

UNCLASSIFIED



Office of Inspector General
United States Department of State

ISP-I-20-21

Office of Inspections

May 2020

Inspection of Embassy Bern, Switzerland

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-20-21

What OIG Inspected

OIG inspected the executive direction, policy and program implementation, resource management, and information management operations of Embassy Bern. The inspection included Consular Agencies Geneva and Zurich.

What OIG Recommended

OIG made 10 recommendations to Embassy Bern.

In its comments on the draft report, Embassy Bern 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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OFFICE OF INSPECTIONS

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What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Bern in a professional and collaborative manner.
- The embassy did not evaluate whether Consular Agencies Geneva and Zurich were cost effective to maintain.
- Embassy Bern's Fiscal Year 2019 Annual Chief of Mission Management Control Statement of Assurance included deficiencies regarding the embassy compound and its facilities. However, the review process failed to identify other management control issues.
- The Political-Economic Section's lack of an approved reporting plan created uncertainty about priorities and led to wasted effort on preparing cable reporting that the Ambassador and the Deputy Chief of Mission did not approve.
- The Political-Economic and Public Diplomacy Sections both produced Swiss news summaries with duplicative content, an inefficient use of staff.
- Embassy Bern's Consular Section had a unique workload that included American citizen services for U.S. citizens living in Iran and staff support for the World Economic Forum, but the embassy had not analyzed the effect of these services on the section's workload.
- While the information management staff met customer needs, they did not focus on information security, placing the Department of State's information at risk of compromise.

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CONTEXT

The Swiss Confederation (Switzerland) is a country of 8.5 million people straddling the Alps and Jura mountains in central Europe. Founded in 1291 as a confederation of three cantons,¹ today's Switzerland is a federal state comprising 26 cantons. Its borders were internationally recognized in 1815, and it is governed under an 1848 constitution, amended in 1874 to allow voters to introduce referenda. Federalism, direct democracy, and neutrality in foreign affairs are foundational features of Switzerland's political system. As an example of direct democracy, government decisions are subject to quarterly referenda by voters. The country is not a member of the North Atlantic Treaty Organization or the European Union (EU), although it enjoys access to the EU market through a 1972 trade agreement. Switzerland joined the UN in 2002.

Switzerland's per capita gross domestic product of \$61,400 is among the world's highest. Switzerland is the eighth largest source of foreign direct investment in the United States (\$250 billion in 2017), the 15th largest trading partner (\$122 billion in goods and services in 2017), and a major research and development partner. The country is a partner in addressing transnational security challenges, including nuclear weapons proliferation, organized crime, violent extremism, and counterterrorism and terrorism finance. Switzerland, as a protecting power, represents the United States in Iran, a country with which the United States does not have diplomatic relations.

Embassy Bern's top strategic priorities, as detailed in its 2018 Integrated Country Strategy (ICS) and in Front Office communications with the Department, are:

- Increasing Swiss direct investment in the United States.
- Deepening cooperation on global security challenges, including counterterrorism and cybersecurity.
- Advocating for U.S. firms competing for Swiss Government procurements.
- Protecting American citizens.

At the time of the inspection, Embassy Bern's authorized staff included 42 U.S. direct-hire employees, 65 locally employed (LE) staff, and 8 eligible family members. The Departments of Commerce and Defense and the Federal Bureau of Investigation also are represented in the embassy. With 1.3 million U.S. citizen visitors annually, 35,000 Americans resident in Switzerland, and more than 10,000 U.S. citizens in Iran,² the embassy processes more than 8,000 passport applications and 3,000 special consular services each year, as well as visa applications from 171 nationalities. Embassy Bern also manages consular agencies in Zurich and Geneva and provides consular services for Liechtenstein.³ In addition to its ongoing work, the

¹ A canton is a territory within a country, similar to a state.

² As the United States does not have an embassy in Iran, Embassy Bern provides consular services to U.S. citizen located there. This is discussed in more detail in the Consular section of this report.

³ The U.S. Ambassador to Switzerland is also accredited to Liechtenstein.

entire embassy mobilizes to support the President and the official U.S. delegation to the World Economic Forum, held in Davos-Klosters, Switzerland, each January. In addition to Embassy Bern, which handles the bilateral relationship with the Swiss Government, the separate U.S. Mission to the United Nations and Other International Organizations in Geneva (Mission Geneva) engages with the more than 100 UN agencies and international organizations and 170 diplomatic missions located in Geneva. Mission Geneva's ambassador has chief of mission authority over employees assigned to that mission.⁴

OIG evaluated Embassy Bern's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.⁵ A companion classified inspection report discusses the embassy's security program and issues affecting the safety of embassy personnel and facilities and information management (IM) operations.

EXECUTIVE DIRECTION

OIG assessed Embassy Bern's leadership based on interviews that included comments on Front Office performance, staff questionnaires, and OIG's review of documents and observations of meetings and activities during the on-site inspection.

Tone at the Top and Standards of Conduct

The Chief of Mission, a first-time, non-career ambassador, arrived in November 2017. Prior to assuming this position, he was the director of a South Carolina-based advertising and public relations firm. The Deputy Chief of Mission (DCM), a career member of the Senior Foreign Service, arrived in August 2019. Her prior assignments included tours in the Department and in Tel Aviv, Israel; Dublin, Ireland; Frankfurt, Germany; and Kingston, Jamaica.

