

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-20-01

Office of Inspections

October 2019

Inspection of Embassy Maseru, Lesotho

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-20-01

What OIG Inspected

OIG inspected executive direction, the President's Emergency Plan for AIDS Relief program, resource management, and information management operations of Embassy Maseru.

What OIG Recommends

OIG made 8 recommendations: 6 to Embassy Maseru, 1 to the Bureau of Overseas Buildings Operations, and 1 to the Office of the Global AIDS Coordinator regarding the President's Emergency Plan for AIDS Relief program.

In its comments on the draft report, the Department concurred with all 8 recommendations. OIG considers all 8 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.

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What OIG Found

- The Ambassador and the Deputy Chief of Mission generally led Embassy Maseru in a professional and collaborative manner consistent with Department of State leadership principles.
- Information management operations at Embassy Maseru lacked basic standard operating procedures to prioritize tasks and adhere to the Department's information security requirements.
- Disruptions of deliveries of commodities to clinics supported by the President's Emergency Plan for AIDS Relief placed at risk the program's ability to meet key goals related to testing, treatment, and viral suppression.
- Emergency doors in an embassy compound building did not meet Department standards.
- Spotlight on Success: As part of a broader crisis management exercise, the embassy organized a Crisis Preparedness Fair to involve the entire embassy community in emergency planning.
- Spotlight on Success: The Management Section instituted a continuous process improvement system for management controls.

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CONTEXT

The Kingdom of Lesotho is a small, mountainous country slightly smaller than the state of Maryland and completely surrounded by the country of South Africa. In 2019, an estimated 51 percent of Lesotho's population of almost 2 million were under the age of 25. More than half of the country's population lives below the poverty line, and its HIV/AIDS prevalence rate is the second highest in the world. Human trafficking is also a significant issue, as Lesotho serves as a source and a destination for trafficking in both adults and children. Approximately three-fourths of Lesotho's citizens live in rural areas and engage in animal herding and subsistence agriculture.

Lesotho is a constitutional monarchy with a history of political instability. Since gaining independence from the United Kingdom in 1966, it has seen a mix of rule by decree, coups, military government, and democratically elected government. Since the June 2017 election—the third in 5 years—Lesotho has been governed by a four-party coalition. The last two elections were considered to be free and fair.



Figure 1: Map of Lesotho (Source: CIA World Factbook)

The United States and the Kingdom of Lesotho have enjoyed a long partnership based on shared priorities and a commitment to a peaceful, healthy, and prosperous Lesotho. The U.S. Government is the largest donor in Lesotho, with U.S. bilateral foreign assistance primarily for the President's Emergency Plan for AIDS Relief (PEPFAR). PEPFAR's proposed 2018 budget for Lesotho was \$83.5 million, up \$51 million from 2016. PEPFAR implements a strategic portfolio of programs aimed at epidemic control, defined as fewer new infections than HIV-positive patient deaths from all causes. The \$362.5 million Millennium Challenge Corporation (MCC) compact, which concluded in September 2013, developed Lesotho's health care and water sanitation infrastructure and promoted private sector development. In December 2017, MCC selected Lesotho to begin the process of developing a second

MCC compact, for which negotiations were ongoing at the time of the inspection. U.S. assistance also promotes trade facilitation, renewable energy development, good governance, and disaster reduction through sustainable agricultural practices.

The top three objectives of Embassy Lesotho's August 2018 Integrated Country Strategy (ICS) are:

- Strengthen democratic institutions and promote good governance.
- Promote a healthy nation by achieving HIV epidemic control.

- Spur inclusive economic growth, equitable trade, and investment.

The FY 2019 authorized staffing levels for Embassy Maseru included 32 U.S. direct-hire positions, 3 eligible family members, and 91 locally employed (LE) staff members. Additionally, the Peace Corps had 93 volunteers serving in Lesotho. Other U.S. Government agencies represented in the embassy were the U.S. Agency for International Development (USAID), the Department of Health and Human Services' Centers for Disease Control and Prevention (CDC), the Department of Defense, and MCC.

OIG conducted this inspection of Embassy Maseru consistent with Section 209 of the Foreign Service Act of 1980.¹ Using its risk-based approach to inspections, OIG inspected executive direction, the PEPFAR program, and management operations, including management controls and information management. A companion classified inspection report discusses Embassy Lesotho's security program and issues affecting the safety of mission personnel and facilities, as well as classified findings related to the embassy's information management program.

EXECUTIVE DIRECTION

OIG assessed leadership on the basis of interviews, staff questionnaires, and OIG's review of documents and observations of meetings and activities during the course of the on-site portion of the inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in Lesotho in January 2018. She previously served as the Chief of Staff for the Assistant Secretary for Administration and, prior to that, as the Deputy Executive Director of the Bureau of Near Eastern Affairs. The Deputy Chief of Mission (DCM), also a career member of the Foreign Service, arrived in Maseru in October 2017. His prior assignment was the Mission Deputy at Embassy Koror, Palau.

OIG found that, overall, the Ambassador and the DCM led the embassy in a collegial manner and worked together effectively. The Ambassador, a management officer, provided the DCM with guidance on management operations, while the DCM, a political officer, advised the Ambassador on political issues. For example, the Ambassador worked with the DCM to resolve an LE staff tax withholding issue, described in more detail below, and the DCM helped the Ambassador strategize on how best to engage the Government of Lesotho on political matters.

The Ambassador and the DCM had an open-door policy, which the American staff confirmed. The Ambassador held monthly meetings with all agency and section heads, in addition to a weekly Country Team meeting. The DCM attended these meetings and also met weekly with section heads to discuss and resolve outstanding problems.

¹ See Appendix A.

