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Office of Inspector General
United States Department of State

ISP-I-20-17

Office of Inspections

June 2020

Inspection of Embassy Dhaka, Bangladesh

BUREAU OF SOUTH AND CENTRAL ASIAN AFFAIRS

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HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-20-17

What OIG Inspected

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

What OIG Recommends

OIG made 26 recommendations to Embassy Dhaka.

In its comments on the draft report, Embassy Dhaka concurred with 25 recommendations and neither agreed nor disagreed with 1 recommendation. OIG considers all 26 recommendations resolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal written response is reprinted in its entirety in Appendix B.

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OFFICE OF INSPECTIONS

BUREAU OF SOUTH AND CENTRAL ASIAN AFFAIRS

Inspection of Embassy Dhaka, Bangladesh

What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Dhaka in a collaborative and professional manner. Staff described both leaders as energetic and approachable.
- The embassy had difficulty filling mid-level positions after the withdrawal of minor dependents following a 2016 terrorist attack. Many managerial positions had long staffing gaps that exacerbated workload pressures on the remaining staff.
- The Ambassador's active outreach efforts advanced efforts to build political capital and goodwill. However, particularly given the staffing shortages throughout the embassy, the Ambassador contributed to the workload stress of embassy staff by not prioritizing demands he placed on employees to support these efforts.
- The Ambassador engaged extensively with Bangladeshi Government officials and led efforts by the international community to assist 900,000 Rohingya refugees who had fled Burma.
- Consular Section staff routinely worked long hours in an effort to manage a growing backlog of immigrant visa work.
- The embassy's social media program did not comply with Department of State standards.
- The network cabling infrastructure in Embassy Dhaka's unclassified server and telephone frame rooms was antiquated and did not comply with Department standards.
- Spotlights on Success: The Information Management Office created a tracking system for employee checks of the emergency and evacuation radio network that increased participation rates dramatically. In addition, the office created a travel request application that saved time for travelers and travel managers.

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CONTEXT

The People's Republic of Bangladesh, located on the Bay of Bengal bordering India and Burma, had a population of approximately 162 million in 2020 and was the eighth most populous country in the world. Slightly smaller than Iowa, Bangladesh is also one of the most densely populated countries worldwide. Most of the land is a flat plain formed at the confluence of the Ganges and Brahmaputra River systems that flow from the Himalaya Mountains. More than 89 percent of the people are Muslims, and 10 percent are Hindus. Bangladesh also has smaller Buddhist and Christian communities.

With military assistance from India, Bangladesh won independence from Pakistan in 1971 after a brutal civil war. For the next 20 years, Bangladesh experienced a series of military coups. The current Prime Minister, Sheikh Hasina, has led the country since 2009. She was re-elected in 2018 among widespread claims of election irregularities.



Figure 1: Map of Bangladesh. (Source: CIA World Factbook.)

The Bangladeshi economy has grown at an annual average of approximately 6 percent since 2005. According to the World Bank, Bangladesh reduced its poverty rate from 44.2 percent in 1991 to 14.8 percent in 2017 and achieved lower-middle income status in 2015. The gross domestic product per capita was \$4,200 in 2017. Germany and the United States are the two largest single-country export destinations for Bangladeshi products, 80 percent of which are garments.

Bangladesh is struggling to accommodate more than 900,000 refugees who are Rohingyas, a Burmese Muslim minority. Several terrorist groups are active in Bangladesh. In 2016, terrorists killed 24 people, including 18 foreigners, in an attack on a restaurant in Dhaka's diplomatic enclave. One of the victims held dual U.S. and Bangladeshi citizenship. The Islamic State of Iraq, which operates in Bangladesh under the name Islamic State in Bangladesh, claimed responsibility for that attack. The group has targeted foreigners, foreign aid workers, university professors, students, and secular bloggers.

The United States is increasing engagement with Bangladesh under the Indo-Pacific Strategy.¹ Embassy Dhaka's 2018 Integrated Country Strategy (ICS) has four goals:

- A more peaceful and stable Bangladesh that can contribute to Indo-Pacific and global security.

¹ The Indo-Pacific Strategy, a top administration priority, aims to implement a whole-of-government strategy to promote a shared vision of prosperity, sovereignty, and peace with all countries in the Indo-Pacific region.

- A commitment by Bangladesh to democracy, transparency, pluralism, tolerance, good governance, and respect for human rights.
- Helping Bangladesh become a healthy, educated, food-secure, and climate resilient middle-income country.
- Increasing sustainable and broadly shared economic prosperity that opens new markets for U.S. firms.

U.S. foreign assistance to Bangladesh in FY 2018 totaled more than \$169 million. This included \$95 million in U.S. Agency for International Development programs and smaller programs for projects such as police training and military assistance.

At the time of the inspection, Embassy Dhaka had 139 authorized U.S direct-hire employees, of whom 66 worked for the Department of State (Department) and 73 worked for other agencies, including the U.S. Agency for International Development and the Departments of Defense, Justice, Health and Human Services, and Agriculture. The embassy also had 511 locally employed (LE) staff and 5 eligible family members. The embassy occupies two compounds, with the chancery having been built in 1988. The Department is planning to construct a new chancery and annexes during the next several years.

OIG evaluated Embassy Dhaka's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.² A companion classified inspection report discusses the embassy's security program, issues affecting the safety of embassy personnel and facilities, and one Sensitive But Unclassified finding related to the information management operations.

EXECUTIVE DIRECTION

OIG assessed Embassy Dhaka's leadership based on interviews that included comments on the Ambassador's and the Deputy Chief of Mission's (DCM) performance, a review of staff questionnaires, and OIG's review of documents and activities during 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 Bangladesh in November 2018. He previously served as Ambassador to the Republic of Botswana and Consul General in Johannesburg, South Africa. Other previous assignments included tours as a Diplomatic Security Agent at embassies in India, Iraq, Indonesia, Malaysia, and El Salvador. The DCM, also a career member of the Senior Foreign Service, arrived in September 2019, shortly before the start of the on-site portion of this inspection. Her previous assignment was as Consul General in Karachi, Pakistan. Previously, she served as DCM at Embassy Bujumbura, Burundi, and as the U.S. Assistance Coordinator in Kyiv, Ukraine.

² See Appendix A.

In their short time together at the embassy, the Ambassador and the DCM established a productive working relationship, both with each other and with embassy staff. American and LE staff consistently described the Ambassador and the DCM as energetic, collaborative, and approachable, traits in keeping with the Department's leadership principles in 3 Foreign Affairs Manual (FAM) 1214. Many employees also described the Ambassador as accessible and passionate about Bangladesh.

OIG found the Ambassador engaged actively with individual American and LE staff, regularly visited embassy sections and agencies, and generally was visible throughout the embassy. Once a week he also visited the annex compound, sometimes taking the public pedestrian bridge across a busy highway. LE staff consistently praised the Ambassador's support and interest in their activities. The Ambassador invited families to recognition ceremonies for LE staff who earned Special Immigrant Visas to the United States for their years of service to the U.S. Government. When the Ambassador learned the family of one LE staff member lived in an area outside of Dhaka that he would be visiting, he arranged to meet with the family and bring photos back to the LE staff member. This gesture resonated deeply not only with that LE staff member but with other local employees.

Embassy Had Difficulty Staffing Mid-Level Positions

The embassy had difficulty in recent years filling mid-level positions. In the year prior to the inspection, several mid-level positions in different sections either had no assigned employee or had long gaps. For example, the embassy experienced a 30-month gap between Facility Managers, a 10-month gap between Public Affairs Officers, a 15-month gap between Information Management Specialists, a 34-month gap between the Management Section's Office Management Specialists, and 24-month gaps in two of five Regional Security Office positions.

Department and embassy officials attributed the recruiting challenges primarily to the decision to prohibit minor dependents from residing at post. In 2016, following a terrorist attack in Dhaka, the Department decided to allow only adult dependents to accompany employees. Many American staff members told OIG this change made the embassy unattractive to Foreign Service employees with children. Furthermore, they said an assignment to the embassy had many of the disadvantages of serving in a Special Incentive Post,³ such as restrictions on traveling within the country, without some of the major benefits—including higher pay, shorter assignments, and more rest and recreation trips—that typically attract more bidders for other Foreign Service positions in the region.

In February 2019, the Ambassador submitted a cable to the Department recommending minor dependents be allowed to return to post. At the time of the inspection, the Department had yet

³ Cable 19 STATE 88706, "2020 Service Recognition Package for Special Incentive Posts," August 16, 2019, describes the benefits and incentives for service in Afghanistan, Central African Republic, Cuba, Iraq, Pakistan, Somalia, South Sudan, and Syria.

to respond. However, subsequent to the on-site portion of the inspection, the embassy submitted a new, updated recommendation, which the Department was evaluating at the time OIG's report was issued.

Front Office Demands Contributed to Workload Stresses on Staff

OIG found Front Office demands contributed to an excessive workload experienced by embassy staff and compounded the strain caused by the staffing gaps discussed above. Some employees worked 7 days per week, with some working more than 60 hours per week. At the same time, the Ambassador accepted numerous invitations, many of which were not tied to ICS strategic goals. In addition, in his first 11 months in Dhaka, the Ambassador visited each of Bangladesh's eight administrative regions, also known as divisions. The burden of supporting the Ambassador's events and travel significantly increased the workload of the Political-Economic and Public Diplomacy Sections and the Regional Security Office. His trips and attendance at other events required staff to prepare his remarks, accompany him, and write reporting cables. These demands, including those for security and management support, were especially burdensome on the weekends, when the Ambassador tended to travel.

According to 3 FAM 1214b(2-3), Department leaders must establish attainable strategic goals, provide focus, monitor results, and manage resources effectively. The Ambassador did not prioritize his engagements based on advancing ICS goals, but, as he told OIG, instead accepted almost every invitation during his first 7 months at the embassy and traveled widely in order to build political capital and goodwill. Although these goals are generally consistent with the ambassador's overall responsibilities, the time needed to prepare for and accompany the Ambassador on these trips forced some employees to work long hours at night and on weekends while they were already facing heavy workloads because of staffing gaps.