The Ambassador and the DCM set a positive, inclusive, and professional tone for the embassy in accordance with Department leadership principles in 3 Foreign Affairs Manual (FAM) 1214. Embassy staff consistently told OIG both were approachable, solicited input and feedback, supported operations and programs, and clearly outlined the embassy's priorities. OIG observed the Ambassador interacting collegially with staff in meetings and events. He participated in events organized by the embassy's Community Liaison Office, hosted an event for embassy newcomers, and showed interest in the well-being of embassy staff families. He also hosted an event in 2019 to show his appreciation for the intensive work the embassy staff did through the holiday season to support the World Economic Forum in January. The DCM's leadership skills and familiarity with the Department's requirements and workflow processes assisted the Ambassador in managing embassy operations, consistent with their roles as outlined in 2 FAM 113. OIG concluded that they formed an effective leadership team.

⁴ OIG inspected Mission Geneva in conjunction with Embassy Bern. See *Inspection of U.S. Mission to the United Nations and Other International Organizations in Geneva, Switzerland* (ISP-I-20-16, report not yet released).

⁵ See Appendix A.

The Ambassador and the DCM demonstrated a commitment to ethical performance. The Ambassador, for example, regularly referred issues involving gifts and invitations to the Department's Office of Legal Adviser for ethics reviews. OIG's review of vouchers for the embassy's representational expenses found they complied with Department guidelines. The embassy received and recorded gifts in accordance with guidance in 2 FAM 960.

Execution of Foreign Policy Goals and Objectives

Shortly after his arrival, the Ambassador led a collaborative effort that integrated input from all employees to establish mission priorities. This effort contributed to the embassy's ICS update, as directed by 18 FAM 301.2-1b, which the embassy submitted to the Department in July 2018. The Ambassador regularly referred to the ICS on an ongoing basis to assess progress and encourage discussion.

The Ambassador focused his efforts on the ICS goal of promoting Swiss direct investment in the United States. He met weekly with the embassy's U.S. Commercial Service investment specialist to review the number of companies in the investment pipeline (initial investment or expansion in the United States), upcoming investment events, U.S. governor investment missions, and key business meetings. He used this information to develop strategies and proposals to support interested businesses in making investments. He attended the 2018 and 2019 annual SelectUSA⁶ investment summits and took 38 Swiss firms interested in investing in the United States to the 2019 event. That same year, he twice toured Swiss businesses in the United States to attend ribbon-cuttings and to highlight the investments. He also hosted U.S. governors seeking Swiss investors. An OIG review of his calendar showed that the Ambassador had more than 100 meetings with U.S., Swiss, and Liechtenstein business leaders between January and mid-November 2019, met with American Chambers of Commerce in Switzerland on 12 occasions, and represented the United States at the World Economic Forum in January 2019. Washington interagency officials cited the Ambassador's role in the U.S. Congress ratification of a Swiss tax treaty protocol that had been pending in the Senate for almost 10 years. They also credited his efforts regarding a workforce development memorandum of understanding; more than 30 Swiss firms agreed to this memorandum of understanding, which would create as many as 40,000 apprenticeships in Swiss-owned firms in the United States over the next 5 years. He joined with a Senior Advisor to the President, the Secretaries of Education, Labor, and Commerce, and Swiss officials in the signing ceremony for the agreement.

To promote U.S. exports to Switzerland, the Ambassador advocated for U.S. firms competing for major Swiss defense procurements, while being careful not to show favoritism to one U.S. firm over another. Washington officials described the Ambassador's insights into the country's political dynamics and working relationships with Swiss interlocutors as extremely helpful in exploring Swiss interest in a free trade agreement.

⁶ The Department of Commerce's SelectUSA Investment Summit is a high-profile event promoting business investment in the United States.

The Ambassador fulfilled his responsibilities under 2 FAM 113.1 to develop close relations with host government officials and attend and host representational events. His 2019 calendar reflected that he met with Swiss Government officials, including the President and federal counselors, more than 40 times, hosted or attended more than 60 representational or ceremonial events, and delivered speeches or remarks on 28 occasions. OIG advised the Ambassador, and he agreed, to also ensure that he and his staff maintain a broad range of contacts, including with potential leaders outside the power structure, and that embassy reporting reflect significant political, economic, and societal developments as described in 2 FAM 113.1(10-11).

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. Staff told OIG the embassy's sections used Bureau of the Comptroller and Global Financial Services internal control checklists as part of the process to develop the Statement of Assurance, and that the checklists had been reviewed by the DCM. This process reaffirmed significant deficiencies regarding the physical security of the embassy compound and physical inadequacies of embassy compound facilities, as discussed in the companion classified report. The embassy also reported these items in the FY 2017 and FY 2018 Statements of Assurance. However, OIG found internal control issues, as discussed later in this report, that should have been identified using the checklists. The Ambassador was receptive to OIG's suggestion that the embassy use both OIG and Comptroller checklists on an ongoing basis to assess operations, identify internal control deficiencies, and take appropriate corrective action as directed in cable 14 STATE 29422.⁷

OIG confirmed that the DCM carried out regular reviews of the Consular Section chief's nonimmigrant visa adjudications, as required by 9 FAM 403.12.