OIG found the Ambassador demonstrated the Department of State's (Department) leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214. OIG questionnaires and interviews indicated embassy staff found the Ambassador to be open, honest, caring, and passionate about her work in Lesotho. OIG interviews and surveys showed that she encouraged staff at all levels to bring their ideas, concerns, and questions to her, which led to productively identifying and resolving problems. She actively solicited feedback on issues affecting morale and sought to resolve them. For example, when embassy employees had difficulties crossing the border into South Africa, the Ambassador raised the issue with the Government of Lesotho, and the situation improved.

Embassy employees told OIG the DCM modeled 3 FAM 1214 leadership and management principles that relate to valuing and developing people, as he was skilled in mentoring and committed to subordinates' professional development. Employees also described the DCM as approachable and collaborative, and they appreciated that he organized embassy community events that included both LE and American staff.

The Front Office Led an Effort to Resolve a Tax Issue for Local Staff

OIG found that the Ambassador and DCM strengthened relationships with both LE staff and the host country by resolving a tax issue involving the LE staff. Based on Department policy, the embassy had not withheld local taxes for the LE staff. Instead, employees were expected to pay their taxes directly to the Lesotho tax authority. However, local employees had not always complied with this requirement, and the Lesotho tax authority eventually began seizing funds from LE staff members' bank accounts for back taxes. After the LE staff asked the Front Office to help resolve the issue, the Ambassador worked with the Department to allow the embassy to withhold taxes from LE staff pay. She also met with the LE Staff Committee on several occasions to hear their concerns. Furthermore, beginning in June 2018, the DCM, along with the Management Officer, met with the LE Staff Committee at least once every 3 weeks to work through the details of resolving the tax issue. The Front Office also used Country Team meetings and town halls to keep the embassy community apprised of developments. In April 2019, the embassy began withholding local taxes and sending the funds to the host country's tax authority on behalf of the LE staff.

Execution of Foreign Policy Goals and Objectives

Officials in Department bureaus and at other agencies, along with embassy staff, credited the Ambassador with developing a good rapport with host country officials that provided her with access to the Prime Minister and ministers throughout the Government of Lesotho. She used her access to urge her interlocutors to undertake security sector and political reforms and make progress on HIV epidemic control. OIG's review of the Ambassador's calendar showed that she also occasionally hosted Lesotho ministers at her residence for dinner. She also met with the King to discuss HIV/AIDS prevention strategies. Both the Ambassador and the DCM told OIG that the fact that Lesotho was voting more frequently with the United States at the United Nations was an example of positive U.S. influence in the country.

The DCM led the development of the ICS, which involved all section heads and was submitted to the Department in August 2018. After its publication, the Front Office used town halls, Country Team meetings, and LE Staff Committee meetings to raise employee awareness of its objectives. After she arrived in Lesotho, the Ambassador also undertook a public outreach and program oversight initiative to stress top ICS goals and create a strong narrative of U.S. commitment to Lesotho. As part of this effort, she traveled to all 10 districts in Lesotho and visited PEPFAR program sites across the country. She met with PEPFAR small grant recipients, visited the most remote program-supported hospital, and visited PEPFAR-supported health facilities across the country.

The Embassy Coordinated Foreign Assistance Effectively

The Ambassador and the DCM actively engaged and coordinated with MCC personnel on foreign assistance to identify the most effective engagement strategies and to avoid duplicating other programs. The DCM worked closely with MCC headquarters in Washington and personnel serving temporarily in Lesotho to ensure collaboration and to address any concerns. The DCM also met regularly with host government ministries that support MCC and other foreign assistance programs.

OIG found that the embassy developed effective interagency coordination mechanisms for the PEPFAR program.² OIG's interviews with embassy employees found a history of effective leadership by the embassy's PEPFAR Coordinator, a clear division of responsibilities between USAID and CDC, and co-location of staff as factors that facilitated collaboration. They also said that strong interagency relationships, in turn, facilitated interagency decision-making to advance epidemic control goals.

Embassy employees OIG interviewed credited the Ambassador and the DCM with effectively engaging with the host country on PEPFAR issues. For example, the Ambassador met regularly with the Ministry of Health to advance PEPFAR goals and raised PEPFAR issues in her meetings with the King and other senior officials. The Government of Lesotho promptly adopted key PEPFAR health policy guidance, which enabled advances in improving the country's HIV/AIDS response.³ PEPFAR operations are discussed in more detail later in this report.

Adherence to Internal Controls

The Ambassador and the DCM conducted their responsibilities related to management controls in accordance with cable 18 STATE 30272.⁴ They worked closely with the Management Officer to address and enhance management controls and operations, which had been affected by

² PEPFAR is led and managed by the Department's Office of the U.S. Global AIDS Coordinator and Health Diplomacy and implemented by seven U.S. Government departments and agencies.

³ For example, Lesotho adopted PEPFAR and World Health Organization guidance on initiating immediate treatment for individuals who test positive for HIV ("test and treat"), focusing testing on partners and children of those living with HIV ("index testing"), and transitioning to a more effective antiretroviral drug regime.

⁴ Cable 18 STATE 30272, "Your Role in Assuring Strong Management Controls and Oversight Over Post Operations," April 3, 2018.

staffing gaps several years prior to the inspection. Specifically, they revamped the embassy's management controls and implemented standard operating procedures. Upon his arrival in October 2017, the Management Officer initiated a management operations review and began updating policies, implementing regulations, and enhancing management controls to meet Department requirements. As discussed in the Resource Management section of this report, the Management Officer, with full Front Office support, developed a continuous process improvement system to track and resolve internal control deficiencies.

