate (ATO)<sup>8</sup> for TOMIS since 2013. An ATO ensures that adequate security controls are in place for an information system based on the associated risk with its use. Department standards<sup>9</sup> state that an information system must be granted an ATO before it first becomes operational, and the ATO must be reauthorized at least every 3 years or whenever changes are made that affect the potential risk level of operating the system. As part of the system's authorization process, system owners also must define the security level of the information contained in the system and establish appropriate security controls to protect the information. In addition, as part of the authorization process, system owners must provide current copies of their system contingency plan and system security plans.

---

<sup>7</sup> The change control board process ensures that a system cannot be changed or introduced without proper approval, and that change requests are addressed according to appropriate procedures. The change control board is a group typically consisting of two or more individuals that have the collective responsibility and authority to review and approve change requests to an information system.

<sup>8</sup> An authorization to operate is the official management decision given by a senior organization official to authorize operation of an information system and to explicitly accept the risk to organization's operations, assets, individuals, other organizations, and the nation, based on the implementation of an agreed-upon set of security controls.

<sup>9</sup> 12 FAH-10H-312.4, "Security Authorization Management Responsibilities;" 5 FAM 1066.1-3, "Systems Authorization;" and 5 FAM 1066.1-5, "Systems Security Documentation."

The last ATO for TOMIS was granted on a provisional basis in December 2012 and expired in December 2013. OIG found no documentation of any steps OFM took to reauthorize TOMIS from 2013 to 2017. In May 2017, OFM sent a request to reauthorize TOMIS to the Bureau of Information Resource Management, but the bureau stated that the OFM package was incomplete. OIG did not find documentation of further progress on a renewed ATO since 2017. Without a valid ATO, OFM management are unaware of the severity of any risks associated with TOMIS and cannot confirm that risks to the system have been adequately identified and mitigated.

**Recommendation 5:** The Office of Foreign Missions, in coordination with the Bureau of Information Resource Management, should obtain an authorization to operate for The Office of Foreign Missions Information System, in accordance with Department standards. (Action: OFM, in coordination with IRM)

***Office of Foreign Missions Did Not Have a Tracking System to Manage TOMIS Issues***

OFM lacked a system to track TOMIS-related issues reported by OFM employees. OFM staff reported an average of 60 to 80 TOMIS-related issues daily to the IT helpdesk either by email, phone calls, or in person. However, these reported issues were not catalogued in a way that allowed IT staff to identify systemic issues or track time spent resolving the problems. OFM IT staff told OIG that they researched solutions to track TOMIS issues, including the use of an automated helpdesk tracking system, but, at the time of the inspection, they had not yet made a decision. According to the Government Accountability Office's *Standards for Internal Control in the Federal Government* Principle 13.05, management should process data into quality information<sup>10</sup> and use it to make informed decisions to achieve key objectives and address risks. Without a tracking system, OFM staff are unable to identify systemic issues with TOMIS, track time spent by IT staff to resolve matters, and ensure all TOMIS related-issues have been resolved.

**Recommendation 6:** The Office of Foreign Missions should implement a system for tracking and ensuring resolution of reported issues with The Office of Foreign Missions Information System. (Action: OFM)

***Office of Foreign Missions Did Not Have Mechanisms to Verify Data Accuracy in TOMIS***

OFM did not have mechanisms in place to verify the accuracy of TOMIS data. OFM staff expressed concerns to OIG about errors in TOMIS records when comparing information retrieved from the Consular Consolidated Database and the eGOV system. OFM employees also commented that there have been inconsistencies among individual records as multiple employees worked within different versions of TOMIS. Employees stated that they could not produce reports to perform compliance checks for data accuracy because none of the three versions of TOMIS included this functionality. OFM staff stated they relied on ad hoc detection

---

<sup>10</sup> The Government Accountability Office defines quality information as "appropriate, current, complete, accurate, accessible, and provided on a timely basis." GAO-14-704G, September 2014, page 60.

and correction of data errors in the course of doing their routine work. Furthermore, a history tab<sup>11</sup> that could be used to identify some errors was inaccessible to most TOMIS users, and OFM could not use the feature to identify and correct errors across multiple versions of TOMIS.

