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Office of Inspector General
United States Department of State

ISP-I-25-04

Office of Inspections

December 2024

**Inspection of Embassy Brazzaville,
Republic of the Congo**

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

ISP-I-25-04

What OIG Inspected

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

What OIG Recommends

OIG made 29 recommendations to Embassy Brazzaville. In its comments on the draft report, the embassy concurred with 28 recommendations and disagreed with 1 recommendation. OIG considers all 29 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 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 Deputy Chief of Mission led Embassy Brazzaville in a professional and collaborative manner. They fostered workforce resilience in the wake of the deaths of two embassy staff in 2022 and 2023.
- With a small U.S. direct-hire staff, the Deputy Chief of Mission prioritized work tasks to match available personnel resources.
- The Front Office initiated several efforts to improve foreign assistance coordination.
- Embassy Brazzaville did not follow its Leahy vetting standard operating procedure.
- Embassy Brazzaville significantly boosted its digital media outreach after the Public Diplomacy Section added a fourth locally employed staff position in August 2022.
- Deficiencies in general services, facility management, human resources, financial management, and information management adversely affected embassy operations.
- The embassy did not follow Department of State requirements to review unliquidated obligations, resulting in up to \$1.26 million that could be put to better use.

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CONTEXT

The Republic of the Congo (Congo) has an estimated population of 6.1 million and extends more than 800 miles from the Atlantic Ocean through equatorial West-Central Africa along the north bank of the Congo River. The United States established diplomatic relations in 1960 following Congo's independence from France. Congo had a Marxist government during most of its initial decades of independence, with the United States suspending diplomatic relations from 1965 through 1977 during Congo's most radical Marxist period. In 1992, Congo sought to transition to multiparty democracy. The following years were marked by turbulence, culminating in a civil war that prompted the United States to suspend embassy operations from 1997 through 2001. The country has enjoyed relative stability since the government reached a peace accord with the last remaining rebel group in 2003. President Denis Sassou-N'Gusso, most recently re-elected in 2021, has served as head of state for all but 5 years since first coming to power in 1979.



Figure 1: Map of the Republic of the Congo. (Source: CIA World Factbook.)

Congo's economy relies primarily on its petroleum sector. It is the third largest oil exporter in sub-Saharan Africa, and several U.S. companies are active in petroleum production and services. The United States ratified a Bilateral Investment Treaty with Congo in 1994. Most goods moving in and out of Congo pass through the coastal city of Pointe-Noire, the only deep-water port on the African Atlantic coast between Luanda, Angola, and Lagos, Nigeria. Given Congo's relative stability in an unstable region, it plays an important role in maritime security in the Gulf of Guinea, with a growing security partnership with the United States. The country is also important to the global climate change agenda: it is home to large, untouched areas of rainforest, and significant amounts of the global carbon supply remain stored in Congolese marshes.

Embassy Brazzaville's top four policy goals, as outlined in the Integrated Country Strategy approved in April 2022, are to:

- Preserve and protect Congo's environment.
- Work in partnership with Congo to ensure a secure, healthy, and more democratic future.
- Increase mutually beneficial growth and improve the business climate.
- Empower Congolese youth with 21st century skills and knowledge.

Most U.S. assistance to Congo—\$11 million in FY 2023—is managed by the U.S. Agency for International Development (USAID) from Embassy Kinshasa, the Democratic Republic of Congo, as part of regional health, environment, and humanitarian assistance programs.¹ Bilateral development assistance has been limited due to Congo’s earlier periods of civil strife as well as its recurring Tier 3 status under the Department of State’s (Department) annual trafficking in persons review.² A small security assistance program, the International Military Education and Training program, is managed by the Department of Defense’s Office of Security Cooperation.

At the time of the inspection, Embassy Brazzaville had 15 authorized U.S. direct-hire Department positions, 1 Department of Defense position, 8 Marine Security Guards, 3 eligible family member positions, 325 locally employed (LE) staff positions, and 3 third country national contract employees (2 for USAID and 1 for the Department of Defense HIV/AIDS Prevention Program). Of the 15 U.S. direct-hire positions, 6 were serving in their first or second tours. The embassy has occupied a new embassy compound since January 2009.

The Office of Inspector General (OIG) evaluated the embassy’s executive direction, policy and program implementation, resource management, and information management consistent with Section 209 of the Foreign Service Act of 1980.³ A related classified inspection report includes discussion of the embassy’s security program and issues affecting the safety of embassy personnel and facilities.

EXECUTIVE DIRECTION

OIG assessed leadership based on interviews, staff questionnaires, and OIG’s review of documents and observations of embassy meetings and activities during the onsite portion of the inspection.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived at Embassy Brazzaville in February 2022. He previously served as the Chargé d’Affaires, a.i., and Deputy Chief of Mission (DCM) at Embassy Vienna, Austria; the Consul and Senior Civilian Representative of Consulate Herat, Afghanistan; and the DCM at Embassy Ljubljana, Slovenia. The DCM arrived in

¹ The Bureau of Population, Refugees, and Migration also provides humanitarian assistance via the United Nations High Commission for Refugees for refugees from the Central African Republic, which is to the north of Congo. The Bureau of International Narcotics and Law Enforcement Affairs manages programs from Washington, including regional programs to combat wildlife trafficking and illegal logging in the Congo Basin.

² The Trafficking Victims Protection Act of 2000 (the Act), as amended, requires the Secretary of State to submit a list of countries that require special scrutiny to Congress and to provide an interim assessment of the progress made in combating trafficking in persons by the countries on that list. The Department ranks each country on one of four tiers, as mandated by the Act. Those countries whose governments do not fully comply with the minimum standards and are not making significant efforts to do so are ranked on Tier 3. Under the Act, governments of countries on Tier 3 may be subject to certain sanctions, whereby the U.S. government may withhold or withdraw nonhumanitarian, non-trade-related foreign assistance.

³ See Appendix A.

Brazzaville in August 2022. She was most recently the Political and Economic Counselor and acting DCM at Embassy Conakry, Guinea and previously served as the Africa Advisor at Embassy Paris, France.

OIG found the Ambassador and DCM generally modeled the Department's leadership and management principles outlined in 3 Foreign Affairs Manual (FAM) 1214b.⁴ For instance, in the wake of the deaths of two embassy staff—one in September 2022 and one in December 2023—the Ambassador fostered workforce resilience in accordance with 3 FAM 1214b(10). He facilitated arrangements for counseling for both U.S. direct-hire and LE staff and spoke at embassy-wide town halls after each death to console employees and provide updates on issues such as the repatriation of remains. LE staff told OIG that they valued the Ambassador's stated norm that all employees in the workplace treat each other with dignity and respect. Additionally, LE staff said they appreciated the Ambassador's initiative to keep them informed of ongoing embassy outreach and diplomatic initiatives.

OIG also determined the DCM engaged in strategic planning of staff activities and agendas in accordance with 3 FAM 1214b(10). In particular, the DCM persisted in the face of adversity, took calculated risks, was flexible, showed empathy, and provided encouragement to others in difficult times. Embassy staff told OIG that, given the small number of U.S. direct-hire employees in Brazzaville, the DCM prioritized work tasks to match available personnel resources, allowing employees to concentrate their efforts on the most pressing matters. This approach enabled the embassy's two officers responsible for reporting to focus their attention on projects most relevant to the Integrated Country Strategy, thus facilitating the embassy's execution of foreign policy and providing emotional space for grieving employees after the deaths of the two embassy staff.

Execution of Foreign Policy Goals and Objectives

In accordance with 18 FAM 301.2-4d, the Front Office articulated Embassy Brazzaville's goals and objectives in the Integrated Country Strategy, and the embassy reviewed its goals and objectives in its FY 2025 Mission Resource Request. At the time of the inspection, the embassy was in the process of updating the Integrated Country Strategy to more fully reflect the Ambassador's focus on environmental protection and maritime security and deepening engagement with the Congolese government. Under the Front Office's direction, Embassy Brazzaville promoted USAID's Central Africa Program for the Environment to help Congo protect its part of the tropical forest and peatlands in the Congo River Basin. The Department's Deputy Special Envoy for Climate led a U.S. delegation to the October 2023 Three Basins Summit,⁵ hosted by Congo. In addition, the embassy engaged with local authorities in Congo's principal port of Pointe-Noire, culminating in the organization of a regional maritime port

⁴ The Department's leadership and management principles outlined in 3 FAM 1214b are to (1) model integrity, (2) plan strategically, (3) be decisive and take responsibility, (4) communicate, (5) learn and innovate constantly, (6) be self-aware, (7) collaborate, (8) value and develop people, (9) manage conflict, and (10) foster resilience.

⁵ The Three Basins Summit brought together leaders from the Amazon, Congo, and Borneo-Mekong-Southeast Asia regions to form a global coalition to preserve biodiversity and tropical forests.

security exercise with Congo in May 2024, in conjunction with the governments of France, Angola, and the Democratic Republic of the Congo.

OIG also found the Ambassador and DCM set forth clear priorities for foreign assistance programs implemented in Congo, as required by 1 FAM 013.2k(6) and 2 FAM 113.2c.⁶ Additionally, OIG determined the Front Office coordinated foreign assistance issues within Embassy Brazzaville, as well as with relevant personnel at Embassy Kinshasa and staff in the Washington interagency community. To expand program capacity and improve communication, the Ambassador and DCM successfully advocated for placing the Department of Defense's Office of Security Cooperation chief position in Brazzaville. The Ambassador also effectively worked with both USAID and the Centers for Disease Control and Prevention at Embassy Kinshasa to identify staff at those agencies to focus on development and health issues, respectively, in Congo.

Finally, OIG determined the Ambassador conducted outreach to a wide variety of host government, civil society, and youth audiences, projecting the message that the United States could be a productive partner for Congo and the Congolese people. Washington audiences expressed satisfaction to OIG with the reporting from the embassy on local dynamics.