The Management Officer, with guidance from the Ambassador and the DCM, led the preparation of the FY 2018 Chief of Mission Annual Management Control Statement of Assurance, in accordance with 2 FAM 022.7. The Front Office reviewed and submitted the statement, to which other Country Team members contributed, on October 1, 2018. It identified significant deficiencies in the security management of embassy facilities and in information technology (IT). The embassy developed corrective action plans for each of the deficiencies and certified that the actions proposed or taken would adequately correct the identified weaknesses and strengthen management controls. During the inspection, however, OIG identified additional internal control issues in security and information management, as discussed later in this report and in the companion classified inspection report.

Security and Emergency Planning

The Ambassador conducted her security responsibilities in accordance with 12 Foreign Affairs Handbook (FAH)-1 H-721. Embassy employees told OIG they felt safe with the level of security provided on a daily basis and that the Front Office fully supported mission efforts to protect embassy staff, families, and facilities. Both the Ambassador and the DCM participated in all radio checks and emergency drills.

The DCM chaired the Emergency Action Committee and worked with the Regional Security Officer to determine when committee meetings were needed and ensure that embassy staff were well-versed on emergency crisis issues. For example, in August 2018, violent protests over low wages broke out near the embassy. In response, the Front Office convened the Emergency Action Committee numerous times over a 2-week period to determine the steps necessary to protect embassy staff. During the first week, the Front Office instructed staff to delay or cancel their commutes depending on their location or route. During the second week, the embassy sent staff home before protests could escalate. The Ambassador and the DCM met with the Regional Security Officer at least monthly and more frequently if circumstances warranted. The companion classified report discusses issues related to physical security and emergency preparedness.

Spotlight on Success: Crisis Preparedness Fair

In December 2017, the Regional Security Officer organized a Crisis Preparedness Fair as part of a broader crisis management exercise. The Crisis Preparedness Fair was an effort to involve the entire embassy community—especially LE staff and American family members—in emergency planning. Most embassy sections hosted their own emergency preparedness-themed activities. For example, the Public Affairs Section held a question and answer game show, the Information Management Office displayed emergency communication equipment, the Regional Security Office and Health Unit had trauma and medical treatment demonstrations (including CPR), and the Facilities Management Section offered fire extinguisher training. The fair included information for participants to take home. In addition to providing training and exposure to emergency resources and personnel, it gave key external contacts an informal environment in which to meet the embassy staff with whom they would interact in an emergency. The fair was well received within the community, and the Regional Security Officer planned to make it an annual event.

Developing and Mentoring Foreign Service Professionals

The DCM served as the mentor for Embassy Maseru's two First- and Second-Tour officers in accordance with 3 FAM 2242.4; he also mentored the embassy's several first-time section heads. He advised them on topics such as bidding on assignments and frequently took them to meetings with Government of Lesotho officials or identified other opportunities for them to interact with these officials. He also invited section chiefs to share their experiences with more junior staff.

Embassy staff also credited the Ambassador with being an excellent mentor. She identified opportunities for junior staff to accompany her to meetings with the Prime Minister, cabinet officials, and a broad range of stakeholders. For example, the Information Management Officer accompanied her to a remote district, met with district officials, and drafted the reporting cable. The Ambassador appointed the second-tour General Services Officer as the women's global issues coordinator and planned to take her on a trip to meet with local government authorities and then draft the reporting cables.

POLICY AND PROGRAM IMPLEMENTATION

Foreign Assistance

OIG reviewed PEPFAR interagency coordination, program performance, and selected internal controls relating to supply chain management, local partner transitions, grants management, and adherence by agencies to expenditure levels set in the PEPFAR Country Operational Plan.⁵

⁵ The Country Operational Plan is the primary strategic planning and budget document for the Office of the U.S. Global AIDS Coordinator and Health Diplomacy. It describes annual U.S. Government investments linked to specific results in HIV/AIDS programs and is the basis for approval of annual U.S. Government bilateral HIV/AIDS funding in most partner countries. Embassies prepare the Country Operational Plan under annual guidance from the coordinator's office.

OIG identified weaknesses with respect to the Government of Lesotho's supply chain management, as discussed below, but did not find other issues that required corrective action. The embassy corrected one issue related to grants management during the inspection.⁶

Supply Chain Disruptions Place Program's Ability to Accomplish Key Goals at Risk

OIG found that disruptions of deliveries of commodities to PEPFAR-supported clinics placed at risk the program's ability to meet key goals related to testing, treatment, and viral suppression. For FY 2019, the estimated U.S. Government contribution to Lesotho HIV commodities procurements was approximately \$9 million. The Government of Lesotho directly managed most commodity procurements, including those funded by the U.S. Government. The Lesotho Government reported that, as of February 2019, it had less than a 6-month supply nationwide of 9 out of 15 first-line antiretroviral (ARV) drugs for adults and children. In May 2019, embassy staff found widespread shortages of commodities, including first-line ARV drugs, in health facilities they visited. Maintaining these supplies is critical to the program because the drugs provide lifesaving treatment for more than 253,000 people in Lesotho. According to embassy staff, in previous years, health facilities had reported stockouts and low supplies of tuberculosis preventive therapy drugs, HIV self-testing kits, and laboratory equipment and commodities; however, stockouts of first-line ARV drugs had not occurred before 2019. PEPFAR employees told OIG that stockouts and low supplies of first-line ARV drugs in April 2019 meant PEPFAR-supported clinics were dispensing as little as a 1-week supply of ARV drugs rather than the minimum 90-day supply the PEPFAR program recommends. As described in the 2019 PEPFAR Country Operational Plan, commodity security and supply chain management are critical to helping Lesotho reach epidemic control.⁷