OIG advised the Ambassador and the DCM to develop and implement a plan to address these workload issues in order to help employees find a work-life balance. During the inspection, the DCM sought input from all sections and developed a work-life balance plan that covered every facet of embassy work and engagement. As part of the plan, the Front Office pledged to be selective about weekend commitments and to prioritize taskings based on strategic goals. During the inspection, the Ambassador and the DCM started deferring or limiting embassy engagement on weekends. The Front Office also pledged to refrain from sending emails on weekends and holidays unless there was an emergency and to institute quarterly travel schedules to allow better long-term planning. OIG concluded the Front Office was taking steps to reduce workload stresses on the staff and as a result did not make a recommendation to address this issue.

Execution of Foreign Policy Goals and Objectives

Under the leadership of the Front Office, the embassy Country Team collaborated to develop the ICS strategic plan that articulated U.S. Government priorities in Bangladesh, as directed by 18 FAM 301.2-1b. The Political-Economic Section worked with all agencies and sections to gather inputs and develop objectives for the ICS, which the Department approved in August

2018. The embassy displayed the ICS goals on posters and on in-house television monitors throughout the embassy.

Ambassador Had Extensive Advocacy and Outreach Activities

The Ambassador engaged extensively with Bangladeshi Government officials and officials from other countries and international organizations, as required by 2 FAM 113.1. The Ambassador frequently interacted with the Prime Minister, cabinet members, and political party leaders to advance ICS objectives. Since his arrival, the Ambassador met 80 times with key Bangladeshi Government officials and participated in 75 public diplomacy events. As noted earlier in the report, OIG advised, and the Ambassador agreed, to prioritize and be more selective about such activities, especially the public diplomacy events. He also hosted several high-level visitors and congressional delegations and developed a wide range of contacts in other foreign missions in Bangladesh. The Department of Commerce told OIG the Ambassador was very responsive to commercial advocacy requests. The Ambassador maintained contact with Washington through daily calls with the Department's Bangladesh Desk Officer, biweekly calls with the Deputy Assistant Secretary for the Bureau of South and Central Asian Affairs, and frequent email exchanges with the Senior Bureau Official.

Ambassador Led International Efforts to Assist Rohingya Refugees

The Ambassador's outreach in Bangladesh was particularly strong on efforts to assist Rohingya refugees. The United States is the leading bilateral international donor in the humanitarian relief effort for 900,000 Rohingya refugees from Burma, also known as Myanmar. The Ambassador led the diplomatic corps by making sure the international community was not working at cross purposes in dealing with the Bangladeshi Government on this issue. During the inspection, the Ambassador hosted a discussion at his residence for the diplomatic corps and the Bangladeshi Foreign Secretary on next steps for dealing with the crisis. This issue consumed more than 50 percent of the Political-Economic Section chief's time. It also required a sustained commitment of human resources, vehicles, and support personnel from the Regional Security Office and Management Section to handle high-level delegations from the United States and ongoing relief operations.

The Ambassador also addressed Bangladeshi human rights issues in the press and social media, including urging swift justice for those responsible for the beating death of a university student who criticized the government. The Ambassador also focused on youth issues and religious tolerance issues. For example, during the inspection, he spoke to students at the United University Space Camp in Dhaka and was keynote speaker at a Buddhist anniversary event.

Adherence to Internal Controls

The acting Management Officer, with guidance from the Ambassador and the previous DCM, led the preparation of the FY 2019 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1), which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. The effort included all applicable members of the embassy, who reviewed every aspect of their processes

related to management controls. The Statement of Assurance, which the Ambassador reviewed and signed on August 22, 2019, said the embassy's evaluation provided reasonable assurance that management control objectives were achieved. However, OIG identified multiple management control issues throughout the embassy, as detailed later in this report and in the companion classified report.

The newly arrived DCM reviewed the visa adjudications of the Consular Section Chief within 3 business days, as required by 9 FAM 403.12.

Security and Emergency Planning

The Ambassador's leadership of the embassy's security program was consistent with the President's Letter of Instruction to Bilateral Chiefs of Mission, and Embassy Dhaka's security program generally operated in accordance with Department standards. However, OIG identified several issues that are addressed in the companion classified report.

Regional Security Office staff told OIG the Ambassador and the DCM fully supported the security program. In accordance with 12 Foreign Affairs Handbook (FAH)-1 H-271a, they led by example by participating in drills and weekly checks of the emergency and evacuation radio network, meeting regularly with security personnel, and underscoring the importance of embassy security in town halls, Country Team meetings, and embassy notices. Following her arrival in September 2019, the DCM chaired three meetings of the embassy's Emergency Action Committee, in accordance with 12 FAH-1 H-722, to review potential risks that could affect the health, safety, and security of mission employees and resident U.S. citizens.

The embassy submitted to the Department the 2018 review of the security memorandum of agreement between the Chief of Mission and United States Indo-Pacific Command Commander, as required by 2 FAH-2 H-116.4.⁴

Spotlight on Success: New Program Tracking Radio Checks Improved Participation Rates

The Information Management Office created an electronic program that allowed the Marine Security Guards to easily track participation by each employee and dependent during the weekly checks of the emergency and evacuation radio network. The program also accounted for those employees and dependents who were away from the embassy during each radio check. The Front Office and the Country Team reviewed rates of participation each week, and supervisors followed up with those individuals who did not take part. The weekly radio check participation rate improved dramatically from 2018 to 2019, when the system was implemented. In the first 6 months of 2018, the participation rate averaged 38.3 percent per week but increased to an average of 92.8 percent in the 6 months leading up to mid-October

⁴ 2 FAH-2 H-116.4a states, "[e]ach country's memorandum of agreement (MOA) assigns operational control of overseas security functions for all Department of Defense (DoD) elements/personnel in country and not under the command of a geographic combatant commander (GCC) to either the chief of mission or the GCC, thereby eliminating "gray areas" that have led to confusion over security responsibility for some DoD elements or personnel." Similarly, 2 FAH-2 H-116.4b requires "All countries must have a current MOA signed by the chief of mission and [GCC]."

2019. A higher participation rate minimized the risk that a family would be unable to send or receive messages in an emergency.

Equal Employment Opportunity Program

The embassy's Equal Employment Opportunity (EEO) program, which included one counselor and seven LE staff liaisons, generally met Department requirements in 3 FAM 1514.2. The embassy had several EEO cases in the year before the inspection. OIG found the counselor took appropriate steps when he received complaints about EEO issues, and the Front Office supported the program. The embassy posted program notices and information in the chancery and annex, and the DCM reminded Country Team members about EEO requirements during the inspection.

Because the embassy had several EEO cases in the past, the Ambassador asked the Department's Office of Civil Rights to provide EEO training to all staff. The training occurred during the inspection, and the Ambassador mandated participation by all employees. He was among the first employees to take the training.

Developing and Mentoring Foreign Service Professionals

At the time of the inspection, the DCM had restarted the mentoring program for 17 First- and Second-Tour (FAST) employees, in accordance with 3 FAM 2242.4. FAST staff members told OIG they appreciated the DCM's intention to reinvigorate the program and they were grateful that she sought their input on activities that conformed more to their interests. The FAST leadership group also surveyed program members in October 2019 to identify potential activities, speakers, service projects, and workshops to develop a schedule of professional development activities. However, FAST employees told OIG that adding professional development opportunities would not be helpful until the workload issues discussed earlier in this report were brought under control.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Dhaka's policy and program implementation through a review of the Political-Economic Section's advocacy and analysis work, the Public Diplomacy Section's activities, and the Consular Section's provision of American citizen and visa services. OIG found the embassy generally met Department requirements for policy and program implementation, except as noted below.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, commercial promotion, program implementation and

grants, and Leahy vetting.⁵ The section, with 11 officers, was without a chief and deputy for 3 of the 6 months prior to the inspection. Only three officers had been at post for more than 6 months. The section chief and deputy arrived within the 2 months prior to the inspection. OIG found the section's activities complied with Department standards and guidance, with the exceptions discussed below.

Lack of Strategic Direction Inhibited Reporting

OIG found that in the 6 months prior to the inspection, the Political-Economic Section generated insufficient reporting on issues related to the embassy's ICS goals. OIG reviewed 121 political-economic cables issued between April and October 2019 for their relevance to Department policies, priorities, and ICS goals and found substantial coverage of Rohingya refugees, security incidents, and human rights, as well as responses to action requests. However, OIG found limited reporting tied to other ICS objectives, including efforts to maintain and expand the security partnership with the United States, increase tolerance for peaceful dissent and coexistence of political parties, and open the Bangladesh market to U.S. businesses. Moreover, Department stakeholders expressed a desire for more reporting, including on counterterrorism, the political situation, and labor.

The ICS, by definition, articulates U.S. goals and strategy in a particular country and guides reporting priorities. Guidance at 2 FAM 113.1c(10) describes post responsibilities to report on significant political, economic, leadership, and societal developments occurring abroad. In addition to staffing gaps, the Ambassador's outreach and engagement activities, discussed in the Executive Direction section of this report, also increased the workload of the Political-Economic Section, affecting the content and nature of the section's reporting. During the inspection, the section initiated procedures to improve cable reporting practices, including establishing a reporting plan to focus efforts on priority ICS-related topics and analytical reporting as well as reinstating a weekly report to combine other smaller events and activities into a single focused message for Washington audiences.

Section Pursued Limited Economic and Labor Engagement

The Political-Economic Section pursued commercial engagement but made limited economic and labor-related efforts. For example, between April and October 2019, the section organized a trade fair in Bangladesh for U.S. businesses and recruited Bangladeshi businesses for other trade and investment events. However, Department offices and other agencies told OIG they wanted to see more engagement on labor and economic issues in order to open the Bangladesh market to U.S. firms, an ICS goal. Guidance in 2 FAM 911.1-2 requires economic sections to advocate for the implementation of foreign government policies that improve market access for U.S. firms. Staffing vacancies, particularly among the LE staff, limited the section's efforts on these two issues. The embassy was aware of this problem and had started taking steps to fulfill the ICS goal. In 2019, the Ambassador reached an agreement with the

⁵ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the Department from furnishing assistance to foreign security forces if the Department receives credible information that such forces have committed gross violations of human rights. See 22 U.S.C. § 2378d.

Department of Commerce to establish a U.S. Commercial Service office in Dhaka, but it was not expected to open until 2021. In the meantime, the section filled the two vacant LE staff positions and hired an Expanded Professional Associate Program employee⁶ to analyze labor and economic-related impediments to doing business in Bangladesh. As a result, OIG did not make a recommendation on this issue.

