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Office of Inspector General
United States Department of State

ISP-I-23-10

Office of Inspections

April 2023

Inspection of Embassy Beirut, Lebanon

BUREAU OF NEAR EASTERN AFFAIRS

UNCLASSIFIED



HIGHLIGHTS

Office of Inspector General
United States Department of State

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What OIG Inspected

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

What OIG Recommends

OIG made 15 recommendations to Embassy Beirut. In its comments on the draft report, the embassy concurred with all 15 recommendations. OIG considers all 15 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.

April 2023

OFFICE OF INSPECTIONS

BUREAU OF NEAR EASTERN AFFAIRS

Inspection of Embassy Beirut, Lebanon

What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Beirut in a professional and collaborative manner and engaged with Lebanon to advance foreign policy goals.
- Embassy Beirut generally managed grants in compliance with standards and addressed areas for improvement during the inspection.
- Embassy Beirut's compound layout, consisting of multiple buildings of varying ages and construction spread over more than 19 acres, contributed to infrastructure problems and safety deficiencies.
- The embassy's fire protection program did not comply with Department of State standards and the embassy did not address several issues identified in previous fire reviews.
- Embassy Beirut's locally employed information management staff required additional training to complete their duties, and information systems security officers did not perform all required duties.
- Spotlight on Success: Embassy Beirut leveraged English language programs and alumni to reach marginalized communities.
- Spotlight on Success: The embassy's Public Diplomacy Section used program evaluation and data analytics to inform its outreach to target audiences in Lebanon.
- Spotlight on Success: Embassy Beirut's Foreign Assistance Working Group centralized oversight of new programming by involving all embassy sections and agencies handling assistance programming.

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CONTEXT

Lebanon's history since independence in 1943 has been marked by periods of political turmoil interspersed with prosperity built on its position as a regional center for finance and trade. The country's 1975-90 civil war was followed by years of social and political instability. This instability included tragic consequences for the United States: In April 1983, a truck loaded with explosives blew up outside Embassy Beirut, killing 49 employees, including 17 U.S. diplomatic and military personnel; in October 1983, a suicide bomber attacked U.S. and French military barracks, killing 241 U.S. service members; in September 1984, another bombing at the embassy killed 11 people; and in September 1985, another explosion at the embassy killed 12 locally employed staff. Continuing security concerns later prompted the U.S. government to withdraw all diplomatic personnel and suspend operations at the embassy on September 6, 1989; the embassy reopened on November 29, 1990. Security threats and associated constraints continue to directly affect the embassy's operating environment.



Figure 1: Map of Lebanon. (Source: CIA World Factbook 2021).

Sectarianism is a key element of Lebanese political life, with a governmental power-sharing arrangement, unique to the region, that seeks to accommodate diverse religious and ethnic groups in a single, consensus-based political system. Neighboring Syria long influenced Lebanon's foreign and domestic policies, and its military forces were in Lebanon from 1976 until 2005. After the Syrian military withdrew, Israel and the Lebanon-based terrorist group Hizballah continued to engage in attacks and counterattacks against each other, fighting a brief war in 2006 and engaging in cross-border skirmishes in 2019 and 2020. In addition to these security challenges, Lebanon has been mired in an economic and financial crisis since fall 2019 from which it has yet to recover.

The United States seeks to help Lebanon preserve its independence, sovereignty, national unity, stability, and territorial integrity. The United States, along with the international community, supports full implementation of United Nations Security Council Resolutions 1559, 1680, and 1701, which call for the disarming of all militias, the delineation of the Lebanon-Syria border, and the deployment of the Lebanese Armed Forces throughout Lebanon.

Since 2010, the United States has provided more than \$4 billion in foreign assistance to Lebanon. This assistance aims to strengthen strategic partners such as Lebanon's security forces, ensure key services reach the Lebanese people, preserve the multi-sectarian character of Lebanon, and counter Hizballah's narrative and influence. In addition, the United States, Lebanon's primary security partner, has provided more than \$2 billion in bilateral security assistance to the Lebanese Armed Forces since 2006. The United States also has provided more

than \$2.3 billion in humanitarian assistance to help Lebanon support refugees from Syria's internal armed conflict that began in 2011.