Embassy employees told OIG they did not know the reasons for supply chain disruptions and, therefore, were uncertain about the mix of diplomatic and technical program interventions needed to address them. OIG concluded that external assistance from the Department's Office of the U.S. Global AIDS Coordinator and Health Diplomacy or regional technical expertise may be necessary to better understand the problem. Through interviews with embassy staff and reviews of a USAID-funded external study of the Lesotho drug supply chain and the PEPFAR Country Operational Plan, OIG identified two general areas of concern regarding supply chain management:

- **Internal Controls Challenges:** Embassy employees described a weak internal control environment within the Government of Lesotho as a general concern. Specific challenges included poorly written contracts that did not include performance indicators or delivery milestones and lack of an inventory accountability process at the central and

⁶ Specifically, OIG found that the embassy's Public Affairs Officer signed 24 grants with an award value of \$271,627 on behalf of PEPFAR. As stated in 10 FAH-1 H-032c, public diplomacy grants officers should not sign grants on behalf of other sections or for awards without an intrinsic public diplomacy purpose. When OIG informed the embassy about this issue, it worked with Embassy Pretoria, South Africa, to transfer grants officer duties to that embassy's PEPFAR community grants coordinator.

⁷ As noted previously, epidemic control is defined as the point at which new HIV infections have decreased and fall below the number of deaths of those individuals with HIV.

local level. Weak internal controls, in turn, could facilitate waste, fraud, or mismanagement of U.S. Government-funded commodities.

- **Organization, Leadership, and Accountability:** Embassy employees and a USAID-funded study also cited ineffective coordination between the Lesotho Government organizations involved in commodities purchases. Late payments to vendors by the Lesotho Ministry of Finance and lengthy bureaucratic procurement processes were also identified as challenges.

OIG concluded that stockouts and low supplies of first-line ARV drugs and other commodities, even on a temporary basis, present risks to the PEPFAR program. For example, patients who lack access to a stable supply of ARV drugs may discontinue treatment if they find the process of obtaining them burdensome. Stockouts and low supplies of drugs and laboratory equipment and supplies could increase risks that patients under treatment do not achieve viral suppression,⁸ which could lead to viral resistance among patients. In addition, patients who are not virally suppressed are at higher risk of transmitting the virus to others. As discussed above, the reasons for Lesotho's persistent supply chain management problems are complex and not well understood by Embassy Maseru's PEPFAR staff. Without a comprehensive understanding of the reasons for supply chain disruptions, the program risked not meeting PEPFAR performance goals. Moreover, the program may not be able to ensure accountability for U.S. Government funds provided for HIV/AIDS commodities procurements.

Recommendation 1: The Office of the U.S. Global AIDS Coordinator and Health Diplomacy, in coordination with Embassy Maseru, should conduct an interagency assessment of supply chain management issues to identify root causes of deficiencies and develop a corrective action plan, including proposed policy and technical changes, with the Government of Lesotho. (Action: S/GAC, in coordination with Embassy Maseru)

Lesotho Close to Meeting Epidemic Control, Key HIV/AIDS Goals

Despite the supply chain management challenges described above, Lesotho expected to achieve HIV/AIDS epidemic control by the end of FY 2020. The country also was close to achieving Department and Joint United Nations Programme on HIV/AIDS goals on testing, treatment, and viral suppression.⁹ According to the 2019 Lesotho Country Operational Plan, 81 percent of persons living with HIV know their status, 92 percent of those who know their status are under ARV drug treatment, and 88 percent of those treated are virally suppressed. Since 2003, the U.S. Government has delivered \$1.99 billion in foreign assistance to Lesotho for testing, treatment, prevention, and comprehensive health and social services programs to combat HIV/AIDS, including \$82.5 million in FY 2018 funding. This funding has enabled life-

⁸ If taken as prescribed, ARV drugs reduce the amount of HIV in the body (viral load) to a very low level, which keeps the immune system working and prevents illness. Another benefit of reducing the amount of virus in the body is that it helps prevent transmission to others.

⁹ These goals call for ensuring by 2020 that 90 percent of people living with HIV know their status, 90 percent of those tested are on antiretroviral treatment, and that 90 percent of those under antiretroviral treatment are virally suppressed and thus less able to transmit the virus.

saving treatment for most people living with HIV in Lesotho and also has contributed to reductions in new HIV infections. For example, the country reduced new infections by 42.1 percent from 2014 to 2017, according to epidemiological assessments.¹⁰

Long-Term Program Sustainability, Progress on Local Partner Transitions Remains Uncertain

Despite this progress, PEPFAR faced challenges in ensuring long-term sustainability and host country ownership of the program. The Government of Lesotho funded approximately 18 percent of the total HIV/AIDS health budget in 2018 and relied on international donors for the remaining funds. Additionally, the embassy told OIG that few local implementing partners with technical and administrative capacity operated in Lesotho, which limited the program's ability to transfer funding to such entities although this is encouraged by the coordinator's office to promote host country ownership of the program. As a result, USAID reported that it delivered no assistance through local partners, and CDC's sole local partner was Lesotho's Ministry of Health, which it funded through a cooperative agreement. USAID said it planned to increase the amount of aid delivered through local partners to 48 percent by 2022 and was assessing whether to initiate government-to-government assistance to Lesotho.¹¹ In response to this information, OIG advised the embassy that, as it increases the percentage of PEPFAR assistance delivered through local implementing partners, it should develop policies and procedures to ensure proper oversight over the awards. Such steps are necessary given the concerns, noted previously, that these partners may lack technical and administrative capacity and are thus at elevated risk of waste, fraud, and mismanagement.

RESOURCE MANAGEMENT

OIG reviewed internal control systems in facilities management, human resources, financial management, and general services operations. OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exception described below.

