

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-20-18

Office of Inspections

September 2020

**Inspection of Embassy Ouagadougou,
Burkina Faso**

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-20-18

What OIG Inspected

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

What OIG Recommends

OIG made 10 recommendations to Embassy Ouagadougou.

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

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What OIG Found

- The Ambassador and the Deputy Chief of Mission established clearly defined goals and priorities for Embassy Ouagadougou. They effectively employed a wide variety of mechanisms to communicate and coordinate their activities with the Government of Burkina Faso.
- In meeting advocacy and reporting responsibilities, the embassy reported on the growing extremist threat in northern Burkina Faso as well as on allegations of increased human rights violations. The embassy also continued to press the Burkina Faso Government to address human rights violations even as government forces faced serious terrorist activity.
- A 13-month staffing gap in the General Services Officer position was a root cause of several internal control deficiencies identified in the Management Section.
- Information management operations and services generally complied with Department of State policies and guidance but lacked inventory control procedures for network user accounts and information technology equipment.

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CONTEXT

Burkina Faso is a poor, landlocked country with few natural resources and a weak industrial base. Eighty percent of the country's more than 19 million people engage in subsistence farming. The current president was democratically elected in 2015 after widespread protests in 2014 ended the 27-year rule of the previous president. In 2016, the government adopted a 5-year development strategy that aims to reduce poverty, build human capital, and satisfy basic needs of its population. However, political insecurity, unreliable energy supplies, and poor transportation infrastructure pose long-term economic development challenges.

The Burkina Faso Government continues to face growing security challenges from violent extremism. Although the rise of violent extremism originally was linked to similar activity in neighboring Mali, extremist groups—including Jama'at Nusrat al-Islam wal-Muslimin, Ansarul Islam, and the Islamic State in the Greater Sahara—are now firmly rooted in Burkina Faso. Since 2016, Burkina Faso has experienced numerous terrorist attacks throughout the country. Violent extremists launched more than 100 attacks in the first quarter of 2019, with some attacks occurring in the capital in recent years. The growing instability caused by these attacks has resulted in more than 200,000 internally displaced persons and the closure of 1,300 schools as of 2019.

To counter extremism, the government arrested numerous terrorist suspects; augmented the size of its special terrorism detachment Groupement des Forces Anti-Terroristes in the country's north; and joined the G5 Sahel Joint Force—with regional neighbors Chad, Mali, Mauritania, and Niger—to fight terrorism and criminal trafficking groups.

Designed to assist the country to meet these challenges, the embassy's three strategic objectives, as outlined in its August 2018 Integrated Country Strategy (ICS), are:

- Promote stronger democracy and improved governance.
- Advance peace and security.
- Promote equitable economic opportunity and social development.

At the time of the inspection, Embassy Ouagadougou had 54 authorized U.S. direct-hire staff members, 445 locally employed (LE) staff, and 12 eligible family members. Of the 54 direct-hire employees, 35 worked for the Department of State (Department) and 19 worked for other U.S. Government agencies, including the Departments of Defense, Health and Human Services, and Justice, and the U.S. Agency for International Development. U.S. bilateral foreign assistance to Burkina Faso in FY 2018 totaled approximately \$29.5 million. In addition, the President's Emergency Plan for AIDS Relief, or PEPFAR, allocated \$12.5 million in FY 2019 to Burkina Faso.

OIG evaluated the embassy's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.¹ A companion classified

¹ See Appendix A.

inspection report discusses the embassy's security program, certain aspects of the information management program, and issues affecting the safety of mission personnel and facilities.

EXECUTIVE DIRECTION

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

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in Burkina Faso in November 2016 after serving as the Deputy Chief of Mission (DCM) at Embassy Bamako, Mali. His previous assignments included political and public diplomacy positions in France and South Korea and desk officer in the Bureau of European and Eurasian Affairs. The DCM arrived in August 2018 after serving as a senior foreign policy advisor at U.S. Africa Command. Her previous assignments included political and economic positions in Ethiopia and Guinea; she also served as Deputy Director of the Office of Economic Policy in the Bureau of African Affairs.

The Ambassador and the DCM established an inclusive, positive, and professional tone for the embassy consistent with Department leadership principles enunciated in 3 Foreign Affairs Manual (FAM) 1214. The Ambassador and the DCM held ad hoc and regularly scheduled meetings with every office and agency in the embassy and actively participated and offered direction in working groups and staff meetings. Embassy staff told OIG the Ambassador and the DCM complemented each other and worked well together as a team, in accordance with 2 FAM 113.2. The Ambassador served as the external face of the embassy and concentrated on relations with the Burkina Faso Government and the international community, and the DCM managed embassy operations and mentored employees.

