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Office of Inspector General  
United States Department of State

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ISP-I-25-14

Office of Inspections

June 2025

# Inspection of Embassy Lusaka, Zambia

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-25-14

## What OIG Inspected

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

## What OIG Recommends

OIG made 32 recommendations to Embassy Lusaka. In its comments on the draft report, the embassy concurred with 30 recommendations and neither agreed nor disagreed with 2 recommendations. OIG considers all 32 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.

June 2025

OFFICE OF INSPECTIONS

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## Inspection of Embassy Lusaka, Zambia

### What OIG Found

- The Ambassador and Deputy Chief of Mission generally led Embassy Lusaka consistent with the Department of State's leadership and management principles.
- The embassy had morale issues with its locally employed staff, attributed to the aftermath of its 2023 fraud investigation that resulted in terminating, suspending, or reprimanding 135 staff members.
- Extended power outages and other hardships in Zambia also affected locally employed staff, and embassy leadership took action to alleviate the impact of the hardships on those staff.
- Public diplomacy efforts were well integrated and supported the embassy's Integrated Country Strategy goals, but the Public Diplomacy Section did not document its administration of grants in accordance with requirements.
- The Consular Section did not process nonimmigrant and immigrant visa cases, conduct visa validation studies, and implement consular internal controls in full compliance with Department standards.
- The embassy's financial management office did not track employee accounts receivable for approximately 5 years and did not have a process to ensure the funds overpaid or advanced to employees were repaid to the government as required.
- Embassy Lusaka's property management program, fuel operations, cashier operations, and contracting officer's representative program did not fully comply with Department standards.
- The embassy's information management and information security operations, including network operations, non-enterprise networks, telephone program, emergency preparedness, and cybersecurity operations, did not fully comply with Department standards.

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## CONTEXT



**Figure 1:** Geopolitical map of Zambia (Source: 2024 Encyclopedia Britannica, Inc.).

Zambia is a landlocked country in southern Africa that borders eight countries.<sup>1</sup> Its estimated population of 20.8 million is expected to double by 2049. Zambia has one of the highest levels of urbanization in Africa, with almost half its population concentrated in urban areas.

The U.S. government established diplomatic relations with Zambia in 1964, following its independence from the United Kingdom. Founding president Kenneth Kaunda bridged rivalries among the country's regions and ethnic groups to unify Zambia, which has remained one of the most peaceful nations in the region. In 1991, Zambia transitioned from single-party rule

to a multiparty democracy. The country's president, Hakainde Hichilema, was elected in 2021 on a mandate to revive the economy following a sovereign debt default in 2020 and to reduce corruption, which remains a public concern.

Zambia has a poverty level of more than 75 percent in rural areas. Its economy is driven by copper mining and exports. The copper sector accounts for about 70 percent of Zambia's export earnings and about one-third of government revenue. Zambia is currently the seventh-largest copper producer in the world. However, a shortage of electricity generation capacity and overreliance on hydroelectric power limit the potential for growth in the mining sector. In addition, Zambia's agricultural production in 2024 suffered under a prolonged drought, which reduced local food supply, increased inflation, and caused extended power outages.

From FY 2021 through FY 2023, the United States provided more than \$1.5 billion in foreign assistance to Zambia, focused on HIV/AIDS and health, peace and security, economic growth, education, and democracy and governance. U.S. foreign assistance to Zambia is primarily implemented through the U.S. Agency for International Development (USAID), the Centers for Disease Control and Prevention, and the Department of State (Department). Zambia is eligible

<sup>1</sup> Zambia borders Angola, Botswana, the Democratic Republic of the Congo, Malawi, Mozambique, Namibia, Tanzania, and Zimbabwe.

for preferential tariff treatment under the African Growth and Opportunity Act.<sup>2</sup> In 2023, U.S. trade in goods with Zambia included \$94.4 million in exports and \$153.3 million in imports.

The United States views Zambia as one of Africa's most stable multiparty democracies. U.S. interests in Zambia are focused on strengthening democratic institutions, promoting inclusive economic growth, improving social development systems, and supporting Zambia's contributions to regional stability. At the time of the inspection, Embassy Lusaka's Integrated Country Strategy (ICS), approved on April 11, 2022, included the following goals:

- Support Zambian democratic institutions to promote stability and deter democratic backsliding in the Southern African Development Community region.<sup>3</sup>
- Promote trade and investment for sustainable, inclusive economic growth and shared prosperity.
- Improve quality of life through stronger, more adaptive, and more resilient health and education systems.
- Strengthen the bilateral security partnership to advance peace and security in the region.

At the time of the inspection, Embassy Lusaka had the following Department-authorized positions: 45 U.S. direct hires,<sup>4</sup> 14 eligible family members, and 226 locally employed (LE) staff. Additionally, the embassy had 39 U.S. direct hires, 1 eligible family member, 155 LE staff, and 1 third-country national working for eight other U.S. government agencies: USAID, the Department of Defense, the Centers for Disease Control and Prevention, the U.S. Army, the Millennium Challenge Corporation, the Peace Corps, the U.S. Commercial Service, and the Department of the Treasury.

The Office of Inspector General (OIG) evaluated Embassy Lusaka's operating environment, executive direction, policy and program implementation, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980.<sup>5</sup> A related classified inspection report includes discussion of the embassy's security program and issues affecting the safety of embassy personnel and facilities.

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<sup>2</sup> The Africa Growth and Opportunity Act is a U.S. trade preference program that allows certain products from eligible sub-Saharan countries to be imported duty free into the United States to encourage export-led growth and economic development.

<sup>3</sup> The Southern African Development Community is a regional economic community with 16 member states: Angola, Botswana, Comoros, Democratic Republic of the Congo, Eswatini, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, Tanzania, Zambia, and Zimbabwe. The Southern African Development Community's mission is to promote sustainable and equitable economic growth and socio-economic development through efficient, productive systems, deeper cooperation and integration, good governance and durable peace and security, so the region emerges as a competitive and effective player in international relations and the world economy.

<sup>4</sup> Seventeen of the U.S. direct-hire positions were vacant at the time of the inspection.

<sup>5</sup> See Appendix A.

## OPERATING ENVIRONMENT

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### **Fraud Investigation and Related Personnel Actions Affected Locally Employed Staff Morale**

OIG identified morale issues with LE staff, attributed to the aftermath of the embassy's 2023 internal review and subsequent fraud investigation. In early 2023, the embassy's Front Office began an internal management control review of embassy operations and, by mid-year, uncovered a fraud scheme involving LE staff and the falsification of administrative records. Ultimately, the embassy terminated, suspended, or reprimanded 135 LE staff in 2023 and 2024. During this process, the embassy posted statements on social media about the fraud and related disciplinary actions for the sake of transparency. This embassy and Department investigation and resulting personnel actions concluded prior to the beginning of OIG's inspection. OIG did not assess the investigation or review the personnel actions except to consider the effect on embassy operations. OIG noted the terminations and other personnel actions and public statements generated anxiety and affected morale among LE staff working at the embassy, even those not involved in the fraudulent activity. The embassy communicated as much as allowable to LE staff to alleviate anxiety about disciplinary actions and other hardships, as discussed below.

### **Extended Power Outages and Other Hardships Impacted Locally Employed Staff**

On February 29, 2024, Zambia's President declared a drought emergency and warned of the negative consequences to the country's hydroelectric power generation. Because Zambia relies on hydroelectric power for 85 percent of its power generating capacity, the ongoing severe drought caused extended power outages, which—by September 2024—lasted as long as 21 hours a day.<sup>6</sup> The power outages also affected water pumps, leading to limited water availability. Additionally, fuel shortages beginning in mid-2024 drove up fuel prices. OIG noted these difficult local conditions created personal daily hardships for LE staff, which also had the potential to impact their readiness to work.

## EXECUTIVE DIRECTION

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

### **Tone at the Top and Standards of Conduct**

The Ambassador and the Deputy Chief of Mission (DCM) arrived in Lusaka in September and August of 2022, respectively. The Ambassador, a career member of the Senior Foreign Service, previously served as Deputy Assistant Secretary of State for West Africa. The DCM previously served as Director of the International Narcotics and Law Enforcement Affairs Section at Embassy Kingston, Jamaica.

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<sup>6</sup> The embassy compound and residences were able to maintain power through the use of generators.

OIG found the Ambassador and DCM generally led Embassy Lusaka consistent with the Department's leadership and management principles in 3 Foreign Affairs Manual (FAM) 1214b.<sup>7</sup> Embassy staff provided OIG examples where the Front Office demonstrated the principles of decisiveness and taking responsibility, communicating clearly, and valuing people. Soon after arriving in Lusaka, the Ambassador and DCM initiated a review to assess and improve internal management controls. That review led to a lengthy investigation and numerous difficult disciplinary actions as described in the Operating Environment section of this report. The Ambassador and DCM met with staff on multiple occasions during the entire process. They did not waver as the investigation and its findings unfolded, recognizing the concerns and morale of embassy staff while also ensuring the effective use of resources.

Staff also told OIG that both the Ambassador and DCM communicated clearly and were approachable and highly visible. Staff at all grade levels and across agencies told OIG they appreciated that the embassy's leaders took the time to get to know them personally. The Ambassador and DCM met monthly with the LE Staff Advisory Council to seek their perspectives on bilateral relations. In his town hall meetings and via all-hands email messages, the Ambassador repeatedly stressed his policy goals and values.

OIG found embassy leadership took concrete action to demonstrate the value they placed on their staff, specifically the LE staff. Aware of the economic and social challenges related to the severe drought and the reduced availability of water, food, and electric power, embassy management introduced several workplace flexibilities<sup>8</sup> to acknowledge and remediate LE staff hardships. In addition, recognizing the LE staff's desire for more frequent and direct communication with leadership, in September 2024, the Front Office began dedicating time each week for the DCM to meet with any LE staff who requested a meeting.

## **Execution of Foreign Policy Goals and Objectives**

OIG found the Ambassador fulfilled his responsibilities to oversee the embassy's strategic planning and activities, as defined in 2 FAM 113.1b. Department and interagency officials praised the embassy's response to increased U.S. engagement with Zambia following the country's 2021 change of government. They also assessed positively the quality of Embassy Lusaka's reporting. OIG's review of the Ambassador's and DCM's calendars confirmed the Front Office actively engaged the Zambian government and sectors of civil society and conducted commercial diplomacy. OIG also determined the Ambassador actively coordinated the large U.S. foreign assistance programming in Zambia, as outlined in 1 FAM 013.2K(6) and the President's Letter of Instruction to Chiefs of Mission.

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<sup>7</sup> The Department's leadership and management principles outlined in 3 FAM 1214b are (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.

<sup>8</sup> Measures included flexibility in working hours, permission to shower at the embassy and take water home, and opportunities to launder and press work uniforms at the embassy.