Adherence to Internal Controls

The Front Office oversaw the development of the FY 2023 Annual Chief of Mission Management Control Statement of Assurance, in accordance with 2 FAM 022.7(1) and (5), which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. OIG reviewed embassy supporting documentation, which showed that embassy sections reviewed internal controls as required. As part of the Statement of Assurance process, Embassy Brazzaville identified inadequate U.S. direct-hire management staff as a significant deficiency.⁷ During the inspection, OIG identified internal control irregularities in the embassy's general services, facility management, human resources, and financial management operations, which are discussed in the Resource Management section of this report.

OIG confirmed that the DCM conducted regular reviews of the Consular Section chief's nonimmigrant visa adjudications, as required by 9 FAM 403.12-1d and 9 FAM 403.12-2a and b. In addition, OIG confirmed the embassy had a gift policy in place that generally met the requirements of 2 FAM 964. Embassy staff told OIG that, as the Front Office infrequently received gifts, the embassy had no gift registry, but they committed to institute one in the near

⁶ For example, the embassy's Integrated Country Strategy listed the environment as a top priority. Accordingly, the embassy had a USAID employee in Brazzaville to focus on these programs.

⁷ According to 2 FAM 021.3, a significant deficiency is a "deficiency, or combination of deficiencies, that in management's judgment should be communicated [in the Statement of Assurance] because they represent significant weaknesses in the design or operation of internal control that could adversely affect the organization's ability to meet its internal control objectives."

future. Because of the embassy's commitment, OIG did not make a recommendation to address this issue.

Security and Emergency Planning

The Ambassador's leadership of the security and emergency preparedness programs was consistent with Department standards in 12 Foreign Affairs Handbook (FAH)-1 H-762a. From December 2022 through November 2023, the Ambassador signed 19 security directives, which were posted to the embassy SharePoint site. Additionally, OIG found the memorandum detailing the division of security responsibilities between the embassy and the regional combatant commander and the Emergency Action Plan to be current. All U.S. direct-hire and temporary duty employees received a security briefing upon arrival, and responses to OIG questionnaires showed that the majority of embassy staff knew where to find the Emergency Action Plan and understood what to do in case of an emergency. The Front Office regularly met with the Regional Security Officer, who also had access to the Ambassador, if necessary, on an ad hoc basis. In addition, embassy staff told OIG that the Ambassador and the DCM regularly participated in security and emergency drills and that they supported planning for a potential evacuation of Embassy Kinshasa employees and family members across the Congo River from Kinshasa to Brazzaville, if security conditions in the Democratic Republic of the Congo were to deteriorate. Lastly, the embassy had a crisis management exercise scheduled for fall 2024.

Equal Employment Opportunity and Diversity, Equity, Inclusion, and Accessibility

OIG determined the Front Office supported Equal Employment Opportunity (EEO) principles and activities, in accordance with 2 FAM 1510 and 3 FAM 1212. In their public remarks, the Ambassador and the DCM highlighted the need to embrace principles of respect and nondiscrimination. For instance, the Ambassador spoke about lesbian, gay, bisexual, transgender, and queer rights during Pride month, and the DCM gave presentations for Black History Month and Women's History Month events. The embassy had three designated EEO liaisons for LE staff and a U.S. direct-hire EEO counselor who coordinated with the Front Office on EEO issues. The EEO counselor held training sessions for approximately three-quarters of the embassy staff and created a SharePoint site in French, English, and local languages detailing how to navigate the EEO process. In addition, written materials on EEO principles and anti-harassment were posted on bulletin boards throughout the embassy, and this information was contained in embassy management notices.

The embassy had an active Diversity, Equity, Inclusion, and Accessibility Council that sponsored regular events, such as a women's self-defense class, a Congolese cultural day, and sessions on cultural norms. Embassy staff told OIG the Front Office supported the council, with the Ambassador and the DCM regularly meeting with the council chair.

Developing and Mentoring Foreign Service Professionals

OIG found the Front Office oversaw the embassy's First- and Second-Tour (FAST) program, as required in 3 FAM 2242.4. At the time of the inspection, Embassy Brazzaville had six FAST employees. Due to the small size of the embassy, the Front Office had frequent contact with all FAST employees, so the Ambassador and the DCM elected to mentor each individually and not through a formal FAST mentoring program. For example, the DCM met with FAST personnel one-on-one to provide guidance regarding performance evaluations. The Front Office also had visiting officials meet with the FAST employees as a group. In addition, the Front Office had an open-door policy, and the Ambassador had periodic one-on-one sessions with not just FAST employees but every U.S. direct hire at the embassy. FAST employees told OIG they were satisfied with the mentoring they received from the Ambassador and the DCM.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Brazzaville's policy and program implementation work performed by the Political-Economic, Public Diplomacy, and Consular Sections, as well as the embassy's coordination of foreign assistance programs. OIG found the embassy generally met Department requirements for policy and program implementation, with the exceptions discussed below.

Political-Economic Section

OIG assessed the Political-Economic Section's leadership and management, policy implementation, reporting, and Leahy vetting.⁸ OIG reviewed 46 section cables from June 1, 2023, to May 31, 2024, and found the reporting to be relevant to embassy strategic objectives. In interviews with OIG and in communications with the embassy, Department stakeholders praised the section's reporting, especially on Congo leadership and macro-economic issues. The section's support for the Three Basins Summit in 2023 also garnered praise.

The Political-Economic Section completed 228 Leahy vetting checks from March 2023 to March 2024. The Bureau of Democracy, Human Rights, and Labor (DRL), which is responsible for implementing Leahy vetting requirements for the Department, told OIG the embassy's rate of "short-fuse" cases, where nominations were submitted closer than the standard lead times for Washington approval, was not ideal. However, the bureau noted the embassy's rate of 31 percent was better than the average for other embassies within the Bureau of African Affairs. Additionally, OIG determined the Political-Economic Section worked with the Consular Section and the Regional Security Office to complete Leahy vetting. However, OIG found one area for improvement in Leahy vetting, as described below.

⁸ The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the United States from furnishing certain assistance to a unit of a foreign security force if the Department has credible information that the unit has committed a gross violation of human rights. See 22 United States Code (U.S.C.) § 2378d and 9 FAM 303.8-5(B). Leahy vetting is the process of determining if the Department has credible information that units or individuals proposed to benefit from certain assistance have committed a gross violation of human rights. The Department helps implement a similar law applicable to "amounts made available to the Department of Defense" for assistance to foreign security forces. See 10 U.S.C. § 362.

During the inspection, the section took action to correct one issue identified by OIG by beginning to archive relevant electronic messages in accordance with record management requirements of 5 FAM 435d. Overall, OIG determined the Political-Economic Section generally complied with applicable Department standards, with the exception described below.

Leahy Vetting Practices Did Not Comply With Embassy's Standard Operating Procedure or Department Guidance

OIG found Embassy Brazzaville's practices for Leahy vetting did not comply with the embassy's standard operating procedure or Department guidance. The section's standard operating procedure, last updated in 2019, listed the Department of Defense (DoD) as a vetting office at the embassy through the Defense Attaché.⁹ However, at the time of the inspection, the Political-Economic Section was not requesting or receiving vetting results from DoD. In an interview with DoD staff in Brazzaville, staff told OIG that DoD conducted its own vetting,¹⁰ although the results were not communicated to the embassy's Leahy Vetting Coordinator in the Political-Economic Section.

The Bureau of Democracy, Human Rights, and Labor's 2017 worldwide Leahy vetting guidance states that the senior defense official should be part of the Leahy vetting team or committee as DoD is a nominating agency. Additionally, any negative DoD findings should be shared with the embassy Leahy vetting team, the Ambassador, and the Consular Section for possible inclusion in the Consular Lookout and Support System¹¹ and to ensure full visibility on potential gross violators of human rights. DoD staff told OIG that they did not have any negative findings in recent years. Nonetheless, because the Political-Economic Section did not request or receive vetting results from DoD, the embassy risked reducing the reliability of the Leahy vetting system to detect disqualifying information on security forces.

Recommendation 1: Embassy Brazzaville, in coordination with the Bureau of Democracy, Human Rights, and Labor and the Bureau of African Affairs, should bring its Leahy vetting practices into compliance with the embassy's standard operating procedures and Department guidance. (Action: Embassy Brazzaville, in coordination with DRL and AF)

⁹ According to the embassy's standard operating procedure, DoD is "responsible for reviewing batches in their respective office's files, databases, and relevant sources for disqualifying derogatory information." Then, DoD "will enter the results into INVEST [the Leahy vetting tracking system], if possible, or provide results in writing (email) directly to the Post Leahy Vetting POC for entry directly."

¹⁰ DoD's Office of Security Cooperation told OIG any Office of Security Cooperation-nominated individual or unit for security assistance such as training is subject to the Leahy vetting process through DoD.

¹¹ The Consular Lookout and Support System, or CLASS, is used by Department of State passport agencies, overseas posts, and the Department of Homeland Security and other border inspection agencies to perform namechecks on visa and passport applicants to identify individuals who may be ineligible for issuance or require other special action.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's leadership, strategic planning and reporting, resource and knowledge management, grants management, program management and exchanges, media engagement, and oversight of the embassy's American Center.¹² It is a relatively new public diplomacy operation, established in August 2012, with one U.S. direct-hire Public Affairs Officer and four LE staff. Discretionary funds available for the section's grant-supported programs and activities ranged from approximately \$45,000 to \$60,000 annually in recent fiscal years. OIG found that section programs and activities supported the Integrated Country Strategy, with special attention to the goal on the environment, and focused especially on next generation Congolese audiences through exchange programs and English-language activities.

New Locally Employed Staff Position Helped Embassy Expand Digital Media Outreach

OIG determined the embassy significantly boosted its digital media outreach after the Public Diplomacy Section added a fourth LE staff position in August 2022 dedicated to that area. Specifically, the embassy increased its Facebook followers by 31 percent and its X (formerly known as Twitter) followers by 39 percent from August 2022 through April 2024.¹³ During the same period, the section increased its production of local content, especially video, by approximately 20 percent (to approximately 80 percent of all content), and initiated hybrid programming using Facebook Live to reach beyond its traditional in-person urban base audiences. The expanded reach, especially to more remote parts of the country, was evident in the increased awareness of and interest in embassy exchange program opportunities. For example, applicants for the section's premier youth exchange program, the Mandela Washington Fellowship,¹⁴ increased from 146 in 2022 to 208 in 2024.