The embassy's Equal Employment Opportunity (EEO) program fulfilled requirements outlined in 3 FAM 1514.2. The embassy publicized the appointment of the EEO counselor, three LE EEO liaisons, and the Federal Women's Program Coordinator and prominently displayed program notices in English and French throughout the compound. The EEO counselor trained the LE liaisons immediately after assuming his position and conducted training sessions for local interns working at the embassy. The counselor also established a schedule to train all embassy employees on preventing sexual harassment by the end of 2019, had the training materials translated into French, and led a series of training sessions with the local guard force. Embassy staff consistently reported to OIG that the Front Office regularly emphasized the importance of the EEO program at embassy meetings.

Execution of Foreign Policy Goals and Objectives

The Ambassador fulfilled his responsibilities under 2 FAM 113.1 to create and supervise an effective strategic plan that provides the guiding vision for the mission. Soon after his arrival, the Ambassador led a collaborative effort involving key embassy staff to conduct an in-depth

assessment of current conditions in Burkina Faso. He convened small working groups and Country Team members to integrate input from all embassy sections to develop an ICS that articulated U.S. Government priorities, as directed by 18 FAM 301.2-1b, and presented the approved ICS to embassy staff in town hall meetings. Through interviews and observations, OIG found the ICS goals guided embassy activities and were well-known to employees. The Front Office reviewed ICS goals and progress in Country Team meetings and embassy working groups, including democracy and governance, countering terrorism and violent extremism, and health working groups.² The working groups tied their strategic planning to the ICS and adjusted their efforts, when appropriate, to meet ICS goals.

The Ambassador established a good rapport with host government officials, leaders from all levels of society, and heads of international organizations as directed by 2 FAM 113.1. His calendar showed he met regularly with Burkina Faso Government officials, including quarterly meetings with the President. In addition, after the approval of the ICS in 2018, the Ambassador presented its general outline to the country's President, Prime Minister and other ministers, and civil society organizations in bilateral meetings, town halls, and press interviews.

Adherence to Internal Controls

The Ambassador and the DCM prepared the FY 2019 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7, which requires chiefs of mission to develop and maintain appropriate systems of management control of their organizations. Upon the DCM's arrival in August 2018, the Front Office took steps to strengthen the embassy's management controls. The DCM formed a management controls "red team," consisting of representatives of most embassy sections, to examine potential fraud or waste. The team took several actions to overcome potential vulnerabilities, including establishing procedures for consular oversight of offsite fee collection, direct billing of agencies for items not covered under the furniture and appliance pool program, introducing more American staff oversight into the procurement system, and reconciling reports of fuel usage quarterly.

Security and Emergency Planning

The Ambassador's leadership of the mission's emergency preparedness program was consistent with Department guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-721a and the President's letter of instruction to bilateral chiefs of mission, which requires them to take full and direct responsibility for the security of the mission and its personnel.

² The democracy and governance working group included the Ambassador, DCM, and representatives of the U.S. Agency for International Development (USAID), the Political Section, Public Diplomacy Section, Regional Security Office, Resident Legal Advisor, and Senior Police Advisor. The countering terrorism and violent extremism working group included the Ambassador, DCM, and representatives of USAID, the Political Section, Public Diplomacy Section, Regional Security Office, Defense Attaché Office, Special Operations Forces Liaison Officer, Resident Legal Advisor, and Senior Police Advisor. The health working group included the DCM and representatives of USAID, the Centers for Disease Control and Prevention, and the Economic Section.

The Bureau of Diplomatic Security designated the embassy a high-threat post on August 28, 2019, and, at the Front Office's request, the Department's Foreign Service Institute conducted a crisis management exercise tailored for the embassy in September 2019. It included a mass casualty exercise, crisis preparedness for eligible family members, a briefing by the military's U.S. Africa Command on its capabilities and roles in crisis response, and a panel discussion by the Ambassador and the DCM to share their own experiences in crisis situations. Of particular note was a session in which embassy section deputies took over leadership roles so they could obtain a better understanding of the Emergency Action Committee process. The Ambassador and the DCM attended most of the exercise, which complemented several crisis or tabletop exercises the embassy had held in the previous 12 months. An unanticipated outcome of the exercise was the decision by the DCM to create an LE staff crisis team, consisting of employees from each embassy office, to identify the particular challenges they could face in an emergency.