According to 5 FAM 637.1a-b and 5 FAM 637.2a-b, data is an invaluable resource for the Department to inform decisions and must be carefully managed to ensure credibility and accuracy. Furthermore, the accuracy of data must be verified and validated throughout the lifecycle of the information. OFM management and staff acknowledged they did not have any proactive measures in place, such as periodic audits of data samples, to verify TOMIS data. Without such regular verification procedures, OFM risks making incorrect determinations on a range of important issues, including the privileges and immunities for foreign mission personnel, failing to identify foreign mission members whose driver's licenses should be revoked, or failing to identify foreign mission members who are eligible for expulsion.

**Recommendation 7:** The Office of Foreign Missions should implement a process to regularly verify and validate the accuracy of the records in The Office of Foreign Missions Information System in accordance with Department standards. (Action: OFM)

***TOMIS User Access Controls Did Not Comply With Department Guidance***

OIG found that OFM IT poorly managed the permissions and roles assigned to employees to gain access to TOMIS, contrary to Department guidance. According to 12 FAH-10H-112.1-1 and 12 FAH-10H-112.1-3, system owners, management, and the Information Systems Security Officer (ISSO) should annually review the list of users to determine whether all users require access to the information system and that all temporary, terminated, or transferred accounts have been removed. OIG found, however, that OFM had employed 69 different permissions and roles to assign users with various levels of "read," "write," and "edit" capabilities for each TOMIS module. OIG also concluded that OFM IT was not proactive in restricting role-based permissions but rather repeatedly issued ad hoc permissions on request. Finally, OIG also noted that there was no defined process for removing permissions and roles for departing OFM staff members. Without limiting and controlling employee permissions and roles for TOMIS, OFM is not taking all appropriate steps to minimize the risk of unauthorized access to its information systems.

**Recommendation 8:** The Office of Foreign Missions should manage user access controls for The Office of Foreign Missions Information System in accordance with Department standards. (Action: OFM)

***Office of Foreign Missions Did Not Monitor TOMIS Contractor Performance***

The COR for the TOMIS contract did not monitor and document contractor performance in accordance with Department standards. Guidance in 14 FAH-2H-521 states that the COR must use a monitoring plan to assess contractor performance commensurate with the complexity

---

<sup>11</sup> The history tab is available only in TOMIS III, but not all OFM staff have access to the feature.

and importance of the contract. For the TOMIS contract, OIG found that a quality assurance surveillance plan was in place and that it met the requirement for a monitoring plan, as it set forth the procedures and guidelines to ensure the contractor achieved the required performance standards or service levels. However, OIG found that the quality assurance surveillance plan was not actually being used by the COR to monitor contractor performance for TOMIS development. Without proper monitoring, OFM risks paying the contractor for work that does not meet the performance standards or service levels required by the contract.

**Recommendation 9:** The Office of Foreign Missions should require the contracting officer's representative to monitor and document contractor performance in accordance with Department standards. (Action: OFM)

## INFORMATION SECURITY

---

### ***Information Systems Security Officer Program Did Not Comply with Department Standards***

OIG found that OFM had not implemented the Department's ISSO program, which seeks to ensure information security oversight. A variety of policies and other standards require OFM to take these steps. Guidance in 12 FAH-10 H-352(1-2) requires offices to designate, to the Bureau of Information Resource Management, an ISSO and an alternate ISSO to manage the security of the office's information systems. The National Institute of Standards and Technology<sup>12</sup> and the Department's Cybersecurity Awareness and Training Program<sup>13</sup> require ISSOs to take fundamental or role-based training within 6 months of being assigned as ISSO. Refresher training is recommended annually, and it is mandatory every 3 years. Finally, 12 FAH-10 H-712.3b(2-4) and 12 FAH-10 H-122.5-2(1-2) require the ISSO to regularly review audit logs, monitor user accounts, and perform routine scanning of networks, among other duties.