Security and Emergency Planning

OIG found the Ambassador's leadership of Embassy Bern's security program was consistent with the President's Letter of Instruction to chiefs of mission, which requires the chief of mission to take full and direct responsibility for the security of the embassy and its personnel. Embassy security staff told OIG the Ambassador and the DCM fully supported the security program. Both led by example by participating in drills and mandating that all U.S. personnel participate in the monthly checks of the emergency and evacuation radio network, in accordance with 5 Foreign Affairs Handbook (FAH)-2 H-732.7a. Participation was nearly 100 percent in October and November 2019. The embassy also successfully tested a new emergency notification system in September 2019. The DCM chaired the embassy's Emergency Action Committee, which reviewed potential risks that could affect the health, safety, and

⁷ Cable 14 STATE 29422, "Your Role in Assuring Strong Management Controls and Oversight Over Embassy Operations," March 18, 2014.

security of embassy employees and resident U.S. citizens as described in 12 FAH-1 H-232. The embassy's emergency action plan was certified and published during the inspection.⁸

In March 2019, the ambassador discussed security issues with the international school attended by embassy dependents. The same month, the embassy conducted a crisis management exercise that included representatives of the international school, Swiss federal and cantonal police, and other foreign embassies. The Ambassador also hosted an event in September 2019 for approximately 200 Swiss Government law enforcement personnel from throughout the country.

Finally, OIG confirmed the embassy submitted to the Department its annual review of the security memorandum of agreement between the Chief of Mission and the Department of Defense geographic combatant commander, as required by 2 FAH-2 H-116.4b.⁹

Equal Employment Opportunity Program

At the time of the inspection, the embassy had nominated an Equal Employment Opportunity (EEO) counselor, as directed by 3 FAM 1514.2. The nominee was scheduled to complete training to become an approved counselor in December 2019. The embassy issued a staff notice to inform employees that counselors at other embassies would be available to assist in the interim should the need arise. The previous EEO counselor conducted training sessions for all American and LE staff in 2018, and the embassy posted the required EEO information. Embassy staff told OIG the Ambassador spoke about his commitment to equal treatment and inclusion at a town hall in September 2019, and demonstrated his commitment, for example, by participating in a pride parade in Geneva in July 2019. He told OIG he wanted embassy staff of all backgrounds to feel included. He also designated a Federal Women's Program Coordinator, who was developing plans for awareness and engagement among embassy staff. OIG advised the Ambassador to encourage an LE staff member to volunteer as the LE staff EEO liaison, and he agreed to do so.

Developing and Mentoring Foreign Service Professionals

OIG found the DCM oversaw the embassy's First- and Second-Tour (FAST) employee development program in accordance with 3 FAM 2242.4. FAST employees commented favorably to OIG concerning the DCM's involvement in the program, which is intended to give entry-level personnel exposure to a wide variety of diplomatic activities to build their skills. In

⁸ In its inspection report of Mission Geneva, OIG recommended the mission contribute to Embassy Bern's emergency action plan to establish a single, comprehensive emergency action plan for U.S. diplomatic missions in Switzerland. (See ISP-I-20-16, report not yet released.)

⁹ In December 1997, the Secretaries of Defense and State signed an agreement to address the security of Department of Defense personnel located overseas, in which the Secretary of State agreed, per 22 U.S.C. 4805(a), to delegate operational control of security functions for certain Department of Defense personnel to the Secretary of Defense. This agreement is implemented through country-level memoranda of agreement between the chief of mission and relevant geographic combatant commander. See 2 FAH-2 H-116.4a, "COM Security Responsibility and the Department of Defense."

her first 3 months at the embassy, the DCM met with FAST employees twice, including at an event at her residence where they discussed a topic selected by the FAST employees. In addition, at the DCM's request, a mid-level officer briefed the FAST employees on control officer duties in preparation for their participation in the annual World Economic Forum, consistent with guidance in cable 15 STATE 96434¹⁰ to develop mentoring skills of mid-level employees. OIG found that FAST employees served on embassy hiring, housing, and awards committees. The Federal Women's Program Coordinator was also a FAST employee. In addition, the Ambassador included FAST employees in his representational events. OIG advised, and the DCM agreed, to explore opportunities for the embassy's FAST employees to collaborate with employees in Mission Geneva's FAST program.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Bern's policy and program implementation through a review of the operations of the Political-Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions discussed below.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, and Leahy vetting.¹¹ As Embassy Bern was not a U.S. Commercial Service partner post,¹² the Political-Economic Section also handled commercial promotion, focused on promoting Swiss investment in the United States. In OIG interviews, Department and other agency officials expressed satisfaction with, and in some cases praised, the section's work on their issues. OIG found the section prepared reports relevant to ICS goals and 2 FAM 113.1c(10) requirements to report on significant political, economic, and societal developments. These included Swiss views on a possible free trade agreement; reform of a copyright law, which addressed U.S. concerns; regulation of crypto currencies; and Swiss federal elections. OIG noted a workload imbalance among staff, possibly due to staff turnover and seasonal factors, that section leadership agreed to remedy. OIG otherwise determined the embassy's political-economic operations generally complied with Department standards and policies, with one exception.

¹⁰ Cable 15 STATE 96434, "Promoting Professional and Leadership Development for Mid-Level Foreign Service Employees," August 14, 2015.

¹¹ 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 USC 2378d.

¹² U.S. Commercial Service partner posts provide fee-based commercial services to U.S. companies seeking market opportunities in countries where the U.S. Commercial Service is not present. Although the Department of Commerce had one LE staff member at Embassy Bern, who served as the U.S. Commercial Service investment specialist, the embassy did not provide these services.