In addition, the embassy held almost weekly accountability exercises, using phone and computer systems rather than its emergency radio network. Furthermore, the embassy travel policy required armored vehicles and security escorts, as well as Regional Security and Front Office approval, for travel to most locations outside the capital. Embassy staff told OIG they believed the embassy was as prepared as possible for an emergency.

During the inspection, the embassy was updating the memorandum of understanding between the Ambassador and the geographic combatant commander on the security of Department of Defense personnel in Burkina Faso, in accordance with 2 FAH-2 H-116.4b.

Developing and Mentoring Foreign Service Professionals

The DCM oversaw the embassy's First- and Second-Tour (FAST) employee development program in accordance with 3 FAM 2242.4, which requires DCMs to ensure these employees are mentored and developed professionally. The DCM held a planning retreat at her residence in December 2018 with the embassy's three FAST employees to design the program structure. Specifically, they identified opportunities and activities to improve skills in areas such as crisis management, high-level visits, and public speaking. In addition, they informally opened the program to eligible family members, third-tour and mid-level officers, and other individuals interested in professional development, an approach that increased embassy participation. The DCM also included leadership, crisis management, and mentoring elements in the FAST employees' work requirement statements. The group usually met monthly for DCM-directed seminars on topics relevant to their professional development. In addition, the DCM mentored them individually in one-on-one ad hoc meetings. The group also coordinated monthly brown-bag sessions (called the "explainer series") that featured Country Team members discussing their work and answering questions. FAST employees told OIG they viewed the program positively.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Ouagadougou's policy and program implementation through a review of the Political and Economic Sections' advocacy and analysis work, the Public Diplomacy Section's efforts, and the Consular Section's provision of American citizen and visa services. OIG also reviewed the embassy's foreign assistance planning and coordination and program management of Department-funded foreign assistance programs. OIG found the embassy generally met Department requirements for policy and program implementation, except as described below.

Political and Economic Sections

OIG reviewed the Political and Economic Sections' leadership, management, policy implementation, reporting and advocacy, Leahy vetting, and grants. At the time of the inspection, the sole political officer was also the acting economic officer and the commercial/economic LE position was vacant. Despite these vacancies, OIG determined the embassy's political-economic activities generally conformed to Department standards, with the exception noted below.

Section Fulfilled Advocacy and Reporting Responsibilities

OIG found the embassy generally fulfilled its advocacy and reporting responsibilities in accordance with ICS goals. Department offices widely praised to OIG the mission's reporting for its quality, relevance, and usefulness, citing in particular reporting on the growing extremist threat in northern Burkina Faso as well as increasing reports of human rights violations. The Bureau of Democracy, Human Rights, and Labor praised the embassy for continuously pressing the Burkina Faso Government to address human rights violations even as government forces faced serious terrorist activity. In addition, the Bureau for Economic and Business Affairs complimented the embassy's cable on the government's efforts to develop its energy and electricity sectors by working with investors and development organizations. OIG reviewed 72 embassy reporting cables sent between April and October 2019 and found them to be adequately sourced, timely, and relevant to ICS goals. OIG noted approximately 25 percent of the cables reviewed consisted of in-depth analysis. The embassy held a weekly reporting meeting, led by the Ambassador, that facilitated a continuous update of the embassy's reporting plan.

Special Self-Help Grants Management Documentation Was Incomplete

OIG found none of the Ambassador's Special Self-Help Program grants files contained complete documentation. OIG reviewed all eight Economic Section-managed grants awarded under this program in FY 2019; these grants had a total value of \$50,278. The files did not always include panel review decisions for approved grants, monitoring reports, evidence of checks of grantees in SAM.gov,³ and grants officer representative designation memos. However, the embassy

³ The System for Award Management, or SAM.gov, is the system for entities, including potential Federal assistance awardees, to register to do business with the U.S. Government. The site also can be used to determine whether an

provided sufficient information for OIG to determine the work called for in the grants was underway or completed. The section brought the grant files into compliance with Department guidelines⁴ before the inspection concluded. As a result, OIG did not make a recommendation to address this issue.

Embassy Conducted Leahy Vetting in Accordance With Department Standards

OIG's review found the embassy processed Leahy vetting cases in 2018 and 2019 in accordance with Department guidelines.⁵ Specifically, from November 2018 to September 2019, the embassy vetted 747 individuals and security units for gross violations of human rights.