Facilities Management

Emergency Exit Doors in the PEPFAR Building Did Not Meet Department Standards

Two emergency exit doors in the embassy compound's PEPFAR building did not fully meet Department standards in 12 FAH-5 H-444a. The embassy installed the doors when it converted the building from a warehouse to offices in 2007. The Regional Security Officer had identified the safety deficiencies with the doors and installed the required reverse swing closing

¹⁰ OIG calculated the percentage decrease from 2014 to 2017 by comparing reported figures on these issues. In particular, the U.S. President's Emergency Plan for AIDS Relief, *Lesotho Country Operational Plan (COP) 2018 Strategic Direction Summary* (March 15, 2018), cites a 2014 Demographic and Health Survey that found annual incidence at 1.9 percent. The U.S. President's Emergency Plan for AIDS Relief, *Country Operational Plan COP 2019 Strategic Direction Summary* (April 5, 2019), cites a 2017 Lesotho Population Based HIV/AIDS Impact Assessment that found annual incidence at 1.1 percent.

¹¹ Funding provided to partner governments is known as government-to-government assistance.

mechanisms in 2018; however, the doors still lacked the required electrical locks with emergency override and panic devices. Without these safety devices, an alarm does not sound if the doors are opened, and embassy security is not notified if there is an emergency. In mid-May 2019, the embassy requested assistance from the Bureau of Overseas Buildings Operations to complete the safety upgrades. Notwithstanding this request, the doors had yet to be brought into compliance with Department safety standards at the time of the on-site portion of the inspection. As a result, the staff working in the building were at risk of injury in an emergency.

Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Maseru, should bring the doors in the President’s Emergency Plan for AIDS Relief building into compliance with Department standards. (Action: OBO, in coordination with Embassy Maseru)

Spotlight on Success: Management Section Instituted a Continuous Process Improvement System to Improve Management Controls

In 2018, while working on the annual Chief of Mission Management Control Statement of Assurance, the Management Officer instituted a continuous process improvement system that significantly improved the embassy’s ability to track and resolve its internal control deficiencies. The embassy also created a quality coordinator position, currently filled by an eligible family member, to run the tracking system. The system includes all deficiencies identified through the statement of assurance process as well as in OIG questionnaires and recommendations in past OIG reports of other embassies. The quality coordinator tracks the deficiencies, meets regularly with the employees responsible for addressing these concerns and enters into the system updates on the embassy’s progress in resolving the problems. A deficiency is not considered “corrected” until preventative measures are in place to ensure that it does not re-occur. As of April 2019, the embassy had successfully resolved 62 items identified since the process began in December 2018.

INFORMATION MANAGEMENT

OIG reviewed the embassy’s Information Management Section operations, including classified, unclassified, and dedicated internet network (DIN) computer operations; classified communications security; emergency communications preparedness; radio and telephone programs; and mail and pouch services. Although operations and services generally met customer needs, OIG found the section lacked basic standard operating procedures for computer operations to prioritize tasks and ensure adherence to the Department’s information security and management principles. Since early 2018, lengthy gaps in LE staff positions due to attrition and personal leave also affected the efficiency of the embassy’s unclassified and DIN computer operations.

OIG found deficiencies in effective information security and program management implementation, as detailed below and in the companion classified report. Additionally, OIG advised the Information Management Officer on issues related to records management, information security training, emergency communication equipment, computer and media

classification markings, unclassified server room access control, and help desk workload tracking.

Security and Routine Maintenance Procedures to Protect Automated Information Systems Lacking

Embassy Maseru's classified and unclassified systems did not fully comply with 12 FAM 620 and 12 FAM 630 policies for protecting the systems. Specifically:

- The section did not properly maintain Active Directory security and distribution groups for the unclassified computer network, as required by 12 FAH-10 H-112.5-2(1-3) and 12 FAH-10 H-112.1-2a(2-3), b, and j.
- The section did not limit users' access to information necessary to accomplish their assigned tasks, in accordance with 12 FAH-10 H-112.5-2(1).
- Application and service accounts did not follow access control requirements in 12 FAH-10 H-132.4-2.
- The section did not review and analyze unclassified server audit logs for indications of inappropriate or unusual activity, as required by 12 FAH-10 H-122.5-1c.
- The section did not maintain classified and unclassified systems operations logs for all normal daily operations; system power-ups and power-downs; and installation, removal, or modification of the system, in accordance with 12 FAH-10 H-122.12.
- The Local Configuration Change Control Board did not provide oversight for IT configuration change activities, contrary to 12 FAH-10 H-222.2-1(1,2).
- The section did not complete and test its classified and unclassified IT contingency plans, as required in 12 FAH-10 H-232.3-1b(1-3).

Although the section's staff of one American and two local employees started taking corrective action to address these issues before and during the on-site portion of the inspection, they had not yet finished the standard operating procedures. Without standard operating procedures, the embassy was unable to ensure the confidentiality, integrity, and availability of its unclassified and classified computer operations.

Recommendation 3: Embassy Maseru should implement standard operating procedures for its unclassified and classified computer operations in accordance with Department standards. (Action: Embassy Maseru)

Information Systems Security Officers Did Not Perform All Duties

The embassy's unclassified and classified Information Systems Security Officers (ISSO)¹² did not perform all information systems security duties, such as review and analysis of information systems audit logs for inappropriate or unusual activity, as required by 12 FAM 613.4. In addition, ISSOs did not brief new employees on their information security responsibilities and

¹² The Information Management Officer was the primary ISSO and the Regional Security Officer served as the alternate ISSO.

the Department's policies. ISSO briefings are particularly important for LE staff who have never worked for the U.S. Government. OIG also found that the ISSOs did not use the Department's ISSO resources, such as standard operating procedures and checklists, to prioritize and plan their duties. OIG addressed this deficiency in a May 2017 management assistance report¹³ that highlighted widespread failures among embassy ISSOs to perform information systems security duties. A lack of planning and training as well as competing priorities led the embassy to neglect these duties, which placed the security of the Department's computer systems at risk.