OIG found the following deficiencies in OFM's ISSO program:

- OFM's ISSO designation letter, signed in April 2013, was outdated. It included an individual designated as the alternate ISSO who was no longer with OFM, and it did not reflect OFM's correct current placement within the Office of the Under Secretary of State for Management.
- The primary ISSO had not taken any refresher ISSO training since January 2013.
- The primary ISSO did not perform required ISSO duties including conducting or documenting formal reviews of OFM's network logs, including monthly vulnerability scans, random email reviews, and server audit log reviews; and monitoring file transfers between non-Department systems and unclassified Department systems.

The lack of management oversight resulted in an inadequate ISSO program. Without an adequate ISSO program, OFM is at risk of potential unauthorized access and malicious activity.

---

<sup>12</sup> National Institute of Standards and Technology Special Publication 800-53, rev. 4, "Security and Privacy Controls for Federal Information Systems and Organizations," pages F-38 (April 2013).

<sup>13</sup> Department of State, Cybersecurity Awareness and Training Program, Sections 6.0 and 6.3.3.1, October 2014.

**Recommendation 10:** The Office of Foreign Missions should update its Information Systems Security Officer designation letter. (Action: OFM)

**Recommendation 11:** The Office of Foreign Missions should require the designated primary and alternate Information Systems Security Officers complete training in accordance with Department standards. (Action: OFM)

**Recommendation 12:** The Office of Foreign Missions should require that the Information Systems Security Officer perform information systems security duties in accordance with Department standards. (Action: OFM)

***Office of Foreign Missions Did Not Register Its Dedicated Internet Network as Required by Department Standards***

Although OFM had one dedicated internet network (DIN) that was used by IT staff for TOMIS code development and testing, OFM did not register this DIN as required by Department standards. Guidance in 5 FAM 872.1(b-c) states that all DINs must be registered with the Department's Enterprise IT Configuration Board and updated annually with complete technical information. OFM IT staff was not familiar with the Department's requirement for registering DINs and, thus, failed to register and provide current information on the network to the Department. Failure to register DINs and update the technical information increases the risk of outages, potential compromises, and loss of data. During the inspection, based on OIG's advice, OFM registered the DIN and received approval for its use. Furthermore, OIG advised OFM to ensure that registration of the DIN is completed annually, which OFM agreed to do. Because OFM registered the DIN, OIG did not make a recommendation to address this issue.

## **RESOURCE MANAGEMENT**

---

***Office of Foreign Missions Did Not Have a Records Management Program***

OFM did not have a records management program to ensure the uniform creation, maintenance, and disposition of files and records, in accordance with Department standards.<sup>14</sup> Department policy, however, requires offices to implement and administer records policies, standards, and procedures in a defined records management program that includes effective management controls. Furthermore, Department offices are required to assign trained employees to manage office files, ensure the integrity of records, and assist in filing and disposition.

OIG found no documented standard operating procedures to manage OFM's records. Instead, employees stored most documents on OFM's network shared drive, but maintained files and records inconsistently. OIG found the shared drive lacked organization and version control, and

---

<sup>14</sup> 5 FAM 413, "Program Objectives;" 5 FAM 414.4, "Bureaus;" 5 FAH-4 H-212, "Records Creation – General Methods and Procedures;" and 5 FAH-4 H-215.1-1, "Department Offices."



files had inconsistent naming conventions. OIG also found OFM documents dating from 2000 without any evidence that files had been appropriately archived. Moreover, OFM did not have any individual listed on the Department's bureau records coordinator list. Without an established and enforced records management process, OFM cannot provide a complete record of official actions or maintain and dispose of files and records in accordance with Department policy.

OFM took corrective steps during the inspection to address the lack of a records management program. For example, OFM drafted an office-wide management notice providing details on how files should be stored and organized. In addition, each OFM office designated a point of contact to be responsible for managing and archiving its respective files. OFM's assigned office records coordinator was added to the Department's bureau records coordinator list. Because OFM showed progress in establishing an effective records management program, OIG did not make a recommendation to address this issue.