OIG found the embassy's public diplomacy programs and activities met Department standards and guidance, with the following exception.

Section Did Not Properly Document Public Diplomacy Grants in the Official Files

The Public Diplomacy Section did not properly document its administration of public diplomacy grants in accordance with the requirements of the Department's Federal Assistance Directive.¹⁵ OIG reviewed all nine public diplomacy grants awarded in FY 2023, which had a combined value

¹² American Centers are Department operated public diplomacy facilities designed to attract and engage targeted foreign audiences with activities such as English language programs, policy and cultural dialogues, and digital resources. Embassy Brazzaville has one American Center co-located in the embassy chancery building.

¹³ The embassy had 39,984 Facebook followers on August 30, 2022. As of May 16, 2024, the embassy raised that figure by 12,572, an increase of 31.4 percent. Twitter followers increased from 9,988 to 13,924 during the same period, an increase of 39.4 percent.

¹⁴ The Mandela Washington Fellowship for Young African Leaders is the flagship program of the U.S. government's Young African Leaders Initiative. Since 2014, nearly 5,100 young leaders from every country in sub-Saharan Africa have participated in the fellowship.

¹⁵ The grants reviewed were subject to the Department's Federal Assistance Directive, version 7.0, October 2022.

of \$61,342.¹⁶ The official grant files were generally missing the project proposals,¹⁷ documentation of the merit review process for grant selection,¹⁸ evidence of performance monitoring,¹⁹ or a final assessment by the grants officer representative as part of closed-out grants.²⁰ The lapses were due to a lack of clear standard operating procedures for the section's grants program and staff with limited experience in grants administration. Although OIG found no evidence that the terms of the awarded grants were not met, failure to properly document grant files can impair the section's ability to identify and mitigate risk, monitor program implementation, evaluate program results, and ensure accountability for public diplomacy resources.

Recommendation 2: Embassy Brazzaville should document public diplomacy grants in accordance with Department standards. (Action: Embassy Brazzaville)

Consular Operations

OIG reviewed Embassy Brazzaville's consular operations, including U.S. citizen services, fraud prevention programs, nonimmigrant visa services, training, management controls, communications and outreach, anti-fraud programs, consular cashing and fees, consular space, and crisis preparedness. Embassy Kinshasha processed immigrant visas. At the time of the inspection, the Consular Section had one U.S. direct-hire consular officer and three LE staff. The section faced difficult local conditions, an understaffed embassy, a high nonimmigrant visa refusal rate, and high percentage of third-country visa applicants. Due to global staffing constraints, temporary duty support was generally unavailable during the sole consular officer's leave. The embassy relied on backup commissioned officers from other embassy sections and occasional support from Embassy Kinshasha's Consular Section, which was also understaffed.

During the inspection, Embassy Brazzaville corrected five issues identified by OIG. Specifically, the embassy:

- Completed a formal training plan (7-FAH-1 H-242C(3)).
- Completed a travel and representation plan (7-FAH-1 H-434.2).
- Initiated a plan for Consular Section staff to archive communication conducted via non-government electronic messaging (5 FAM 444).
- Ensured processing of nonimmigrant visa referral and priority appointment requests adhered to Department standards (9 FAM 601.8-3(E), 9 FAM 601.8-4(E), 9 FAM 601.8-4(B)(2)).
- Initiated a plan to ensure that consular fees and receipts are deposited daily with the Class B cashier (7 FAH-1 H-726.2-5a(3)).

¹⁶ At the time of the inspection, no FY 2024 grants had been issued.

¹⁷ Federal Assistance Directive (October 2022), Chapter 2, Section G.1.

¹⁸ Ibid., Chapter 2, Section H.

¹⁹ Ibid., Chapter 4, Section D.

²⁰ Ibid., Chapter 5, Section C.

OIG found Embassy Brazzaville’s consular programs generally complied with guidance in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies. However, as described below, the Consular Section’s outside waiting area did not meet Department standards.

Embassy Did Not Provide a Safe Waiting Area for Applicants for Consular Services

Embassy Brazzaville’s outside waiting area for visa and passport applicants did not comply with Department standards. According to 7 FAH-1 H-281a, an effective consular section needs to provide secure, adequate, efficient, comfortable, and attractive accommodation for both visitors and staff. As shown in Figure 2, OIG observed that the waiting area consisted of two benches that seat six people, which was not sufficient for the number of applicants. Additionally, the benches were covered by a small, tent-like overhang that was of limited use to protect



Figure 2: The Consular Section’s outside waiting area. (Source: Embassy Brazzaville.)

applicants during the rainy season. In 2023, the embassy proposed a canopy project for its consular waiting area. The proposal, which was cleared by the embassy Facility Management Unit, will be considered for possible FY 2025 funding by the Consular Facilities Planning Board of the Bureau of Consular Affairs. If the board approves the funding, it will then request approval for the proposal from the Bureau of Overseas Buildings Operations (OBO). Failure to provide consular applicants with a waiting area that protects them from the elements, projects an inappropriate image of the United States to the public.

Recommendation 3: Embassy Brazzaville, in coordination with the Bureau of Consular Affairs, Bureau of Diplomatic Security, and the Bureau of Overseas Buildings Operations, should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Brazzaville, in coordination with CA, DS, and OBO)

Foreign Assistance

OIG reviewed the embassy’s coordination of foreign assistance programs and grants management. Most U.S. assistance to Congo—\$11 million in FY 2023—is managed by USAID from Embassy Kinshasa, the Democratic Republic of Congo, as part of regional health, environment, and humanitarian assistance programs. A small security assistance program is managed by the Office of Security Cooperation. OIG found the embassy generally managed its foreign assistance programs and coordinated those programs with entities in Kinshasa and Washington, as appropriate, as discussed in the Executive Direction section of this report.

RESOURCE MANAGEMENT

OIG reviewed Embassy Brazzaville's internal control systems in general management, general services, facility management, human resources, financial management, and the health unit's operations.

During the inspection, Embassy Brazzaville corrected four deficiencies identified by OIG. Specifically, the embassy:

- Published a chief of mission memorandum to justify accommodation exchange services, as required by 4 FAM 361.5.
- Implemented a mission funds control policy, as required by 4 FAM 081.1(1) and 4 FAM 082.1e.
- Implemented a cash movement policy, as required by 4 FAM 393.4-6a.
- Started to perform and document periodic, unannounced spot counts of expendable and nonexpendable property in warehouses to verify the accuracy of property records in the Department's Integrated Logistics Management System (ILMS),²¹ as required by 14 FAM 411.2-2b(8).

Overall, OIG found the embassy's Management Section generally implemented required processes and procedures in accordance with applicable laws and Department standards, with the exceptions noted below. Embassy staff attributed the internal control issues described below to a lack of awareness of Department standards, a lack of management oversight due to previous staffing gaps,²² and a management platform staffed with several first-tour officers.

General Management

Missing and Outdated Policies Hindered the Embassy's Management Operations

OIG found that missing and outdated key management policies hindered the embassy's management operations. OIG reviewed management policies on the embassy SharePoint site and found that policies in facility management, financial management, general services, and human resources were missing. In addition, several policies had not been updated in more than 5 years. For example, OIG found that:

- The embassy did not develop and publish any policies in key life and safety areas such as electrical safety, swimming pool safety, residential fire extinguisher and carbon monoxide alarm programs, mishap reporting, safety and health oversight of contractors,

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

²² The embassy received its first Financial Management Officer/Human Resources Officer U.S. direct-hire position in April 2023.

and an integrated pest management program. In addition, the embassy last updated and published its safety, health, and environmental management policy in 2018. According to 15 FAM 968a, an embassy must develop and publish specific procedures and responsibilities for implementing safety, health, and environmental management program requirements, and the designated post occupational safety and health officer (POSHO) must reissue these documents whenever there is a POSHO change.

- The embassy last updated its make-ready policy and commissioning policy in 2018. However, the policies should be updated every 2 years, as required by 6 FAH-5 H-522.2c and 6 FAH-5 H-524e.
- The embassy last updated its representational funds policy in 2015 and last issued a management notice on unauthorized commitments and ratification procedures in 2019. According to 2 FAM 021.3, management control documentation consists of written policies and procedures, and this documentation must be current and permanently on file.

The Government Accountability Office's *Standards for Internal Control in the Federal Government*,²³ Principle 3.11, states that effective documentation assists in promoting internal controls by establishing and communicating responsibilities to personnel. Furthermore, guidance in 18 FAM 301.1-4 states that managing involves thoughtful planning and implementation of programs, projects, and processes in a manner that achieves their intended goals and objectives. The absence of key life and safety policies as well as regularly updated key management policies increases both life and safety risks to embassy staff and property and reduces operational efficiency, which could result in waste and mismanagement.

Recommendation 4: Embassy Brazzaville should implement a process to regularly review and update its management policies. (Action: Embassy Brazzaville)

Per Diem, Post Hardship Differential, and Education Allowance Surveys Were Outdated

OIG found the embassy had not submitted a report for foreign travel per diem rates for Congo since 2017 or a post hardship differential survey²⁴ since 2018. In addition, the embassy had not submitted its educational allowance report since the 2021 to 2022 school year. Department of State Standardized Regulations, Section 074.2, specify that overseas posts should submit a hotel and restaurant report to establish foreign travel per diem rates every 2 years. Furthermore, Section 072.12 requires embassies to submit an education allowance questionnaire annually in June and hardship post differential surveys in July every 2 years in even years. Management Section staff told OIG they did not receive any reminders from the Bureau of Administration and were unaware of these requirements. Failure to submit reports in

²³ Government Accountability Office, *Standards for Internal Control in the Federal Government*, page 29 (GAO-14-704G, September 2014).