Recommendation 4: Embassy Maseru should require that Information Systems Security Officers perform their duties in accordance with Department guidance. (Action: Embassy Maseru)

Embassy's Internal Control of Mobile Devices Was Ineffective

Embassy Maseru did not implement effective internal controls for the inventory and management of mobile devices, such as cell phones, tablets, and laptops, as required in 12 FAH-10 H-163.1a(3) and 12 FAH-10 H-164.1a(8). As a result, the embassy did not have a complete inventory of mobile devices at the time of the inspection. OIG found that the General Services Office and the Information Management Section shared responsibility for mobile device inventory, but there was no clear and documented delineation of those responsibilities to ensure effective control. Furthermore, in December 2018, the embassy identified an estimated loss of \$100,000 because of weak internal controls in the disposal of mobile devices with active subscriber identification module, or SIM, cards at a May 2018 embassy auction. To address this issue, the embassy implemented a standard operating procedure for the disposal of IT equipment. However, it did not similarly implement procedures for the issuance and tracking of mobile devices. The lack of standard operating procedures increases the risk of inaccurate inventory records and potential loss of mobile devices.

Recommendation 5: Embassy Maseru should implement standard operating procedures for managing mobile devices that include issuance, inventory, and disposition of devices. (Action: Embassy Maseru)

Network Devices in the PEPFAR Building Were Unprotected and Unmarked

Sensitive But Unclassified network devices in the PEPFAR building were inadequately protected or marked to prevent accidental or malicious interruption of service or unauthorized use, as required by 12 FAM 644.1. OIG observed that not all network devices in the building had markings to show whether they were owned by the Department, CDC, or USAID, all of which had devices in the building. Without the proper physical and procedural controls and markings, the network devices are vulnerable to accidental or malicious disruption.

¹³ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

Recommendation 6: Embassy Maseru should protect its network devices in accordance with Department standards. (Action: Embassy Maseru)

Unregistered and Unmonitored Dedicated Internet Networks Created Cybersecurity Risk

The section did not inventory, monitor, or register Embassy Maseru's DINs with the Bureau of Information Resource Management, as required by 5 FAM 872.1. Section staff did not know the number of DINs in the embassy or their purpose, location, or configuration. For example, until OIG raised this issue, the staff was unaware of a wireless DIN operating in the PEPFAR building with a U.S. Government-banned network device. On the advice of OIG, the Information Management Officer removed the device from the network. A lack of staff oversight and ISSO monitoring contributed to this problem. Without registering, securing, and monitoring the DINs operating in the embassy, information on the Department's unclassified network may be vulnerable to cyber-attack.

Recommendation 7: Embassy Maseru should inventory, secure, monitor, and register its dedicated internet networks with the Bureau of Information Resource Management in accordance with Department standards. (Action: Embassy Maseru)

Unclassified and Classified Network Cabling Did Not Meet Department Standards

Network cables in the chancery's unclassified and classified server rooms and in the PEPFAR building did not meet the Department's cabling installation guidelines. Guidance in 5 FAH-9 H-221 and 5 FAH-9 H-353 establishes standards to provide a uniform identification process for cabling to prevent unauthorized access and facilitate troubleshooting and easy installation or removal of cabling. OIG observed disorganized and unmarked cables in the unclassified and classified server rooms, as well as cables routed across the PEPFAR building ceiling without the conduit necessary for proper protection. This occurred because section staff did not devote time to cable maintenance. In addition to creating a network security vulnerability, non-standard cabling makes it difficult for the network staff to fix network connectivity problems expeditiously.

Recommendation 8: Embassy Maseru, in coordination with the Bureau of African Affairs, should correct the network cabling infrastructure to comply with Department standards. (Action: Embassy Maseru, in coordination with AF)

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Maseru, the Office of the U.S. Global AIDS Coordinator and Health Diplomacy, and the Bureau of Overseas Buildings Operations. The Department's complete responses can be found in Appendix B.

Recommendation 1: The Office of the U.S. Global AIDS Coordinator and Health Diplomacy, in coordination with Embassy Maseru, should conduct an interagency assessment of supply chain management issues to identify root causes of deficiencies and develop a corrective action plan, including proposed policy and technical changes, with the Government of Lesotho. (Action: S/GAC, in coordination with Embassy Maseru)

Management Response: In its September 9, 2019, coordinated response with Embassy Maseru, the Office of the U.S. Global AIDS Coordinator and Health Diplomacy concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of an interagency assessment of supply chain management issues with the President's Emergency Plan for AIDS Relief program in Lesotho and a corrective action plan to address those issues.

Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Maseru, should bring the doors in the President's Emergency Plan for AIDS Relief building into compliance with Department standards. (Action: OBO, in coordination with Embassy Maseru)

Management Response: In its September 13, 2019, response, the Bureau of Overseas Buildings Operations concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the doors in the President's Emergency Plan for AIDS Relief building comply with Department standards.

Recommendation 3: Embassy Maseru should implement standard operating procedures for its unclassified and classified computer operations in accordance with Department standards. (Action: Embassy Maseru)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Maseru implemented standard operating procedures for its unclassified and classified computer operations.

Recommendation 4: Embassy Maseru should require that Information Systems Security Officers perform their duties in accordance with Department guidance. (Action: Embassy Maseru)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Maseru's Information Systems Security Officers perform their duties in accordance with Department guidance.