Embassy Records Management Program Did Not Adhere to Department Standards

The embassy's records management program did not retire official records in accordance with Department standards. According to the Department's records management database, the embassy's political, economic, and public diplomacy records have been non-compliant since 2017. In addition, the embassy warehouse contained approximately 150 file boxes of documents and 15 locked safes of unknown contents. Department standards in 5 FAM 414.8(1-2) require that all Department employees preserve documentary materials meeting the definition of a record under the Federal Records Act and create, use, maintain, preserve, and dispose of the Department's information and records according to Department requirements. In addition, 5 FAM 414.5a requires the principal officer at each post to implement and administer records policies, standards, systems, and procedures issued by the Department's Records Officer.⁶ Furthermore, 5 FAM 433a-b requires posts to maintain an active, continuing program to retire records in accordance with records disposition schedules. Embassy officers cited a lack of understanding of the Department records management guidelines as the reason for this issue. The absence of an effective records retirement program increases the risk of loss of important data and historical records that could affect the Department's and the mission's ability to conduct policy analysis, decision-making, and archival research.

Recommendation 1: Embassy Ouagadougou should retire its official records in accordance with Department standards. (Action: Embassy Ouagadougou)

entity is excluded, suspended, or debarred from receiving Federal grants, contracts, or other forms of Federal financial and non-financial assistance and benefits.

⁴ Bureau of Administration Office of the Procurement Executive, Federal Assistance Directive, October 2018. See Chapter 2, Section H, "Conduct a Merit Review of Proposals and Recipient Selection," at 44; Chapter 4, Section D.5. "Site Visits," at 132-134; Chapter 4, Section D.4, "Desk Monitoring," at 132; Chapter 2, Section J.1., "System for Award Management (SAM.gov)," at 50; Chapter 2, Section J.2., "Federal Awardee Performance and Integrity Information System," at 51; and Chapter 2, Section P, "Grants Officer Designates Grants Officer Representative (GOR)," at 79-81.

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. The Department's 2017 Leahy Vetting Guide describes how embassies should implement Leahy vetting.

⁶ The provisions cited direct the responsible parties to 5 FAM 400 and 5 FAH-4.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning, reporting, section leadership, resource management, Federal assistance awards, American Spaces,⁷ educational and cultural exchanges, and media engagement. The section used an adequate range of public diplomacy tools and programs, including Federal assistance grants, social media, and American Spaces to advance ICS goals. OIG found the embassy's public diplomacy activities generally complied with Department standards and guidance.

OIG reviewed 20 grants awarded by the Public Diplomacy Section in FY 2018 and FY 2019 totaling \$937,740 (out of a total universe of 60 grants with an award value of \$1,092,279). During the inspection, OIG identified cases of incomplete documentation in the section's grants files uploaded to the Department's SAMS Overseas system,⁸ including missing panel review decisions for approved grants, monitoring reports, and grants officer representative designation memos. The section brought the grant files into compliance with Department guidelines⁹ before the inspection concluded. As a result, OIG did not make a recommendation to address this issue.

Consular Affairs

OIG reviewed Embassy Ouagadougou's consular operations, including section leadership, American citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. The Consular Section delivered American citizen services to a community that included an estimated 984 U.S. residents and approximately 6,000 American citizen visitors annually. With the exceptions described below, OIG found the Consular Section's operations complied with Department guidelines.

Referrals and Priority Appointment Request Files Missing Required Documentation

OIG reviewed the case files for 11 referrals and priority appointment requests¹⁰ adjudicated between July 1 and September 24, 2019, and found two case files lacked required

⁷ 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. The embassy has two American Spaces: one in the chancery and the other at Norbert Zongo University in the city of Koudougou.

⁸ The State Assistance Management System Overseas, or SAMS Overseas, is the Department's program to capture the data essential for overseeing, administering, monitoring, and reporting Department-wide Federal assistance. It includes all four phases of the Federal assistance lifecycle as outlined by Office of Management and Budget guidelines: pre-award, award, post-award, and closeout.

⁹ Federal Assistance Directive, October 2018, Chapter 2, Section H, "Conduct a Merit Review of Proposals and Recipient Selection," at 44; Chapter 4, Section D.5. "Site Visits," at 132-134; and Chapter 4, Section D.4, "Desk Monitoring," at 132.