Uncertainty About Reporting Priorities Resulted in Wasted Effort

OIG found the Political-Economic Section did not finalize reporting plans it drafted in connection with the turnover of all three American officers in summer 2019, nor did it clear them with the Front Office. As a result, uncertainty about political-economic reporting priorities led the section staff to spend time drafting reports—for example, on two public demonstrations—that the Front Office did not approve. OIG advised, and section leadership agreed, to finalize its reporting plans and improve its communication with the Front Office about reporting priorities. During the inspection, the section revised its reporting plans, which the DCM approved. Because of the embassy's action, OIG did not make a recommendation to address this issue.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning and reporting, resource and knowledge management, grants management, program activities, and media engagement.¹³ OIG concluded the section focused on embassy policy goals and was well-integrated with other embassy elements. The Department's Office of the Under Secretary for Public Diplomacy cited the section's Public Diplomacy Implementation Plan—the principal annual strategic planning document required of public diplomacy sections—as “a great model for the type of planning we want to encourage in public diplomacy going forward.” With the exception of two issues—which the section corrected during the inspection and are described below—OIG found the embassy's public diplomacy activities complied with Department standards and guidance.

Section Corrected Grants Administration Issues During the Inspection

OIG found the section complied with most Department grants administration requirements but identified several issues, which embassy staff corrected during the inspection. OIG reviewed 18 of the 36 grants the section awarded in FY 2018 and FY 2019 (total value: \$155,745) and found that no file had all of the closeout documents required by the Department's Federal Assistance Directive.¹⁴ Section staff located the required documentation and added it to the files. OIG also found the LE employee with lead responsibility for grants administration did not have the training required by 10 FAH-1 H-032d(3). OIG advised him to update his training and become certified as a grants officer representative, which he did during the inspection. Additionally, OIG advised the section to add grants officer training as a requirement for the entry-level Assistant Public Affairs Officer position, consistent with the Department's guidance in 10 FAH-1 H-032a-b that, when possible, all public diplomacy sections have more than one warranted grants officer to ensure adequate oversight of the grants program. The section agreed to do so.

¹³ The section did not oversee any American Spaces, which 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.

¹⁴ Bureau of Administration, Office of the Procurement Executive, Office of Acquisitions Policy, Federal Assistance Division, Federal Assistance Directive (version 3.0, October 2018).

Embassy's Duplicative News Summaries Required Extensive Staff Time To Create

During its review of the Public Diplomacy and Political-Economic Sections, OIG found both produced daily news summaries, an inefficient use of staff time. For example, both sections independently drafted entries on the same subject for their section's news summary. OIG found during a one-month period from October to November 2019, more than half of the stories in the Public Diplomacy Section's Swiss Media Review duplicated items in the Political-Economic Section's Morning Notes. Furthermore, because of the need to review media outlets in French, German, and Italian, some of which only publish in print editions, the Public Diplomacy Section's news summary required three or four staff members to collectively spend at least 5 hours per day to create the summary. This represented a significant burden for a section whose leadership cited limited staff as the biggest constraint on public diplomacy operations.

Guidance in 1 FAM 014.1 states that organizational structures should strive to achieve a proper balance among mission needs, efficiency of operations, and effective employee utilization. OIG advised the embassy to reduce redundant use of staff time by consolidating or otherwise revisiting their approach to the two daily products. OIG also advised the Public Diplomacy Section to consider outsourcing some or all the preparation of its Swiss media review in order to redirect staff to other priorities. The section agreed and began a trial contract during the inspection. The Political-Economic Section also began using the public diplomacy media review as the basis for its Morning Notes and adding its own commentary. As a result of the embassy's actions, OIG did not make a recommendation to address this issue.

Consular Section

OIG reviewed Embassy Bern's consular operations, including American citizen services, visa services and processing, training, workload and staffing, management controls, communications and outreach, crisis preparedness, and fraud prevention programs. As part of the inspection, OIG visited the consular agencies in Geneva and Zurich, both of which rank in the top five of all consular agencies worldwide in terms of passport and notarial volume.¹⁵ OIG assessed coordination between the Consular Section in Bern and the two consular agencies, and with other sections and agencies within the embassy.

OIG found the Consular Section chief, who arrived in 2017, coordinated effectively with other parts of the embassy. The Consular Section also successfully implemented significant parts of the ICS, expanding use of investor visas and promoting cooperation with the Swiss on apprenticeship programs. Furthermore, in FY 2019, the Consular Section improved its ability to assist private U.S. citizens in a crisis by strengthening contacts with local officials and organizations through an energetic outreach program, hosting a seminar for consular officers of other countries and Swiss officials, participating in an embassy crisis management exercise, and

¹⁵ According to 7 FAH-1 H-137, "A consular agent may be appointed by the Secretary to provide limited consular services at a location within a consular district. Consular agents are limited, non-career appointees of the Foreign Service already residing abroad, who act under the supervision and direction of the supervisory consular officer. They are generally employed on a part-time basis."

conducting an in-house consular exercise with help from the Bureau of Consular Affairs. Overall, OIG concluded that the embassy carried out its consular responsibilities in compliance with applicable law and Department guidance, with the exceptions detailed below.

Embassy Did Not Analyze its Unique Workload and Staffing Needs

Embassy Bern's Consular Section delivered additional services beyond those that are standard for a consular section. For example, Embassy Bern provides most American citizen services for persons living in Iran, but OIG found the embassy had not analyzed the effect these services had on the Consular Section's workload. The Swiss Government agreed to act as the protecting power for U.S. interests in Iran¹⁶ after the United States closed its embassy in Tehran in 1979. Swiss diplomats offer protective services for U.S. citizens in Tehran (for example, by visiting detainees and advocating with Iranian authorities). They also deliver routine consular services, such as passport renewals, reports of births and deaths, and provision of U.S. Federal benefits. The Swiss Foreign Ministry in Bern receives the cases from Tehran via Swiss Government diplomatic pouch, which it then forwards to Embassy Bern's Consular Section for action. The embassy consular staff reviews the material, enters necessary data into relevant computer systems, and forwards the documents to the United States for processing. After receiving the completed documents from Washington, the consular staff repackages them and forwards them to the foreign ministry for delivery to U.S. citizens in Iran. This process involves steps not normally required when an applicant appears in person at a consular section. Furthermore, the Swiss representative office in Tehran lacks internet connectivity, making communications slow and difficult.