²⁴ Post hardship differential is meant to compensate employees for service at places in foreign areas where conditions of environment differ substantially from conditions of environment in the continental United States and warrant additional compensation as a recruitment and retention incentive.

a timely manner could result in overpayment or underpayment of travel or educational expenses to U.S. government employees.

Recommendation 5: Embassy Brazzaville should submit the per diem, post hardship differential, and education allowance surveys in accordance with Department standards. (Action: Embassy Brazzaville)

General Services

Embassy Furniture and Appliance Pool Program Did Not Comply With Department Standards

OIG found the embassy's furniture and appliance pool (FAP) program²⁵ did not comply with Department standards. According to data in ILMS, approximately \$156,000 of the embassy's \$828,000 FAP assets were flagged as potentially misclassified in the system. Specifically, OIG found that 186 assets, valued at approximately \$115,000, should have been classified as FAP assets but were classified under different agency codes, contrary to guidance in 6 FAH-5 H-514.1d(3). Additionally, the embassy incorrectly issued 92 furniture and appliance pool assets, valued at \$39,000, to office locations or designated residences,²⁶ contrary to guidance in 6 FAH-5 H-514.1d(2) and 6 FAH-5 H-514.2-3c. According to 17 STATE 58544,²⁷ overseas posts must take responsibility for their ILMS data, and general services officers must ensure the data is accurate and up to date. Management Section staff told OIG this occurred due to insufficient training. Failure to properly classify FAP assets in ILMS and manage FAP assets in accordance with Department standards risks mismanagement of the embassy's FAP holdings and incorrectly charging customers for the cost of participating in the program.

Recommendation 6: Embassy Brazzaville should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Brazzaville)

Embassy's Contract Administration Program Did Not Adhere to Department Standards

The embassy's contract administration program did not adhere to Department standards. The embassy's contracting officers (CO) executed 12 contracts valued at approximately \$4.8 million. OIG reviewed the files for all 12 contracts and found:

- Although all contracts stated there was a contracting officer's representative (COR) assigned, only one contract had a COR who met the proper designations and qualifications as required in 14 FAH-2 H-143a and was actually serving as a COR.

²⁵ The FAP program furnishes overseas housing through the purchase, replacement, refurbishment, maintenance, inventory control, warehousing, pick-up/delivery, and eventual disposal of non-expendable residential furniture, furnishings, appliances, and equipment. Pooled furniture programs can achieve economies of scale and greatly reduce the time and effort required to oversee and manage residential furnishings.

²⁶ Designated residences include the residence for the Ambassador. Furniture and furnishings for designated housing and offices are funded through other allotments.

²⁷ Cable 17 STATE 58544, "Furniture and Appliance Pool (FAP) and Budget Realities," June 8, 2017.

- Nine contracts stated that the Facility Manager was the COR, and two stated that the Diplomatic Technology Officer was the COR. However, neither the Facility Manager nor the Diplomatic Technology Officer were officially designated as CORs.
- Neither the CORs nor the COs completed mandatory performance reviews in the Contractor Performance Assessment Reporting System²⁸ for the one contract valued at above \$250,000, as required by 14 FAH-2 H-572d and Federal Acquisition Regulation (FAR) 42.1502(a) and (b).

Management staff did not enforce these requirements and said that the lack of trained personnel prevented the appointment of properly designated CORs. Failure to have a compliant contract administration program increases the risk of contract mismanagement.

Recommendation 7: Embassy Brazzaville should bring its contract administration program into compliance with Department standards. (Action: Embassy Brazzaville)

Embassy Failed to Compete Procurements in Accordance With Department Standards

The embassy did not properly compete procurements in accordance with Department standards and the FAR. OIG examined 5 purchase requests for cell phone services, from April 2021 through November 2023, totaling approximately \$550,000 and 12 purchase requests for bulk fuel, from October 2023 through May 2024, totaling more than \$300,000. OIG found:

- The embassy did not compete procurements in accordance with FAR 6.101.
- It did not justify its decisions to contract without full and open competition by citing the appropriate statutory authorities, in accordance with 14 FAH-2 H-225a-b.
- The embassy's documentation to support the purchase requests did not include the information required in FAR 6.303-2.

These deficiencies occurred because the embassy's contracting staff lacked knowledge of contract execution and administration. In addition, a lack of direct supervision and oversight of the LE staff exacerbated these deficiencies. Inadequate competition can result in excessive costs, misuse of U.S. government resources, and substandard contractor performance.

Recommendation 8: Embassy Brazzaville should compete its procurement actions in accordance with Department standards and federal regulations. (Action: Embassy Brazzaville)

²⁸ The Contractor Performance Assessment Reporting System is the government-wide evaluation reporting tool for all past performance reports on contracts and orders. An annual performance assessment must be completed in the system for each contract above the simplified acquisition threshold of \$250,000, according to Federal Acquisition Regulation 42.1502(a) and (b).

Motor Vehicle Policy Did Not Adhere to Department Requirements for Other Authorized Use of Embassy Vehicles

The embassy's motor vehicle policy, dated June 2023, did not comply with Department standards. Specifically, the motor vehicle policy allowed for other authorized use of embassy vehicles for transportation of non-official personnel, such as family and friends, to and from the airport on personal trips. However, 14 FAM 432.4(2) states that transport of non-official personnel is only allowed when public or commercial transportation options do not exist or are unsafe. Embassy staff, who were new to the embassy since the June 2023 update of the policy, told OIG they had not reviewed the policy, and they were unaware it allowed for non-official airport transportation. Despite the lack of evidence of any cases where embassy staff had used this service, allowing for it in the policy creates the possibility that official vehicles may be used for unofficial purposes.

Recommendation 9: Embassy Brazzaville should revise its motor vehicle policy to adhere to Department standards for other authorized use of U.S. government vehicles. (Action: Embassy Brazzaville)

Facility Management

Embassy Did Not Perform Workplace Hazard Inspections as Required

Embassy Brazzaville did not perform workplace hazard inspections as required. OIG found the last documented inspection of the embassy's low-risk workplaces was in 2021 and its high-risk workplaces in 2023. According to 15 FAM 962a, all low-risk workplaces must be inspected at least once a year, and all high-risk workplaces must be inspected at least twice a year. In addition, OIG found the embassy was not inspecting all its high-risk²⁹ workplaces. For example, the embassy did not have any documentation of hazard inspections of the warehouse, the mail screening facility, or the automotive shop. Furthermore, the embassy did not use the inspection checklist updated by OBO's Office of Safety, Health and Environmental Management in September 2022.³⁰ Staff told OIG they were not aware of all the workplace hazard inspection requirements and therefore had overlooked some of the inspection areas and timelines. Failure to perform regular workplace hazard inspections using the correct checklist increases the risk that some workplace hazards will not be identified and mitigated.

Recommendation 10: Embassy Brazzaville should perform workplace hazard inspections of both high-risk and low-risk workplaces in accordance with Department standards. (Action: Embassy Brazzaville)

²⁹ According to 15 FAM 962c, "high-risk activity involves the potential for serious injury, illness or fatality, or significant exposure to a physical, chemical, or biological hazard. This includes activities involving, but not limited to, construction, electrical work, work at heights above six feet, confined spaces, trenching or excavating, chemical use, materials storage and handling and maintenance work."

³⁰ For example, OBO's updated checklist for the automotive shop had prompts assessing automotive lift safety and the availability of personal protective equipment in the body shop.

Embassy's Swimming Pool Safety Program Did Fully Comply With Department Standards

The embassy's swimming pool safety program did not fully comply with Department standards. OIG found that, while the embassy performed safety inspections of all embassy swimming pools in August 2023, there was no evidence that the embassy resolved any of the deficiencies found during the inspections. Specifically, the inspections found deficiencies such as a lack of depth marking at the side of the pools, gates that were not self-locking, and wading pools that were not separated from the main pool. OIG found no documentation that these deficiencies were corrected. During the inspection, OIG examined all of the embassy's swimming pools and found several deficiencies, including latches on gates that were not working and gates propped open with furniture or rocks.

OBO's Office of Safety, Health, and Environmental Management established swimming pool safety standards, which are contained in 15 FAM 957.4, that define the minimum requirements for the protection and life safety of all pool users at Department-controlled properties. The standards also contain the swimming pool safety checklist that should be used to identify deficiencies and prioritize corrective actions. Embassy staff told OIG that they were aware of the deficiencies but had not had a chance to resolve them. Failure to correct deficiencies at embassy housing swimming pools puts employees and their families' lives and safety at risk.

Recommendation 11: Embassy Brazzaville should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brazzaville)

Embassy Lacked Post Occupational Safety and Health Officer Certifications for Some of Its Residential and Non-Residential Properties

Embassy Brazzaville lacked POSHO certifications for some of its residential and non-residential properties. OIG's analysis of the embassy's POSHO certification application data³¹ found 11 of the embassy's 23 residences had expired certifications of more than 30 days, and 1 residence had not been certified at all. In addition, three of the non-residential properties, including the employee association building, had expired certifications, and eight structures on the embassy compound, including the warehouse, had never been certified. According to 15 FAM 971b, the POSHO or their designated qualified representative must inspect all properties for safety, health, and environmental hazards. That officer must then certify in the POSHO certification application that those hazards have been effectively controlled or eliminated prior to the property being occupied. Additionally, Department standards in 15 FAM 971.4 state the POSHO must complete certifications prior to occupancy of a residence, and those certifications expire upon lease expiration or 5 years, whichever comes first. If a residence is to remain occupied after a certificate expires, a new POSHO certification must be completed within 30 days after the certificate's expiration. Embassy staff acknowledged to OIG that they were behind on the residential certification renewals and had overlooked the non-residential property certifications

³¹ The POSHO certification application generates and documents the form used by POSHOs to certify that a residence meets the requirements of 15 FAM 252.5. The form lists the safety requirements that must be certified prior to occupancy. The application allows relevant documentation to be electronically attached to the form.

as they were unaware that these structures needed to be certified. Failure to conduct the required safety and health certifications of all embassy residential and non-residential properties could lead to safety and health vulnerabilities for embassy staff.