¹⁰ A referral is a request by an authorized U.S. Government official (the referring official) for an expedited appointment, other courtesies, and issuance of a nonimmigrant visa. All relevant immigration law and policy applies to the visa adjudication. A priority appointment request is a formal request by a qualified U.S. Government official for an earlier interview or for other courtesies for an individual when U.S. national interest or a compelling mission priority would be served by expediting the appointment.

documentation. Specifically, OIG found one case file did not indicate the U.S. Government's interest in priority treatment, whether the contact was favorably known to the referring officer, or whether the officer had reasonable knowledge of the contact's bona fides. Another case did not include a scanned copy of the priority appointment request. Department standards in 9 FAM 601.8-4(B)(2)a(1-2) require requesting officials to certify that assisting a contact through a priority appointment request directly furthers a U.S. national interest or a compelling mission priority and that the contact is either personally and favorably known to the requesting official or that the requesting official has reasonable knowledge of the contact's bona fides. In addition, 9 FAM 601.8-4(E)a and b and 9 FAM 601.6-4 require consular sections to scan all required documents into the file. Consular Section management attributed the missing documentation to inattention to the scanning requirements. Failure to complete the form in accordance with Department standards increases the risk that a case will be improperly rejected or that a non-qualified case will be accepted for priority handling. OIG advised consular officers to revise the procedures for processing referrals to ensure that all required forms to substantiate a referral or priority appointment request are completed and scanned into the case file. During the inspection, section staff corrected its procedures and scanned the required documentation to the file. As a result, OIG did not make a recommendation to address this issue.

Embassy Did Not Review Nonimmigrant Visa Adjudications as Required

The embassy did not review nonimmigrant visa adjudications in accordance with Department standards. For example, the DCM or, in her absence, the acting DCM, did not review 12 of the 23 cases adjudicated by the Consular Section chief in July 2019, as required by 9 FAM 403.12-2a-b. Furthermore, Department guidance in 9 FAM 403.12-1b requires designated officers to review a defined subset of each adjudicating officer's cases. Through interviews and observation, OIG determined that a technical issue contributed to the problem. Failure to review visa adjudications increases the risk of issuing a visa to an ineligible applicant or of refusing a case that may have been eligible for a visa. On OIG's advice, embassy reviewing officers corrected the technical problem and began conducting reviews as required. As a result, OIG did not make a recommendation to address this issue.

Section Lacked an Effective Strategy for Fraud Prevention

The Consular Section did not prepare an effective written strategy for its fraud prevention program as required by Department standards. Through interviews and document reviews, OIG found the embassy's written fraud prevention strategy included an outline of roles and training requirements. However, it did not identify fraud-related management controls and service goals, detail fraud prevention roles and responsibilities, or define functions and strategies for preventing and combatting fraud that could affect citizenship services and visa processing, as required by 7 FAH-1 H-941.1. During the inspection, the embassy updated its fraud prevention strategy and ensured it aligned with written standard operating procedures that govern all fraud prevention unit activities. As a result, OIG did not make a recommendation to address this issue.

RESOURCE MANAGEMENT

OIG reviewed internal control systems in general management, human resources, financial management, general services, and facilities management operations at Embassy Ouagadougou. OIG determined the section's human resources, financial management, and facilities management functions implemented required processes and procedures in accordance with applicable laws and Department guidance. However, OIG found problems in the section's other operations, as described below. Section staff attributed many of these issues to a lack of management oversight caused by a 13-month staffing gap in the embassy's General Services Officer position.¹¹ The position was filled permanently on August 19, 2019.

General Services

Embassy Did Not Fully Comply With Department Motor Vehicles Safety Standards

Embassy Ouagadougou did not comply with some elements of the Department's overseas motor vehicle safety standards. Specifically:

- Sixteen of 29 chauffeurs either did not receive or were not current with armored vehicle driver training (12 FAM 389b).
- Four of 29 chauffeurs and 67 of 94 incidental (self-drive) drivers either did not receive or were not current with required driver safety training or retraining (14 FAM 433.5a and b).
- Four of 29 chauffeurs, and 22 of 94 incidental drivers, had expired medical certifications or never received medical certifications before driving official vehicles (14 FAM 433.4b and c).
- The Mission Vehicle Accountable Officer did not maintain medical fitness information concerning U.S. direct-hire American staff drivers (14 FAM 433.4e).