In addition to this extra workload, OIG found the Consular Section suspends most routine services for up to 3 weeks every year before and during the World Economic Forum. During this time, the section redirects all but one officer to the event. However, the Bureau of Consular Affairs did not account for this event in its resource planning.

OIG determined that neither the Bureau of Consular Affairs nor Embassy Bern's Consular Section analyzed the employee time and other resources required to deliver services under the protecting power agreement and to support the World Economic Forum. Without such an analysis, the embassy cannot assess resource requirements. Moreover, failure to account for these unique obligations could lead to improper budgeting and may result in a lack of appropriate resources to complete its required functions. OIG advised the section and the Bureau of Consular Affairs to analyze the additional demands and provide staffing and resources as appropriate. The section and the Bureau of Consular Affairs agreed; therefore, OIG is not making a recommendation to address this issue.

¹⁶ A protecting power relationship involves one country (in this case, Switzerland) delivering services on behalf of citizens and other interests of another country (the United States) within the territory controlled by a third country (Iran). See 7 FAM 1000.

Embassy Did Not Evaluate Whether Consular Agencies Were Cost Effective

The embassy did not evaluate whether the consular agencies in Zurich and Geneva were cost effective to maintain. In its last inspection of Embassy Bern in 2009,¹⁷ OIG reviewed the operations of both consular agencies. The 2009 inspection report questioned the need to continue to operate Consular Agency Zurich. At that time, OIG recommended Embassy Bern and the Bureaus of Consular Affairs, and Overseas Buildings Operations determine the most cost-effective way to handle the consular workload for Zurich and establish a plan to implement any necessary changes. In its formal response, the embassy told OIG that it had determined the workload justified continuing operations in Zurich. The Bureau of Consular Affairs further advised OIG that it would relocate the agency when the lease expired in September 2011, but the agency remained in the same building. In addition, in a February 2018 visit, the Bureau of Overseas Buildings Operations recommended the embassy examine Consular Agency Zurich's cost effectiveness and the feasibility of consolidating its workload with the embassy's Consular Section. The embassy had yet to conduct the review at the time of the inspection.

Many of the consular agency concerns OIG raised in 2009 were present during this inspection. Furthermore, OIG found some of the same concerns with Consular Agency Geneva. Consular Agency Zurich, located 1 hour by train from Bern, and Consular Agency Geneva, located 2 hours by train from Bern, each operated 15 hours a week at a combined annual direct cost in excess of \$750,000.¹⁸ The embassy also incurred indirect costs related to management oversight, security, facilities management, and IT support to each facility. OIG also found a significant amount of unused space in each agency's facility. Guidance in 1 FAM 014.1 directs that organizational structures should strive to achieve a proper balance among mission needs, efficiency of operations, and effective employee utilization. Executive Order 13327¹⁹ mandates efficient and economical use of the U.S. Government's real property assets, including management attention to, and clear goals and objectives for, their use.

Continued operation of the two consular agencies results in use of U.S. Government resources without a clearly justified benefit. The failure to perform a full cost-benefit analysis of their continued operation may mean the U.S. Government is paying more than required to deliver consular services in Geneva and Zurich.

Recommendation 1: Embassy Bern, in coordination with the Bureaus of Consular Affairs, Diplomatic Security, and Overseas Buildings Operations, should conduct a cost-benefit analysis to determine whether to continue consular operations in Zurich and Geneva or

¹⁷ OIG, *Inspection of Embassy Bern, Switzerland*, (ISP-I-09-31A, June 2009). This report did not address the workload at Consular Agency Geneva.

¹⁸ OIG was able to document the following costs: annual rent: Geneva, \$81,000, and Zurich \$145,400; total payroll costs for consular agent and assistant: Geneva, \$116,400, and Zurich, \$120,400; salary for guards: Geneva, \$64,100, and Zurich, \$123,500; and utilities and other administrative support costs: Geneva, \$57,800, and Zurich, \$60,100. These costs are illustrative rather than comprehensive.

¹⁹ Executive Order 13327, Federal Real Property Asset Management, February 4, 2004.

instead to consolidate them in the embassy. (Action: Embassy Bern, in coordination with CA, DS, and OBO)

Consular Waiting Area Did Not Comply With Department Standards

Embassy Bern’s waiting area for visa and passport applicants did not comply with Department standards. OIG found applicants stood outside the embassy in an uncovered area while waiting to be admitted through the consular Compound Access Control facility for security checks and consular processing. Guidance in 7 FAH-1 H-281a states that an effective consular section needs to provide secure, adequate, efficient, comfortable, and attractive accommodation for both visitors and staff. Consular staff told OIG that it was their understanding that the embassy and OBO previously were unable to obtain city permission to construct a cover for the waiting area but acknowledged that they could pursue the matter again. Failure to provide cover for visa and passport applicants leaves them exposed to inclement weather.