Section Did Not Manage Grants in Accordance With Department Requirements

OIG reviewed all five of the Political-Economic Section's grants issued between FY 2016 and FY 2018 (total value: \$271,716). OIG determined the section managed three closed grants in accordance with Department requirements. However, OIG found issues with the section's management of two open grants. For example, the section's Grants Officer also served as the Grants Officer Representative for one grant, contrary to the Department Federal Assistance Directive,⁷ which requires these duties be separate for grants over \$100,000. Based on a review of the grant file, which was substantially complete, OIG determined the grant recipient was performing successfully. In the second case, the grant file did not include evidence of monitoring to ensure compliance with the terms and conditions of the award and assess whether it was achieving its intended goal, as required in the Federal Assistance Directive.⁸ Accordingly, OIG could not assess whether the grant recipient was making appropriate progress towards the goal of the grant. In addition, the section did not enter the grant into the Department's system for managing and tracking Federal assistance, as required by cable 16 STATE 127862.⁹ Lack of staff experienced in grant oversight made it difficult for the section to properly manage the active grants, which increased the risk of misuse or waste of Government funds.

Recommendation 1: Embassy Dhaka should comply with Department requirements for Federal assistance awards managed by the Political-Economic Section. (Action: Embassy Dhaka)

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning and reporting, grants administration, media engagement, and exchange programs, as well as activities at American Spaces throughout the country.¹⁰ In collaboration with other embassy sections, the Public Diplomacy Section promoted U.S. foreign policy interests identified in the ICS, including

⁶ The Expanded Professional Associate Program provides eligible family members with employment opportunities in key positions abroad. The program differs from other family member employment in that it offers responsibilities similar to Foreign Service entry-level positions.

⁷ Federal Assistance Directive, Version 2.3, valid April 17, 2018, Chapter 2, Section P.

⁸ Federal Assistance Directive, Version 2.2, valid March 7, 2018, Chapter 2, Section O and Chapter 4, Section D.

⁹ Cable 16 STATE 127862, "Deployment and Mandatory Use of the Overseas State Assistance Management System (SAMS Overseas) for Federal Financial Assistance," November 30, 2016.

¹⁰ American Spaces are Department-operated or -supported public diplomacy facilities that host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives. In Bangladesh, American Spaces are located in Dhaka, Sylhet, Chittagong, Khulna, and Rajshahi.

democracy and human rights, economic development, and educational opportunity. The section deployed social media and online programming and facilitated outreach by alumni of U.S. exchange programs to overcome travel restrictions and engage with a broad spectrum of the Bangladeshi public. The August 2019 arrival of the new Public Affairs Officer ended a 10-month vacancy in the position, which the Assistant Cultural Affairs Officer had filled, supported by a series of eight temporary duty senior advisors. OIG found section operations generally met Department standards and guidelines, with the exceptions noted below.

Public Diplomacy Section Lacked a Training Plan

OIG found that the Public Diplomacy Section lacked a training plan, and, as a result, the section staff did not receive training they needed to keep their skills up to date. LE staff from across the section—particularly the press, cultural, and administrative functions—reported concerns about training. Employees told OIG about occasions in 2018 and 2019 when managers cancelled scheduled regional and Washington training at the last minute and described the appearance of favoritism in allocating training opportunities. In addition, staff members questioned the relevance of certain courses to job functions, which furthered perceptions that both American and LE supervisors used training as a reward rather than to fulfill professional needs. OIG found section leaders did not meet Department requirements¹¹ to plan training and promote professional development, innovation, and team building. OIG determined the complete turnover of American direct-hire officers in late 2018, the constant turnover of temporary duty personnel in the year prior to the inspection, and the resulting staffing gaps precluded effective planning and follow-through on decisions relating to training. Sections that fail to support training are at a disadvantage when it comes to acquiring new skills and maintaining competitiveness for program resources. Moreover, in this case, the lack of a plan led to an ad hoc process that contributed to perceptions of favoritism.

Recommendation 2: Embassy Dhaka should implement a training plan for the Public Diplomacy Section in accordance with Department standards. (Action: Embassy Dhaka)

Embassy's Website and Social Media Program Did Not Comply With Department Standards

Working with support from the two-person audio-visual unit and other sections of the embassy, a two-person social media unit maintained the embassy's website and social media accounts on five platforms.¹² However, OIG found that the embassy's social media program did not comply with Department standards. Specifically:

- The embassy did not have an up-to-date social media strategy (10 FAH-1 H-061 and 10 FAH-1 H-063).

¹¹ See 13 FAM 022.5 and 10 FAM 114. The Department's Public Affairs Officer Handbook, "Working within the Embassy," provides additional guidance.

¹² In addition to a Facebook page that surpassed 7 million followers, the section maintained three Twitter accounts—@USEmbassydhaka (for the entire mission), @USAmbassadorBangladesh (for messages from the Ambassador), and @Dhaka_Air (to promote awareness of air quality)—and posted content on YouTube, Instagram, and Flickr.

- The embassy did not have a social media crisis communication plan to manage emergency communications with the media and the public. Instead, the embassy mistakenly included elements of a communication plan in the social media strategy, leaving crisis planners unaware of procedures for informing the public and coordinating messaging (10 FAH-1 H-066 and cable 18 STATE 70388).¹³
- The social media unit lacked standard operating procedures for the embassy’s website and social media accounts, including clearance procedures. As a result, unit staff with access to the embassy’s accounts released uncleared messages and made unauthorized changes to access permissions (10 FAH-1 H-064).

Department and embassy social media managers cited turnover in the social media unit and in section leadership and staffing gaps as the primary factors contributing to this issue. Failure to implement a fully compliant social media program risks the credibility of the embassy’s policy advocacy and its ability to manage emergency communications with the media and the public.

Recommendation 3: Embassy Dhaka should bring its social media program into compliance with Department standards. (Action: Embassy Dhaka)

Suspension of Annual Program Statement Hindered Competition

In 2019, the Public Diplomacy Section did not issue an Annual Program Statement. This decision, made in conjunction with the embassy’s suspension of its small grants program, limited the section’s ability to comply with Federal Assistance Directive¹⁴ requirements that “awards must generally be competed in a full and open manner.” As described in the directive, the Department uses Annual Program Statements to meet open competition requirements, encourage the submission of creative proposals, and increase the likelihood that projects are in line with embassy goals. Section staff told OIG the program was suspended due to the demands of other mission priorities and the limitations on management capacity resulting from staffing gaps. Failure to issue an Annual Program Statement, however, diminishes the embassy’s ability to ensure competition for grant opportunities and to work with local partners on small grants programs that advance mission goals.

Recommendation 4: Embassy Dhaka should resume issuing an Annual Program Statement for its Public Diplomacy grants program. (Action: Embassy Dhaka)

Public Diplomacy Section Position Descriptions Were Inaccurate

Many section staff members told OIG their position descriptions did not include new or changed duties or contained other inaccuracies. Section leadership told OIG they were awaiting Department guidance on scheduling implementation of the Public Diplomacy Staffing

¹³ Cable 18 STATE 70388, “Using Social Media in a Crisis: Resources for Planning How and What to Communicate,” July 11, 2018.

¹⁴ Federal Assistance Directive, issued May 2017, revised October 2018.

Modernization Initiative¹⁵ and were following Department guidance to refrain from rewriting position descriptions in the interim. During the inspection, the Office of Policy, Planning, and Resources of the Under Secretary for Public Diplomacy and Public Affairs proposed dates in 2020 for Embassy Dhaka to implement of the Staffing Modernization Initiative. OIG advised the Public Affairs Officer to conduct a review and analysis of position descriptions and organizational structure in preparation for the initiative's implementation, which she agreed to do.

Consular Affairs

OIG reviewed consular operations, including leadership, management controls, American citizen services, nonimmigrant and immigrant visas, cashiering, internal controls, outreach, crisis preparedness, and fraud prevention programs. The Visa Unit chief (who departed for his next assignment during the inspection) and a dedicated team of adjudicators and LE staff managed large workload increases and staffing gaps in key positions. The Consul General and acting visa chief both arrived in September 2019 and started taking steps to add additional staff, reinvigorate cross training, mentor FAST professionals, and prepare for crises.

OIG found Consular Section programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions noted below. In response to OIG's advice, the section corrected a minor issue regarding immigrant visa adjudication reviews.

Visa Workload Growth Outstripped Staff Capacity

Although many employees, especially FAST officers, routinely worked long hours, the Consular Section staff was unable to keep up with a growing visa workload. OIG found the following factors contributed to this increased workload:

- The nonimmigrant visa workload grew 32.4 percent in one year, from 31,723 applications in FY 2018 to 42,011 applications in FY 2019.
- The section had seven eligible family members until the terrorist attack in 2016. All seven left when the embassy moved to adults-only dependents that year. The section had one eligible family member employee from January 2018 to January 2019 and none since. As a result, officers performed duties—such as namechecks, biometrics collections, DNA testing, and American citizen services—that normally would be performed by eligible family members.
- Long-term staffing gaps affected management continuity, especially in training and fraud prevention. The visa manager position was vacant for 15 months in 2018 and 2019, the Fraud Prevention Manager position was vacant from 2016 until January 2019,

¹⁵ The Staffing Modernization Initiative is a holistic review and realignment of the organizational structure of public diplomacy sections globally by the Department. It is centered on the revision of all LE staff position descriptions to align them with the Department's public diplomacy objectives.

and the Assistant Regional Security Officer-Investigations position was vacant from January 2016 until March 2019. During the inspection, the visa chief position became vacant. There were also gaps in FAST consular officer positions beginning in 2018, which the Department projected would continue well into 2020.

- Consular Section leadership told OIG that due to the limitations on management capacity resulting from staffing gaps, they did not have time to train and mentor FAST employees and improve processes because they were busy with other duties, such as helping collect biometrics and adjudicating visa applications.

Although the immigrant visa workload was stable, the cumulative effect of the factors noted above resulted in a 5-month backlog of immigrant visa cases. The National Visa Center projected this backlog would grow each month as more cases entered the pipeline, making it impossible for the section to catch up without additional staff.