OIG found the Front Office and embassy staff actively used the April 2022 ICS to guide their work. The Ambassador used an annual offsite meeting, as well as monthly thematic in-depth discussions at expanded Country Team meetings, to monitor and assess progress towards ICS goals. The Ambassador also organized discussion at the weekly Country Team meeting by ICS goal to reinforce coordination among the various agencies and sections.

### **Adherence to Internal Controls**

OIG determined the embassy prepared the FY 2024 Annual Chief of Mission Management Control Statement of Assurance in accordance with Department guidance in 2 FAM 022.7 and 2 FAM 024d, which requires chiefs of mission to develop and maintain appropriate systems of management controls and to submit an annual statement of assurance. Nonetheless, as discussed in the Policy and Program Implementation, Resource Management, and Information Management sections of this report, OIG found several internal control deficiencies.

OIG confirmed the Front Office and the embassy's Management Officer maintained a gift registry that generally met the requirements of 2 FAM 964. However, as discussed in the Information Management section of this report, OIG found the Front Office and most sections were not adhering to records management procedures, although they were aware of the deficiencies and were planning to address them.

### **Security and Emergency Planning**

The Ambassador and DCM conducted oversight of the embassy's security and emergency preparedness programs consistent with 2 FAM 113.1b(5) and 12 Foreign Affairs Handbook (FAH)-1 H-761a. OIG assessed that Embassy Lusaka's Emergency Action Plan was complete and met Department requirements. In addition, security directives were up-to-date, and the Ambassador and DCM participated regularly in embassy drills. Finally, embassy staff told OIG the Ambassador and DCM regularly reinforced the Regional Security Officer's security policies and programs.

### **Equal Employment Opportunity**

OIG found the embassy's Equal Employment Opportunity (EEO) program complied with Department standards in 2 FAM 1511.1a. The embassy had one EEO counselor and was recruiting LE staff EEO liaisons at the time of the inspection. OIG observed up-to-date EEO program information posted on an embassy bulletin board in a heavily trafficked area.

### **Developing and Mentoring Foreign Service Professionals**

OIG determined Embassy Lusaka maintained a professional development program for First- and Second-Tour (FAST) employees, as required by 3 FAM 2713b. Embassy Lusaka's FAST program was open to all U.S. personnel working in an embassy for the first time, including eligible family members. The FAST committee co-chairs told OIG the Front Office and other embassy leaders supported the FAST program both by leading mentoring sessions themselves and by encouraging all eligible staff to participate in the program. Additionally, during the inspection,

the embassy issued a new management policy that emphasized Embassy Lusaka's commitment to "the professional development of FAST officer and specialist employees." The policy outlined the membership of the FAST committee, policy references, and some specific professional development opportunities.

## **POLICY AND PROGRAM IMPLEMENTATION**

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OIG assessed Embassy Lusaka's policy and program implementation through a review of the advocacy and analysis work of the Political-Economic and Public Diplomacy Sections, and the U.S. citizen and visa services provided by the Consular Section. OIG also assessed the foreign assistance functions of the U.S. President's Emergency Plan for AIDS Relief (PEPFAR)<sup>9</sup> program, the coordination of U.S. foreign assistance to Zambia, and management of foreign assistance grants. OIG found the embassy generally met Department requirements for policy and program implementation. However, as discussed below, OIG made recommendations to address deficiencies in the Public Diplomacy and Consular Sections.

### **Political-Economic Section**

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, commercial promotion, and Leahy vetting.<sup>10</sup> In interviews with OIG, Department and interagency stakeholders praised the Political-Economic Section's reporting for its quality, usefulness, and timeliness. They highlighted candid reporting on corruption issues, as well as reporting on the mining sector and on strategic competition as being particularly noteworthy. In addition, OIG's review of 106 reporting cables produced by the section from September 7, 2023, through October 30, 2024, found the reporting to be timely, well-written, and relevant to embassy and U.S. government strategic objectives. OIG also determined the Political-Economic Section generally coordinated well with Washington offices and with other sections and agencies in Lusaka to advance high-priority U.S. government initiatives such as the Lobito Corridor project.<sup>11</sup> Although stakeholders commended the section's support for official visits, they also noted that the heavy visitor load strained the section's limited resources. OIG determined that the section generally complied with Department standards, with one exception described below.

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<sup>9</sup> The Department's Bureau of Global Health Security and Diplomacy manages and oversees the PEPFAR program, which is implemented by seven other U.S. government departments and agencies. In Zambia, additional PEPFAR implementing partners include nongovernmental organizations and Zambian governmental entities.

<sup>10</sup> 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 U.S. Code § 2378d and 9 FAM 303.8-5(B). Leahy vetting is the process of determining whether 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. Code § 362.

<sup>11</sup> The Lobito Corridor project is a U.S. government-supported, transportation-focused infrastructure initiative to connect copper producing regions of Zambia and the Democratic Republic of Congo with the Angolan port of Lobito on the Atlantic Ocean.

***Leahy Vetting Procedures Were Not Cleared by Department as Required***

OIG found that, although the Political-Economic Section's Leahy vetting process worked as intended, the section had not submitted its standard operating procedures for clearance, as required by Department guidance.<sup>12</sup> OIG determined the section did not submit the standard operating procedures for clearance due to a lack of awareness of the requirement, as well as turnover in the individual responsible for vetting.<sup>13</sup> Not clearing the standard operating procedures with the Department increased the risk that Leahy vetting would not be conducted correctly or in a timely manner. This, in turn, could result in nominated candidates for training not being able to participate, representing a waste of government resources. During the inspection, Embassy Lusaka's Leahy Vetting Coordinator submitted the embassy's 2022 standard operating procedures<sup>14</sup> to the Department for clearance. Therefore, OIG did not make a recommendation to address this issue.

**Public Diplomacy**

OIG reviewed the Public Diplomacy Section's leadership, strategic planning, reporting, resource and knowledge management, federal assistance awards, educational and cultural programs, media engagement, and American Spaces.<sup>15</sup> The embassy managed discretionary funds for grant-supported program activities totaling approximately \$250,000 per year from FY 2022 through FY 2024.

OIG found public diplomacy efforts were well integrated with the whole mission and supported the embassy's ICS goals. The Public Diplomacy Section was well-represented in appropriate embassy working groups and coordinated with USAID and other sections on messaging and complementary lines of programmatic action, including using whole-of-mission opportunities to engage audiences at the embassy's three American Spaces. Overall, OIG determined the embassy's public diplomacy activities met Department standards and guidance, with the exception noted below.

***Public Diplomacy Grants Were Not Documented as Required***

OIG found the section did not properly document monitoring of its administration of public diplomacy grants in accordance with requirements.<sup>16</sup> The Federal Assistance Directive requires

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<sup>12</sup> U.S. Department of State, Leahy Vetting Guide, A Guide to Implementation and Best Practices, page 16 (2017).

<sup>13</sup> During the inspection, the individual responsible for Leahy vetting in the section resigned, and the section chief named a newly hired staff member to take responsibility for vetting.

<sup>14</sup> The embassy's standard operating procedures for Leahy vetting normally would need to be updated in 2024, but the Department advised the embassy to wait until a new Department Leahy Vetting Guide becomes available before updating its standard operating procedures.

<sup>15</sup> American Spaces are Department operated or supported 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 Lusaka directly administers an American Center on the embassy compound and supports American Corners in downtown Lusaka and in Kitwe.

<sup>16</sup> The grants reviewed were subject to the Department's Federal Assistance Directive, version 7.0, October 2022.

federal award files to include evidence of monitoring grant activity.<sup>17</sup> OIG reviewed files for 20 out of 70 total grants awarded from FY 2022 through FY 2024.<sup>18</sup> Fifteen grant files lacked evidence of performance monitoring.<sup>19</sup> These lapses were due, in part, to the section failing to prioritize requirements. Although the embassy provided sufficient information for OIG to determine that the work called for in the grants was underway or completed, failure to adhere to Department requirements for grants documentation affects the section's ability to identify and mitigate risk, monitor implementation, evaluate results, and ensure accountability for public diplomacy resources.

**Recommendation 1:** Embassy Lusaka should monitor and document public diplomacy grants in accordance with Department standards. (Action: Embassy Lusaka)

## Consular Operations

OIG reviewed Embassy Lusaka's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. At the time of inspection, the Consular Section was staffed by two officers,<sup>20</sup> five LE staff, and a part-time eligible family member consular assistant. OIG observed that the consular team was relatively inexperienced. Four of the five LE staff had been hired since 2021, the consular assistant was newly hired, and the adjudicating eligible family member had only limited consular experience at a prior mission.

During the inspection, the Consular Section corrected several issues OIG identified. Specifically, the section:

- Eliminated duplicate nonimmigrant visa cases (9 FAM 403.2-7(C)).
- Drafted a formal voting action plan (7 FAM 1513a(2)).
- Performed mandatory namechecks of all designated Consular Liaison Volunteers in the American Liaison Network<sup>21</sup> (7 FAM 074).
- Held a consular crisis management exercise (7 FAM 1812.1-9a).
- Initiated denials of passport applications pending for more than 90 days (8 FAM 801.1-2d).

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<sup>17</sup> Ibid, Chapter 4, Section D; Chapter 5, Section C.

<sup>18</sup> The sample included files for nine open, six closed, and five expired grants. The total value of the sampled grants was \$437,470.

<sup>19</sup> Federal Assistance Directive (October 2022), Chapter 4, Section D; Chapter 5, Section C.

<sup>20</sup> One of the officers was a Foreign Service officer and the other was an eligible family member trained to perform passport and visa adjudications equivalent to a Foreign Service officer.

<sup>21</sup> An American Liaison Network is a country-based network of volunteers composed of representatives from key U.S. citizen constituencies, including faith groups, business communities, retirees, and students. The program facilitates regular two-way communication between embassies and consulates and U.S. citizen constituencies abroad on topics such as security, health, voting, and travel (7 FAM 071b). The volunteers, known as Citizen Liaison Volunteers, are private U.S. citizens who assist consular sections in several ways, including emergency assistance to U.S. citizens, disseminating information, identifying local resources to assist U.S. citizens, and maintaining local contacts who might be of use to consular operations (7 FAM 073a and b).

OIG assessed the Consular Section's compliance with guidance contained in 7 FAM, 7 FAH-1, 8 FAM, 9 FAM, applicable statutes, and other Department policies. OIG noted five deficiencies, which are detailed below. Embassy staff attributed these deficiencies to lack of engagement by the Consular Section chief and a heavy visa workload. OIG also assessed that Consular Section staff were generally unaware of some requirements.

***Consular Staff Did Not Process Routine Nonimmigrant Visas in a Timely Manner***

Consular staff did not process routine nonimmigrant visas in a timely manner. OIG found there was a 43 percent decrease in nonimmigrant visa adjudications between a 9-month timeframe in 2023 and a similar timeframe in 2024.<sup>22</sup> This decrease nearly doubled the wait time for an interview to apply for a nonimmigrant visa for tourism. On September 25, 2023, applicants for tourist visas<sup>23</sup> in Zambia faced a wait time of 164 days. By September 26, 2024, the wait time had increased to 365 days. Guidance in 7 FAH-1 H-821a(2) states that public services should be provided in a timely manner without needless delay. Furthermore, 7 FAH-1 H-252.3d requires consular managers to lead by example and for managers of small sections to spend a significant amount of time regularly adjudicating visas.