Recommendation 12: Embassy Brazzaville should complete post occupational safety and health officer certifications for all its residential and non-residential properties in accordance with Department standards. (Action: Embassy Brazzaville)

Embassy Did Not Have a Watercraft Safety Program for Its Official Boats

The embassy did not have a watercraft safety program for its official boats. Specifically, the embassy did not have any published boat safety policies and guidelines related to its boat fleet nor did it perform any safety inspections of its watercraft. OIG found the embassy operated a fleet of two government-owned boats primarily for emergency evacuation purposes and for the transportation of travelers on official business between Kinshasa and Brazzaville. However, although the embassy included general information on the boat transportation program and use of embassy boats as part of its embassy-wide government vehicle use policy, the policy did not include any specific watercraft safety policies and guidelines. In a September 2023 memo to all facility and general services managers and a November 2023 newsletter to all POSHOs, OBO's Office of Safety, Health and Environmental Management released an updated generic post boating policy, which contained specific guidelines related to watercraft safety and a boat safety notice, for use by overseas posts. OIG found embassy staff did not review these safety guidelines nor had they communicated any boat safety policies or guidance information to embassy staff. In addition, OIG found the embassy did not perform any regular safety checks on its boats as required in the Office of Safety, Health and Environmental Management policy. Embassy management staff told OIG that this was overlooked because they were unaware of Department requirements. Failure to inform staff of, and enforce, watercraft safety and to perform regular safety checks on embassy watercraft increases the risk of accidents and fatalities.

Recommendation 13: Embassy Brazzaville should publish boat safety guidelines for its boat program and manage the program in accordance with Department standards. (Action: Embassy Brazzaville)

Embassy Used a Shipping Container as Functional Space Without Department Approval

The embassy used a shipping container as functional space without Department approval. OIG found the embassy converted one shipping container on the embassy compound into a functional space to serve as an office for the embassy's gardeners. On a walkthrough of the compound, OIG observed the space contained a desk, chairs, air conditioning, and electrical power installation. According to 15 FAM 644.2b, the Department does not support the use of shipping containers as occupied structures to accommodate functional space needs. In addition, 15 FAM 644.2a states that overseas posts must also obtain OBO approval and permit for any changes to relocatable structures, whether occupied or not, before they can be used for purposes other than their originally intended and authorized use. Embassy management staff

stated that they believed the space was used as storage for the gardeners and were unaware that the container was being used as functional office space. When OIG raised this issue, the embassy stated it planned to move the gardener's office to the warehouse. At the time of the inspection, the embassy had not yet done so. OIG issued an audit in September 2023 that found widespread unauthorized use of shipping containers by overseas posts.³² Unapproved shipping containers may not conform to Department building or fire codes and pose a safety risk for employees working in them or risk of damage to Department property.

Recommendation 14: Embassy Brazzaville, in coordination with the Bureau of Overseas Buildings Operations, should obtain authorization to use a shipping container as functional space or remove it in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with OBO)

Fire Protection Program Did Not Fully Comply With Department Standards

The embassy's fire protection program did not fully comply with Department standards. Specifically, OIG found that the embassy did not:

- Inspect its fire extinguishers monthly and record dates on the inspection tags. OIG checked the inspection tags on fire extinguishers posted on the embassy compound, in the warehouse, and in residences and found that many had missing inspection tags or did not show evidence they were inspected monthly as required in 15 FAM 843c and d.
- Perform monthly emergency lighting inspections as required in 15 FAM 844(a).
- Perform annual emergency egress inspections as required in 15 FAM 846.4.

Embassy staff told OIG they overlooked the requirements for both the monthly inspection on fire extinguishers and the inspection of the emergency lighting and emergency egress due to multiple competing priorities. Failure to regularly inspect fire extinguishers and perform other important inspections on emergency lighting and emergency egress risks safety and increases the likelihood of injury and loss of life.

Recommendation 15: Embassy Brazzaville should bring its fire protection program into compliance with Department standards. (Action: Embassy Brazzaville)

Embassy Did Not Provide Evidence That It Performed and Documented Periodic Maintenance of Its Water Distillers

The embassy did not provide evidence that it performed and documented periodic maintenance of its residential water distillers. According to 15 FAM 957.5, embassies must provide potable water that is microbiologically and chemically safe to drink at all Department facilities abroad, which is accomplished by periodically testing the water and ensuring that appropriate water treatment devices or systems are provided, used, and properly maintained.

³² OIG, *Audit of Physical Security Standards for Department of State Temporary Structures at Selected Overseas Posts* (AUD-SI-23-30, September 2023).

The OBO drinking water safety program guidance states that, to ensure drinking water remains reliably safe, the embassy must establish and follow a comprehensive operations and maintenance plan for supplemental treatment devices, including water distillers.

Embassy staff told OIG that although maintenance workers were performing maintenance on the distillers, staff could not provide any documentation showing the work had been performed or the frequency of the maintenance. Additionally, OIG noted that maintenance for the distillers had been scheduled in the Department's Global Maintenance Management System,³³ but it did not find any work orders or other documentation of the maintenance work being completed. Even following the embassy's coliform bacteria testing in March 2023, which returned positive results in the water at three embassy residences that were using water distillers, OIG found the embassy had not updated the maintenance schedule in the Global Maintenance Management System. Although OBO's drinking water safety program does not require periodic quality checks when using distillers for drinking water, because equipment breakdown can occur and because it is also possible to contaminate the reservoir tank or the water tap, in a January 2021 newsletter, OBO advised overseas posts to complete certain maintenance tasks monthly or bi-monthly to ensure that distillers are running well and are not a source of unsafe drinking water, especially if water quality is poor. However, Embassy Brazzaville did not document any of these periodic checks. Without the embassy regularly maintaining its water distillers and documenting that it has done so, embassy employees and family members are at risk of drinking water that is unsafe for human consumption.

Recommendation 16: Embassy Brazzaville should perform maintenance on its water distillers and document the work in accordance with Department standards. (Action: Embassy Brazzaville)

Human Resources

Local Compensation Plan Did Not Comply With Local Labor Law or Prevailing Practice

The embassy's local compensation plan (LCP)³⁴ for LE staff did not comply with local labor law or adhere to prevailing practice. Specifically, OIG found the LCP:

- Did not adhere to local labor law or prevailing practice on the payment of allowances during maternity leave.
- Did not adhere to local law or prevailing practice on separation, severance, or end-of-service and retirement benefits.

³³ The Global Maintenance Management System is a comprehensive facility management application that is designed to, among other tasks, record sustainment, restoration, and improvement activities to include work requests processing and preventive maintenance.

³⁴ A local compensation plan forms the legal basis for all salary, bonus, and other payments to LE staff under guidelines in 3 FAM 7521.

- Included a reduction-in-force policy, contrary to 17 STATE 83954,³⁵ which requires that LCPs not include reduction-in-force policies.
- Did not align with prevailing practice on payment of a 13-month bonus.
- Did not align with prevailing practice on rates of overtime pay, education allowances for children of LE staff, and employees contributing to medical insurance premiums.

Standards in 3 FAM 7224.2-1a require that LCPs conform as closely as feasible to local law and prevailing practice but be based on and administered in accordance with U.S. laws and regulations. The embassy acknowledged the current LCP, which was last revised in October 2023 specifically to reflect an exceptional increase in LE staff salaries, was not thoroughly reviewed at that time or annually as required by 3 FAH-2 H-131.3a(1). Human resources staff told OIG they sent a cable to the Bureau of Global Talent Management's Office of Overseas Employment in February 2020 requesting numerous revisions to the LCP but were unable to finalize the process due to the embassy previously not having a Human Resources Officer and challenges presented during the COVID-19 pandemic. Without an updated LCP, LE staff may not receive the benefits to which they were entitled, and the embassy may not be compliant with local labor law.

Recommendation 17: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the embassy's local compensation plan in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

Locally Employed Staff Handbook Contained Outdated Information

Embassy Brazzaville last updated its LE staff handbook in December 2023, but OIG found the handbook contained inaccurate information. For example, information on LE staff promotion eligibility contradicted guidance in 3 FAM 7374; the sick leave and special leave sections reference employees with 60-hour workweek schedules, which the embassy no longer has; and the handbook includes information on other authorized use of official vehicles that is not applicable to LE staff. Department standards in 3 FAM 7155a require each overseas post to develop and maintain an LE staff handbook that documents the embassy's LE staff employment policies and procedures, as well as LE staff responsibilities and expected conduct. Human resources staff told OIG they were unaware that the handbook contained outdated and inaccurate information. Absent an updated handbook with accurate policies and procedures, LE staff may receive erroneous information about the benefits to which they are entitled, and the risk of litigation may increase for the Department.

Recommendation 18: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

³⁵ Cable 17 STATE 83954, "Revisions to HR O/E Policies (1) Substituting Experience for Education; (2) Priority Placement; (3) Reduction in Force (RIF)," August 14, 2017.

Locally Employed Staff Position Descriptions Did Not Comply With Department Standards

Embassy Brazzaville did not review LE staff position descriptions for accuracy as required by Department standards. Based on discussions with human resources staff and a review of position descriptions, OIG found 52 positions had yet to be classified in accordance with Department standards via a regional classification center.³⁶ Of those positions that had been classified, OIG reviewed 10 LE staff position descriptions and found that 9 had not been classified in accordance with Department standards. OIG also observed that one position description that provided the grade and work responsibilities for approximately 115 LE staff positions was classified at a grade below the standard position description issued in 2020 by the Bureau of Global Talent Management's Office of Overseas Employment. This may have resulted in lower salaries paid to these employees.

According to 3 FAM 7313.1(4), supervisors of LE staff are responsible for ensuring that position descriptions adequately and accurately reflect assigned duties and responsibilities. Human resources staff told OIG that although human resources staff reminded supervisors monthly of pending position descriptions requiring reclassification, supervisors often did not have time to review or reclassify positions due to heavy workloads and competing priorities. Inaccurate position descriptions can directly affect LE staff members' level of compensation.