According to 7 FAH-1 H-432.4a, consular managers should submit personnel requests if changing conditions warrant. The embassy requested temporary help in October 2018, which the Bureau of Consular Affairs denied. At the time of the inspection, the embassy had yet to make another request for either new permanent positions or temporary duty help. After discussions with OIG, the new Consul General sent a detailed analysis to the Department, with the full support of the Front Office, requesting additional permanent officer positions and immediate temporary duty help. The Bureau of Consular Affairs replied during the inspection that it would support these requests. As a result, OIG did not make a recommendation on this issue.

Information Unit Duplicated Functions of Department Contractor

The Consular Information Unit's five LE staff members answered email inquiries, many of which should have been handled by an outside contractor hired by the Bureau of Consular Affairs. OIG found the staff answered 22,600 email visa inquiries in FY 2018, of which approximately 35 percent contained routine matters related to nonimmigrant visas the contractor should have answered. The staff told OIG that a smaller percentage of the immigrant visa inquiries involved questions the contractor also could have answered. Department cable 15 STATE 87970 states staff should not duplicate services provided by vendors.¹⁶ New consular managers told OIG they did not know why this occurred. Assigning consular staff to answer correspondence covered by the contract is duplicative, does not appropriately employ the staff's expertise and time, and expends resources that could be put to better use.

Recommendation 5: Embassy Dhaka should cease having locally employed staff answer routine visa inquiries and direct such inquiries to the vendor contracted by the Bureau of Consular Affairs. (Action: Embassy Dhaka)

¹⁶ Cable 15 STATE 87970, "Global Support Strategy Information Services," July 24, 2015.

American Consular Staff Lacked Continued Training and Coaching

American consular officers did not receive adequate training and coaching. Guidance in 7 FAH-1 H-242c(3) states consular sections should have formal training plans for American and LE staff. However, OIG found that, beyond a structured 4-week program for newly arrived officers, the section provided training and mentoring mostly through ad hoc information sharing by more experienced adjudicators. In addition, officers did not have regular training to recognize fraud or to understand and use the results of visa validation studies. Consular managers acknowledged the section used monthly administrative and professional development days, when no visa interviews were scheduled, to catch up on pending case reviews or other work rather than for training. Although staffing gaps were the primary cause for consular managers' inability to provide required training, coaching, and mentoring, failure to provide adequate training can lead to errors in adjudications and inefficient operations.

Recommendation 6: Embassy Dhaka should implement formal training plans for Consular Section officers in accordance with Department standards. (Action: Embassy Dhaka)

Cross-Training of Consular Locally Employed Staff Had Lapsed

The Consular Section had not conducted section-wide cross-training for LE staff since 2017, including training on American citizen services, a critical function in case of a major disaster. Moreover, the four LE staff in the American Citizen Services Unit were not fully cross-trained in all unit duties. This is inconsistent with guidance in 7 FAH-1 H-230, which instructs consular managers to establish cross-training opportunities for LE staff, and in 7 FAM 1812.3-2b, which calls for section managers to train employees from other consular units in American citizen services functions so they can back up the regular staff. Consular staff believed that cross-training lapsed because consular managers were too busy addressing the visa workload. Lack of cross-training prevents the embassy from maximizing staff flexibility and readiness to handle crises.

Recommendation 7: Embassy Dhaka should implement a cross-training program for Consular Section locally employed staff, in accordance with Department standards. (Action Embassy Dhaka)

Embassy Did Not Have Consular Crisis Preparedness Plans

The embassy did not have consular crisis preparedness plans. The American Liaison Network,¹⁷ a critical tool for communicating with U.S. citizens during a crisis, last met in May 2018. In addition, the Consular Section did not use the Consular Crisis Risk Assessment tool to evaluate and prioritize disaster risks and needed responses. Consular managers told OIG they knew of only two staff members who could operate the embassy's emergency electronic messaging platform. Furthermore, the section had no working level contacts in the Bangladesh National Disaster Response Team. Department standards in 7 FAM 1810 provide guidance for consular

¹⁷ The Department's American Liaison Network, formerly known as a warden system, uses citizen liaison volunteers to facilitate two-way communication between an embassy and American citizens in that country.

officers in planning for and managing a crisis, and 7 FAM 071 instructs consular section chiefs to maintain an American Liaison Network. The section had not focused on crisis preparedness plans because of the staffing and workload issues discussed above. Failure to meet crisis preparedness requirements puts U.S. citizens and embassy employees at risk.

Recommendation 8: Embassy Dhaka should create consular crisis preparedness plans in accordance with Department standards. (Action: Embassy Dhaka)

Consular Managers Lacked Line-of-Sight of Cashier's Booth

Consular managers could not visually monitor the work of the consular cashier, a key internal control. The cashier booth had a wooden door with a grilled window that was too small to enable consular managers to monitor the cashier's activities. According to 7 FAH-1 H-282(2)(i) and 7 FAH-1 H-281e, consular sections should have a cashier booth that allows American supervisors to physically observe work areas. Lack of line-of-sight into the cashier's booth increases the risk of cashier malfeasance.

Recommendation 9: Embassy Dhaka should install a closed-circuit television monitoring system or other means to enable consular managers to visually observe the activities within the Consular Section cashier booth. (Action: Embassy Dhaka)

Consular Workspace Allocation Did Not Comply With Department Standards

The placement of consular officers' workstations did not comply with Department standards. According to 7 FAH-1 H-281e, officers' workstations should be located throughout the section to provide the greatest range of overlapping lines of sight. With one exception, all FAST officer workstations were located in a single area of the section. Failure to locate American officers throughout the section prevents effective visual oversight and supervision of staff and increases the likelihood of misfeasance or malfeasance. The Bureau of Overseas Buildings Operations (OBO) began a year-long renovation of the Consular Section in November 2019. In conjunction with that renovation, consular managers planned to implement a new seating pattern to ensure line of sight.

Recommendation 10: Embassy Dhaka should correct line-of-sight issues in the Consular Section to comply with Department guidance for consular officers to visually monitor all consular operations. (Action: Embassy Dhaka)

RESOURCE MANAGEMENT

OIG reviewed internal control systems in general services, facility management, financial management, and human resources operations at Embassy Dhaka. Overall, OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exceptions noted below.

In addition, the embassy corrected five management control issues during the inspection. Specifically:

- The General Services Officer began conducting periodic unannounced spot counts of expendable and nonexpendable property stored in embassy warehouses (14 FAM 411.2-2c).
- The General Services Officer reviewed and reissued the mission's motor vehicle policy (14 FAM 435.1a).
- The Contracting Officer reviewed the embassy's blanket purchase agreements,¹⁸ in accordance with Department of State Acquisition Regulation, Section 613.303-6.
- The Facility Manager installed fire extinguishers in the controlled access area¹⁹ (15 FAM Exhibit 842).
- The Ambassador formally authorized the provision of accommodation exchange services²⁰ by the embassy cashier (4 FAH-3 H-361.2a).

General Services Operations

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

Embassy Dhaka did not comply with elements of the Department's Overseas Motor Vehicle Safety standards. Specifically, OIG found:

- Forty-five chauffeurs, who drove armored vehicles, did not receive armored vehicle training (12 FAM 389b).
- Four chauffeurs and 44 incidental (self-drive) drivers did not receive driver safety retraining (14 FAM 433.5a-b).
- Chauffeurs frequently exceeded the 10-hour per day limit on driving shifts, contrary to guidance in 14 FAM 433.8a. Time and attendance records over a 12-week period showed 13 of the motor pool's 53 chauffeurs exceeded the 10-hour per day limit 28 times, with some chauffeurs working up to 16-hour shifts.

These internal control issues occurred because of a lack of management oversight. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. Government property.

Recommendation 11: Embassy Dhaka should comply with all Department Overseas Motor Vehicle Safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Dhaka)

¹⁸ A blanket purchase agreement is a simplified method of filling anticipated repetitive needs for supplies or services by establishing "charge accounts" with qualified sources of supply.

¹⁹ A controlled access area is the only area within a building where classified information or materials may be handled, stored, discussed, or processed.

²⁰ Accommodation exchange allows authorized employees to exchange U.S. dollars for foreign currency.

Embassy Mechanics Used U.S. Government Equipment to Service Personally Owned Vehicles

The embassy's LE staff mechanics performed automotive maintenance and repairs on personal vehicles owned by American employees on U.S. Government premises, using equipment purchased to service Government-owned vehicles. According to 28 Code of Federal Regulations Section 45.4(a), however, employees may use Government property only for official business or as authorized by the U.S. Government. Embassy staff told OIG they believed this practice was allowed because the repairs were made after-hours. However, the practice is an inappropriate use of Government resources.

Recommendation 12: Embassy Dhaka should prohibit locally employed staff mechanics from servicing personally owned vehicles on U.S. Government property or with U.S. Government equipment, in accordance with Federal regulations. (Action: Embassy Dhaka)

Embassy Did Not Document All Property Disposals as Required

The embassy did not document most nonexpendable property it disposed of in FY 2019 in accordance with Department standards. Specifically, OIG found that 1,575 of the 2,475 assets shown in the Integrated Logistics Management System²¹ (ILMS) as disposed of in FY 2019 did not include the required documentation. According to guidance in 14 FAH-1 H-713.1a, the property management officer must approve disposals by completing a Property Disposal Authorization and Survey Report, Form DS-132, before the action takes place. Staff told OIG that the embassy did not properly document the approvals because the staff did not use ILMS to generate the required documentation. This issue is an internal control weakness that increases the risk of theft.

Recommendation 13: Embassy Dhaka should document all nonexpendable property disposals in the Integrated Logistics Management System, in accordance with Department standards. (Action: Embassy Dhaka)

Embassy Did Not Use Electronic Scanners to Inventory All Residential Assets

Embassy Dhaka did not consistently use electronic bar code scanners to conduct residential inventories. According to ILMS data, in the three fiscal years prior to the inspection, property management staff manually inventoried 7.4 percent of its assets²² located in the embassy's 111 residential units instead of using electronic scanners. Manual inventory reconciliation increases the risk of property mismanagement and theft. OIG advised the embassy that the Department's

²¹ ILMS is an integrated web-based system that encompasses all Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

²² The embassy valued these assets at \$386,926.

preferred method of conducting residential inventory is to use electronic barcode scanners compatible with ILMS. The embassy agreed to start using the electronic scanners.