OIG determined that the Consular Section chief did not routinely interview nonimmigrant visa applicants in Lusaka's two-officer Consular Section, leading to a decline in the section's productivity. The section chief told OIG her focus on other priorities, such as building a training program for new staff, limited the time she had available for visa interviews.

The increase in nonimmigrant visa appointment wait times had a detrimental effect on customer service for one of the embassy's most visible services and risked negatively affecting public opinion about the United States. It also drove a 700 percent increase in priority appointment requests<sup>24</sup> submitted by other embassy sections for their official contacts. In addition to limiting visa appointment availability, when consular managers do not adjudicate visas on a regular basis, they lose the opportunity to mentor less experienced officers and re-evaluate and streamline processes.

**Recommendation 2:** Embassy Lusaka should implement a plan to increase nonimmigrant visa adjudication capacity and reduce interview appointment wait times. (Action: Embassy Lusaka)

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<sup>22</sup> Embassy Lusaka adjudicated 9,027 nonimmigrant visas from January 1 to September 8, 2023, but only 5,117 in the same timeframe in 2024.

<sup>23</sup> Worldwide, B1/B2 visas for business and tourist purposes are the most common form of nonimmigrant visa.

<sup>24</sup> A priority appointment request is a formal request by a qualified U.S. government official for an earlier interview or for other courtesies for an individual. There must be a reason related to serving U.S. national interest or a compelling embassy priority to expedite an appointment. In the first 9 months of 2023, there were 15 priority appointment requests made at Embassy Lusaka. In the same timeframe in 2024, there were 109 priority appointment requests.

### ***Embassy Did Not Comply With Various Consular Procedural Requirements***

OIG found the Consular Section did not comply with multiple procedural requirements necessary to ensure effective and efficient consular operations. Specifically, OIG found the section did not:

- Routinely run immigrant visa end-of-day reports (9 FAM 601.4-4(B)a(1)).
- Comply with immigrant visa records management requirements, including the requirement to destroy paper files of issued and refused cases (9 FAM 601.6-3(B)).
- Conduct regular quarterly audits of the section's inventory of controlled items (7 FAH-1 H-655.2).
- Consistently perform quarterly unannounced cash counts (7 FAH-1 H-743.2a and b).

Furthermore, the Consular Section chief did not periodically spot check approved immigrant visa cases to ensure consistent application of law, regulation, and procedures, as required by the Bureau of Consular Affairs' management controls checklist for immigrant visa operations. Failure to comply with procedural requirements increases vulnerability to malfeasance, both with funds and with immigration benefits, such as the issuance of immigrant and nonimmigrant visas.

**Recommendation 3:** Embassy Lusaka should comply with Department consular procedural requirements. (Action: Embassy Lusaka)

### ***Consular Crisis Preparedness Did Not Comply With Department Standards***

OIG found Embassy Lusaka's consular crisis preparedness did not comply with Department standards. Although section staff participated in a consular crisis management exercise in November 2024 and began to assess crisis response resources and materials as a result, the section lacked written guidance on staff roles and responsibilities in a crisis, as required by 7 FAM 1814. Consular personnel were also not sufficiently cross-trained as required in 7 FAM 1812.3-2b. The section had not requested any disaster plans or other information that host government authorities may have developed for common crisis scenarios nor identified possible private sector resources that would be useful in a disaster, as recommended under 7 FAM 1812.3-1 and 7 FAM 1813.4.

Additionally, the embassy did not meet Department standards found in 7 FAM 071c for maintaining and testing its American Liaison Network. An American Liaison Network enables a consular section both to reach U.S. citizens in an emergency and to obtain information from them. The embassy was aware that it needed to update its network, but it had not yet done so. Without an updated American Liaison Network, the embassy would be hampered in protecting U.S. citizens during a crisis. Consular staff told OIG that, given the small staff and heavy demand for visa and emergency U.S. citizen services, they had not had the opportunity to fully address crisis preparedness. Failure to properly prepare for a crisis could put U.S. citizens at risk during an emergency.

**Recommendation 4:** Embassy Lusaka should comply with Department standards for consular crisis preparedness. (Action: Embassy Lusaka)

***Consular Section Did Not Properly Monitor the Global Support Services Program***

OIG found that the embassy did not monitor the Global Support Services (GSS)<sup>25</sup> program as required by 7 FAH-1 H-263.3 and the Bureau of Consular Affairs' GSS checklist. Missions are responsible for management oversight of the visa applicant services provided by outside contractors. However, the Consular Section's GSS mission coordinator did not perform quarterly test calls to the GSS call center or conduct quarterly reviews of a selection of audio or electronic files to assess the accuracy of information provided by GSS and the GSS staff's language skills. Consular staff told OIG they were unaware of these monitoring requirements. Failure to perform these functions leaves the embassy unable to verify the accuracy and quality of information the GSS call center provides to applicants.

**Recommendation 5:** Embassy Lusaka should monitor the Global Support Services program in accordance with Department standards. (Action: Embassy Lusaka)

***Consular Section Did Not Conduct Required Validation Study on Issued Nonimmigrant Visas***

The Consular Section did not conduct one of two required validation studies of nonimmigrant visas issued in 2023, the year prior to the inspection. Guidance in 7 FAH-1 H-946f requires consular sections to conduct at least two validation studies per year. Although section staff were aware of this requirement, they told OIG that they had not completed the second study due to the demands of the Fraud Prevention Manager's visa adjudication responsibilities. Failure to conduct validation studies means the embassy is unable to determine whether officers have adjudicated visa applications appropriately and whether additional training is needed.

**Recommendation 6:** Embassy Lusaka should conduct validation studies on issued nonimmigrant visas in accordance with Department standards. (Action: Embassy Lusaka)

## **Foreign Assistance**

In FY 2023, the United States provided \$491 million in assistance to Zambia. Of this amount, \$349 million was designated for the PEPFAR program, overseen by the PEPFAR Coordination Office at the embassy and implemented primarily by USAID Zambia and the Centers for Disease Control and Prevention. Additionally, USAID Zambia managed development programs in-country, while several Department bureaus and offices managed assistance programs from

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<sup>25</sup> GSS is a worldwide program managed by the Bureau of Consular Affairs that "contracts for visa applicant services that are not inherently governmental functions and that may include: information services, appointment systems, offsite fee collection, document delivery, onsite greeters, and offsite biometric data collection. . . ." Embassies and consulates are required to provide management oversight of the services they receive through the program, to include reconciliation of visa fees (7 FAH-1 H-263.3).

Washington with minimal engagement from the embassy.<sup>26</sup> Finally, the embassy's Political-Economic Section managed grants funded by the Bureau of Population, Refugees, and Migration. OIG assessed the embassy's management, oversight, and coordination of foreign assistance programs and found the embassy generally complied with Department policies and other foreign assistance-related guidance.

## RESOURCE MANAGEMENT

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OIG reviewed Embassy Lusaka's operations and internal controls in financial management, general services, facility management, human resources, and general management including the employee association, the Health Unit, and the Community Liaison Office. During the inspection, the embassy corrected six internal control issues that OIG identified. Specifically, the embassy:

- Updated the embassy's policy on the sale and export of personal property (2 FAM 225.4b).
- Corrected data entry errors in the Department's Fleet Management Information System<sup>27</sup> that overinflated the cost of embassy vehicle maintenance for six vehicles by more than \$140,000 in 2024 (14 FAM 431.6-4(3)).
- Updated the time and attendance system to remove five inactive timekeepers and one inactive system administrator (Bureau of the Comptroller and Global Financial Services' post access security controls guidance for WinT&A,<sup>28</sup> Chapter 1, section 2(a)).
- Issued a memorandum approving two timekeepers to maintain dual timekeeper and system administrator permissions (12 FAH-10 H-112.5-2(1) and Bureau of the Comptroller and Global Financial Services' post access security controls guidance for WinT&A, Chapter 1, section 6).
- Obtained medical examinations for 10 embassy drivers who had expired medical certifications as of September 2024 (6 FAM 1943.1a).
- Discontinued the practice of allowing LE staff mechanics to perform repairs on vehicles owned by U.S. direct hires in the embassy mechanic shop outside of work hours (5 FAM 723(6)(f) and 28 Code of Federal Regulations (C.F.R.) § 45.4(a)).

OIG found the embassy's Management Section generally implemented processes and procedures in accordance with applicable laws and Department guidance, except as described below.

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<sup>26</sup> These bureaus and offices included the Bureau of Political-Military Affairs; the Bureau of Population, Refugees, and Migration; the Bureau of Democracy, Human Rights, and Labor; the Bureau of International Narcotics and Law Enforcement Affairs; the Office to Monitor and Combat Trafficking in Persons; and the Bureau of Energy Resources.

<sup>27</sup> The Fleet Management Information System, a module within the Integrated Logistics Management System, is the Department's enterprise system for managing all fleet operations. It is designed to capture key operational data on vehicle dispatch, maintenance, and fuel.

<sup>28</sup> WinT&A is the Department's time and attendance system for overseas employees.

## Financial Management

### ***Embassy Did Not Maintain an Employee Accounts Receivable Program***

OIG found the embassy's financial management office did not maintain an employee accounts receivable program for approximately 5 years preceding OIG's inspection. The embassy lacked standard procedures to record, track, and ensure timely collection of employee accounts receivables.<sup>29</sup> In addition, the financial management office did not have a process to ensure funds owed to the government were repaid as required. As a result, neither OIG nor the embassy was able to determine the total dollar value of employee accounts receivable, including what had been repaid and what was still owed to the U.S. government.

According to 4 FAM 033.2-6 and 4 FAM 232.1-1c, embassies are responsible for developing procedures to accurately track and record known accounts receivable in a timely manner. Additionally, guidance in 4 FAM 493.1-3a states that the embassy management officer or the financial management officer must forward all debts to the Department's Account Receivable office for collection prior to the debts reaching 91 days of delinquency, which the embassy also did not do because it was not tracking employee accounts receivable.<sup>30</sup> Management Section staff told OIG that the responsibility to maintain an employee accounts receivable program was not reassigned when the person previously responsible left the embassy approximately 5 years ago. They also said they prioritized working on tasks other than recording, tracking, and ensuring repayment of employee accounts receivable. Failure to account for employee accounts receivable risks the loss of funds that should be reimbursed to the U.S. government.