Embassy staff told OIG these internal control issues occurred because of competing priorities coupled with 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 2: Embassy Ouagadougou should comply with applicable Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Ouagadougou)

Embassy Maintained an Excessive Motor Vehicle Inventory

Embassy Ouagadougou maintained more official vehicles than authorized. Specifically, the embassy had an inventory of 93 motor vehicles, or 23 vehicles above the fleet target size of 70

¹¹ During the staffing gap, the embassy relied on a combination of temporary duty support and management staff to sustain operations.

vehicles. The Department uses the vehicle allocation methodology survey to set target fleet size based on industry fleet standards and post necessity, as called for in 14 FAM 436.2a. Embassy staff told OIG the excessive motor vehicle inventory occurred because of a lack of management oversight caused by the long-term absence of a permanent General Services Officer. Retaining excess vehicles increases insurance and maintenance costs and deprives the U.S. Government of the proceeds of excess vehicle sales.

Recommendation 3: Embassy Ouagadougou, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines and put proceeds of sales to better use. (Action: Embassy Ouagadougou)

Motor Vehicle Fleet Data Was Not Verified

Embassy Ouagadougou did not verify official motor vehicle fleet data entered into the Fleet Management Information System as required by Department standards, leading to inaccuracies in the data. Specifically, one vehicle listed a negative mileage of 3,407 kilometers in July 2019, while two vehicles listed negative mileage of 731 kilometers and 44,049 kilometers, respectively, in August 2019. In September 2019, one vehicle showed a negative mileage of 25,429 kilometers, while two other vehicles were listed as being driven 45,379 kilometers and 20,818 kilometers, respectively, during a 30-day period. According to 14 FAM 431.6-2b(7), the mission vehicle accountable officer is responsible for reviewing vehicle and driver usage and periodically verifying data integrity in the Fleet Management Information System. Embassy staff told OIG the incorrect entries occurred because of excessive work volume and a lack of management oversight. This internal control weakness increases the risk of vehicle mismanagement and potential fuel theft.

Recommendation 4: Embassy Ouagadougou should implement controls to verify the integrity of data entered into the Fleet Management Information System, in accordance with Department standards. (Action: Embassy Ouagadougou)

Embassy Did Not Review Blanket Purchase Agreements

Embassy Ouagadougou did not annually review any of its 62 blanket purchase agreements¹² to procure a variety of goods and services, as required. The embassy was unable to provide OIG with documentation showing any blanket purchase agreement reviews. According to Department of State Acquisition Regulation, Section 613.303-6, contracting officers must conduct an annual review to ensure the embassy follows authorized procedures and report the results, including a corrective action plan, to the head of the contracting activity. Embassy staff told OIG they did not complete the reviews because of competing priorities and a lack of management oversight due to the long-term vacancy of the General Services Officer. Without annual blanket purchase agreement reviews, the embassy cannot guarantee procurement integrity, maintain awareness of changes in market conditions, and determine whether there

¹² 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.

are other pertinent factors that may warrant making new arrangements with different suppliers or modifying existing arrangements.

Recommendation 5: Embassy Ouagadougou should conduct annual reviews of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Ouagadougou)

Inadequate Acquisition and Property Management Resulted in Excessive Stock and Early Disposals

OIG found the embassy procured more property than needed to sustain operations and disposed of property before it reached the end of its lifecycle. A review of Integrated Logistics Management System data showed the embassy did not have a plan for using or disposing of nearly \$1.2 million in excess stock stored in the warehouse. In addition, of the 396 assets the embassy disposed of in FY 2019, 255 had yet to reach the end of the items' lifecycle. Of this number, 58 had yet to reach one-third of their useful lifecycle.

Guidance in 14 FAM 411.4 defines property management as the planned acquisition, efficient use, physical accounting, and appropriate disposition of property, while 14 FAM 412 states property acquisition should be limited to the quantity necessary for efficient Government business. Embassy staff told OIG poor acquisition and property management practices occurred because of a lack of management oversight or an acquisition plan. Failure to adhere to Department property management and procurement planning standards increases the risk of unnecessary expenditure of U.S. Government funds and undermines the internal controls mechanisms in place that help prevent fraud or theft.

Recommendation 6: Embassy Ouagadougou should implement procedures to conduct acquisition and property management in accordance with Department standards. (Action Embassy Ouagadougou)

Contracting Officer's Representative Program Did Not Comply With Department Standards

Embassy Ouagadougou's contracting officer's Representative (COR) program did not comply with Department standards. Specifically, OIG found the Regional Procurement Support Office in Frankfurt, Germany, executed a mobile communications contract prior to the end of FY 2019 but did not designate a COR as recommended in 14 FAH-2 H-143a. The permanent General Services Officer later nominated a COR who did not have the required training and did not maintain a COR file as required by 14 FAH-2 H-517a. These issues occurred because the support office needed to issue the contract before the end of the fiscal year deadline and the embassy did not ensure the COR had the required training. A non-compliant COR program increases the risk of contract mismanagement.