Embassy Improperly Used Shipping Containers for Permanent Property Storage

The embassy used eight shipping containers as permanent storage space for property such as new computers and furniture. This is inconsistent with guidance issued by the Department in September 2018²³ stating it does not support the use of shipping containers as an occupied space or to accommodate functional space needs and that containers not certified by OBO should be dismantled and removed. Although embassy staff told OIG the embassy started using shipping containers as early as 2010 because of a lack of warehouse space, shipping containers are not an adequate method of permanent storage and increases the risk of damage to Department property.

Recommendation 14: Embassy Dhaka should dismantle and remove its shipping containers and portable structures in accordance with Department requirements. (Action: Embassy Dhaka)

Embassy Did Not Close Procurement Files Within Required Time Frame

The embassy did not close out procurement files within the required time frame. Specifically, OIG found the embassy had yet to close out 1 procurement file from FY 2015, 3 from FY 2016, 281 from FY 2017, 876 from FY 2018, and 477 from FY 2019. In addition, the embassy had a backlog of 1,825 procurement files from FY 2016 to FY 2019 that required additional staff action to complete closeout. Guidance in 14 FAH-2 H-573.2b states that contracts conducted under simplified acquisition procedures, as were all of these contracts, should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Embassy staff told OIG the backlog occurred because of competing priorities and staffing shortages. Failure to close out procurement files within the regulatory time frame increases the risk of inaccuracies in the Department's administrative procurement records.

Recommendation 15: Embassy Dhaka should close out procurement files in accordance with Department standards (Action: Embassy Dhaka)

Per Diem Rates Were Out of Date for Four Locations in Bangladesh

Foreign per diem rates for four locations²⁴ in Bangladesh were out of date. According to Department of State Standardized Regulation, Section 074.2, all agencies having responsibility for preparing and submitting reports must provide complete, accurate, and supportable

²³ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018.

²⁴ These locations are Dhaka, Chittagong, Sylhet, and a general category of "other," which encompasses all non-listed locations within Bangladesh.

information in the biennial hotel and restaurant reports.²⁵ The Bureau of Administration, however, stated that Embassy Dhaka had not submitted a hotel and restaurant report since 2013 for these locations. Embassy staff told OIG the reports were not completed due to competing priorities. Failure to submit reports on a timely basis could result in overpayment or underpayment to U.S. Government personnel.

Recommendation 16: Embassy Dhaka should submit all hotel and restaurant reports to the Bureau of Administration in accordance with Department guidelines. (Action: Embassy Dhaka)

Facility Management

Embassy Structures Did Not Comply With Department Building Standards

Embassy Dhaka did not comply with all Department standards for two buildings constructed on its annex compound. OIG found the embassy built the permanent structures, used as warehouses, without requesting the required OBO technical review to ensure the projects conformed to Department building codes. In addition, the embassy failed to obtain permits from OBO before proceeding with construction, as required by 15 FAM 641b(5). Staff told OIG that these deficiencies occurred because of a lack of management oversight. Use of structures without ensuring conformance to building code requirements poses significant life and safety risks to the employees accessing these structures.

Recommendation 17: Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as warehouses on the embassy annex compound and submit the survey for approval, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with OBO)

Elevator Program Did Not Meet Department Standards

The embassy's elevator program did not comply with Department standards. OIG reviewed available elevator safety reports issued by OBO and found the bureau deemed the embassy's two elevators unsafe for continued use in 2016, 2018, and 2019. As a result of the safety deficiencies OBO identified, both elevators lacked a current certificate of use,²⁶ as required in 15 FAM 661d. Staff told OIG the embassy did not address these deficiencies because of a lack of management oversight. Operating non-compliant elevators increases the risk of workplace injuries.

²⁵ The Department uses Hotel and Restaurant Reports to determine the appropriate U.S. Government per diem allowance.

²⁶ In order to receive a certificate of use, an accredited elevator inspector must inspect each elevator annually, with a comprehensive inspection every 5 years, and the embassy must complete any necessary repairs, after which the elevator is again inspected. If the second inspection indicates full compliance, OBO issues a 1-year certificate of use.

Recommendation 18: Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should complete all elevator repairs needed to obtain a current certificate of use for each elevator, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with OBO)

Residential Fire Protection Program Did Not Fully Comply With Department Standards

The embassy's residential fire protection program did not fully comply with Department standards. Although the embassy residences had smoke and carbon monoxide detectors and fire extinguishers, OIG found no evidence that occupants in 10 of the 13 residences inspected or checked their fire extinguishers on a monthly basis, as required by 15 FAM 842b. This occurred because of insufficient management oversight. Failure to comply with fire protection standards increases the risk of injury, loss of life, and damage to property.

Recommendation 19: Embassy Dhaka should bring its residential fire protection program into compliance with Department standards. (Action: Embassy Dhaka)

Human Resources

Embassy Did Not Submit Post Hardship Survey as Required

OIG found the embassy did not submit its post hardship differential survey by the required deadline. Department of State Standardized Regulation, Section 513.2, establishes a schedule for submitting post hardship surveys every 2 years. According to the Bureau of Administration's Office of Allowances, Embassy Dhaka had yet to complete its survey, which was due in December 2018. Embassy staff told OIG the embassy did not complete the survey because of competing priorities. Failure to submit a timely hardship survey to the Office of Allowances increases the risk of overpayments or underpayments to U.S. Government employees.

Recommendation 20: Embassy Dhaka should submit its hardship differential survey in accordance with Department guidelines. (Action: Embassy Dhaka)

Financial Management

Embassy Unduly Subsidized the American Embassy Employee Association

Embassy Dhaka unduly subsidized the American Embassy Employees Association (AEEA) by funding utility costs for the American Club compound and the commissary located on the embassy annex. For example, OIG found the embassy subsidized utilities costs of \$120,000 for the American Club compound and the commissary in FY 2017 and FY 2018.²⁷ In FY 2019, the embassy discontinued

²⁷ The embassy paid for electric, gas, and water costs associated with the American Club compound and electric costs for the commissary. The embassy receives one electricity bill for the annex properties, which includes the submeter for the commissary building.

the American Club subsidy but continued to pay for the commissary's utilities costs. During the inspection, the embassy sought reimbursement for the commissary utilities for FY 2019, totaling \$35,183. Additionally, the embassy told OIG that it planned to invoice the AEEA monthly beginning in October 2019 for the commissary utility costs.

The embassy provided financial assistance to AEEA despite the fact the association operated at a profit and had sufficient cash reserves to cover its operating costs. According to 6 FAM 524b, the principal officer should consider an association's profits when deciding whether a subsidy is necessary, and the U.S. Government should not unduly subsidize employee associations. In addition, it states that associations should reimburse the embassy for the cost of utilities. Embassy staff told OIG the purpose of the utility subsidy to the American Club and commissary was to insulate the AEEA from a decrease in membership revenue following the departure of many foreigners after the 2016 terrorist attack. By continuing to subsidize the AEEA when it is profitable, however, the embassy was incurring unnecessary costs.

Recommendation 21: Embassy Dhaka should manage the American Embassy Employees Association in accordance with Department standards. (Action: Embassy Dhaka)

INFORMATION MANAGEMENT

OIG reviewed Embassy Dhaka's classified, unclassified, and dedicated internet network operations; physical protection of information technology (IT) assets; emergency communication preparedness; radio and telephone programs; mail and pouch services; and records management. OIG determined the information management (IM) programs and services, with the exceptions noted below, generally met the day-to-day computing and communications needs of the embassy. One IM finding is discussed in the companion classified inspection report.

OIG identified six internal control issues the embassy corrected during the inspection. Therefore, OIG did not make recommendations to address these issues. Specifically, the embassy:

- Developed standard operating procedures for the procurement and installation of all IT equipment (5 FAM 121.1).
- Initiated service level agreements for Public Diplomacy and Consular Sections' dedicated internet networks (09 STATE 110378).²⁸
- Disposed of non-functioning telephone equipment (5 FAH-2 H-852).
- Wrote the appointment letter for pouch and mail control officers (14 FAM 714.3(2-3)).
- Updated Information Systems Security Officer (ISSO) designations (5 FAM 121b).
- Renamed overseas privileged account names on the unclassified and classified networks (5 FAH-12 H-116.5).

²⁸ Cable 09 STATE 110378, "Corrected Guidance: Post Management of Dedicated Internet Networks (DINS) for Information Resource Centers," October 15, 2008.

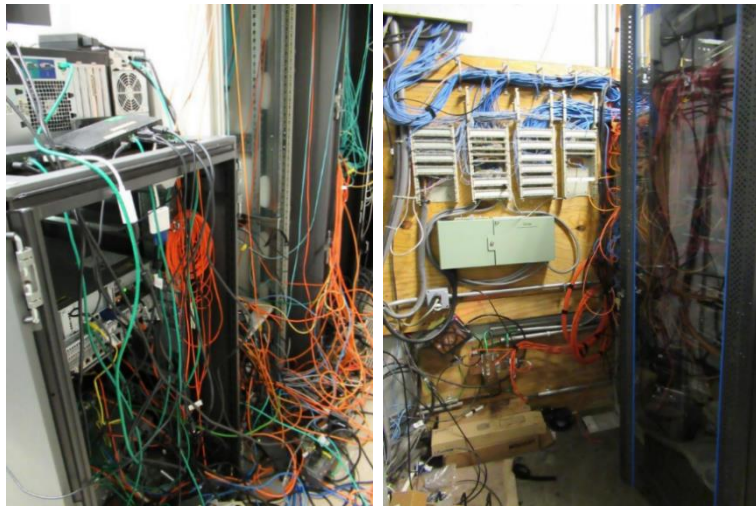
Information Systems Security Officer Activities Did Not Meet Department Standards

OIG found Embassy Dhaka's ISSO did not record information system audits or complete account reviews included in the Department's ISSO checklist, as required in 12 FAM 632.5a. In addition, 12 FAH-10 H-122.5-2 requires ISSOs to conduct at least monthly reviews and analyses of audit records to ensure users are not processing information above the authorized classification level for the computer system or otherwise engaging in security-related anomalies or suspicious activities. OIG issued a management assistance report in May 2017²⁹ that identified the need to enforce the performance of ISSO duties by overseas IM personnel in accordance with Department standards. In a subsequent cable,³⁰ the Department directed embassy management to work with ISSOs to ensure performance of their duties by prioritizing resources to make sure that cybersecurity needs were met and documented. Nonetheless, section employees told OIG they were short-staffed and did not prioritize cybersecurity needs, including the ISSO duties listed above. Without regularly scheduled ISSO reviews and documented records, Department networks are vulnerable to potential unauthorized access and malicious activity.