**Recommendation 7:** Embassy Lusaka should record, track, and collect employee accounts receivable, in accordance with Department requirements. (Action: Embassy Lusaka)

### ***Embassy Cashier Operations Did Not Adhere to Department Standards***

OIG found Embassy Lusaka's cashier operations did not meet Department internal control standards. Specifically, OIG found:

- The embassy lacked a decision memorandum approved by the chief of mission for providing accommodation exchange services (4 FAM 361.5a).
- The embassy did not review its cashier operations or cash movement policies annually (4 FAM 399.4-2a and 4 FAM 393.4-6a). OIG found that the embassy last updated its cashier operations and cash movement policies in December 2021 and February 2020, respectively.

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<sup>29</sup> According to 4 FAM 033.2-2(3), the Department has several types of accounts receivable that must be tracked, one of which being employee receivables. Receivables are established for employees for various debts, such as the overpayment of a salary that has not been repaid. These become employee accounts receivable when they exceed the Department criterion of 30 days for timely repayment.

<sup>30</sup> Accounts Receivable is an office within the Bureau of the Comptroller and Global Financial Services that manages and collects debts owed to the Department. See 4 FAM 491.3, "Definitions."

- The financial management office did not vary its monthly unannounced verifications of the cash held by the embassy's principal cashier (4 FAM 397.1-2a). OIG found that the embassy often conducted the verifications at predictable intervals. For example, in FY 2024, 6 of 12 required cash verifications occurred on the last Thursday of the month, and two did not occur at all.
- Unannounced subcashier cash verifications did not always occur as required<sup>31</sup> (4 FAM 397.2-3a). In FY 2024, the U.S. direct-hire supervisor conducted only 7 of the 12 required quarterly cash verifications of the consular subcashiers.
- Alternate cashiers did not act as the principal cashier two to three times a quarter as required (Bureau of the Comptroller and Global Financial Services' Cashier User Guide, Chapter 3.3.5).
- In FY 2024, the Financial Management Officer did not complete 10 of the 12 required monthly disbursing accountability cashier collection report verifications (Cashier User Guide, Chapter 13.9.1(1)).
- In FY 2024, the Financial Management Officer did not complete 4 of the 12 required monthly reconciliations of the embassy's consular collections (7 FAH-1 H-744.3d and the Cashier User Guide, Chapter 13.9.1(2)).

OIG determined these issues occurred because of insufficient oversight by the cashiers' U.S. direct-hire supervisors. Failure to ensure adequate management oversight of cashiering operations increases the risks of errors, loss of funds, fraud, and misuse of embassy cashier services.

**Recommendation 8:** Embassy Lusaka should bring its cashier operations into compliance with Department standards. (Action: Embassy Lusaka)

### ***Embassy Had Overdue Travel Advances***

OIG found that the embassy had overdue travel advances.<sup>32</sup> As of October 2024, the Department's travel management system, E2 Solutions, showed Embassy Lusaka had 80 overdue travel advances totaling \$24,770. Of these, 33 were outstanding between 30 and 59 days, 20 were outstanding between 60 and 89 days, and 27 were outstanding for more than 90 days, contrary to 4 FAM 464.4. According to 4 FAM 493.1-3a, the embassy's management officer or the financial management officer must forward all debts to the Department's Accounts Receivable office for collection prior to the debts reaching 91 days of delinquency. Financial management staff told OIG many of the travel advances that showed as overdue in E2 had been paid but had yet to be closed out in E2 Solutions because closeout was a lower priority for the section and the financial specialist position was vacant. Nevertheless, overdue

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<sup>31</sup> Unannounced subcashier verifications occur monthly if a subcashier's cash advance is \$1,000 or more, or quarterly, if the subcashier's cash advance is less than \$1,000. The embassy had three consular subcashiers with advances below \$1,000. Because there were multiple subcashiers, the U.S. direct-hire supervisor's overall verification schedule varied by subcashier for each quarter.

<sup>32</sup> According to 4 FAM 464, the purpose of a travel advance is to provide an employee authorized to travel at U.S. government expense with funds to meet authorized travel expenses.

travel advances represent a loss of funds to the U.S. government that could otherwise be put to better use if the travel advances are cleared in a timely manner as required.

**Recommendation 9:** Embassy Lusaka should clear overdue travel advances, in accordance with Department guidelines, and put overdue travel advance funds of up to \$24,770 to better use. (Action: Embassy Lusaka)

## General Services

### *Embassy Did Not Manage Fuel Operations in Accordance With Department Standards*

Embassy Lusaka did not manage its fuel operations in accordance with Department standards. OIG found that the embassy allowed U.S. direct-hire employees to refuel their personally owned vehicles (POV) at the embassy's fuel pumps and delegated the collection of proceeds of sales for that fuel to its employee association, the American Mission Community Association (AMCA). OIG also found that AMCA reimbursed the embassy for the POV fuel collections through the embassy's International Cooperative Administrative Support Services (ICASS)<sup>33</sup> program, 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 the collections for POV fuel. Embassy staff told OIG they did not send the proceeds of POV fuel sales to the U.S. Treasury as they were unaware of the requirement to do so.

Furthermore, OIG determined in its review of AMCA's accounting processes that the association was not reimbursing the embassy for POV fuel collections either in a timely manner or in full. For example, in FY 2023 and FY 2024, AMCA took more than a year to repay the embassy for a portion of POV fuel collections, despite Department standards which require repayment within 30 days.<sup>34</sup> Specifically, in September 2024, AMCA reimbursed the embassy for more than 9 months' worth of POV fuel sales through March 2024, totaling approximately \$38,000, which had been dispensed up to more than a year prior.<sup>35</sup> However, even with that payment, the association was still roughly 6 months in arrears on reimbursing the embassy for all POV fuel sales.<sup>36</sup> OIG also found that the embassy financial management staff never reconciled the reimbursements from AMCA with the embassy's records. As a result, embassy officials were

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<sup>33</sup> ICASS is the principal means by which U.S. government agencies share the cost of common administrative support services at most diplomatic and consular missions overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions.

<sup>34</sup> See 4 FAM 493.1-3a and 4 FAM 493.1-2a.

<sup>35</sup> The embassy provided OIG copies of three checks from AMCA dated September 16, 2024, for reimbursement of POV fuel sales from July 2023 through March 2024. These checks also covered AMCA's reimbursement for embassy space the association used during the same period.

<sup>36</sup> This includes fuel dispensed for POVs from April through September 2024.

unsure whether AMCA had reimbursed the embassy for the actual amount of fuel dispensed to POVs.

AMCA staff acknowledged their internal accounting processes made it impossible for the embassy to reconcile the association's reimbursements for POV fuel. This was because it reimbursed the embassy for POV fuel collections after being paid by U.S. direct-hire staff,<sup>37</sup> rather than reimbursing the embassy for all POV fuel dispensed in a certain period, such as monthly. The embassy's financial management office told OIG that they assumed AMCA's reimbursements were correct and embassy staff never verified whether the reimbursements matched POV fuel consumption data because they trusted AMCA was managing the collection of sales for POV fuel correctly. By not verifying the reimbursements AMCA made for POV fuel sales against fuel dispensed and not returning the funds to the U.S. Treasury as miscellaneous receipts, the U.S. government may not be receiving the funds it is due.

**Recommendation 10:** Embassy Lusaka should manage its fuel operations in accordance with Department standards. (Action: Embassy Lusaka)

***Property Management Program Did Not Fully Comply With Department Standards***

OIG found the embassy's property management program did not fully comply with Department standards. Specifically, OIG found the embassy:

- Did not conduct quarterly unannounced spot counts of expendable and nonexpendable property in the year before the inspection. According to 14 FAM 411.2-2b(8), the accountable property officer must conduct quarterly, unannounced spot check inventories of personal property to verify the accuracy of property records in Department's Integrated Logistics Management System (ILMS) and reconcile any discrepancies.<sup>38</sup>
- Transferred \$1 million in nonexpendable property to different locations from 2021 to 2024,<sup>39</sup> but did not document the transfers in ILMS using the DS-584 Nonexpendable Property Transaction form, as required by 14 FAM 425.3-6.

OIG determined that these issues were due to a lack of management oversight and employee unfamiliarity with property management control requirements. Failure to account for property in the Department's approved property record system and conduct regular spot checks leaves the embassy vulnerable to theft and can impact the accuracy of property inventories.

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<sup>37</sup> U.S. direct-hire staff did not pay for fuel at the time it was dispensed. Rather, AMCA would obtain a master report of fuel consumption from the embassy every few weeks and send each direct hire a bill for their POV fuel that was payable to the association.

<sup>38</sup> ILMS is an integrated web-based system that encompasses all Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

<sup>39</sup> These transfers included \$381,000 in 2021, \$182,000 in 2022, \$76,000 in 2023, and \$372,000 in 2024.

**Recommendation 11:** Embassy Lusaka should bring its property management program into compliance with Department standards. (Action: Embassy Lusaka)

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

OIG found the embassy's furniture and appliance pool (FAP) program<sup>40</sup> did not comply with Department standards. Specifically, OIG found:

- According to ILMS data, approximately \$75,000 of the embassy's \$4 million FAP assets were flagged as potentially misclassified in the system. For example, 164 assets valued at \$60,000 should have been classified as FAP assets. Instead, they were classified under different agency codes, contrary to guidance in 6 FAH-5 H-514.1d(3). Additionally, the embassy incorrectly issued 25 FAP assets, valued at \$15,000, to designated residences,<sup>41</sup> contrary to guidance in 6 FAH-5 H-514.1d(2) and 6 FAH-5 H-514.2-3c(1).
- The embassy had excess inactive FAP stock in the warehouse. At the time of the inspection, 18 percent of FAP assets were stocked in the warehouse (worth \$739,000). This was higher than the Department target of up to 15 percent for embassies with challenging circumstances, such as those with local conditions that could impact order delivery timelines. According to 6 FAH-5 H-514.1d(5), an embassy should seek to maintain minimal FAP warehouse stock levels.
- The embassy's FAP policy was last updated in August 2017. According to 6 FAH-5 H-512.2-2b, embassy management should update the policy at least every 2 years to ensure its relevance.

Management Section staff told OIG these deficiencies occurred due to insufficient FAP program oversight and the need for additional staff training on how to manage and account for FAP assets. 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 12:** Embassy Lusaka should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Lusaka)

***Embassy's Motor Pool Program Did Not Meet Department Standards***

Embassy Lusaka's motor pool program did not meet Department standards for the management of official vehicles. Specifically, OIG found the embassy:

- Last updated its motor vehicle policy in June 2022. In accordance with 14 FAM 435.1a,

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<sup>40</sup> The FAP program furnishes overseas housing through the purchase, replacement, refurbishment, maintenance, inventory control, warehousing, pick-up and 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.

<sup>41</sup> Designated residences include the residence for the Ambassador. Furniture and furnishings for designated housing and offices are funded through other allotments.

the motor vehicle policy must be reviewed at least annually and revised, as needed, to incorporate any updates to the FAM or policy.