Recommendation 5: Embassy Maseru should implement standard operating procedures for managing mobile devices that include issuance, inventory, and disposition of devices. (Action: Embassy Maseru)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the embassy implemented standard operating procedures for managing its mobile devices.

Recommendation 6: Embassy Maseru should protect its network devices in accordance with Department standards. (Action: Embassy Maseru)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Maseru protected its network devices in accordance with Department standards.

Recommendation 7: Embassy Maseru should inventory, secure, monitor, and register its dedicated internet networks with the Bureau of Information Resource Management in accordance with Department standards. (Action: Embassy Maseru)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Maseru inventoried, secured,

monitored, and registered its dedicated internet networks with the Bureau of Information Resource Management.

Recommendation 8: Embassy Maseru, in coordination with the Bureau of African Affairs, should correct the network cabling infrastructure to comply with Department standards. (Action: Embassy Maseru, in coordination with AF)

Management Response: In its September 9, 2019, response, Embassy Maseru concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Maseru corrected the network cabling infrastructure to comply with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Rebecca Gonzales	1/2018
Deputy Chief of Mission	Daniel Katz	10/2017
Chiefs of Sections:		
Management	Jacob Rocca	10/2017
Consular	Amanda Grier	1/2019
Political/Economic	Matthew Jamrisko	10/2017
Public Affairs	Melissa Schumi Jones	8/2017
Regional Security	Dennis Jones	8/2017
Other Agencies:		
U.S. Agency for International Development	Kristin Ruckshuhl	11/2016
Department of Health and Human Services		
Centers for Disease Control and Prevention	Andy Pelletier	05/2015
Peace Corps	Leon Kayego	08/2017

Source: Embassy Maseru

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 18 to July 5, 2019, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

Objectives and Scope

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

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved and U.S. interests are accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; and whether instances 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.

APPENDIX B: MANAGEMENT RESPONSES

Embassy of the United States of America



Maseru, Lesotho

September 9, 2019

UNCLASSIFIED

THROUGH: Bureau of African Affairs – Tibor Nagy, Assistant Secretary

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

FROM: Embassy Maseru – Rebecca Gonzales, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Maseru, Lesotho

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

OIG Recommendation 1: *The Office of the U.S. Global AIDS Coordinator and Health Diplomacy, in coordination with Embassy Maseru, should conduct an interagency assessment of supply chain management issues to identify root causes of deficiencies and develop a corrective action plan, including proposed policy and technical changes, with the Government of Lesotho. (Action: S/GAC, in coordination with Embassy Maseru)*

Management Response: Embassy Maseru, along with the PEPFAR Country Team, concurs with the recommendation. PEPFAR Lesotho has reached out to the Global Health Supply Chain implementing partner, Chemonics, to identify root causes of deficiencies. Two major deficiencies include: 1) the need for the formalization of the supply chain management directorate and 2) annual disbursement of funding for ART. Ambassador Gonzales has been communicating with the Ministry of Finance and the Ministry of Health to advocate for these changes. The Department of Treasury, Office of Technical Assistance has been engaged to place a resident advisor at the Ministry of Finance starting in January 2020 to strengthen cash management and forecasting to improve budget execution and planning. This has the potential to minimize cash shortage challenges and allow for the annual disbursement of funding for commodities. USAID plans to hire a dedicated health system strengthening specialist in early FY2020 to address weaknesses within the health sector, including procurement and supply chain. Finally, a joint mission between the PEPFAR interagency team and Global Fund will be providing technical assistance in procurement and supply challenges within the laboratory in

September 2019. The Office of the U.S. Global AIDS Coordinator and Health Diplomacy is fully supportive of this plan and will continue to coordinate with Embassy Maseru to address supply chain management issues.

OIG Recommendation 2: *The Bureau of Overseas Buildings Operations, in coordination with Embassy Maseru, should bring the doors in the President's Emergency Plan for AIDS Relief building into compliance with Department standards. (Action: OBO, in coordination with Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. The Bureau of Overseas Buildings Operations, in coordination with Embassy Maseru, should bring the doors in the President's Emergency Plan for AIDS Relief building into compliance with Department standards. (Action: OBO, in coordination with Embassy Maseru)

OIG Recommendation 3: *Embassy Maseru should implement standard operating procedures for its unclassified and classified computer operations in accordance with Department standards. (Action: Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. Non-compliance with this requirement was identified by Embassy Maseru's Information Management Officer as a potential deficiency during management control review activities in 2018 when it was noted that existing IRM standard operating procedures were outdated. Working with the Quality Coordinator, IRM staff established a plan for redress and the IMO informed the Management Officer and Quality Coordinator that this was resolved in March 2019. However, the OIG recommendation indicates that full compliance was not achieved. Working with the Quality Coordinator, IRM staff have are tracking progress as outlined below.

Management identified chronic staffing shortages in ISC as a partial root cause for lack of timely resolution of this deficiency. In response, in July 2019 Post established an additional ISC position for which recruitment is underway.

Subsequent to the 2019 inspection, and with assistance of an AF/EX/SYS LE Staff Rover, IRM staff took steps to rectify the issue. Post has identified a series of key procedures which were either incomplete or non-existent and has addressed those deficiencies as follows.

Active Directory

The IMO has established Active Directory management SOPs and trained IRM staff on them.

Daily/Weekly/Monthly Checklists

With the IRM team, the IMO has established and continues to refine daily, weekly, and monthly activity checklists to ensure key tasks are regularly performed.

Systems and Maintenance Logs

Using templates developed with the AF/EX/SYS LE Staff Rover, the IRM section has established systems and maintenance logs for Classified and Unclassified networks.