Recommendation 19: Embassy Brazzaville should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Brazzaville)

Locally Employed Staff's Annual Performance Evaluations Were Not Completed on Time

Embassy Brazzaville did not complete all LE staff performance evaluations on time in accordance with Department standards. These evaluations are the basis for processing within grade salary step increases and for determining eligibility for recruitment in other positions. As of May 2024, the embassy reported more than 30 late LE staff performance evaluations.³⁷ In accordance with 3 FAH-2 H-135.5a(2), supervisors are required to submit LE staff evaluations by the date established in the embassy's annual rating cycle. Embassy Brazzaville human resources staff reminded supervisors of their responsibility to submit timely performance evaluations, but managers did not hold their supervisors accountable to this requirement. Delays in preparing, submitting, and processing performance evaluations could have financial repercussions, affect promotion prospects, and negatively impact morale for the LE staff.

Recommendation 20: Embassy Brazzaville should require supervisors to complete locally employed staff performance evaluations on time and hold supervisors accountable for noncompliance. (Action: Embassy Brazzaville)

³⁶ Classifiers at each bureau's regional classification centers use the Mission Classification System, or MClass, software to analyze and grade overseas LE staff and eligible family member positions.

³⁷ From December 2023 through May 2024, 94 LE staff performance evaluations were due. Of these, more than 30 were not completed on time.

Financial Management

Embassy Did Not De-Obligate Unliquidated Obligations in a Timely Manner

The embassy did not de-obligate its unliquidated obligations in a timely manner. OIG found that, as of May 2024, the embassy had approximately \$3.65 million in unliquidated obligations, of which approximately \$1.26 million had no activity for more than 1 year. According to Department standards in 4 FAM 225d, unliquidated obligations with no activity for more than 1 year must be targeted and de-obligated if they cannot be documented as valid obligations. OIG determined the embassy did not have a specific process to validate unliquidated obligations with no activity for more than 1 year. Failure to review and de-obligate unliquidated obligations in a timely manner results in an accumulation of funds that could be put to better use.

Recommendation 21: Embassy Brazzaville should review and de-obligate all unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so that funds of up to \$1.26 million can be put to better use. (Action: Embassy Brazzaville)

Recommendation 22: Embassy Brazzaville should establish and implement standard operating procedures to review and de-obligate unliquidated obligations in accordance with Department standards. (Action: Embassy Brazzaville)

Embassy Did Not Send Receipts From the Sale of Fuel for Privately Owned Vehicles to Treasury

The embassy did not send receipts from the sale of fuel for use in privately owned vehicles to the U.S. Treasury as required. OIG found the embassy allowed U.S. direct-hire employees to purchase embassy fuel for their privately owned vehicles. The embassy retained the collections and reimbursed International Cooperative Administrative Support Services (ICASS)³⁸ funds rather than forwarding the funds to the U.S. Treasury. The miscellaneous receipts statute in 31 U.S. Code § 3302(b) requires an official or agent of the government to deposit money received for the government from any source into the miscellaneous receipts account of the U.S. Treasury if the retention of the money is not authorized. At the time of the inspection, the embassy had no specific statutory authority to retain these collections. Fuel for privately owned vehicles is a personal expense and, in the absence of specific statutory authority, appropriated funds are not legally available to cover the cost of fuel for privately owned vehicles. Embassy staff told OIG that they did not forward these funds to the U.S. Treasury as this would negatively affect their ICASS fuel budget. However, by retaining the funds for personal fuel sales and not returning the funds to the U.S. Treasury as miscellaneous receipts, the U.S. government is not receiving the funds it is due.

³⁸ The International Cooperative Administrative Support Services, or ICASS, is the principal means by which U.S. government agencies share the cost of common administrative support services at most 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.

Recommendation 23: Embassy Brazzaville should send its miscellaneous receipts from the sale of fuel to privately owned vehicles to the U.S. Treasury, as required by law. (Action: Embassy Brazzaville)

Embassy Did Not Close Out Salary Advances as Required

OIG found that as of May 2024, Embassy Brazzaville had four open salary advances from 2019 through 2021. According to 21 STATE 110976,³⁹ employees must sign a written agreement to repay salary advances in full or through regular payroll deductions over a period not to exceed 26 pay periods, which is 1 year. The embassy can deduct the amount from an employee's end of service benefits if that employee leaves employment for any reason prior to repaying the advance in full. Repayment of salary advances are to begin in the first pay period following receipt of the advance. Embassy staff told OIG the overdue salary advances occurred because U.S. direct-hire managers did not ensure that a staff member was tracking the outstanding advances. Overdue salary advances represent a loss of funds to the Department if they remain uncollected.

Recommendation 24: Embassy Brazzaville should track outstanding salary advances and close out overdue salary advances in accordance with Department guidelines. (Action: Embassy Brazzaville)

Embassy Did Not Manage Official Residence Expenses in Accordance With Department Standards

The embassy did not manage its official residence expenses (ORE) in accordance with Department standards. Specifically, OIG found:

- The embassy did not have an ORE policy or handbook, as required by Department of State Standardized Regulations, Section 455, which outlines the need for compliance with Department policies and conveyed benefits and expectations to ORE staff.
- The Ambassador's and DCM's salary contributions were not revised to generate salary increases for ORE staff following pay raises for the Ambassador and the DCM in 2023 and 2024, as required by 3 FAM 3253.1 and 3 FAM 3254a.
- The embassy did not conduct annual reconciliations of ORE expenses, as prescribed in Department of State Standardized Regulations, Section 455.

OIG found embassy management staff had a general lack of understanding of the ORE program, including an unawareness of the Department's regulations governing ORE allowances. Failure to adhere to Department standards on the management of ORE allowances, including not implementing documented processes and adequate financial and internal controls, may increase the potential risks of litigation for the Department and mismanagement of ORE allowances.

³⁹ Cable 21 STATE 110976, "Locally Employed (LE) Staff: Blanket Authorization to Implement Salary Advance Plans," November 2, 2021.

Recommendation 25: Embassy Brazzaville should manage its official residence expenses in accordance with Department standards. (Action: Embassy Brazzaville)

INFORMATION MANAGEMENT

OIG reviewed Embassy Brazzaville's diplomatic technology (DT) operations, including unclassified and non-enterprise network⁴⁰ computer operations; physical and environmental protection of IT resources; mobile devices management; emergency communications preparedness; telephone programs; and pouch and mail. OIG determined the embassy's DT operations generally complied with Department standards. However, the two U.S. direct-hire DT officers who staffed the unit departed Embassy Brazzaville just before the onsite portion of the inspection.⁴¹ The deficiencies OIG describes below occurred during the tenure of the two DT officers.

Information Systems Security Officers Did Not Perform All Required Duties

Embassy Brazzaville's designated primary and alternate Information Systems Security Officers (ISSO) did not perform ISSO duties for classified, OpenNet,⁴² and non-enterprise networks. Specifically, OIG found the ISSOs did not:

- Review user access controls annually to verify if access was still needed or had been updated (12 FAH-10 H-112.1-3b and c).
- Brief users on cybersecurity responsibilities prior to granting access to information systems (12 FAH-10 H-212.1-3).
- Review audit logs for security violations or unusual activities (5 FAM 724c1).
- Review security audits regularly, along with a risk assessment, to identify and quantify all potential threats and exposures (5 FAM 731f).

Additionally, the designated ISSOs did not have the required ISSO administrative accounts to perform their duties.⁴³ The DT unit chief told OIG the primary ISSO did not receive ISSO training in new hire orientation on methods for completing ISSO duties before arriving at the embassy. OIG issued management assistance reports in May 2017 and December 2020 that highlighted

⁴⁰ A non-enterprise network is a Department-procured and locally managed computing environment. Non-enterprise networks are used by a specific entity to meet their mission requirements that cannot be achieved using an enterprise managed solution.

⁴¹ OIG was able to interview one of the DT officers, the DT unit chief, remotely after his departure from the embassy.

⁴² OpenNet is the Department's Sensitive But Unclassified network.

⁴³ ISSOs are required to use ISSO accounts to maintain separation of ISSO functions from systems management duties. According to the National Institute of Standards and Technology (NIST), separation of duties includes "ensuring that security personnel who administer access control functions do not also administer audit functions." See NIST Special Publication 800-53, revision 5, "Security and Privacy Controls for Information Systems and Organizations," page 36 (September 2020).

widespread Department failures to perform ISSO duties.⁴⁴ Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 26: Embassy Brazzaville should complete all information systems security officer responsibilities in accordance with Department standards. (Embassy Brazzaville)

Embassy Brazzaville Did Not Have an Operational High-Frequency Radio

Embassy Brazzaville did not have an operational high-frequency radio. OIG observed that the embassy last connected successfully with net control⁴⁵ at Embassy Yaoundé, Cameroon on March 22, 2022. Department standards in 5 FAM 541c require overseas posts to test radio networks at a minimum monthly. Because the embassy's U.S. direct-hire DT officer positions were vacant at the time of the inspection, OIG attempted to connect the radio with net control in Yaoundé. However, the effort was unsuccessful. A nonfunctioning high-frequency radio puts the safety and security of embassy staff and family members at risk in the event of an emergency.

Recommendation 27: Embassy Brazzaville should repair its high-frequency radio and conduct monthly checks in accordance with Department standards. (Action: Embassy Brazzaville)

Embassy Did Not Have a Functioning Local Information Technology Configuration Control Board

Embassy Brazzaville did not have a functioning local Information Technology Configuration Control Board (ITCCB). According to 5 FAM 862.1d, a local ITCCB is required to ensure that locally procured hardware and software do not adversely affect the Department's and embassy's information security. The board helps the embassy identify, secure, and manage the lifecycle of IT software and hardware unique to the embassy. The embassy was prepared to submit and register an ITCCB, but it did not have a U.S. direct-hire DT officer on staff to submit the application. Without a local ITCCB, the DT unit cannot inform users of configuration control requirements and manage risks on the Department's network.