- Did not consistently close motor pool trip tickets within the required timeframe (14 FAM 437.2(2)(b)). As of November 27, 2024, the embassy had 137 open tickets for trips completed between 15 and 65 days earlier (a 31-day average).
- Did not record proceeds of sale for vehicles in the Fleet Management Information System (4 FAM 327.2-1e). In September 2023 and November 2024, the embassy sold or exchanged 12 vehicles, but General Services staff did not enter the proceeds of sale into the Fleet Management Information System as required.
- Had motor pool chauffeurs with expired armored vehicle training (12 FAM 389d). Specifically, as of November 26, 2024, the embassy had 10 motor pool chauffeurs with expired armored vehicle familiarization training. Additionally, the most recent armored vehicle training for two Marine Security Guard chauffeurs, responsible for driving armored vehicles, expired in June 2022 and December 2023. A third Marine Security Guard chauffeur had no documented armored vehicle training.

Embassy staff stated that some of these issues occurred because staff were unaware of Department requirements. OIG also determined these issues occurred because of a lack of management oversight. Failure to enforce motor pool requirements increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. government property.

**Recommendation 13:** Embassy Lusaka should comply with Department requirements for managing the official vehicles in its motor pool. (Action: Embassy Lusaka)

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

OIG found the embassy's contracting officer's representative (COR) program did not comply with Department standards. At the time of the inspection, the embassy had 10 CORs who oversaw 15 contracts valued at approximately \$19 million. Specifically, OIG found:

- The responsible contracting officer did not prepare COR delegation memoranda for six CORs (14 FAH-2 H-143.2).
- Four CORs did not have current annual ethics training (13 FAM 301.2-3a and Procurement Information Bulletin No. 2012-15).
- CORs did not maintain all files in the ILMS COR e-Filing<sup>42</sup> module. Instead, the CORs maintained paper files (14 FAH-2 H-142b(16)(b)).
- CORs and contracting officers did not complete mandatory performance reviews of contractors in the Contractor Performance Assessment Reporting System<sup>43</sup> for all eight

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<sup>42</sup> The COR e-Filing module provides a centralized repository for procurement documentation and a streamlined electronic COR files management checklist.

<sup>43</sup> 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 done in the system for each contract above the simplified acquisition threshold of \$250,000, according to 48 C.F.R. § 42.1502(b) and 48 C.F.R. § 2.101.

contracts requiring review (14 FAH-2 H-572 d<sup>44</sup> and 48 C.F.R. 42.1502a).

Despite these issues, OIG's discussions with embassy staff and review of other documentation showed the embassy had monitored the contracts, received the services for which it had contracted, and addressed contractor performance when issues arose. OIG determined that COR delegation memoranda, ethics training, and annual performance evaluations were not completed due to a lack of management oversight. Staff told OIG they were unaware of the requirement to use the e-Filing module to maintain COR files. A noncompliant COR program increases the risk of contract mismanagement.

**Recommendation 14:** Embassy Lusaka should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Lusaka)

***Embassy Did Not Close Out Procurement Files Within Required Timeframes***

Embassy Lusaka did not close out its procurement files in ILMS within required timeframes. Specifically, the embassy had a backlog of 1,999 procurement files from FY 2015 to FY 2023 that were ready for closeout but had yet to be closed out in ILMS. Guidance in 14 FAH-2 H-573.2b<sup>45</sup> states that contracts under simplified acquisitions procedures should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Embassy staff told OIG this deficiency occurred because contract closeout processes were a low priority for the Management Section, given other workload constraints. Failure to close out procurement files within the required timeframe increases the risk of inaccuracies in procurement records and of internal control issues in procurement operations.

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

**Facility Management**

***Safety, Health, and Environmental Management Program Did Not Fully Comply With Department Standards***

OIG found the embassy's safety, health, and environmental management program did not fully comply with Department standards. Specifically, OIG found the embassy:

- Was unable to provide evidence it had inspected low-risk areas, such as office spaces, annually. Additionally, facilities staff documented inspections of high-risk work areas only once in 2023 and 2024. 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.

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<sup>44</sup> The contracting officer is responsible for ensuring the evaluation takes place, but the COR may be tasked with evaluating contractor performance. See 14 FAH-2 H-572e, "Final Evaluation."

<sup>45</sup> Guidance in 14 FAH-2 H-573.2b also cites 48 C.F.R. § 4.804-1.

- Did not conduct the required workplace safety training of management officials<sup>46</sup> and supervisors to enable them to administer a proper safety, health, and environmental management program. Additionally, Embassy Lusaka's Post Occupational Safety and Health Officer (POSHO) did not provide safety and occupational health orientation to employees within 30 days of their arrival (15 FAM 965e, g, and h).
- Had incomplete POSHO records that did not comply with the 15 FAM 966 requirements for recordkeeping. Notably, the training records and the annual hazardous materials inventory were not included in the POSHO records. Additionally, policies, procedures, and other safety and health directives disseminated by the Bureau of Overseas Buildings Operations and the embassy were also not included (15 FAM 966(6), (8), (10), and (11)).

OIG determined these issues accumulated over time because the embassy lacked institutionalized procedures and managerial oversight. Additionally, staff told OIG that some POSHO records were not maintained or lost when the embassy terminated the employment of the person managing the records. Failure to comply with the Department's safety, health, and environmental management standards increases the risk of injury.

**Recommendation 16:** Embassy Lusaka should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lusaka)

### ***Residential Fire Protection Program Did Not Fully Comply With Department Standards***

The embassy's residential fire protection program did not fully comply with Department standards. OIG found that some embassy residences had expired fire extinguishers and that embassy staff were not conducting monthly checks of fire extinguishers in accordance with 15 FAM 843d and e. Of the seven residences OIG inspected, four had fire extinguishers that needed to be replaced. In addition, residents in five of the residences had not documented monthly visual inspections of fire extinguishers for operable condition.<sup>47</sup> The embassy was also not servicing fire extinguishers annually as required by 15 FAH-2 H-007.2-5b(1)(b). Instead, it serviced fire extinguishers in-between reassignment of housing to new residents, which typically occurs every 2 or 3 years, depending on the length of an individual's assignment. Embassy staff told OIG that they did not maintain a list of fire extinguishers and their expiration dates and, therefore, did not have any way of knowing when fire extinguishers were past their life expectancy. These deficiencies occurred because of insufficient management oversight. Failure to comply with fire protection standards increases the risk of injury, loss of life, and damage to property.

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<sup>46</sup> According to 15 FAM 965e, the term "management officials" includes DCMs, management counselors and officers, general services officers, and others.

<sup>47</sup> The fire extinguishers at the other two residences OIG inspected were replaced with new inspection tags the week of OIG's inspection. As such, OIG was unable to verify whether the residents had been doing the monthly visual inspections of the fire extinguishers at those properties.

**Recommendation 17:** Embassy Lusaka should bring its residential fire protection program into compliance with Department standards. (Action: Embassy Lusaka)

## Human Resources

### *Embassy Time and Attendance Procedures Did Not Meet Department Standards*

Embassy Lusaka's time and attendance procedures did not meet Department standards. Specifically, OIG found the embassy:

- Designated more than the 10 local holidays permitted by the Department. Guidance in 3 FAM 2338.4 states embassies are limited to granting 10 days of administrative leave for purposes of observing local holidays. Embassy Lusaka's 2024 holiday schedule showed the embassy observed 11 local holidays, and the 2025 holiday schedule showed the embassy may observe up to 12 local holidays.<sup>48</sup>
- Did not adequately train its timekeepers (4 FAH-3 H-525.2-1). As of November 2024, 5 of Embassy Lusaka's 21 timekeepers (24 percent) had no documented timekeeper training, and 6 (29 percent) additional timekeepers had no documented refresher training (4 FAH-3 H-525.1-3).
- Did not comply with requirements for authorizing overtime in advance (3 FAM 2332.5(2)). In FY 2024, the embassy incurred approximately \$172,000 in LE staff overtime. OIG reviewed 50 overtime submissions for three pay periods in FY 2024<sup>49</sup> and found only 9 (18 percent) authorization forms were submitted and approved in advance. Generally, employees did not submit overtime requests to supervisors before overtime was accrued, and an average of 12 calendar days elapsed from the first day overtime was worked to when the supervisor approved the request.

Human resources staff stated they were unaware of the Department standards that allowed only 10 designated local holidays to be observed using administrative leave and for staff to complete refresher timekeeper training. These issues were caused by both supervisors and embassy timekeepers not overseeing the embassy's time and attendance procedures to ensure compliance with Department standards. Failure to provide this oversight can lead to fraud, waste, and abuse of embassy resources.

**Recommendation 18:** Embassy Lusaka should comply with the Department's time and attendance requirements. (Action: Embassy Lusaka)

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<sup>48</sup> The 2025 Embassy Lusaka holiday schedule notes if a Zambian holiday falls on a Saturday, the preceding Friday is not considered a holiday, unless officially declared so by the Zambian Cabinet. In 2025, two Zambian holidays fall on a Saturday and thus, depending on the Zambian Cabinet's declarations, could result in two local holidays being observed on a workday.

<sup>49</sup> OIG selected three pay periods at random to determine the embassy's overall compliance with relevant overtime standards. OIG's reviewed overtime forms submitted between March 10 to 23, 2024 (pay period 5), April 21 to May 4, 2024 (pay period 8), and June 30 to July 13, 2024 (pay period 13).

## General Management

### ***Employee Association's Board of Directors Did Not Provide Sufficient Oversight***

OIG found the embassy employee association's board of directors did not oversee the association's operations as required. The board did not conduct unannounced inventory spot checks or monthly cash counts of monies collected from sales at the association's shop in 7 of the last 12 months since September 2023, as required by 6 FAM 531d. Board members were unable to provide the reason why the monthly cash counts and inventory spot checks did not occur. The board's failure to exercise adequate oversight of the financial management and operation of the embassy's employee association puts its assets and operations at risk and could lead to mismanagement of funds.

**Recommendation 19:** Embassy Lusaka should require the embassy employee association's board of directors to conduct its oversight responsibilities in accordance with Department standards. (Action: Embassy Lusaka)

### ***Embassy Post Hardship Differential Survey Was Out of Date***

OIG found the embassy had not submitted its Post Hardship Differential Survey since 2021. Department of State Standardized Regulations, Section 072.12, establishes a schedule for submitting post hardship surveys every 2 years. According to the Bureau of Administration's Office of Allowances, Embassy Lusaka had yet to complete its survey, which had been due in January 2024. Embassy staff told OIG they were unaware the report was overdue. Failure to submit a timely hardship survey to the Office of Allowances increases the risk of overpayments or underpayments to U.S. government employees.

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

## INFORMATION MANAGEMENT

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OIG reviewed Embassy Lusaka's information management and information security operations, including Sensitive But Unclassified and classified network operations and non-enterprise networks (NEN),<sup>50</sup> telephone and radio programs, mail operations, emergency preparedness, and cybersecurity responsibilities. The embassy's Diplomatic Technology (DT) unit provided information management and information security support to more than 500 users.