***Standard Operating Procedures on Fee Collections Did Not Comply With Department Standards***

OIG found that OFM's standard operating procedure (SOP) on fee collections did not comply with Department requirements. In FY 2017, OFM collected over \$500,000 from foreign mission members in exchange for motor vehicle services, such as issuing diplomatic automobile registrations and license plates. However, OFM's SOP had a variety of weaknesses. It did not designate any accountable officers with responsibility for the office's collections as required by 4 FAM 322.2b. OFM had not limited the number of employees with access to the collection function, as stipulated in 4 FAH-3 H-323b. Finally, OFM did not provide receipts after making collections, nor did the existing SOP require receipts. Both of these items are required in 4 FAM 322.2-1. Moreover, the Bureau of the Comptroller and Global Financial Services (CGFS) had not reviewed and approved the OFM SOP in accordance with 4 FAM 322.2-2. Had CGFS completed this review and identified the deficiencies, OFM might have corrected the SOP. Although OIG did not find any evidence of malfeasance related to OFM's collected funds, it advised OFM to correct the deficiencies in its SOP. During the inspection OFM began coordinating with CGFS to develop a Department-approved SOP. However, because of the numerous deficiencies in the SOP and the amount of fees collected annually, OIG made a recommendation to ensure the SOP is completed.

**Recommendation 13:** The Office of Foreign Missions, in coordination with the Bureau of the Comptroller and Global Financial Services, should bring its standard operating procedures for fee collections into compliance with Department requirements. (Action: OFM, in coordination with CGFS)

## RECOMMENDATIONS

---

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to the Office of Foreign Missions and the Bureau of Human Resources. The Department's complete responses can be found in Appendix B.

**Recommendation 1:** The Office of Foreign Missions, in coordination with the Under Secretary for Management, should appoint a temporary Principal Deputy Director, until such time as a permanent Director is in place. (Action: OFM, in coordination with M)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the appointment of a temporary Principal Deputy Director.

**Recommendation 2:** The Office of Foreign Missions should prepare a Functional Bureau Strategy, in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Office of Foreign Missions' Functional Bureau Strategy.

**Recommendation 3:** The Bureau of Human Resources, in coordination with the Office of Foreign Missions, should conduct an organizational assessment of the Office of Foreign Missions and implement any recommendations resulting from the assessment. (Action: DGHR, in coordination with OFM)

**Management Response:** In its April 26, 2019, response, the Bureau of Human Resources concurred with this recommendation. The bureau noted an expected completion date of November 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the organizational assessment, including documentation of actions taken to implement any recommendations resulting from the assessment.

**Recommendation 4:** The Office of Foreign Missions should implement the Managing State Projects methodology for The Office of Foreign Missions Information System (TOMIS) development, in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the Managing State Projects methodology used for TOMIS development.

**Recommendation 5:** The Office of Foreign Missions, in coordination with the Bureau of Information Resource Management, should obtain an authorization to operate for TOMIS, in accordance with Department standards. (Action: OFM, in coordination with IRM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation. The Office of Foreign Missions 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 of an authorization to operate for TOMIS.

**Recommendation 6:** The Office of Foreign Missions should implement a system for tracking and ensuring resolution of reported issues with TOMIS. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a tracking system to ensure resolution of reported issues with TOMIS.

**Recommendation 7:** The Office of Foreign Missions should implement a process to regularly verify and validate the accuracy of the records in TOMIS in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation. The Office of Foreign Missions noted an expected completion date of December 2019.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a process to verify the accuracy of records in TOMIS.

**Recommendation 8:** The Office of Foreign Missions should manage user access controls for TOMIS in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of user access controls for TOMIS that are managed in accordance with Department standards.

**Recommendation 9:** The Office of Foreign Missions should require the contracting officer's representative to monitor and document contractor performance in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that contractor performance is managed in accordance with Department standards.