Recommendation 2: Embassy Bern, in coordination with the Bureau of Overseas Buildings Operations, should provide accommodations for consular applicants in accordance with Department standards. (Action: Embassy Bern, in coordination with OBO)

RESOURCE MANAGEMENT

OIG reviewed Embassy Bern’s internal control systems in general services, human resources, facilities management, and financial management operations. The Management Section is the largest section in the embassy and is the International Cooperative Administrative Support Services²⁰ service provider supporting approximately 115 embassy employees, including the consular agencies in Zurich and Geneva. Both the Management Officer and the General Services Officer arrived during summer 2019. OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exceptions described below.

General Services

Embassy Did Not Review Blanket Purchase Agreements Annually as Required

Embassy Bern did not conduct annual reviews of its 53 blanket purchase agreements²¹ valued at \$1.5 million, as required by Department regulations. According to Department of State Acquisition Regulation, Section 613.303-6, contracting officers must conduct an annual review to ensure that authorized blanket purchase agreement procedures are followed and report the

²⁰ The International Cooperative Administrative Support Services, or ICASS, established in 1997, is the principal means by which U.S. Government agencies share the cost of common administrative support services at more than 250 diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions, in accordance with 6 FAM 911 and 6 FAH-5 H-013.2.

²¹ 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.

results of the review, including any needed corrective actions, to the head of the contracting activity. In addition, OIG found vendors did not sign most of the blanket purchase agreements, as required. Staff told OIG that although the vendors provided the items called for in the agreements, most would not agree to the terms specified; in addition, embassy staff did not know the agreements required a signature from the vendors. An annual review by the contracting officer would have identified these deficiencies so they could be corrected. Without an annual review, the embassy cannot guarantee the integrity of its procurement program, including ensuring it is obtaining the highest quality goods or services for the most competitive price.

Recommendation 3: Embassy Bern should conduct a review of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Bern)

Motor Vehicle Safety Program Did Not Comply With Department Standards

Embassy Bern did not comply with three elements of the Department's Overseas Motor Vehicle Safety Management program as outlined in 14 FAM 433. Specifically:

- Three of the 48 professional drivers and incidental (self-drive) operators did not receive safety training, as required in 14 FAM 433.5.
- Nine drivers lacked medical clearances, as called for in 14 FAM 433.4.
- Drivers regularly exceeded Department's 10-hour limit on working hours, contrary to guidance in 14 FAM 433.8.

OIG found these issues occurred because the motor vehicle accountable officer did not implement controls to oversee the motor vehicle safety program. Failure to enforce these standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. Government property.

Recommendation 4: Embassy Bern should bring its Motor Vehicle Safety Management Program into compliance with Department standards. (Action: Embassy Bern)

Embassy Did Not Include Facilities Management Expendable Supplies in Inventory

The embassy did not include all facilities management expendable supplies, such as maintenance materials and tools, in the Department's Integrated Logistics Management System. OIG found the Facilities Management staff procured and maintained their own expendable supplies without the accountable property officer's approval. As stated in 14 FAM 414.5(2), the accountable property officer must approve all procurement request. Furthermore, 14 FAM 411.2-2b(1) states the accountable property officer is responsible for the custody and safekeeping of all property under post control. Failure to properly account for and safeguard expendable supplies causes inaccuracies in the embassy's property records and possible misuse or theft.

Recommendation 5: Embassy Bern should include all facilities management expendable supplies in the embassy's inventory records in accordance with Department standards. (Action: Embassy Bern)

Human Resources

Local Compensation Plan Did Not Comply With Swiss Labor Law

The embassy's LE staff local compensation plan did not comply with Swiss labor law or reflect prevailing practice, as required by 3 FAM 7224.2-1a. Specifically, the embassy did not add provisions regarding the use of sick leave for care of family members. In addition, it did not incorporate the recently updated LE staff pension plan into the local compensation plan. The embassy and the Office of Overseas Employment in the Bureau of Global Talent Management (formerly the Bureau of Human Resources) acknowledged the current local compensation plan, last updated in March 2017, was not reviewed annually as required by 3 FAH-2 H-131.3a(1). Embassy staff told OIG this occurred due to a lack of coordination between the Office of Overseas Employment and the embassy, as well as competing priorities. Without an accurate local compensation plan, the LE staff may not be receiving benefits to which they are entitled.

Recommendation 6: Embassy Bern, in coordination with the Bureau of Global Talent Management, should update its local compensation plan to comply with Government of Switzerland labor law, in accordance with Department standards. (Action: Embassy Bern, in coordination with GTM)

INFORMATION MANAGEMENT

OIG reviewed Embassy Bern's IM operations, including classified, unclassified, and dedicated internet network computer operations; classified communications security; emergency communications preparedness; radio and telephone programs; mail and pouch services; and records management. OIG advised section staff to prioritize their day-to-day workload distribution and allocate time for information security duties. During the inspection, embassy management concurred with OIG's suggestion to use the myServices platform, a Department-wide customer service delivery system, as a tool to prioritize workload distribution. Moreover, embassy management agreed to implement a policy requiring all staff to use myServices for service requests. OIG also advised IM staff on addressing the lack of standard operating procedures for documenting systems maintenance activities, responding to incidents, managing telephone passwords and maintenance logs, preventing telephone switchboard incoming calls from reaching Post One,²² and evaluating emergency and evacuation radio network capabilities for all embassy staff housing. The office implemented most required information management and security controls in accordance with Department policies and applicable laws, with the exceptions noted below and in the companion classified report.

²² Post One is the main Marine Security Guard watch post at embassies and consulates.