As part of its responsibilities, the DT unit provided the full range of support to the embassy as required by ICASS standards. This included network support, landline and mobile services, emergency and satellite communications, mailroom services, and liaising with local internet

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<sup>50</sup> The Department defines a NEN as an internet connection from a commercial or government internet service provider on a Department-owned and operated discrete non-sensitive unclassified local area network that is not connected to any other Department system.

service providers for embassy support. During the inspection, DT unit staff corrected two issues identified by OIG, as follows:

- Updated the secure voice equipment memorandum signed by the Regional Security Officer (5 FAH-6 H-251c).
- Changed the lock combination for the classified pouch vault door (12 FAM 532.2-2(5)).

OIG determined that increased management attention was needed to ensure Embassy Lusaka's DT unit was implementing information management and information security requirements in accordance with Department standards. As detailed below, OIG identified 12 deficiencies that require correction.

### ***Approvals for External Network Extensions Did Not Accord With Department Standards***

Embassy Lusaka managed four external network extensions<sup>51</sup> for its network that were not registered and approved. According to 12 FAM 642.4-4b and cable 21 STATE 74118,<sup>52</sup> the Bureau of Diplomatic Technology, in coordination with the Bureau of Diplomatic Security, must approve all external network extensions at embassies abroad. OIG reviews of Department systems of record and discussions with DT unit staff members found the embassy's external network extensions had not been registered and approved by the two bureaus. OIG determined the DT unit staff responsible for managing the external network extensions were not aware of the process for registering and approving the extensions. Failure to properly register and approve external network extensions increases the risk of operating network segments that are not properly configured and physically secured.

**Recommendation 21:** Embassy Lusaka should register and obtain approval for its external network extensions in accordance with Department standards. (Action: Embassy Lusaka)

### ***IT Contingency Planning Did Not Comply With Department Standards***

Embassy Lusaka's IT contingency planning for its networks did not comply with Department standards. Department guidelines in 12 FAH-10 H-232.3-1b require embassies to review, test, and update their IT contingency plans annually. OIG found Embassy Lusaka's IT contingency plans for its Sensitive But Unclassified and classified networks had not been reviewed or updated in the year prior to the inspection, and the embassy had no records of any testing. DT unit staff told OIG they had not taken the time to test and update the contingency plans because they prioritized working on other tasks. Out-of-date and untested IT contingency plans increase the risk the embassy will not be able to maintain availability of critical information resources in emergency situations.

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<sup>51</sup> The Department defines an external network extension as an expansion of a network's boundaries to include a deployment of Department-approved hardware to a non-Department entity location and not involving an interconnection to another system or extranet.

<sup>52</sup> Cable 21 STATE 74118, "Transition of Network Extension Coordination Responsibility Domestically and Abroad from DS Cyber and Technology Security (DS/CTS) to IRM External Affairs (IRM/EA)," July 16, 2021.

**Recommendation 22:** Embassy Lusaka should update and test the information technology contingency plans for its Sensitive But Unclassified and classified networks in accordance with Department standards. (Action: Embassy Lusaka)

***Unclassified Account Management Procedures Did Not Comply With Department Standards***

Embassy Lusaka's network account management procedures did not comply with Department standards. Department guidelines in 12 FAH-10 H-112.1-3b require system managers to review, at least annually, the list of information system users to determine whether all users require access to the network. DT unit staff told OIG the list of system users had not been reviewed in at least a year, nor had they established a recurring procedure for carrying out such reviews. Failure to properly manage user accounts increases the risk of unauthorized access to Department networks.

**Recommendation 23:** Embassy Lusaka should implement a network account management procedure for regularly reviewing user accounts in accordance with Department standards. (Action: Embassy Lusaka)

***Administrative Password Management Did Not Comply With Department Standards***

DT unit staff did not manage administrative passwords for Embassy Lusaka's networked digital copiers, printers, and senders in accordance with Department standards. Department guidelines in 12 FAH-6 H-542.5-9b(1) and 11n, require the administrative functions of networked digital copiers, printers, and senders to be password protected and for the passwords to be changed every 60 days, in accordance with the Department's password policy. OIG found the administrative passwords for the embassy's networked digital copies, printers, and senders were not changed every 60 days, as required. DT unit staff members were not aware administrative passwords for the networked digital copiers, printers, and senders needed to be changed regularly. Failure to change privileged level passwords regularly increases the risk of unauthorized privileged level access.

**Recommendation 24:** Embassy Lusaka should implement a procedure to change the administrative passwords for its networked digital copiers, printers, and senders in accordance with Department standards. (Action: Embassy Lusaka)

***Embassy Lusaka Did Not Manage Non-Enterprise Networks in Accordance With Department Standards***

Embassy Lusaka operated four NENs that were not configured and monitored in accordance with Department standards. Department guidelines in 12 FAH-10 H-142.5-2(1) require system administrators to monitor and control communications at the perimeter of information systems. Additionally, the Department's NEN minimum security controls standard requires firewalls to be installed on NENs. OIG found system administrators responsible for managing the NENs had not installed firewalls on the NENs nor monitored the networks as required. DT unit staff told OIG they were aware firewalls needed to be installed and NENs needed to be monitored, but higher priority tasks and staffing shortages affected their ability to perform the

work. Failure to install required perimeter security devices and regularly monitor networks increases the risk of a loss of confidentiality, integrity, and availability of systems and data hosted on those networks.

**Recommendation 25:** Embassy Lusaka should configure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Lusaka)

***Information Systems Security Officers Did Not Perform Duties in Accordance With Department Standards***

Embassy Lusaka's Information Systems Security Officers (ISSO) did not perform required ISSO duties in accordance with Department standards. According to 12 FAM 613.4 and 5 FAH-11 H-116a, ISSOs are responsible for implementing security policies and procedures for information systems and using the ISSO checklist to document all required duties. OIG found designated ISSOs did not maintain or refer to a copy of the ISSO checklist to ensure required ISSO duties were being performed. DT unit staff responsible for performing ISSO duties were not full-time ISSOs and told OIG it was difficult to find time to perform ISSO duties in addition to their primary responsibilities. Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

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

***Emergency Communications Equipment Testing Did Not Comply With Department Standards***

Embassy Lusaka did not test all its off-site emergency communications equipment in accordance with Department standards. Department guidelines in 5 FAH-2 H-655 and 5 FAH-2 H-723b require satellite phones and off-site high frequency radios to be tested monthly. Embassy Lusaka's alternate command center contained both a satellite phone and a high frequency radio, but the phone and radio were not tested monthly. DT unit staff responsible for maintaining the emergency communications equipment at the alternate command center told OIG it was difficult to find time to visit the alternate command center monthly due to staffing shortages and the need to focus on other priorities. Failure to test emergency communications equipment on a recurring basis increases the risk that embassy personnel would be unable to effectively communicate in emergency situations.

**Recommendation 27:** Embassy Lusaka should test the satellite phone and high frequency radio at the alternate command center monthly in accordance with Department standards. (Action: Embassy Lusaka)

***Emergency and Evacuation Radio Inventory Management Did Not Comply With Department Standards***

Embassy Lusaka did not manage its emergency and evacuation radio inventory in accordance with Department standards. According to 5 FAM 544.1(5), DT unit staff responsible for overseas radio property inventory must ensure inventory controls are in place and followed. OIG found

DT unit staff responsible for managing emergency and evacuation network radios were not able to verify whether all emergency and evacuation radios were accounted for in the ILMS loanable property module. In addition, personnel were unable to provide a list of all radios on hand at the embassy. DT unit staff told OIG they did not have time to reconcile the radios on hand with the radios that had been entered into the loanable property module because they prioritized other tasks. Inaccurate emergency and evacuation radio inventories can lead to reduced emergency readiness and loss of government furnished equipment.

**Recommendation 28:** Embassy Lusaka should account for all its emergency and evacuation radios and enter all radios into the Integrated Logistics Management Systems loanable property module in accordance with Department standards. (Action: Embassy Lusaka)

***Embassy Lusaka Did Not Establish a Local Configuration Control Board in Accordance With Department Standards***

Embassy Lusaka did not establish a Local Configuration Control Board<sup>53</sup> as required by Department standards. Department standards in 5 FAM 862.1b require bureaus and embassies abroad to establish a Local Configuration Control Board. OIG found Embassy Lusaka had a Local Configuration Control Board at one time, but the board was no longer active. DT unit staff told OIG they did not need a Local Configuration Control Board because they only used software approved by the Department's IT Configuration Control Board. Regardless of the embassy's current software portfolio, an active Local Configuration Control Board is required to review and approve future system and application change requests. Without an active Local Configuration Control Board, the embassy will be unable to properly review and approve changes to applications or systems for which they are responsible.

**Recommendation 29:** Embassy Lusaka should establish a Local Configuration Control Board in accordance with Department standards. (Action: Embassy Lusaka)

***Embassy Lusaka Did Not Establish Telephone Calling Accountability Procedures in Accordance With Department Standards***

Embassy Lusaka did not establish telephone calling accountability procedures in accordance with Department standards. Department standard 5 FAM 527a requires executive officers or their designees to review monthly telephone service statements for accuracy and to seek repayment for unapproved telephone charges incurred by employees. OIG determined that DT unit staff reviewed monthly telephone service statements. However, they did not have a procedure to account for charges incurred by individual phone lines and, thus, were unable to seek repayment for unapproved telephone charges. The embassy's telephone system had the ability to account for charges incurred by individual lines, but DT unit staff had not enabled the feature due to not receiving training on the telephone system's capabilities. Inability to track unapproved telephone charges increases the risk of misuse of government resources.

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<sup>53</sup> The Department defines a Local Configuration Control Board as a board that reviews changes affecting systems or applications for which a bureau or mission is responsible.

**Recommendation 30:** Embassy Lusaka should establish a method to seek repayment for unapproved telephone charges in accordance with Department standards. (Action: Embassy Lusaka)

***Mobile Phone Management Procedures Did Not Comply With Department Standards***

Embassy Lusaka did not manage its mobile phones in accordance with Department standards. According to 5 FAM 527c, embassies abroad are required to establish procedures to review telecommunication charges and service inventories for accuracy. OIG found the DT unit did not have a process for comparing the monthly service charges to the number of mobile phones issued to embassy personnel to ensure the embassy was not paying for service lines not in use. DT unit staff were aware of the deficiency and told OIG they were establishing better management controls for the mobile phone program but had not completed the work at the time of the inspection. Failure to verify that the embassy is not paying for unused mobile phone services can result in wasted funds.

**Recommendation 31:** Embassy Lusaka should verify paid monthly service charges for mobile phone lines and service inventories in accordance with Department standards. (Action: Embassy Lusaka)

***Records Management Program Did Not Comply With Department Standards***

Embassy Lusaka's records management program did not comply with Department standards. OIG found the embassy did not:

- Retire its paper and electronic records in accordance with foreign records disposition schedules (5 FAM 451b).
- Archive records generated on non-government electronic messaging applications (5 FAM 435d).
- Assign responsibilities to an individual in each office to manage records management operations with the Post Records Coordinator (5 FAM 418.9b(4)a).