Recommendation 22: Embassy Dhaka should require that the Information Systems Security Officer perform information systems security duties in accordance with Department standards. (Action: Embassy Dhaka)

Network Cabling Infrastructure Did Not Comply With Department Standards

The network cabling infrastructure in the embassy's unclassified server room and the telephone frame room was antiquated and did not comply with Department standards in 5 FAH-9 H-111.1. For example, OIG observed disorganized cabling in the server and telephone rooms, as shown in Figures 2 and 3, which hindered the staff's ability to troubleshoot outages. This occurred because employees did not use required procedures for installing network cabling system components and did not devote time to cable maintenance. The IM staff told OIG they did not request assistance from the Regional Information Management Center in Bangkok to correct the network cabling



Figures 2 and 3: Embassy Dhaka unclassified server and telephone frame room. (Source: Embassy Dhaka.)

²⁹ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

³⁰ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

infrastructure. Non-standard network cabling infrastructure makes it difficult for the network staff to address network connectivity problems expeditiously.

Recommendation 23: Embassy Dhaka, in coordination with the Regional Information Management Center Bangkok and the Bureau of Information Resource Management, should correct the embassy's network cabling infrastructure, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with RIMC Bangkok and IRM)

Records Management Program Did Not Meet Department Standards

The embassy's records management program did not comply with Department standards. During the inspection, OIG found paper files from embassy sections dating back to 2015 that had not been reviewed for appropriate disposition. Guidance in 5 FAM 414.5 requires the embassy to implement and administer Department records policies, standards, systems, and procedures. In addition, guidance in 5 FAM 414.8(1) requires the embassy to preserve or dispose of documentary materials in accordance with the Federal Records Act.³¹ The identified weaknesses occurred because of lack of management oversight. Without an effective records management program, the embassy may not appropriately archive important data for research and historical insights into policy analysis and decision-making.

Recommendation 24: Embassy Dhaka should comply with Department standards for records management. (Action: Embassy Dhaka)

Information Technology Contingency Planning Did Not Meet Department Standards

The embassy did not complete or annually test its unclassified and classified IT contingency plans. Department standards in 12 FAH-10 H-232.3-1b(1-3) require management to develop and test IT contingency plans annually for effectiveness and to determine the embassy's readiness to execute them during unplanned system outages or disruptions. Section managers told OIG they did not complete or test the plans due to competing priorities. Inadequate IT contingency planning and testing prevents IM staff from mitigating the risk of system and service disruptions.

Recommendation 25: Embassy Dhaka should complete annual tests of the information technology contingency plans for the unclassified and classified networks in accordance with Department standards. (Action: Embassy Dhaka)

Embassy Did Not Conduct Information Technology Contingency Plan Training

The embassy did not conduct initial and annual refresher IT contingency training for employees with responsibilities in these areas. According to 12 FAH-10 H-232.2-1, management must ensure that employees receive initial and annual refresher IT contingency training based on their roles and responsibilities as defined in the IT contingency plans. Section managers told

³¹ 44 U.S.C. § 3301.

OIG they were unable to complete this task due to staff shortages. Failure to conduct initial and annual refresher IT contingency plan training impedes the embassy's ability to effectively respond to unplanned systems outages or disruptions.

Recommendation 26: Embassy Dhaka should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities, in accordance with Department standards. (Action: Embassy Dhaka)

Spotlight on Success: Travel Request Application Reduced Work

The Information Management staff created a travel request application to help employees prepare and expedite their travel plans. The application incorporated the user's saved profile preferences with his or her travel plans to create a comprehensive itinerary. It also gave users travel-specific reminders related to, for example, visa requirements and leave requests. The application helped to reduce the time it takes employees and the travel office coordinator to finalize travel plans.

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 Dhaka. The embassy's complete response can be found in Appendix B.¹ The embassy also provided technical comments that were incorporated into this report, as appropriate.

Recommendation 1: Embassy Dhaka should comply with Department requirements for Federal assistance awards managed by the Political-Economic Section. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020,² response, Embassy Dhaka neither agreed nor disagreed with this recommendation. However, the embassy noted it has partially addressed the issue by reassigning the Grants Officer and Grants Officer Representative, and the recommended additional data entry into alternate computer systems will be completed by May 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka complied with Department requirements for Federal assistance awards managed by the Political-Economic Section.

Recommendation 2: Embassy Dhaka should implement a training plan for the Public Diplomacy Section in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka implemented a training plan for the Public Diplomacy Section in accordance with Department standards.

Recommendation 3: Embassy Dhaka should bring its social media program into compliance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka's social media program complied with Department standards.

¹ OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on our presence at the workplace, difficulty accessing certain information, prohibitions on travel, and related difficulties within the agencies we oversee, which also affected their ability to respond to our requests.

² OIG received Embassy Dhaka's response, dated May 17, 2020, on June 2, 2020.

Recommendation 4: Embassy Dhaka should resume issuing an Annual Program Statement for its Public Diplomacy grants program. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka resumed issuing an Annual Program Statement for its Public Diplomacy grants program.

Recommendation 5: Embassy Dhaka should cease having locally employed staff answer routine visa inquiries and direct such inquiries to the vendor contracted by the Bureau of Consular Affairs. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka ceased having locally employed staff answer routine visa inquiries and directed such inquiries to the vendor contracted by the Bureau of Consular Affairs.

Recommendation 6: Embassy Dhaka should implement formal training plans for Consular Section officers in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka implemented formal training plans for Consular Section officers in accordance with Department standards.

Recommendation 7: Embassy Dhaka should implement a cross-training program for Consular Section locally employed staff, in accordance with Department standards. (Action Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka implemented a cross-training program for Consular Section locally employed staff.

Recommendation 8: Embassy Dhaka should create consular crisis preparedness plans in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of Embassy Dhaka's consular crisis preparedness plan.

Recommendation 9: Embassy Dhaka should install a closed-circuit television monitoring system or other means to enable consular managers to visually observe the activities within the Consular Section cashier booth. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation. The embassy noted expected completion in early 2021.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka installed a closed-circuit television monitoring system or other means to enable consular managers to visually observe the activities within the Consular Section cashier booth.

Recommendation 10: Embassy Dhaka should correct line-of-sight issues in the Consular Section to comply with Department guidance for consular officers to visually monitor all consular operations. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka corrected line-of-sight issues in the Consular Section to comply with Department guidance.

Recommendation 11: Embassy Dhaka should comply with all Department Overseas Motor Vehicle Safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka complied with all Department Overseas Motor Vehicle Safety standards for chauffeurs and incidental drivers under chief of mission authority.

Recommendation 12: Embassy Dhaka should prohibit locally employed staff mechanics from servicing personally owned vehicles on U.S. Government property or with U.S. Government equipment, in accordance with Federal regulations. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka prohibited locally employed staff mechanics from servicing personally owned vehicles on U.S. Government property or with U.S. Government equipment, in accordance with Federal regulations.

Recommendation 13: Embassy Dhaka should document all nonexpendable property disposals in the Integrated Logistics Management System, in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts that Embassy Dhaka documented all nonexpendable property disposals in the Integrated Logistics Management System.

Recommendation 14: Embassy Dhaka should dismantle and remove its shipping containers and portable structures in accordance with Department requirements. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka dismantled and removed its shipping containers and portable structures in accordance with Department requirements.

Recommendation 15: Embassy Dhaka should close out procurement files in accordance with Department standards (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation. The embassy noted expected completion by the close of FY 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka closed out procurement files in accordance with Department standards.

Recommendation 16: Embassy Dhaka should submit all hotel and restaurant reports to the Bureau of Administration in accordance with Department guidelines. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka submitted all hotel and restaurant reports to the Bureau of Administration in accordance with Department guidelines.

Recommendation 17: Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as warehouses on the embassy annex compound and submit the survey for approval, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with OBO)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation. The embassy noted an expected completion date of July 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka conducted a technical review of the design plans for the two structures used as warehouses on the embassy annex compound and submitted the survey for approval.

Recommendation 18: Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should complete all elevator repairs needed to obtain a current certificate of use for each elevator, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with OBO)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka completed all elevator repairs needed to obtain a current certificate of use for each elevator.

Recommendation 19: Embassy Dhaka should bring its residential fire protection program into compliance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka's residential fire protection program complied with Department standards.

Recommendation 20: Embassy Dhaka should submit its hardship differential survey in accordance with Department guidelines. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka submitted its hardship differential survey in accordance with Department guidelines.

Recommendation 21: Embassy Dhaka should manage the American Embassy Employees Association in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka managed the American Embassy Employees Association in accordance with Department standards.

Recommendation 22: Embassy Dhaka should require that the Information Systems Security Officer perform information systems security duties in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

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

Recommendation 23: Embassy Dhaka, in coordination with the Regional Information Management Center Bangkok and the Bureau of Information Resource Management, should correct the embassy's network cabling infrastructure, in accordance with Department standards. (Action: Embassy Dhaka, in coordination with RIMC Bangkok and IRM)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka corrected its network cabling infrastructure.

Recommendation 24: Embassy Dhaka should comply with Department standards for records management. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation. The embassy noted expected completion by the end of FY 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka complied with Department standards for records management.

Recommendation 25: Embassy Dhaka should complete annual tests of the information technology contingency plans for the unclassified and classified networks in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka completed annual tests of the information technology contingency plans for the unclassified and classified networks in accordance with Department standards.