Recommendation 28: Embassy Brazzaville should establish and register a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Brazzaville).

⁴⁴ OIG, Management Assistance Report: *Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017) and Management Assistance Report: *Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

⁴⁵ Net control is a regional point of contact in Embassy Yaoundé to test high frequency radios for connectivity.

Embassy's Records Management Program Did Not Comply With Department Standards

OIG found Embassy Brazzaville's records management program did not follow Department standards in 5 FAH-4 H-312.1 and 5 FAH-4 H-312.2 for records oversight and retirement. The embassy archived Front Office paper records from 1990 to 2022, but OIG discovered several boxes of Political-Economic Section and human resources records in the warehouse that had not been archived. OIG determined the DT unit, as the records coordinator, did not prioritize records management. OIG issued management assistance reports in September 2020 and June 2022 that highlighted deficiencies in records management, including records retirement, across the Department.⁴⁶ Without a records management program that complies with Department requirements for organization, records retirement disposition, and oversight, the embassy risks inefficient information retrieval and loss of critical documentation.

Recommendation 29: Embassy Brazzaville should implement a records management program that complies with Department standards. (Action: Embassy Brazzaville)

⁴⁶ OIG, *Management Assistance Report: Deficiencies in Overseas Records Management* (ISP-20-25, September 2020); and OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022)

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 Brazzaville. The embassy's complete responses can be found in Appendix B. The embassy also provided technical comments that were incorporated into the report, as appropriate.

Recommendation 1: Embassy Brazzaville, in coordination with the Bureau of Democracy, Human Rights, and Labor and the Bureau of African Affairs, should bring its Leahy vetting practices into compliance with the embassy's standard operating procedures and Department guidance. (Action: Embassy Brazzaville, in coordination with DRL and AF)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation. The embassy stated it made changes to its Leahy vetting process to include Department of Defense checks and to note when those checks were not needed. Additionally, the embassy noted it will update its standard operating procedures to reflect these changes.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville updated its standard operating procedures and brought its Leahy vetting practices into compliance with Department guidance.

Recommendation 2: Embassy Brazzaville should document public diplomacy grants in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville documented its public diplomacy grants in accordance with Department standards.

Recommendation 3: Embassy Brazzaville, in coordination with the Bureau of Consular Affairs, Bureau of Diplomatic Security, and the Bureau of Overseas Buildings Operations, should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Brazzaville, in coordination with CA, DS, and OBO)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation. However, the embassy noted there does not appear to be space to provide consular applicants with a waiting area that meets Department standards. Embassy Brazzaville stated it does not have a dedicated consular compound access control, there is limited space in front of the main compound access control to provide a suitable waiting area, and it is not feasible to expand the internal waiting area, located in the embassy's main lobby.

The embassy notes it is working with the Bureaus of Overseas Building Operations, Consular Affairs, and Diplomatic Security to finalize a design plan and execute construction of a waiting area external to the main compound access control. Due to space and security constraints, the proposed design does not provide more space than the tent in current use. If the design is approved in FY 2025, the embassy anticipates construction in FY 2026.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville, in coordination with the Bureau of Consular Affairs and the Bureau of Overseas Buildings Operations, provided consular applicants with a waiting area that either meets Department standards or a Department-approved design.

Recommendation 4: Embassy Brazzaville should implement a process to regularly review and update its management policies. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville implemented a process to regularly review and update its management policies.

Recommendation 5: Embassy Brazzaville should submit the per diem, post hardship differential, and education allowance surveys in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville submitted the per diem, post hardship differential, and education allowance surveys in accordance with Department standards.

Recommendation 6: Embassy Brazzaville should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville's furniture and appliance pool program complied with Department standards.

Recommendation 7: Embassy Brazzaville should bring its contract administration program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

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

Recommendation 8: Embassy Brazzaville should compete its procurement actions in accordance with Department standards and federal regulations. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville competed its procurement actions in accordance with Department standards and federal regulations.

Recommendation 9: Embassy Brazzaville should revise its motor vehicle policy to adhere to Department standards for other authorized use of U.S. government vehicles. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville revised its motor vehicle policy to adhere to Department standards for other authorized use of U.S. government vehicles.

Recommendation 10: Embassy Brazzaville should perform workplace hazard inspections of both high-risk and low-risk workplaces in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville performed workplace hazard inspections of both high-risk and low-risk workplaces in accordance with Department standards.

Recommendation 11: Embassy Brazzaville should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville's swimming pool safety program complied with Department standards.

Recommendation 12: Embassy Brazzaville should complete post occupational safety and health officer certifications for all its residential and non-residential properties in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville completed post occupational safety and health officer certifications for all its residential and non-residential properties in accordance with Department standards.

Recommendation 13: Embassy Brazzaville should publish boat safety guidelines for its boat program and manage the program in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville published boat safety guidelines for its boat program and managed the program in accordance with Department standards.

Recommendation 14: Embassy Brazzaville, in coordination with the Bureau of Overseas Buildings Operations, should obtain authorization to use a shipping container as functional space or remove it in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with OBO)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation. The embassy noted it is in the process of moving the gardeners out of the shipping container and construction work has begun for a new gardener space in the warehouse, with estimated completion by the end of December 2024.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville ceased using a shipping container as functional office space and moved the gardeners into a new office space.

Recommendation 15: Embassy Brazzaville should bring its fire protection program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

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

Recommendation 16: Embassy Brazzaville should perform maintenance on its water distillers and document the work in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville performed maintenance on its water distillers and documented the work in accordance with Department standards.

Recommendation 17: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the embassy's local compensation plan in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville updated its local compensation plan in accordance with Department standards.

Recommendation 18: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville updated the locally employed staff handbook in accordance with Department standards.

Recommendation 19: Embassy Brazzaville should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville reviewed and revised locally employed staff position descriptions and classified them in accordance with Department standards.

Recommendation 20: Embassy Brazzaville should require supervisors to complete locally employed staff performance evaluations on time and hold supervisors accountable for noncompliance. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville required supervisors to complete locally employed staff performance evaluations on time and held supervisors accountable for noncompliance.

Recommendation 21: Embassy Brazzaville should review and de-obligate all unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so that funds of up to \$1.26 million can be put to better use. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville reviewed and de-obligated all unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so that funds of up to \$1.26 million can be put to better use.

Recommendation 22: Embassy Brazzaville should establish and implement standard operating procedures to review and de-obligate unliquidated obligations in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville established and implemented standard operating procedures to review and de-obligate unliquidated obligations in accordance with Department standards.

Recommendation 23: Embassy Brazzaville should send its miscellaneous receipts from the sale of fuel to privately owned vehicles to the U.S. Treasury, as required by law. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024,¹ response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville sent its miscellaneous receipts from the sale of fuel to privately owned vehicles to the U.S. Treasury, as required by law.

Recommendation 24: Embassy Brazzaville should track outstanding salary advances and close out overdue salary advances in accordance with Department guidelines. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville tracked outstanding salary advances and closed out overdue salary advances in accordance with Department guidelines.

Recommendation 25: Embassy Brazzaville should manage its official residence expenses in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville managed its official residence expenses in accordance with Department standards.

¹ On November 21, 2024, Embassy Brazzaville provided an updated response to Recommendation 23, which was incorporated into the management response in Appendix B.

Recommendation 26: Embassy Brazzaville should complete all information systems security officer responsibilities in accordance with Department standards. (Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville disagreed with this recommendation. The embassy noted it now has two permanent Diplomatic Technology staff who have received information systems security officer (ISSO) training, are designated ISSOs, and will ensure the required duties are documented.

OIG Reply: OIG considers the recommendation resolved. OIG acknowledges that after the inspection, two permanent Diplomatic Technology staff, who are designated ISSOs, were assigned to the embassy. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville completed all information systems security officer responsibilities in accordance with Department standards.

Recommendation 27: Embassy Brazzaville should repair its high-frequency radio and conduct monthly checks in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville repaired its high-frequency radio and conducted monthly checks in accordance with Department standards.

Recommendation 28: Embassy Brazzaville should establish and register a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Brazzaville).

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Brazzaville established and registered a local Information Technology Configuration Control Board in accordance with Department standards.

Recommendation 29: Embassy Brazzaville should implement a records management program that complies with Department standards. (Action: Embassy Brazzaville)

Management Response: In its November 15, 2024, response, Embassy Brazzaville concurred with this recommendation.

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

PRINCIPAL OFFICIALS

Agency/Section/Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Eugene Young	2/2022
Deputy Chief of Mission	Bisola Ojikutu	8/2022
Chiefs of Sections:		
Consular	Keith Murphy	7/2022
Management	Brian Kressin	7/2023
Political-Economic	Emily Narkis	7/2022
Public Affairs	Eric Elliott	9/2023
Regional Security	Ryan Houck	8/2022
Other Agency Representatives:		
Centers for Disease Control and Prevention	Reena Doshi	4/2023
Office of Security Cooperation	MAJ Joseph Wilhelm ^a	7/2023
Senior Defense Official/Defense Attaché	LTC Chad Brinton ^b	2/2024
U.S. Agency for International Development	Antoine Eyebe	2/2022

^a MAJ Wilhelm was assigned to Embassy Brazzaville but also supported Embassy Kinshasa.

^b LTC Brinton was dually accredited to the Democratic Republic of the Congo and the Republic of the Congo and assigned to Embassy Kinshasa.