The office management specialist designated as Embassy Lusaka's Post Records Coordinator took initial steps to establish a records management program, but at the time of the inspection those efforts were still ongoing. Embassy staff responsible for overseeing the records management program told OIG it was difficult to find time to coordinate required records management activities. OIG issued management assistance reports in September 2020 and June 2022<sup>54</sup> that highlighted deficiencies in records management, including records retirement, across the Department. The lack of an effective records management program increases the risk of loss of information and historical records that affect the embassy's ability to conduct policy analysis, decision-making, and archival research.

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<sup>54</sup> 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).

**Recommendation 32:** Embassy Lusaka should bring its records management program into compliance with Department standards. (Action: Embassy Lusaka)

## RECOMMENDATIONS

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

**Recommendation 1:** Embassy Lusaka should monitor and document public diplomacy grants in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

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

**Recommendation 2:** Embassy Lusaka should implement a plan to increase nonimmigrant visa adjudication capacity and reduce interview appointment wait times. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka implemented a plan to increase nonimmigrant visa adjudication capacity and reduce interview appointment wait times.

**Recommendation 3:** Embassy Lusaka should comply with Department consular procedural requirements. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka complied with Department consular procedural requirements.

**Recommendation 4:** Embassy Lusaka should comply with Department standards for consular crisis preparedness. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka complied with Department standards for consular crisis preparedness.

**Recommendation 5:** Embassy Lusaka should monitor the Global Support Services program in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka neither agreed nor disagreed with this recommendation. The embassy noted that the locally employed staff Global Support Services program point of contact is aware of the requirement and has set up a quarterly calendar reminder to conduct calls and review audio and electronic files for accuracy and staff language skills. The embassy clarified that test calls were made in the last year but infrequently.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka monitored the Global Support Services program in accordance with Department standards.

**Recommendation 6:** Embassy Lusaka should conduct validation studies on issued nonimmigrant visas in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka conducted validation studies on issued nonimmigrant visas in accordance with Department standards.

**Recommendation 7:** Embassy Lusaka should record, track, and collect employee accounts receivable, in accordance with Department requirements. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation. The embassy noted an estimated completion date of July 2025.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka recorded, tracked, and collected employee accounts receivable, in accordance with Department requirements.

**Recommendation 8:** Embassy Lusaka should bring its cashier operations into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka's cashier operations complied with Department standards.

**Recommendation 9:** Embassy Lusaka should clear overdue travel advances, in accordance with Department guidelines, and put overdue travel advance funds of up to \$24,770 to better use. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka cleared overdue travel advances, in accordance with Department guidelines, and put overdue travel advance funds of up to \$24,770 to better use.

**Recommendation 10:** Embassy Lusaka should manage its fuel operations in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka managed its fuel operations in accordance with Department standards.

**Recommendation 11:** Embassy Lusaka should bring its property management program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka's property management program complied with Department standards.

**Recommendation 12:** Embassy Lusaka should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

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

**Recommendation 13:** Embassy Lusaka should comply with Department requirements for managing the official vehicles in its motor pool. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka complied with Department requirements for managing the official vehicles in its motor pool.

**Recommendation 14:** Embassy Lusaka should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation. The embassy noted an estimated completion date of July 2025.

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

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

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation. The embassy noted an estimated completion date of June 2025.

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

**Recommendation 16:** Embassy Lusaka should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka's safety, health, and environmental management program complied with Department standards.

**Recommendation 17:** Embassy Lusaka should bring its residential fire protection program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

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

**Recommendation 18:** Embassy Lusaka should comply with the Department's time and attendance requirements. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka neither agreed nor disagreed with this recommendation. The embassy noted its timekeepers received a refresher presentation from the main timekeeper and have taken time and attendance training. Furthermore, certificates are on file for all timekeepers. The embassy also noted that it follows holidays that have been declared as public holidays by the government of Zambia and that it will observe nine local holidays in 2025.

**OIG Reply:** OIG considers the recommendation resolved. In addition to the issues with timekeeper training and the embassy's observance of more than 10 local holidays, as detailed in the report, OIG also found that the embassy did not comply with requirements for authorizing overtime in advance. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka complied with the Department's time and attendance requirements, including for authorizing overtime in advance.

**Recommendation 19:** Embassy Lusaka should require the embassy employee association's board of directors to conduct its oversight responsibilities in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka required the embassy employee association's board of directors to conduct its oversight responsibilities in accordance with Department standards.

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

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

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

**Recommendation 21:** Embassy Lusaka should register and obtain approval for its external network extensions in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka registered and obtained approval for its external network extensions in accordance with Department standards.

**Recommendation 22:** Embassy Lusaka should update and test the information technology contingency plans for its Sensitive But Unclassified and classified networks in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka updated and tested the information technology contingency plans for its Sensitive But Unclassified and classified networks in accordance with Department standards.

**Recommendation 23:** Embassy Lusaka should implement a network account management procedure for regularly reviewing user accounts in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka implemented a network account management procedure for regularly reviewing user accounts in accordance with Department standards.

**Recommendation 24:** Embassy Lusaka should implement a procedure to change the administrative passwords for its networked digital copiers, printers, and senders in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka implemented a procedure

to change the administrative passwords for its networked digital copiers, printers, and senders in accordance with Department standards.

**Recommendation 25:** Embassy Lusaka should configure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka configured and monitored its non-enterprise networks in accordance with Department standards.

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

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka completed all information systems security officer responsibilities in accordance with Department standards.

**Recommendation 27:** Embassy Lusaka should test the satellite phone and high frequency radio at the alternate command center monthly in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka tested the satellite phone and high frequency radio at the alternate command center monthly in accordance with Department standards.

**Recommendation 28:** Embassy Lusaka should account for all its emergency and evacuation radios and enter all radios into the Integrated Logistics Management Systems loanable property module in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka accounted for all its

emergency and evacuation radios and entered all radios into the Integrated Logistics Management Systems loanable property module in accordance with Department standards.

**Recommendation 29:** Embassy Lusaka should establish a Local Configuration Control Board in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka established a Local Configuration Control Board in accordance with Department standards.

**Recommendation 30:** Embassy Lusaka should establish a method to seek repayment for unapproved telephone charges in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka established a method to seek repayment for unapproved telephone charges in accordance with Department standards.

**Recommendation 31:** Embassy Lusaka should verify paid monthly service charges for mobile phone lines and service inventories in accordance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka verified paid monthly service charges for mobile phone lines and service inventories in accordance with Department standards.

**Recommendation 32:** Embassy Lusaka should bring its records management program into compliance with Department standards. (Action: Embassy Lusaka)

**Management Response:** In its May 7, 2025, response, Embassy Lusaka concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Lusaka's records management program complied with Department standards.

## PRINCIPAL OFFICIALS

Agency/Section/Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Michael Gonzales	9/2022
Deputy Chief of Mission	Linnisa Wahid	8/2022
<b>Chiefs of Sections:</b>		
Consular	Amy Reardon	9/2023
Economic	Katrissa Bohne	7/2024
Management	Shane Spellman	8/2023
Political	Katrissa Bohne	8/2024
Public Diplomacy	Philip Dimon	9/2021
Regional Security	Jason Williams	6/2021
Diplomatic Technology	Martin Wehner	9/2022
<b>Other Agency Representatives:</b>		
Centers for Disease Control and Prevention	Rachel Johnson	11/2023
Department of the Treasury	Keith Stein	9/2023
Millennium Challenge Corporation	Steve Marma	10/2024
Office of Defense Cooperation	Gene Uhler	8/2024
Peace Corps	Timothy Katz	8/2019
Senior Defense Official/Defense Attaché	Matthew Yan	8/2024
U.S. Agency for International Development	Peter Wiebler	8/2022
U.S. Commercial Service	Kolbjorn "Kully" Nelson	9/2024

**Source:** OIG generated from data provided by Embassy Lusaka.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from September 3, 2024, to February 11, 2025, 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

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UNCLASSIFIED  
EMBASSY OF THE  
UNITED STATES OF AMERICA  
LUSAKA, ZAMBIA

May 7, 2025

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THRU: AF/EX, Executive Director Karen Keshap

TO: OIG – Lisa Rodely, Acting Assistant Inspector General for Inspections

FROM: Embassy Lusaka, Ambassador Michael Gonzales

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Lusaka, Zambia

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

**Recommendation 1:** Embassy Lusaka should monitor and document public diplomacy grants in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. The embassy has implemented the recommendation by expanding the section's number of grants officer representatives to support stronger monitoring, as well as implementing monthly meetings to ensure we are meeting reporting expectations. The section has also reduced the number of grants awarded to align with post capacity for adequate supervision.

**Recommendation 2:** Embassy Lusaka should implement a plan to increase nonimmigrant visa adjudication capacity and reduce interview appointment wait times. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. With the arrival of a new Foreign Service Officer adjudicator in December 2024 and recent completion of his training, post has been steadily increasing the number of nonimmigrant visa appointments and should reach maximum capacity by June 2025. The Consular Chief now regularly adjudicates nonimmigrant visas in addition to adjudicating most IV, DV, and citizenship/passport/notarial services.

**Recommendation 3:** Embassy Lusaka should comply with Department consular procedural requirements. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. The consular section has implemented most of the recommendations by consistently performing quarterly unannounced cash counts, conducting regular quarterly audits of the section's inventory of controlled items, and establishing a regular schedule to destroy paper files of immigrant visa records per 9 FAM 601.6-3(B). The consular chief conducts monthly spot checks on approved immigrant visa cases and

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submits the reviews in CCD. Consular has implemented a calendar reminder to run IV end-of-day reports.

**Recommendation 4:** Embassy Lusaka should comply with Department standards for consular crisis preparedness. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. The consular section conducted a tabletop crisis management exercise and organized a subsequent meeting and tour of the airport with Zambian airport emergency response personnel to assess local preparedness in the event of an emergency that would require services at the largest airport in Zambia. All consular staff have completed crisis task force software training (CACMS). Contents of the consular flyaway kits have been inventoried and are sufficiently equipped. Our EFM Consular Associate and alternate ACS LE Staff have continued their ACS cross-training and shadowing. The embassy tested the Consular Liaison Volunteer (CLV) network, updated memorandums of agreement, and reviewed the needs for additional CLVs.

**Recommendation 5:** Embassy Lusaka should monitor the Global Support Services program in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** The LE Staff GSS point of contact is aware of the requirements. Test calls were made in the last year, but infrequently. The GSS POC has set up a quarterly calendar reminder to conduct calls and review audio/electronic files for accuracy and staff language skills.

**Recommendation 6:** Embassy Lusaka should conduct validation studies on issued nonimmigrant visas in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Embassy Lusaka has completed the required NIV validation studies. The reporting cable for the final study is expected to be released the week of May 5, 2025.