Recommendation 26: Embassy Dhaka should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities, in accordance with Department standards. (Action: Embassy Dhaka)

Management Response: In its May 17, 2020, response, Embassy Dhaka concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Dhaka conducted initial and annual refresher information technology contingency training for appropriate employees.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Earl R. Miller	11/2018
Deputy Chief of Mission	JoAnne Wagner	09/2019
Chiefs of Sections:		
Management	Charles Marietta	09/2019
Consular	William Dowers	09/2019
Political/Economic	Brent Christensen	07/2019
Public Affairs	Arlissa Reynolds	08/2019
Regional Security	Prestina Williams	09/2019
Other Agencies:		
Defense Attaché	LTC Miles Baker	07/2019
U.S Agency for International Development	Derrick Brown	07/2018
Centers for Disease Control and Prevention	Dr. Michael Friedman	08/2017
Legal Attaché	Charles Bartenfeld	09/2019
Foreign Agricultural Service	Vacant	

Source: Generated by OIG from data provided by Embassy Dhaka.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 3, 2019, to January 28, 2020, 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 RESPONSE



Embassy of the United States of America

Dhaka, May 17, 2020

UNCLASSIFIED

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

FROM: Embassy Dhaka – Ambassador Earl R. Miller

SUBJECT: Response to the Draft OIG Report – Inspection of Embassy Dhaka, Bangladesh

Embassy Dhaka has reviewed the draft OIG inspection report. Post greatly appreciates the OIG's recommendations and insights. We have already begun to use them to enhance Embassy operations and effectiveness. We also appreciate the OIG team's collegiality and spirit of collaboration throughout the inspection process and the opportunity to comment on the report findings.

EXECUTIVE DIRECTION

The Embassy appreciates mention of the staffing gaps identified on page three of the OIG Draft Report. However, the paragraph understates Post's chronic and severe understaffing and its impact. In addition to the page three gaps, during the Ambassador's tenure:

- The Front Office was short one OMS for seven months and had a four-month gap in the DCM position, filled only part of that time by an REA TDYer also serving as Acting Management Officer;
- Pol/Econ was without a Chief or Deputy for three months and the Acting Chief was also P/E Deputy, Econ Chief, and Labor Officer for three months. The incoming Refugee Coordinator broke his handshake causing gaps in that position;
- The Visa Chief position was vacant for 14 months; a ConOff position was vacant for five months; and the incoming Deputy Consular Chief who will replace her predecessor who departed during the October inspection has not yet arrived. Additionally, Post was unable to fill numerous EFM positions in the Section due to the paucity of family members who chose to come to our then unaccompanied Post;
- The previous Management Officer curtailed in August 2019; the DCM recruited an REA officer to temporarily fill the position who was formally recalled to service in January 2020. The A/GSO EPAP departed in September 2019; her replacement is scheduled to arrive in summer 2020. The S/GSO left in May 2019; his replacement arrived four

months later. The FMO arrived after a three-month gap. The ISO position has been empty since June 2019 and there is no replacement in the pipeline. Post has had no CLO since February 2019; the position was also vacant for 10 months until April 2018;

- The Deputy CAO – a second-tour Officer -- filled the PAO position for 10 months; this was a triple stretch. The remaining two American positions were filled by Civil Servants in hard-to-fill positions; neither had served in a PD position or overseas.

There were additional gaps in other agency staffing, but this was the bulk of the State Department shortfalls.

With such substantial staffing gaps, during the tense and violent run up to national elections and the tumultuous aftermath, in times of heightened terrorist threat, and to support multiple VIP visits to Cox's Bazar and the world's largest refugee camp, some employees did occasionally work seven days a week. Post appreciated the strain on particular offices and officers and worked hard to burden share with our limited personnel resources. As is typical when new Chiefs of Mission arrive, the Ambassador accepted more invitations his first few months in order to promote crucial U.S. foreign policy objectives including the new Indo-Pacific Strategy, conduct high-profile advocacy over concerns for Bangladesh's shrinking democratic space, press the Government of Bangladesh to address trafficking-in-persons issues, and protect human rights and voices of dissent in the aftermath of the hugely flawed national election. While the Front Office may not have been explicit in tying all outreach and travel to the ICS, the Ambassador was careful to accept engagement opportunities that furthered ICS objectives which are, as the OIG noted, displayed prominently throughout the Embassy. Further, the Embassy had and continues to have a strategic travel working group which develops quarterly travel schedules and plans.

In February the Department agreed with Embassy Dhaka's recommendation to return to fully-accompanied status, which should help alleviate continuing staffing and related concerns by 2021, including by filling long-vacant EFM positions.

OIG Recommendation 1:

Embassy Dhaka should comply with Department requirements for Federal assistance awards managed by the Political-Economic Section.

P/E Response: Embassy Dhaka, including Pol/Econ leadership which arrived just prior to the inspection, concur with the recommendation, and has already partially addressed the issue by reassigning the Grants Officer and Grants Officer Representative. The recommended additional data entry into alternate computer systems will be completed by May 2020. In addition, since the inspection, Pol/Econ's open grant has ended and final records will be filed by May 2020. Pol/Econ leadership has conducted Section retreats to identify priorities and considerably enhanced labor reporting by hiring an EFM to oversee that portfolio.

OIG Recommendation 2:

Embassy Dhaka should implement a training plan for the Public Diplomacy Section in accordance with Department standards.

PAS Response: Embassy Dhaka concurs with the recommendation. Before the arrival of the OIG inspection team in October 2019, PAS leadership had established a monthly (1-2 hours each) internal professional development series beginning in September 2019. Topics were determined based on a section-wide anonymous survey and have included providing good customer service; strategic planning; emotional intelligence; leadership skills; taking good photos; and finding sources for free online photos, images, and other digital content. PAS also developed a training plan for FY20 which, while still in draft, was simultaneously being implemented pending feedback from R/PPR on appropriate LE training stemming from the Section's participation in the PD Staffing Modernization Initiative (PDSMI). Due to COVID-19, all Department training has been cancelled and our participation in PDSMI has been postponed indefinitely.

Between the OIG inspection and COVID-forced changes in Department operations 14 of 32 PAS staff attended at least one training session with half of participants attending regional grants courses to improve their effectiveness in managing PD programs; the IO, CAO, and new financial analyst participated in two training sessions each. Under the Embassy's current 100% telework policy for telework-accessible jobs, PAS team members have been encouraged to take online FSI courses as their work schedules permit; all staff are required to take the basic writing courses (via Skillsoft and PK425). When the Department reopens training opportunities and in conformance with R/PPR guidance, PAS will revise and finalize its annual training plan and reschedule the 10+ programmed trainings that were cancelled due to the pandemic as soon as viable.

OIG Recommendation 3:

Embassy Dhaka should bring its social media program into compliance with Department standards.

PAS response: Embassy Dhaka concurs with the recommendation PAS should update the Embassy social media strategy and develop a social media crisis communications plan. Prior to the arrival of the inspectors, the IO was working with the social media unit to develop a social media strategy and supporting standard operating procedures, including confirming a month-long TDY for an FSI social media instructor to help with this task. Due to the COVID-19 outbreak this TDY has been cancelled. While Post has made incremental changes to the way the social media unit functions one of the first tasks for our new IO, scheduled to arrive in September 2020, will be a thorough review and refreshing of the unit, including conceiving of and implementing an overall Embassy social media strategy and social media crisis communication plan to ensure Post complies with Department standards.

OIG Recommendation 4:

Embassy Dhaka should resume issuing an Annual Program Statement for its Public Diplomacy grants program.

PAS response: Embassy Dhaka concurs with the recommendation PAS should resume issuing an Annual Program statement. Post's 2019 decision not to issue an APS was deliberately taken, in consultation with the Department, due to lengthy staffing gaps referred to in the OIG report,

such that it was questionable whether PAS could ensure prudent oversight of taxpayer monies. Embassy Dhaka, however, has now begun drafting it for release in the near future. PAS has also begun developing a small grants program which will allow Post to better engage with USG exchange program alumni and continue to promote Embassy ICS goals. Implications of COVID-19 for successfully implementing an APS in FY20, however, are unclear. Extended Government of Bangladesh closures and lockdowns may also prevent potential implementing partners from accessing or filing the paperwork necessary to apply for federal assistance awards.

OIG Recommendation 5:

Embassy Dhaka should cease having locally employed staff answer routine visa inquiries and direct such inquiries to the vendor contracted by the Bureau of Consular Affairs.

CONS Response: Embassy Dhaka concurs with the recommendation. The Consular Section has shifted routine nonimmigrant visa queries to the local vendor who now answers them. The Information Unit still replies to Congressional inquiries and case specific questions the vendor is unable to address. Consular managers continue to work with Consular Affairs to further expand vendor capabilities to assist the Section.

OIG Recommendation 6:

Embassy Dhaka should implement formal training plans for Consular Section officers in accordance with Department standards.

CONS Response: Embassy Dhaka concurs with the recommendation. The Consular Section has implemented training plans for each section. Consular managers now work more closely with adjudicators on a daily basis, observing line interviews and regularly adjudicating alongside entry-level officers to provide one-on-one coaching and training. The Training Portfolio Officer updates all training materials and maintains a log of mandatory training for both officers and local staff. The Section now conducts weekly adjudicator meetings where officers discuss cases, review new guidance, and work toward consensus.

OIG Recommendation 7:

Embassy Dhaka should implement a cross-training program for Consular Section locally employed staff, in accordance with Department standards.

CONS Response: Embassy Dhaka concurs with the recommendation. The Consular Section has implemented a cross-training schedule and local staff now regularly learn and practice the duties of other sections, especially in the American Citizen Services unit. Local staff demonstrated their proficiency in ACS functions during the coronavirus crisis by responding to thousands of citizen queries and assisting with five charter repatriation flights for American citizens.

OIG Recommendation 8:

Embassy Dhaka should create consular crisis preparedness plans in accordance with Department standards.

CONS Response: Embassy Dhaka concurs with the recommendation. The Consular Section has updated its section of the Emergency Action Plan, the F-77 Report of Potential Evacuees, its emergency response kits, and its internal plans. The Consular Section had planned training for its Citizen Liaison Volunteers (CLV) in April 2020 but this was delayed because of the coronavirus crisis. During the crisis, the ACS unit has been in touch with the CLVs and consular managers will reschedule their in-person training for later this year.

OIG Recommendation 9:

Embassy Dhaka should install a closed-circuit television monitoring system or other means to enable consular managers to visually observe the activities within the Consular Section cashier booth.

CONS Response: Embassy Dhaka concurs with the recommendation. The Consular Chief submitted a work order to purchase and install a closed-circuit television system in the cashier booth. The Consular Section is currently in the midst of a major OBO construction project and all Consular manager offices will be relocated. Once the renovation is complete, the camera system will be installed. Because of the coronavirus crisis, construction has been suspended, but Consular managers estimate a completion date in early 2021.