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from March 18 to August 20, 2024, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections 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

OIG used a risk-based approach to prepare for this inspection. OIG conducted portions of the inspection remotely and relied on audio- and video-conferencing tools in addition to in-person interviews with Department and other personnel. OIG also reviewed pertinent records; circulated surveys and compiled the results; and discussed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the inspection. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE



Embassy of the United States of America

Brazzaville, Republic of Congo
November 15, 2024

UNCLASSIFIED

TO: OIG – Arne Baker, Assistant Inspector General for Inspections

FROM: U.S. Embassy Brazzaville, Ambassador Eugene Young

SUBJECT: Response to Draft OIG Report – U.S. Embassy Brazzaville

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

Recommendation 1: Embassy Brazzaville, in coordination with the Bureau of Democracy, Human Rights, and Labor and the Bureau of African Affairs, should bring its Leahy vetting practices into compliance with the embassy’s standard operating procedures and Department guidance. (Action: Embassy Brazzaville, in coordination with DRL and AF)

Political Section Response: Embassy Brazzaville concurs with the recommendation and will add DoD as a default post vetting section in INVESTc. Going forward, DoD will run checks for DoD-funded assistance as well as State/other funded assistance to military forces and POL will input those results into INVESTc on behalf of DoD, and for non-DoD assistance/forces Post will input a batch note stating that DoD/DATT checks were not completed because it is not DoD-related. Post will update its vetting SOP to reflect the change. It is important to note that the Defense Attache Office for Brazzaville is resident in Kinshasa. Right-sizing Brazzaville to include a resident Defense Attache Office would improve output in this area and strengthen mil to mil cooperation with a country in a strategic regional location.

Recommendation 2: Embassy Brazzaville should document public diplomacy grants in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation but notes that the FY24 grants were all issued during a four-month gap without a permanent Public Affairs Officer to provide consistent oversight of the process. This finding is representative of the larger structural problem of having only a single PD officer to manage the section. Although the PDS has already implemented procedures to ensure it documents grants in accordance with

Department standards, this and similar problems, risk reoccurring the next time there is an extended period without a PAO unless Embassy Brazzaville receives a second PD officer.

Recommendation 3: In the absence of a proper consular CAC and a separate indoor waiting area due to original design flaws, Embassy Brazzaville, in coordination with the Bureau of Consular Affairs and the Bureau of Overseas Buildings Operations, should provide consular applicants with a waiting area that meets Department standards. (Action: Embassy Brazzaville, in coordination with CA and OBO)

Management Response: Embassy Brazzaville concurs with the recommendation, but there does not appear to be space to do so. It is important to note that prior to 2022, there was no covered waiting area for consular applicants outside the embassy grounds. Post does not have a dedicated Consular CAC, there is limited outside space in front of the Main CAC to provide a suitable waiting area, and it is not feasible to expand the internal waiting area, which is located in the Embassy's main lobby in front of Post One (there is no separate consular waiting area). As adding a dedicated CAC with direct access into the Consular Section is likely not feasible in the near term, the embassy is working with Overseas Building Operations (OBO), Consular Affairs (CA), and Diplomatic Security (DS) to finalize a design plan and execute construction of a waiting area external to the main CAC that meets Department standards for applicants per 7 FAH-1 H-281a. Due to space and security constraints, the proposed design does not provide more space than the tent in current use. If the design is approved in FY2025, final construction would be anticipated in FY2026.

Recommendation 4: Embassy Brazzaville should implement a process to regularly review and update its management policies. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will implement a process to regularly review and update its management policies.

Recommendation 5: Embassy Brazzaville should submit the per diem, post hardship differential, and education allowance surveys in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will submit the per diem, post hardship differential, and education allowance surveys in accordance with Department standards. Note that Post could not fill its CLO position between May 2023 and May 2024.

Recommendation 6: Embassy Brazzaville should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will bring its furniture and appliance pool program into compliance with Department standards.

Recommendation 7: Embassy Brazzaville should bring its contract administration program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will work to bring its COR program into compliance.

Recommendation 8: Embassy Brazzaville should complete its procurement actions in accordance with Department standards and federal regulations. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will bring its contract administration program into compliance with Department standards.

Recommendation 9: Embassy Brazzaville should revise its motor vehicle policy to adhere to Department standards for other authorized use of U.S. government vehicles. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will revise its motor vehicle policy to adhere to Department standards for other authorized use of U.S. government vehicles.

Recommendation 10: Embassy Brazzaville should perform workplace hazard inspections of both high-risk and low-risk workplaces in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will properly document its workplace inspections in accordance with Department standards.

Recommendation 11: Embassy Brazzaville should bring its swimming pool safety program into compliance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will ensure that its swimming pool safety program is in compliance with Department standards.

Recommendation 12: Embassy Brazzaville should complete post occupational safety and health officer certifications for all its residential and non-residential properties in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will ensure that its POSHO inspections are completed and properly posted in the SHEM website in accordance with Department standards.

Recommendation 13: Embassy Brazzaville should publish boat safety guidelines for its boat program and manage the program in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation. This is in progress.

Recommendation 14: Embassy Brazzaville, in coordination with the Bureau of Overseas Buildings Operations, should obtain authorization to use a shipping container as functional space or remove it in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with OBO)

Management Response: Embassy Brazzaville concurs with the recommendation and is working to move the gardeners out of the shipping container and into new space arranged for them in the warehouse. Construction work has begun and the new gardener space in the warehouse should be finished by the end of December 2024.

Recommendation 15: Embassy Brazzaville should bring its fire protection program into compliance with Department standards and OBO, in conjunction with Embassy Brazzaville, should begin the replacement of the obsolete chancery fire detection/alarm system. (Action: Embassy Brazzaville, OBO)

Management Response: Embassy Brazzaville concurs with the recommendation and will ensure that its fire protection program is in compliance with Department standards. The OBO team that will begin the replacement of the obsolete chancery fire detection/alarm system that is behind schedule will arrive in November 2024.

Recommendation 16: Embassy Brazzaville should perform maintenance on its water distillers and document the work in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will that it will document and perform maintenance on its water distillers in accordance with Department standards.

Recommendation 17: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the embassy's local compensation plan in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

Management Response: Embassy Brazzaville concurs with the recommendation and has tried to make the requested updates in coordination with GTM. The embassy requested that GTM inform Post which updates will be allowed and is still waiting for a response. GTM did inform post that the embassy must wait until the CY 2025 full comprehensive review before they will review the 13-month bonus.

Recommendation 18: Embassy Brazzaville, in coordination with the Bureau of Global Talent Management, should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Brazzaville, in coordination with GTM)

Management Response: Embassy Brazzaville concurs with the recommendation and has tried to make the requested updates in coordination with GTM. The embassy requested that GTM inform Post which updates will be allowed and is still waiting for a response. GTM did inform post that the embassy must wait until the CY 2025 full comprehensive review before they will review the 13-month bonus.

Recommendation 19: Embassy Brazzaville should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will review and revise locally employed staff position descriptions and classify them in accordance with Department standards.

Recommendation 20: Embassy Brazzaville should require supervisors to complete locally employed staff performance evaluations on time and hold supervisors accountable for noncompliance. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will put policies into place to require supervisors to complete LE staff performance evaluations on time and to hold supervisors accountable for noncompliance.

Recommendation 21: Embassy Brazzaville should review and de-obligate all unliquidated obligations without activity for more than 1 year, in accordance with Department standards, so that funds of up to \$1.26 million can be put to better use. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and since our FMO, Embassy Brazzaville's first FMO ever, arrival in April 2023 Embassy Brazzaville has been able to de-obligate over \$1.3 million worth of ULOs. Now that we have a full-time FMO, Embassy Brazzaville will be able to properly track and de-obligate ULOs.

Recommendation 22: Embassy Brazzaville should establish and implement standard operating procedures to review and de-obligate unliquidated obligations in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and since our FMO, Embassy Brazzaville's first FMO ever, arrival in April 2023 Embassy Brazzaville has been able to de-obligate over \$1.3 million worth of ULOs. Now that we have a full-time FMO, Embassy Brazzaville has implemented proper procedures to review and de-obligate ULOs in accordance with Department standards.

Recommendation 23: Embassy Brazzaville should send its miscellaneous receipts from the sale of fuel to privately owned vehicles to the U.S. Treasury, as required by law. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will send its miscellaneous receipts from the sale of fuel to privately owned vehicles to the U.S. Treasury.

Recommendation 24: Embassy Brazzaville should track outstanding salary advances and close out overdue salary advances in accordance with Department guidelines. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will establish a system to better track outstanding salary advances and close out overdue salary advances in accordance with Department guidelines.

Recommendation 25: Embassy Brazzaville should manage its official residence expenses in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with the recommendation and will review and update how it manages its official residence expenses.

Recommendation 26: Embassy Brazzaville should complete all information systems security officer responsibilities in accordance with Department standards. (Embassy Brazzaville)

Management Response: Embassy Brazzaville does not concur with this recommendation. Post now has its two permanent DT employees (a DTO and a DTC) and both have ISSO training and are designated ISSOs, and they will ensure that the required duties are documented. The situation that caused this recommendation was related to the availability of personnel beyond the control of post. That is the only reason and is fully resolved therefore post suggests removal of the recommendation.

Recommendation 27: Embassy Brazzaville should repair its high-frequency radio and conduct monthly checks in accordance with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with this recommendation. Post now has its two permanent DT employees (a DTO and a DTC) and are working to repair our high-frequency radio and conduct monthly checks.

Recommendation 28: Embassy Brazzaville should establish and register a local Information Technology Configuration Control Board in accordance with Department standards. (Action: Embassy Brazzaville).

Management Response: Embassy Brazzaville concurs with this recommendation and will establish and register a local Information Technology Configuration Control Board in accordance with Department standards.

Recommendation 29: Embassy Brazzaville should implement a records management program that complies with Department standards. (Action: Embassy Brazzaville)

Management Response: Embassy Brazzaville concurs with this recommendation. Post now has its two permanent DT employees (a DTO and a DTC) and they will establish a records management program for post.

ABBREVIATIONS

CO	Contracting Officer
COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DoD	Department of Defense
DT	Diplomatic Technology
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAP	Furniture and Appliance Pool
FAR	Federal Acquisition Regulation
FAST	First- and Second-Tour
ICASS	International Cooperative Administrative Support Services
ILMS	Integrated Logistics Management System
ISSO	Information Systems Security Officer
ITCCB	Information Technology Configuration Control Board
LCP	Local Compensation Plan
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations
ORE	Official Residence Expenses
POSHO	Post Occupational Safety and Health Officer
USAID	U.S. Agency for International Development



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