Recommendation 7: Embassy Ouagadougou, in coordination with the Regional Procurement Support Office Frankfurt and the Bureau of Administration, should comply

with Department contracting officer's representative program standards. (Action: Embassy Ouagadougou, in coordination with RPSO Frankfurt and A)

Embassy Corrected Hazardous Storage Issue

OIG identified one internal control issue in the safety, health, and environmental management program related to the storage of hazardous material. During the inspection, the Assistant Post Occupational Safety and Health Officer oversaw the removal of the improperly stored hazardous commodities and stored them in accordance with 15 FAM 833b(3).

INFORMATION MANAGEMENT

OIG reviewed Embassy Ouagadougou's information management (IM) operations, including classified, unclassified, and dedicated internet network computer operations; classified communications security; emergency communications preparedness; radio and telephone programs; and mail and pouch services. During a four-month Information Management Officer staffing gap, the Information Management Specialist and LE staff performed those duties. OIG found that the section implemented most required information management and security controls in accordance with Department policies and applicable laws and met the needs of embassy users.

During the inspection, the IM staff corrected OIG identified issues related to physical access control for IT areas, documentation of IT operating procedures, and internal knowledge management procedures. However, OIG identified additional issues, as detailed below and in the companion classified report.

Computer User Accounts Not Closed in Accordance With Department Guidelines

The embassy did not comply with Department guidelines for managing classified and unclassified network user accounts for departing employees. The IM staff had an account transfer checklist procedure for departing personnel, and the embassy's departure checklists required departing personnel to out-process with the Information Management Officer. However, OIG found embassy staff frequently departed post without notifying the IM section, and, as a result, IM staff did not initiate the required transfer procedures for classified and unclassified network accounts. Department standards in 12 FAH-10 H-282.5-1a state that, upon employee transfer or reassignment, supervisors must notify IM administrators, as needed. Without appropriate notification from departing employees or their supervisors, Embassy Ouagadougou IM administrators were unable to initiate the account transfer actions, modify the user's account access, and retrieve all information system-related property from the departing user, in accordance with 12 FAH-10 H-282.5-2(1-3). Inactive or unused accounts that remain on a network leave the systems vulnerable to attack or compromise that is less likely to be detected.

Recommendation 8: Embassy Ouagadougou should comply with Department standards for managing classified and unclassified network user accounts for departing employees. (Action: Embassy Ouagadougou)

Embassy Did Not Conduct Inventory of Computer Equipment

The embassy did not inventory all IT equipment as required by Department guidelines. OIG found 20 laptops and 17 workstations in the mail screening area the section had yet to include in the inventory. Guidance in 5 FAM 121.1(7) states the Information Management Officer is the post's accountable property officer for IT equipment and assets. The newly arrived Information Management Officer acknowledged the need to implement IT inventory control procedures. Without such established inventory controls, IT equipment potentially could be lost, unaccounted for, or physically damaged while stored in locations without the environmental controls necessary to safely protect the equipment.

Recommendation 9: Embassy Ouagadougou should implement inventory control procedures for its information technology equipment in accordance with Department guidelines. (Action: Embassy Ouagadougou)

Embassy Provided Unauthorized Support for Personal Television and Internet Services

The embassy provided unauthorized support for staff's personal television and internet services. OIG found the lone LE radio and telephone technician worked an average of 10 hours a week in support of personal television and internet account services for direct-hire American staff assigned to the embassy. According to 15 FAM 723c, telephone and internet service and related support are personal expenses to be borne by the employee.¹³ The embassy's support for personal television and internet services diverted the staffing support required for embassy radio and telephone operations.

Recommendation 10: Embassy Ouagadougou should terminate personal internet and television support to American embassy employees in accordance with Department standards. (Action: Embassy Ouagadougou)

¹³ According to 15 FAM 723d and e, the Ambassador, DCM, and Public Affairs Officer are exceptions to this rule.

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 Ouagadougou. The embassy's complete response can be found in Appendix B.¹

Recommendation 1: Embassy Ouagadougou should retire its official records in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020,² response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou retired its official records in accordance with Department standards.

Recommendation 2: Embassy Ouagadougou should comply with applicable Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou complied with applicable Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority.

Recommendation 3: Embassy Ouagadougou, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines and put proceeds of sales to better use. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou disposed of excess vehicles according to Department guidelines and put proceeds of sales to better use.