OIG Recommendation 10:

Embassy Dhaka should correct line-of-sight issues in the Consular Section to comply with Department guidance for consular officers to visually monitor all consular operations.

CONS Response: Embassy Dhaka concurs with the recommendation. Consular officers have been re-seated and are now intermixed throughout the Section, providing better line-of-sight. The Section is now in the midst of a major construction project and half of the staff, including officers, are working in a temporary space. Upon completion of construction in early 2021 officers will continue to be strategically seated to ensure line-of-sight.

OIG Recommendation 11:

Embassy Dhaka should comply with all Department Overseas Motor Vehicle Standards for chauffeurs and incidental drivers under chief of mission authority.

Management Response: Embassy Dhaka concurs with the recommendation and has taken the following steps:

Driver safety training. Working with the Motor Pool Supervisor and approved Smith System trainers on staff, Post retrained all drivers, and implemented additional quarterly training. Following the OIG visit, GSO updated the SMITH program to include incidental drivers in training programs, and added an additional trainer.

Ten-hour duty limitation. Post investigated instances of drivers exceeding the ten-hour duty limitation and found they occurred in two types of trips – overnight field trips and local area day trips. Post supported roughly 200 trips to Cox’s Bazaar refugee camps last FY in addition to trips throughout the country. Despite GSO guidance during planning meetings for these trips, customers sometimes overstayed at their meeting locations, resulting in drivers exceeding the ten-hour limit. While some of these delays were unpredictable (e.g. a ferry becoming unavailable mid-trip that required re-routing with no safe haven available), most of the overstays were not. GSO has amended Post’s motorpool policy and increasing scrutiny of trip plans to ensure travelers scrupulously observe the 10-hour limit.

OIG Recommendation 12:

Embassy Dhaka should prohibit locally employed staff mechanics from servicing personally owned vehicles on U.S. Government property or with U.S. Government equipment, in accordance with Federal regulations.

Management Response: Embassy Dhaka concurs with the recommendation. The Embassy has issued a Management Notice advising all employees personally owned cars cannot be repaired on Embassy grounds and USG-owned tools cannot be used off-site for POV maintenance or repair. Post also specifically reviewed this policy with Embassy mechanics.

OIG Recommendation 13:

Embassy Dhaka should document all nonexpendable property disposals in the Integrated Logistics Management System, in accordance with Department standards.

Management Response: Embassy Dhaka concurs with the recommendation and notes starting with the March 29, 2019 auction all property auctions have been documented using ILMS. Prior to 2019, Post manually generated disposal documents in .pdf format. However, the last such auction was held September 28, 2018 during the first month of assignment of a newly-arrived A/GSO. The A/GSO stopped this practice and all subsequent auctions – March 29, 2019, July 26, 2019, and September 27, 2019 -- were documented using ILMS.

OIG Recommendation 14:

Embassy Dhaka should dismantle and remove its shipping containers and portable structures in accordance with Department requirements.

Management Response: Embassy Dhaka concurs with this recommendation but cannot take immediate action. Eight containers are currently used for storage on the compound, a reduction from 24 containers in 2010. Most of these remaining containers are being used to store property displaced by the ongoing Compound Security Upgrade (CSU). Upon completion of this project in 2021 these containers will be removed.

OIG Recommendation 15:

Embassy Dhaka should close out procurement files in accordance with Department standards

Management Response: Embassy Dhaka concurs with this recommendation and all new files have been properly closed. The backlog of existing contract files has been steadily reduced and should be finished by the close of FY 2020.

OIG Recommendation 16:

Embassy Dhaka should submit all hotel and restaurant reports to the Bureau of Administration in accordance with Department guidelines.

Management Response: Embassy Dhaka agrees in principle with this recommendation but notes security and travel restrictions in Bangladesh, coupled with new COVID-19-related precautions, make travel and research in the four cities indicated very difficult and resource-intensive. Embassy Dhaka hopes to implement this recommendation in FY 2021.

OIG Recommendation 17:

Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should conduct a technical review of the design plans for the two structures used as warehouses on the embassy annex compound and submit the survey for approval, in accordance with Department standards.

Management Response: Embassy Dhaka concurs with this recommendation. FAC engineers are currently compiling as-built drawings of the two buildings and working with our OBO Area Management Officer on submitting permit paperwork to OBO for review and approval. Post will have required documents submitted to OBO by July 2020.

OBO Response: OBO concurs with this recommendation and will conduct a technical review of the two buildings being used as warehouses on the Embassy Annex compound as part of OBO's overall code and document review process.

OIG Recommendation 18:

Embassy Dhaka, in coordination with the Bureau of Overseas Buildings Operations, should complete all elevator repairs needed to obtain a current certificate of use for each elevator, in accordance with Department standards.

Management Response: Embassy Dhaka concurs with this recommendation but cannot take immediate action. No local contractors in Bangladesh are able to perform the necessary repairs. FAC is working with OBO Elevator Support personnel on an elevator replacement project as this course was found to be the most cost and time effective due to the age and condition of these 31-year-old original units. The elevator replacement Scope of Work and IGE have been completed and the CSP submitted. A path for funding is being developed with an anticipated start date for the project before the end of 2020.

OBO Response: OBO concurs with this recommendation. OBO/CFSM/FAC will request 7901 funding and once it is approved, OBO's Elevator Management Program will coordinate contracting and project management efforts with Post to address the elevator deficiencies.

OIG Recommendation 19:

Embassy Dhaka should bring its residential fire protection program into compliance with Department standards.

Management Response: Embassy Dhaka concurs with this recommendation and has taken remedial action. At Front Office direction, Management conducted seven fire safety briefings from September 24 to December 11, 2019 with mandatory attendance of all American staff, Eligible Family Members, and Members of Household, emphasizing this requirement. Starting December 2, 2019, Embassy management began issuing a monthly notice (Mission Notice 215-19) to remind all personnel of their responsibility to perform a monthly check of fire extinguishers and other fire safety devices in all residences.

OIG Recommendation 20:

Embassy Dhaka should submit its hardship differential survey in accordance with Department guidelines.

Management Response: Embassy Dhaka concurs with the recommendation. Post submitted its hardship differential survey in December 2019. The Department reapproved Embassy Dhaka's 35% hardship differential in February 2020.

OIG Recommendation 21:

Embassy Dhaka should manage the American Embassy Employees Association in accordance with Department standards.

Management Response: Embassy Dhaka concurs with this recommendation, noting it has been largely in compliance since spring 2019. The intent of the subsidies was to offset a stark decrease in AEEA revenue after the 2016 Holey Bakery terrorist attack caused families to depart Post. From 2016-2019, AEEA Boards were concerned about the continued viability of AEEA operations due to marked decreases in revenue. Post agreed to provide utility offsets totaling \$120,000 during this period.

The current Board, elected in April 2019, established a licensing agreement to document AEEA's location on USG-owned property which requires AEEA to reimburse the cost of utilities for all space provided based on separate metering. In October 2019, at the request of the Ambassador and the Board, the Bureau of Administration's Office of Commissary and Recreation Affairs (CR) provided TDY assistance to Embassy Dhaka's AEEA to assist Post in ensuring AEEA complied with Department regulations. Based on the terms of the existing licensing agreement, in December 2019 AEEA agreed to write off the \$74,218 utility offsets as uncollectible. Post no longer provides financial assistance to the AEEA and the Board is committed to maintaining fully independent operations.

OIG Recommendation 22:

Embassy Dhaka should require that the Information Systems Security Officer perform information systems security duties in accordance with Department standards.

Management Response: Embassy Dhaka concurs with the recommendation. Even with the continuing IRM staffing deficits, Management will make every effort to ensure Post staff, supplemented by external resources such as the Regional ISSO, Regional CSO, RIMC, and supplemental inspections, will focus as much as possible on these security duties until Post is fully staffed.

OIG Recommendation 23:

Embassy Dhaka, in coordination with the Regional Information Management Center Bangkok and the Bureau of Information Resource Management, should correct the embassy's network cabling infrastructure, in accordance with Department standards.

Management Response: Embassy Dhaka concurs with the recommendation. Dhaka's IMO has been in contact with RIMC Bangkok leadership and IRM Foreign Operations regarding potential assistance. RIMC Bangkok advised a formal Information Technology Infrastructure Remediation (ITIR) undertaking involving the LAN/WAN Services division (LWS) of the IRM Bureau may be the preferred resolution given the extensive amount of work being described at this stage and would like to conduct a formal survey at Post to confirm and finalize our response. Embassy Dhaka is researching the time and resources required and performing a cost-benefit analysis to determine if an ITIR is deemed necessary whether one can be completed, paid for, and provide sufficient benefits before the Embassy's NEC project is underway, which would render the ITIR moot.

OIG Recommendation 24:

Embassy Dhaka should comply with Department standards for records management.

Management Response: Embassy Dhaka concurs with the recommendation. The Records Officer is working with PAS and Pol Econ offices to complete the retirement of records. This should be completed before the end of the fiscal year.

OIG Recommendation 25:

Embassy Dhaka should complete annual tests of the Information Technology Contingency Plans for the unclassified and classified networks in accordance with Department standards.

Management Response: Embassy Dhaka concurs with the recommendation. It has been the practice at Embassy Dhaka to test the IT Contingency Plan throughout the year in a piecemeal fashion to avoid the disruption of taking down all systems, Embassy-wide, at once. Based on the responses to the OIG which led to this recommendation, it is possible Section managers were not

aware these activities in their workplan were intended as part of the ITCP test and Embassy Dhaka believes Post's response to OIG Recommendation 26 will address this concern as well.

OIG Recommendation 26:

Embassy Dhaka should conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities, in accordance with Department standards.

Management Response: Embassy Dhaka concurs with this recommendation. Given the dovetailed concerns of Recommendation 25, Post IMO and HRO will collaborate on ensuring all staff with responsibilities under the ITCP are briefed on those responsibilities and have their Work Requirement Statements written or adjusted to reflect the need to gain and demonstrate understanding of, and to assist in testing, the portions of the ITCP which apply to their positions.

POC

The point of contact for this memorandum is Deputy Chief of Mission JoAnne Wagner.

ABBREVIATIONS

AEEA	American Embassy Employees Association
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
IM	Information Management
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations

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