**Recommendation 10:** The Office of Foreign Missions should update its Information Systems Security Officer designation letter. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of the updated Information Systems Security Officer designation letter.

**Recommendation 11:** The Office of Foreign Missions should require the designated primary and alternate Information Systems Security Officers complete training in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the primary and alternate Information Systems Security Officers completed the required training.

**Recommendation 12:** The Office of Foreign Missions should require that the Information Systems Security Officer perform information systems security duties in accordance with Department standards. (Action: OFM)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

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

**Recommendation 13:** The Office of Foreign Missions, in coordination with the Bureau of the Comptroller and Global Financial Services, should bring its standard operating procedures for fee collections into compliance with Department requirements. (Action: OFM, in coordination with CGFS)

**Management Response:** In its April 29, 2019, response, the Office of Foreign Missions concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of standard operating procedures for fee collections that comply with Department requirements.

## PRINCIPAL OFFICIALS

---

<b>Title</b>	<b>Name</b>	<b>Arrival Date</b>
<b>Office of the Director</b>		
Director	Clifton Seagroves (acting)	01/17 <sup>15</sup>
Principal Deputy Director	Clifton Seagroves (acting)	09/14 <sup>16</sup>
<b>Headquarters Offices</b>		
Policy and Reciprocity	Clifton Seagroves	09/10
Services and Special Projects	Matthew Sandelands	06/17
Diplomatic Motor Vehicles	Joan Morningstar	01/11
Operations	Patrice Johnson	07/15
<b>Regional Offices</b>		
Northern Region (New York and Chicago)	Brooke Knobel	09/17
Miami	Frances Crespo	05/17
Houston	Robin Blunt	09/17
Los Angeles	Christina Hernandez	08/17
San Francisco	Clayton Stanger	07/18

**Source:** Office of Foreign Missions

---

<sup>15</sup> This reflects the date Clifton Seagroves was designated as acting Director.

<sup>16</sup> This reflects the date Clifton Seagroves was designated as acting Principal Deputy Director.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

---

This inspection was conducted from September 4, 2018, to February 14, 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 the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

### Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Consistent with Section 209 of the Foreign Service Act of 1980, this inspection focused on the Office of Foreign Missions' resource management and management controls. The specific inspection objectives were to determine whether OFM:

- Conveyed strategic priorities and bureau management issues internally, and solicited input, consistent with 3 Foreign Affairs Manual (FAM) 1214 principles.
- Had a strategic plan, measurable goals, and tools to measure results and used annual performance results to revise procedures or future annual targets.
- Followed a systems development lifecycle process for the development of TOMIS, to include defining user and system requirements, establishing projected timelines, and obtaining management approval through defined control gates, in accordance with 12 Foreign Affairs Handbook (FAH)-10 H-342.2-1 and 5 FAH-5 H-200.
- Completed the required assessment and authorization process for TOMIS in accordance with Federal Information Processing Standard 199 and 5 FAM 1060.
- Had a process for testing the reliability and accuracy of the data in TOMIS.
- Administered its contracts in compliance 14 FAM 222 and Office of the Procurement Executive, including monitoring contractors' technical progress.
- Managed its fee collections in accordance with 2 FAM 020, 4 FAM 030.1-1, 4 FAM 040, 4 FAM 232, 4 FAM 320, and 4 FAH-3 H-113.4.
- Ensured its IT staff were performing Information Systems Security Officer duties in accordance with 12 FAM 632.1-2.
- Managed its records and documentation in accordance with 5 FAM 410 and 5 FAH-4.

### Methodology

In conducting inspections, OIG uses a risk-based approach to prepare for each inspection; reviews pertinent records; circulates and compiles the results of survey instruments, as appropriate; conducts interviews with Department 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

---

<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.

with physical, documentary, testimonial, and analytical evidence collected or generated, to develop findings, conclusions, and actionable recommendations.

For this inspection, OIG conducted 143 interviews, including interviews with Department and interagency partners that elicited comments on OFM's performance. OIG also reviewed responses to personal questionnaires from 61 employees and contractors. Finally, OIG reviewed office memoranda prepared by OFM officials and other documentation provided by OFM.