Information Systems Security Officers Did Not Perform All Duties

The embassy's unclassified and classified Information Systems Security Officers did not perform all information systems security duties as required in 12 FAM 613.4. For example, they did not review user emails and electronic file folders or monitor the dedicated internet network as required. OIG has previously addressed the non-performance of Information Systems Security Officer duties across the Department and issued a management assistance report²³ in May 2017 that highlighted widespread failures in this area. In a subsequent cable,²⁴ the Bureau of Information Resource Management requested that embassy management work with Information Systems Security Officers to ensure performance of their duties by prioritizing resources to make sure that cybersecurity needs were met and documented. Failure to perform these duties leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 7: Embassy Bern should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Bern)

Information Technology Contingency Planning Did Not Meet Department Standards

Embassy Bern did not fully test classified and unclassified IT contingency plans, as required by 12 FAH-10 H-232.3-1b(1-3). Department guidelines require management to develop and test IT contingency plans annually for effectiveness and to determine readiness to execute them during unplanned system outages or disruptions. IM staff did not plan time for testing the plans annually. Inadequate contingency planning and testing prevents section managers from mitigating the risk of system and service disruptions.

Recommendation 8: Embassy Bern should test the information technology contingency plans for the unclassified and classified networks annually, in accordance with Department standards. (Action: Embassy Bern)

Information Technology Contingency Plan Training Not Conducted

Embassy Bern did not conduct initial and annual refresher IT contingency training for employees with those responsibilities. According to 12 FAH-10 H-232.2-1, management must ensure that such training is delivered to employees based on their roles and responsibilities, as defined in the IT contingency plans. Section staff did not conduct the training because they were unaware of the requirement. Failure to meet these requirements impedes the embassy's ability to effectively respond to unplanned systems outages or disruptions.

²³ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017).

²⁴ Cable 17 STATE 104970, "Documenting Information Systems Security Officer (ISSO) Duties," October 18, 2017.

Recommendation 9: Embassy Bern should implement a plan to conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bern)

Records Management Program Did Not Comply With Department Standards

Embassy Bern's records management program did not comply with Department standards for records organization, oversight, and retirement, as detailed in 5 FAH-4 H-215.3 and 5 FAM 433. OIG found the embassy's records coordinator did not regularly review post's records management practices for compliance and verify that records were archived on schedule. In addition, the records management officer did not retire the program and principal officer records on schedule. Furthermore, the officer did not delegate records management responsibilities to each embassy section, as required by 5 FAH-4 H-215.3-2b. Without a records management program that complies with standards, the embassy is vulnerable to inefficient information retrieval and potential loss of critical documentation.

Recommendation 10: Embassy Bern should implement a records management program that complies with Department standards. (Action: Embassy Bern)

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 Bern. 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 Bern, in coordination with the Bureaus of Consular Affairs, Diplomatic Security, and Overseas Buildings Operations, should conduct a cost-benefit analysis to determine whether to continue consular operations in Zurich and Geneva or instead to consolidate them in the embassy. (Action: Embassy Bern, in coordination with CA, DS, and OBO)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation. The embassy noted an expected completion date of December 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation of a cost-benefit analysis to determine whether the embassy should continue consular operations in Zurich and Geneva or to consolidate operations in Bern.

Recommendation 2: Embassy Bern, in coordination with the Bureau of Overseas Buildings Operations, should provide accommodations for consular applicants in accordance with Department standards. (Action: Embassy Bern, in coordination with OBO)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that accommodations were provided for consular applicants in accordance with Department standards.

Recommendation 3: Embassy Bern should conduct a review of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bern conducted a review of its blanket purchase agreements in accordance 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.

Recommendation 4: Embassy Bern should bring its Motor Vehicle Safety Management Program into compliance with Department standards. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bern's Motor Vehicle Safety Management Program complies with Department standards.

Recommendation 5: Embassy Bern should include all facilities management expendable supplies in the embassy's inventory records in accordance with Department standards. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation. The embassy noted an expected completion date of October 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all facilities management expendable supplies are included in Embassy Bern's inventory records in accordance with Department standards.

Recommendation 6: Embassy Bern, in coordination with the Bureau of Global Talent Management, should update its local compensation plan to comply with Government of Switzerland labor law, in accordance with Department standards. (Action: Embassy Bern, in coordination with GTM)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation. The embassy noted an expected completion date of August 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bern updated its local compensation plan to comply with Government of Switzerland labor law, in accordance with Department standards.

Recommendation 7: Embassy Bern should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern 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 Bern's Information Systems Security Officers performed their duties in accordance with Department guidance.

Recommendation 8: Embassy Bern should test the information technology contingency plans for the unclassified and classified networks annually, in accordance with Department standards. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern 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 Bern tested the information technology contingency plans for the unclassified and classified networks annually, in accordance with Department standards.

Recommendation 9: Embassy Bern should implement a plan to conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern 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 Bern implemented a plan to conduct initial and annual refresher information technology contingency training for appropriate employees.