**Recommendation 7:** Embassy Lusaka should record, track, and collect employee accounts receivable, in accordance with Department requirements. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. The embassy is currently implementing a new accounts receivable management tool, ATLAS Financials, which will allow for better management of employee accounts receivable, and coordination of amounts due among management sections (FMO, Motor Pool, GSO Housing, DT, etc.). The expected completion date is July 2025.

**Recommendation 8:** Embassy Lusaka should bring its cashier operations into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. The embassy has implemented the recommendation by updating the following documentation:

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- A decision memorandum approved by the chief of mission for providing accommodation exchange services was approved in April 2025.
- The embassy updated its cashier operations and cash movement policies in April 2025.
- The financial management office has performed its monthly unannounced verifications of the cash held by the embassy's principal cashier on different days of the week over the past 6 months, making the process less predictable for the cashier.
- Unannounced subcashier cash verifications have been occurring with frequency required by the regulations (once a quarter) since October 2024. Primary cashier has been tasked with sending reminders to subcashier's supervisor about the quarterly requirement.
- A new cashier schedule was established to assure alternate cashiers are compliant with acting cashier requirements.
- The Financial Management Officer completed the required monthly disbursing accountability cashier collection report verifications, as well as the monthly reconciliations of the embassy's consular collections. All reports are up to date as of April 2025.

**Recommendation 9:** Embassy Lusaka should clear overdue travel advances, in accordance with Department guidelines, and put overdue travel advance funds of up to \$24,770 to better use. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. One of the financial management section employees has been tasked with weekly reporting of open advances, following up with employees to file delinquent vouchers and to return outstanding advances to the embassy cashier.

**Recommendation 10:** Embassy Lusaka should manage its fuel operations in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. As of February 2025, AMCA has started purchasing fuel directly from the Embassy's contractor, rather than purchasing from the Embassy's fuel stock. AMCA has submitted all payments for past fuel to the US Embassy. Therefore, AMCA no longer needs to reimburse the U.S. government for fuel that is resold to POV owners, as these transactions occur independent of the Embassy procurement actions.

**Recommendation 11:** Embassy Lusaka should bring its property management program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Following the OIG inspection in October 2024, the accountable property officer instituted calendar reminders to conduct a quarterly unannounced spot checks with the next one due in May. Secondly, regarding the transfer of \$1 million in nonexpendable supplies effective Friday, May 2, 2025, there are zero transfers of nonexpanded property without a DS-584.

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**Recommendation 12:** Embassy Lusaka should bring its furniture and appliance pool program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Following the OIG Inspection in October, Post worked to bring the FAP into compliance:

- Asset Misclassification - as of May 2025, 96 assets have been corrected, and 68 assets are in the process of correction with an estimated conclusion of June 30. The 25 FAP assets at designated residences issued as loaner items are being addressed with an estimated closure of July 2025.
- Excess inactive FAP stock – Post is at 16.9% and plans to conduct an auction in May 2025 to dispose of excess assets that are of age.
- Embassy FAP Policy was updated effective April 2025 and pending ICASS Council final approval expected in May 2025

**Recommendation 13:** Embassy Lusaka should comply with the Department’s requirements for managing the official vehicles in its motor pool. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. In December 2024, Embassy Lusaka onboarded a new Motor Pool Supervisor, filling a long-standing vacancy and improving management oversight of key processes. As of May 2025, Motor Pool has no outstanding trip tickets over 2 weeks old, all drivers have received armored vehicle familiarization training, and a new Motor Vehicle Policy has been drafted with expected publication this month. Furthermore, as of April 7<sup>th</sup>, Lusaka is ranked as excellent and a top ten motor pool in the world according to ILMS Analytics for Fleet Performance

**Recommendation 14:** Embassy Lusaka should bring its contracting officer’s representative program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation.

- All COR had paper delegation memoranda but not in the new MyService COR system. Procurement worked with all CORs in the multiple steps DOD system enrollment and effective December 2024, everyone is enrolled in the new Department systems and has their Memo Delegation.
- All CORs have completed the required COR training, been designated in the system and have filed their Financial Disclosure.
- The process of assigning COR eFiling has started and the CO is working to assign each COR in ILMS to the relevant file. The CO expects to complete this process by end of July 2025
- Past mandatory performance reviews were done on paper because CORs didn’t have rights. However, following the OIG Inspection in October, Post worked with A/GA and all contracts above \$250,000 have been entered into CPARS and assigned to the CORs and Contractor representatives for reporting. This action was completed in February 2025.

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

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**Response:** Embassy Lusaka concurs with the recommendation. The procurement team is actively working on closing out e-files on a weekly basis, and Post is performing a mass closeout that will reduce the current backlog no later than June 2025.

**Recommendation 16:** Embassy Lusaka should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation.

- Low-risk areas weren't being inspected annually.
  - Facility Management has been practicing annual inspection of low-risk workplaces since 2022, and all records are on file.
- Required workplace safety training for management officials and supervisors wasn't being conducted.
  - Training materials were downloaded from the SHEM website and APOSHO and POSHO will train managers and supervisors in July 2025.
- POSHO records were incomplete.
  - FM began keeping training records in the FAC shared folder in Jan. 2025.

**Recommendation 17:** Embassy Lusaka should bring its residential fire protection program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Previously ordered Fire Extinguishers arrived at Post in November 2024. By the end of May 2025, all new fire extinguishers will be placed into residences.

**Recommendation 18:** Embassy Lusaka should comply with the Department's time and attendance requirements. (Action: Embassy Lusaka)

**Response:**

- *Not all Embassy timekeepers have training completed or on file with the Master Timekeeper.*
  - Timekeepers received a refresher presentation from the Main Timekeeper and have been progressively taking the online version of the WinTA training GFS50 – Basic Time and Attendance Training. Certificates are on file for all timekeepers.
- *Post has 11 Local Holidays on the 2024 calendar. Only 10 Local Holidays are authorized.*
  - To comply with local labor law, Post follows holidays that have been declared as Public Holidays in the Public Holidays Act (1987) and yearly Government Gazette Notices issued by the Government of the Republic of Zambia (GRZ). Post will observe nine local holidays in 2025, fully in compliance with requirements.

**Recommendation 19:** Embassy Lusaka should require the embassy employee association's board of directors to conduct its oversight responsibilities in accordance with Department standards. (Action: Embassy Lusaka)

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**Response:** Embassy Lusaka concurs with this recommendation. Management met with the employee association's board reminding them of the requirement. An inspection and meeting schedule were developed in accordance with guidance. Management attends all AMCA meetings to ensure board compliance.

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

**Response:** Embassy Lusaka concurs with this recommendation. The hardship differential was submitted on February 13, 2025. The resulting change in differential came into effect on March 9, 2025.

**Recommendation 21:** Embassy Lusaka should register and obtain approval for its external network extensions in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. We are working to verify a completion date, given the shortage in personnel (by 60 percent) in the DT section.

**Recommendation 22:** Embassy Lusaka should update and test the information technology contingency plans for its Sensitive But Unclassified and Classified networks in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. We are working to establish a completion date, given the intense shortages of personnel in the section.

**Recommendation 23:** Embassy Lusaka should implement a network account management procedure for regularly reviewing user accounts in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. An SOP is being developed and DT will perform the review annually. We expect the SOP to be available by May 16, 2025.

**Recommendation 24:** Embassy Lusaka should implement a procedure to change the administrative passwords for its networked digital copiers, printers, and senders in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. DT has implemented the recommendation by setting up automated tools to assist with changing passwords. We have instituted a recurring procedure for updating the passwords every 60 days. We plan to complete the first recurring change of passwords in May, 2025.

**Recommendation 25:** Embassy Lusaka should configure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Lusaka)

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**Response:** Embassy Lusaka concurs with the recommendation. A network firewall has been ordered. Monitoring agents have been deployed on servers. DT is deploying monitoring agents to workstations. We are working to establish a completion date, given the intense shortages of personnel in the section.

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

**Response:** Embassy Lusaka concurs with the recommendation. We are aware of the requirements and available tools (e.g., ISSO Checklist). Post does not have a dedicated ISSO position that would normally perform these tasks. Instead, the two DTO positions at Post must perform these tasks as ancillary duties. Due to the already high workload of the two DTOs with their primary duties, we have been unable to perform these ISSO tasks consistently and completely. In the absence of additional American DT staffing, Post may not be able to consistently meet this and all other DT requirements.

**Recommendation 27:** Embassy Lusaka should test the satellite phone and high frequency radio at the alternate command center monthly in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Post has implemented testing satellite phones and HF radios at the Chancery on a monthly basis per the updated guidance from Washington D.C. We are reporting the results of the tests through official channels. Post has tested the equipment at the ACC but due to the intense shortages of personnel in the section a regular schedule has yet to be adopted. Post plans to implement regular testing at the ACC starting in May of 2025.

**Recommendation 28:** Embassy Lusaka should account for all its emergency and evacuation radios and enter all radios into the Integrated Logistics Management Systems loanable property module in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. We have implemented this recommendation by updating ILMS/LP and ATLAS Directory with complete information of radios loaned out to users at Post.

**Recommendation 29:** Embassy Lusaka should establish a Local Configuration Control Board in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. We have implemented this recommendation by establishing a local change control board in accordance with Department standards.

**Recommendation 30:** Embassy Lusaka should establish a method to seek repayment for unapproved telephone charges in accordance with Department standards. (Action: Embassy Lusaka)

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**Response:** Embassy Lusaka concurs with the recommendation. DT has enabled the Embassy's PBX system to produce detailed usage reports. DT has not yet established a procedure for FMO to bill individual offices. Given the chronic staffing shortages, we are still working on an expected date of completion.

**Recommendation 31:** Embassy Lusaka should verify paid monthly service charges for mobile phone lines and service inventories in accordance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. We have implemented the recommendation by creating processes for reviewing monthly service charges from our provider and for addressing discrepancies. The provider is inconsistent in their billing schedule and the accuracy of the bills. DT continues to work with the provider to ensure they provide accurate billing information.

**Recommendation 32:** Embassy Lusaka should bring its records management program into compliance with Department standards. (Action: Embassy Lusaka)

**Response:** Embassy Lusaka concurs with the recommendation. Embassy Lusaka met with the records management team in Washington D.C. and requested training. Records storage and disposition have been reviewed, and records are being brought into compliance.

The point of contact for this memorandum is Shane Spellman.

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## ABBREVIATIONS

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AMCA	American Mission Community Association
C.F.R.	Code of Federal Regulations
COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DT	Diplomatic Technology
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAP	Furniture and Appliance Pool
FAST	First- and Second-Tour
GSS	Global Support Services
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
ILMS	Integrated Logistics Management System
ISSO	Information Systems Security Officer
LE	Locally Employed
NEN	Non-Enterprise Network
PEPFAR	U.S. President's Emergency Plan for AIDS Relief
POSHO	Post Occupational Safety and Health Officer
POV	Personally Owned Vehicle
USAID	U.S. Agency for International Development



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