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 the final version of Embassy Ouagadougou's response, which was dated June 12, 2020, on September 18, 2020.

Recommendation 4: Embassy Ouagadougou should implement controls to verify the integrity of data entered into the Fleet Management Information System, in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou implemented controls to verify the integrity of data entered into the Fleet Management Information System.

Recommendation 5: Embassy Ouagadougou should conduct annual reviews of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou conducted annual reviews of its blanket purchase agreements.

Recommendation 6: Embassy Ouagadougou should implement procedures to conduct acquisition and property management in accordance with Department standards. (Action Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou implemented procedures to conduct acquisition and property management.

Recommendation 7: Embassy Ouagadougou, in coordination with the Regional Procurement Support Office Frankfurt and the Bureau of Administration, should comply with Department contracting officer's representative program standards. (Action: Embassy Ouagadougou, in coordination with RPSO Frankfurt and A)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou complied with Department contracting officer's representative program standards.

Recommendation 8: Embassy Ouagadougou should comply with Department standards for managing classified and unclassified network user accounts for departing employees. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou complied with Department standards for managing classified and unclassified network user accounts for departing employees.

Recommendation 9: Embassy Ouagadougou should implement inventory control procedures for its information technology equipment in accordance with Department guidelines. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou implemented inventory control procedures for its information technology equipment in accordance with Department guidelines.

Recommendation 10: Embassy Ouagadougou should terminate personal internet and television support to American embassy employees in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: In its June 12, 2020, response, Embassy Ouagadougou concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Ouagadougou terminated personal internet and television support to American embassy employees in accordance with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Andrew Young	11/2016
Deputy Chief of Mission	Shannon Cazeau	8/2018
Chiefs of Sections:		
Management	Jonathan Reed	6/2019
Consular	Rafael Andrade	7/2018
Political	Victoria Cedeno	6/2017
Economic	Vacant	
Public Affairs	Todd Bullock	8/2019
Regional Security	Rosendo Cedeno	6/2017
Other Agencies:		
U.S Agency for International Development	Cory Johnston	8/2019
Defense Attaché	Robert Rubiano	102019

Source: Generated by OIG from data provided by Embassy Ouagadougou

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 3, 2019, to January 10, 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

UNCLASSIFIED

June 12, 2020

THRU: AF – Tibor Nagy, Assistant Secretary
TO: OIG – Sandra Lewis, Assistant Inspector General for Inspections
FROM: Embassy Ouagadougou – Samuel Watson, Chargé d’Affaires, ad interim
SUBJECT: Response to Draft OIG Report – Inspection of Embassy Ouagadougou

We provide the following comments in response to the recommendations provided by OIG:

OIG Recommendation 1:

Embassy Ouagadougou should retire its official records in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 2:

Embassy Ouagadougou should comply with applicable Department overseas motor vehicle safety standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 3:

Embassy Ouagadougou, in coordination with the Bureau of Administration, should dispose of excess vehicles according to Department guidelines and put proceeds of sales to better use. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 4:

Embassy Ouagadougou should implement controls to verify the integrity of data entered into the Fleet Management Information System, in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 5:

Embassy Ouagadougou should conduct annual reviews of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 6:

Embassy Ouagadougou should implement procedures to conduct acquisition and property management in accordance with Department standards. (Action Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 7:

Embassy Ouagadougou, in coordination with the Regional Procurement Support Office Frankfurt and the Bureau of Administration, should comply with Department contracting officer's representative program standards. (Action: Embassy Ouagadougou, in coordination with RPSO Frankfurt and A)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 8:

Embassy Ouagadougou should comply with Department standards for managing classified and unclassified network user accounts for departing employees. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 9:

Embassy Ouagadougou should implement inventory control procedures for its information technology equipment in accordance with Department guidelines. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

OIG Recommendation 10:

Embassy Ouagadougou should terminate personal internet and television support to American embassy employees in accordance with Department standards. (Action: Embassy Ouagadougou)

Management Response: Embassy Ouagadougou concurs with the recommendation.

The point of contact for this memorandum is DCM Shannon Cazeau.

ABBREVIATIONS

COR	Contracting Officer's Representative
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
IM	Information Management
LE	Locally Employed

OIG INSPECTION TEAM MEMBERS

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Calvin Carlsen, Team Manager
Steve Begin
Eric Chavera
John Finkbeiner
Paul Gilmer
Edward Loo
Michael McDonald
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WPEAOmbuds@stateoig.gov