Recommendation 10: Embassy Bern should implement a records management program that complies with Department standards. (Action: Embassy Bern)

Management Response: In its April 30, 2020, response, Embassy Bern concurred with this recommendation. The embassy noted an expected completion date of October 2020.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Bern implemented a records management program that complies with Department standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Edward McMullen	11/2017
Deputy Chief of Mission	Eva Weigold-Schultz	08/2019
Chiefs of Sections:		
Management	Jennifer Bucha	07/2019
Consular	Brianna Powers	05/2017
Political/Economic	Michael Taylor	07/2019
Public Affairs	Tanya Ward	06/2017
Regional Security	Matthew Williams	07/2019
Other Agencies:		
Department of Defense	Darren Smith	08/2018
Federal Bureau of Investigation	William Peterson	02/2018

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from September 3, 2019 to January 24, 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

Bern, Switzerland

April 30, 2020

UNCLASSIFIED

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

FROM: Ambassador Edward McMullen, Embassy Bern, Switzerland

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Bern, Switzerland

Embassy Bern has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG, noting that our targeted completion dates may be affected by the ongoing COVID-19 crisis:

OIG Recommendation 1:

Embassy Bern, in coordination with the Bureaus of Consular Affairs, Diplomatic Security, and Overseas Buildings Operations, should conduct a cost-benefit analysis to determine whether to continue consular operations in Zurich and Geneva or instead to consolidate them in the embassy. (Action: Embassy Bern, in coordination with CA, DS, and OBO)

Management Response: Embassy Bern concurs with the recommendation. As CA/EX is better positioned to ensure all equities are represented, they will take the lead with input from post, Diplomatic Security, and Overseas Building Operations to develop a cost-benefit analysis. Expected completion date is December 2020.

OIG Recommendation 2:

Embassy Bern, in coordination with the Bureau of Overseas Buildings Operations, should provide accommodations for consular applicants in accordance with Department standards. (Action: Embassy Bern, in coordination with OBO)

Management Response: Embassy Bern concurs with the recommendation. The physical compound security upgrade (currently scheduled to begin construction in 2022, estimated completion date summer 2023) is expected to redesign the Consular CAC and the exterior

waiting area for consular clients. In the meantime, the embassy will work with OBO to determine what interim options may be feasible within Swiss law and current funding levels.

OIG Recommendation 3:

Embassy Bern should conduct a review of its blanket purchase agreements in accordance with Department standards. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. The Embassy has implemented the recommendation by ceasing use of the noncompliant blanket purchase agreements (BPAs) and by re-establishing compliant BPAs where needed (for example, with fuel providers). The Embassy now actively uses only six BPAs, which comply with Department contracting rules and have been countersigned by the service providers. This action is complete.

OIG Recommendation 4:

Embassy Bern should bring its Motor Vehicle Safety Management Program into compliance with Department standards. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. The GSO conducted a review of the Motor Vehicle Safety Management Program upon arrival at Embassy Bern and had made significant improvements to the program prior to OIG's arrival. Chauffeurs and incidental drivers are now fully compliant with all training and medical requirements. Drivers with expired credentials are not permitted to operate Embassy vehicles. The chauffeurs who were exceeding the 10 hour driving rule were doing so in support of Ambassadorial movements and programming, and have now moved under RSO supervision and control. The RSO team has been fully briefed on the importance of the ten hour duty limit for driver safety, and are regularly switching drivers. The bodyguards have chauffeuring duties in their job descriptions, and can drive at the start of a duty day to ensure that the chauffeurs do not exceed the ten hour duty limit. This action is complete.

OIG Recommendation 5:

Embassy Bern should include all facilities management expendable supplies in the embassy's inventory records in accordance with Department standards. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. The embassy recently implemented the Expendables inventory module, which is less than a year old. The facilities team and property team are working together to incorporate the facilities tools and materials into the Expendables program, which requires the addition of new secured storage areas. This project will be completed prior to the next annual inventory. The expected completion date is October 2020.

OIG Recommendation 6:

Embassy Bern, in coordination with the Bureau of Global Talent Management, should update its local compensation plan to comply with Government of Switzerland labor law, in accordance with Department standards. (Action: Embassy Bern, in coordination with GTM)

Management Response: Embassy Bern concurs with the recommendation. The embassy is updating its local compensation plan and will work with the Bureau of Global Talent Management to ensure the plan complies with Swiss law and accords with Department standards. The expected completion date is August 2020.

OIG Recommendation 7:

Embassy Bern should require the Information Systems Security Officers to perform their duties in accordance with Department guidance. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. The IPO recently completed ISSO training and compiled resources to institute an ISSO program at post. The IPO is ready to begin implementing this program and is developing a schedule to prioritize this with other responsibilities. IRM is also developing SOPs to document service requests and workload, and has reminded all embassy staff on the requirement to submit requests for IT support through myServices. The expected completion date is July 2020.

The embassy has also implemented new staffing procedures to reduce the amount of telephone switchboard calls reaching Post One, and is currently looking for technological improvements to the phone tree and to further prevent non-emergency calls getting through.

OIG Recommendation 8:

Embassy Bern should test the information technology contingency plans for the unclassified and classified networks annually, in accordance with Department standards. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. Both the unclassified and classified information technology contingency plans have been updated. IRM staff will test the contingency plans no later than July. The expected completion date is July 2020.

OIG Recommendation 9:

Embassy Bern should implement a plan to conduct initial and annual refresher information technology contingency training for employees with information technology contingency planning responsibilities. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. IRM staff will train employees with information technology contingency planning responsibilities this year. The expected completion date is July 2020.

OIG Recommendation 10:

Embassy Bern should implement a records management program that complies with Department standards. (Action: Embassy Bern)

Management Response: Embassy Bern concurs with the recommendation. The IMO is developing Embassy Bern's records management program to fully comply with Department standards for records organization, oversight, and retirement. The expected completion date is October 2020.

The point of contact for this memorandum is Deputy Chief of Mission Eva Weigold Schultz.

ABBREVIATIONS

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

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