Information Technology Change Control Board

The IMO has established a charter and identified members of Embassy Maseru's Information Technology Change Control Board. Local ITCCB members have been notified of their appointment and duties as of September 2019.

IT Contingency Plans

Post is finalizing its IT Contingency Plans. In August 2019 Post conducted and documented testing according to the draft plan on Unclassified networks. An updated network diagram is pending, upon which the ITCP will be logged with IRM. Similar activities are planned for the Classified systems by the end of the year.

OIG Recommendation 4: *Embassy Maseru should require that Information Systems Security Officers perform their duties in accordance with Department guidance. (Action: Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. Non-compliance with this requirement was identified by Embassy Maseru's Information Management Officer as a potential deficiency during management control review activities in 2018. Working with the Quality Coordinator, the IMO established a plan for redress and has been tracking progress. The IMO plans a Mission-wide ISSO briefing in September 2019.

In coordination with HR, the IMO is implementing the required ISSO briefing for new staff prior to granting access to Classified or Unclassified systems. Post has updated check lists for onboarding of LE staff and USDH staff to include the required briefing.

As of August 2019, Post has:

- Drafted ISSO briefing material.
- Identified and nominated an additional Alternate ISSO.
- Identified possible training dates for the Alternate ISSO.

OIG Recommendation 5: *Embassy Maseru should implement standard operating procedures for managing mobile devices that include issuance, inventory, and disposition of devices. (Action: Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. Non-compliance with this requirement was identified by Embassy Maseru's Information Management Officer as a potential deficiency during management control review activities in 2018. Working with the Quality Coordinator, IRM staff established a plan for redress and have been tracking progress. Subsequent to the inspection, the Management Officer, General Services Officer, and IMO met to clarify procedures and ownership of mobile devices at Post.

Management identified chronic staffing shortages in ISC as a partial root cause for lack of timely resolution of this deficiency. In response, in July 2019 Post established an additional ISC position for which recruitment is underway.

As of August 2019, Post has:

- Re-aligned responsibilities for the mobile devices to the Information Systems Center.
- Established an inventory tracking system for mobile device property and SIM cards.
- Conducted physical inventory of all mobile devices.
- Developed and implemented a mobile device disposition SOP.

OIG Recommendation 6: *Embassy Maseru should protect its network devices in accordance with Department standards. (Action: Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. The IMO has initiated procurement for SF710 labels which will be applied to all Unclassified IT equipment. The Quality Coordinator is tracking this deficiency.

Management identified chronic staffing shortages in ISC as a partial root cause for this deficiency. In response, in July 2019 Post established an additional ISC position for which recruitment is underway.

OIG Recommendation 7: *Embassy Maseru should inventory, secure, monitor, and register its dedicated internet networks with the Bureau of Information Resource Management in accordance with Department standards. (Action: Embassy Maseru)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. Non-compliance with this requirement was identified by Embassy Maseru's Information Management Officer as a potential deficiency during management control review activities in 2018. Working with the Quality Coordinator, IRM staff established a plan for redress and tracked progress; the IMO reported this issue resolved in March 2019. However, the OIG recommendation indicates that full compliance was not achieved. Since the inspection, the IMO has registered all dedicated internet network (DIN) equipment at Post with IRM.

As of end of August 2019, Post has:

- Removed an unused DIN network and associated equipment.
- Registered remaining DIN networks with IRM.
- Initiated procurement of firewall equipment for DIN systems to better protect the network.

Management identified chronic staffing shortages in ISC as a partial root cause for lack of timely resolution of this deficiency. In response, in July 2019 Post established an additional ISC position for which recruitment is underway.

OIG Recommendation 8: *Embassy Maseru, in coordination with the Bureau of African Affairs, should correct the network cabling infrastructure to comply with Department standards. (Action: Embassy Maseru, in coordination with AF)*

Management Response: Embassy Maseru acknowledges and agrees with the recommendation. The Quality Coordinator is tracking this deficiency. The IMO has requested assistance from RIMC Johannesburg. RIMC Johannesburg has conducted a Network Analysis and Remediation survey for Post and provided a Bill of Materials needed to comply with this recommendation. Post has initiated all necessary procurement actions. RIMC Johannesburg technicians are tentatively scheduled to return to Post when the equipment and materials have been delivered to Post.

As of end of August 2019, Post has:

- Conducted a Network Analysis and Remediation survey (by RIMC Johannesburg).
- Identified materials needed for the remediation.
- Initiated procurement actions to obtain materials needed for the remediation.
- Coordinated with RIMC Johannesburg and tentatively scheduled the technicians' return to Post once materials are delivered.

The point of contact for this memorandum is Jacob Rocca.



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

SEP 13 2019

UNCLASSIFIED
MEMORANDUM

TO: OIG/ISP – Ms. Sandy Lewis
FROM: OBO/RM – Jeffrey C. Reba, Acting *JCR*
SUBJECT: OBO's Comments to Draft OIG Report –Embassy Maseru, Lesotho

OBO has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendation provided by OIG:

OIG Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Maseru, should bring the doors in the President's Emergency Plan for AIDS Relief building into compliance with Department standards. (Action: OBO, in coordination with Embassy Maseru)

OBO Response: OBO concurs with the recommendation. OBO has received from post the shop drawings of the doors to be replaced and is currently reviewing the drawings. OBO will provide a schedule for the replacement of the doors after completing the review of the drawings.

The point of contact for this memo is Amy Gertsch.

Unclassified

ABBREVIATIONS

ARV	Antiretroviral
CDC	Centers for Disease Control and Prevention
DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
MCC	Millennium Challenge Corporation
PEPFAR	President's Emergency Plan for AIDS Relief
USAID	U.S. Agency for International Development

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