## APPENDIX B: MANAGEMENT RESPONSES

---



United States Department of State

Washington, D.C. 20520

UNCLASSIFIED

April 29, 2019

Read by \_\_\_\_\_

### INFORMATION MEMO FOR ASSISTANT INSPECTOR GENERAL FOR INSPECTIONS LEWIS

FROM: M/OFM/OPS – Patrice Johnson 

SUBJECT: Bureau Response on the Draft OIG Inspection Report for the Office of Foreign Missions (OFM)

**BLUF:** OFM has reviewed the draft OIG inspection report and provide the following comments in response to the recommendations provided by the OIG.

**OIG Recommendation 1:** OFM, in coordination with the Under Secretary for Management, should appoint a temporary Principal Deputy Director, until such time as a permanent Director is in place. Action: OFM, in coordination with M.

**Bureau Response:** OFM concurs with the recommendation. On February 25, 2019, Matthew Sandelands was designated to temporarily act as OFM's Deputy Director. Further, the Underscretary of Management and the Office of Civil Service Human Resource Management has allocated a permanent Senior Executive Service full-time equivalent position (FTE) and the corresponding vacancy announcement has been advertised.

**OIG Recommendation 2:** OFM should prepare a Functional Bureau Strategy, in accordance with Department standards. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation and has submitted a draft Functional Bureau Strategy to the Bureau of Budget and Planning Office of Planning and Strategic Performance (BP). OFM is now in the process of addressing BP's recommendations so the document can be finalized.

**OIG Recommendation 3:** The Bureau of Human Resources, in coordination with OFM, should conduct an organizational assessment of OFM and implement any recommendations resulting from the assessment. Action: DGHR, in coordination with OFM.

**Bureau Response:** OFM concurs with the recommendation and is taking preparatory steps to conduct its initial meeting with HR/RMA concerning this matter.

**OIG Recommendation 4:** OFM should implement the Managing State Projects methodology for OFM Information System development, in accordance with Department standards. Action: OFM.

UNCLASSIFIED

UNCLASSIFIED

- 2 -

**Bureau Response:** OFM concurs with the recommendation and incorporated the methodology into each development cycle, working with the contracting company to introduce a verification traceability matrix, formalizing the process for gathering user requirements, and working with the Bureau of Human Resources to hire an additional FTE to implement a formal user acceptance testing program.

**OIG Recommendation 5:** OFM, in coordination with the Bureau of Information Resource Management (IRM), should obtain an authorization to operate for The Office of Foreign Missions Information System (TOMIS), in accordance with Department standards. Action: OFM, in coordination with IRM.

**Bureau Response:** OFM concurs with the recommendation and is currently working with IRM to complete the steps to obtain an authorization to operate. OFM is currently waiting for IRM's Senior Security Control Assessor to verify and approve established controls. Once verified, the Assessor will issue findings to the bureau. We expect this process to be completed by July 2019.

**OIG Recommendation 6:** OFM should implement a system for tracking and ensuring resolution of reported issues with TOMIS. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation and has coordinated with IRM to augment its current IT ticketing system, Remedy, to accept help desk requests for all TOMIS-related needs.

**OIG Recommendation 7:** OFM should implement a process to regularly verify and validate the accuracy of the records in TOMIS in accordance with Department standards. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation and is creating a mechanism to verify the accuracy of TOMIS data. This is an ongoing process to identify the best application and process capable of reviewing history, finding discrepancies, and performing compliance on over 300,000 active records. We expect to have an application and process in place by December 2019.

**OIG Recommendation 8:** OFM should manage user access controls for TOMIS in accordance with Department standards. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation and has updated the TOMIS access request form, establishing clear disabling account standards, and auditing all users roles and permissions.

**OIG Recommendation 9:** OFM should require the contracting officer's representative to monitor and document contractor performance in accordance with Department standards. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation and the contractor is now responsible for performance against the submitted quality assurance surveillance plan by

UNCLASSIFIED

UNCLASSIFIED

- 3 -

rigorously reviewing its work quarterly. Additionally, OFM is working with the Bureau of Human Resources to hire an additional FTE to assist in monitoring contractor performance.

**OIG Recommendation 10:** OFM should update its Information Systems Security Officer (ISSO) designation letter. Action: OFM.

**OIG Recommendation 11:** OFM should require the designated primary and alternate ISSOs complete training in accordance with Department standards. Action: OFM.

**Bureau Response for Recommendation 10 and 11:** OFM concurs with both recommendations and has designated primary and alternate ISSOs, submitted an updated designation letter to IRM, and is working with the Bureau of Diplomatic Security (DS) to complete the required training. The alternate ISSO completed the training. Due to the low number of registrations, DS has cancelled subsequent training dates for the past four months and the primary ISSO has been unable to complete the training. OFM expects the primary ISSO to complete the training as soon as DS has sufficient number of registrants to hold the class.

**OIG Recommendation 12:** OFM should require that the ISSO perform information systems security duties in accordance with Department standards. Action: OFM.

**Bureau Response:** OFM concurs with the recommendation deployed a patch to gather more logging data to track activity, performing vulnerability scans, and reviewing external connection logs monthly.

**OIG Recommendation 13:** OFM, in coordination with the Bureau of the Comptroller and Global Financial Services, should bring its standard operating procedures for fee collections into compliance with Department requirements. Action: OFM, in coordination with CGFS.

**Bureau Response:** OFM concurs with the recommendation and submitted a standard operating procedure for fee collections to CGFS.

Drafted: M/OFM/OPS: Patrice Johnson, ext. 5-3504

Approved: M/OFM: Cliff Seagroves (CS)

Cleared: M/OFM: Matt Sandelands (ok)



United States Department of State

Washington, D.C. 20520

APR 26 2019

UNCLASSIFIED

TO:            OIG – Sandra Lewis  
FROM:         DGHR – Carol Z. Perez   
SUBJECT:     Response to Draft OIG Report – Inspection of the Office of Foreign Missions  
                  (M/OFM)

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

**OIG Recommendation 3:** The Bureau of Human Resources, in coordination with the Office of Foreign Missions, should conduct an organizational assessment of the Office of Foreign Missions and implement any recommendations resulting from the assessment. (Action: DGHR, in coordination with OFM)

**Management Response:** HR/RMA has reviewed the inspection report and concurs with the recommendation to perform an organizational assessment of OFM. In order to adequately analyze the organization's structure, workload, and reporting lines, HR/RMA expects to begin the assessment in May 2019 and deliver a final report to the OIG in November 2019. This timeline is dependent on OFM partnering with HR/RMA to help collect data for the analysis in a timely manner. Implementation progress updates will be delivered to the OIG as requested.

UNCLASSIFIED

## ABBREVIATIONS

---

ATO	Authorization to Operate
CGFS	Bureau of the Comptroller and Global Financial Services
COR	Contracting Officer's Representative
DIN	Dedicated Internet Network
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FBS	Functional Bureau Strategy
FMA	Foreign Missions Act
ICC	International Chancery Center
ISSO	Information Systems Security Officer
OFM	Office of Foreign Missions
SOP	Standard Operating Procedure
TOMIS	The Office of Foreign Missions Information System

## OIG INSPECTION TEAM MEMBERS

---

Gillian Milovanovic, Team Leader

Iris Rosenfeld, Team Manager

Jeffrey Jamison

Kevin Milas

Vandana Patel

Charles Rowcliffe

Christopher Simpson

Judith Spelbrink



**HELP FIGHT**  
FRAUD, WASTE, AND ABUSE

1-800-409-9926

[www.stateoig.gov/HOTLINE](http://www.stateoig.gov/HOTLINE)

If you fear reprisal, contact the  
OIG Whistleblower Coordinator to learn more about your rights  
[WPEAOmbuds@stateoig.gov](mailto:WPEAOmbuds@stateoig.gov)