Embassy Beirut's Integrated Country Strategy (ICS), approved in April 2022, identified four strategic goals:

- Improve the government of Lebanon's performance in maintaining security nationwide.
- Reestablish good governance and prevent further state collapse by promoting long-overdue reforms, judicial independence, and civil society.
- Promote inclusive economic growth and enhanced commitments [from the government of Lebanon] on climate change.
- Leverage U.S. soft power to encourage Lebanon's Western orientation and solidify the United States as the preferred partner among strategic competitors.

The current embassy compound is a contiguous patchwork of leased buildings and plots of land across 19.42 acres. The embassy workforce was spread among more than 37 different properties that include the converted villa chancery, temporary modular trailers, constructed annex office buildings, and the lower levels of the former chancery, which was bombed in 1984. In December 2016, the Bureau of Overseas Buildings Operations (OBO) awarded a contract for the construction of a new embassy compound that will include a new office building, annexes, and housing. The project experienced a 14-month delay due to Lebanon's economic collapse and nationwide protests, visa processing issues, and the COVID-19 pandemic. The project, with a budget of \$1.025 billion, is estimated to be completed in 2025.

At the time of the inspection, Embassy Beirut had 100 authorized U.S. direct-hire staff, 655 locally employed (LE) staff, and 5 eligible family member positions. The Departments of Commerce, Defense, and Justice and the U.S. Agency for International Development also are represented at the embassy.

OIG evaluated the embassy's executive direction, policy and program implementation, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980.¹ A related classified inspection report discusses the embassy's security program and issues affecting the safety of mission personnel and facilities, and certain aspects of the embassy's policy implementation.

EXECUTIVE DIRECTION

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

¹ See Appendix A.

Tone at the Top and Standards of Conduct

The Ambassador, a career member of the Senior Foreign Service, arrived in Beirut in March 2020 after serving as Deputy Chief of Mission (DCM) at the U.S. Embassy in Cairo, Egypt. Previously, she served as Deputy Principal Officer at Consulate General Jerusalem and in political officer positions at Embassy Tunis, Tunisia, and Embassy Tel Aviv, Israel. She also served in Washington in the Bureau of Population, Refugees and Migration, and at the Senate Foreign Relations Committee as Senior Professional Staff Member covering the Middle East and North Africa. The DCM, also a member of the Senior Foreign Service, arrived in Beirut in May 2021 after serving as the Economic Counselor at Embassy Abuja, Nigeria. He served previously as DCM in Kigali, Rwanda, and in four missions in the region, including at Embassy Beirut as Cultural Affairs Officer.

The Ambassador and the DCM modeled leadership principles in 3 Foreign Affairs Manual (FAM) 1214b² and functioned effectively as a team with the Ambassador focusing on external contacts and key foreign policy objectives and the DCM focusing on internal embassy operations, consistent with their roles as outlined in 2 FAM 113.1 and 2 FAM 113.2. OIG found that embassy staff recognized the Ambassador and the DCM as acting with integrity and consistently fostering interagency collaboration, strategic planning, and leading by example. The Ambassador and the DCM kept the staff informed of embassy external and internal activities through town hall meetings and embassy-wide emails. To foster interagency collaboration, the Ambassador and the DCM met regularly with representatives of U.S. government agencies individually and in Country Team meetings. The DCM led issue-specific interagency meetings, such as the Foreign Assistance Working Group and Law Enforcement Working Group. Additionally, LE staff expressed appreciation for Front Office support for paying their salaries in U.S. dollars in response to Lebanon's staggering inflation.

Embassy staff described the Ambassador as accessible and supportive of staff professional development. For example, they told OIG that the Ambassador provided guidance in section staff meetings she attended and feedback to drafters on their cable drafts. Staff also told OIG that the Ambassador promoted morale-building activities for the embassy community, including hosting exercise classes and welcome events for new staff. Staff also praised the Ambassador as a policy and regional expert who used her access to Lebanon's top leaders and their advisors for maximum impact in advancing U.S. interests. OIG's review of the Ambassador's calendar indicated she had broad and ready access to senior government of Lebanon officials, and a wide range of engagements with Lebanon's business, media, civil society, and community leaders. Embassy staff told OIG the Ambassador fostered a high-tempo, results-oriented climate that required the Political-Economic Section to work frequent overtime to draft documents and cables for Washington. The Ambassador told OIG she was aware of the long work hours all staff spent on tasks, such as preparing for and hosting high-level U.S.

² The Department's leadership and management principles outlined in 3 FAM 1214b include (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.

government visitors, and that she had encouraged them to take time to relax away from the embassy compound.

Embassy staff described the DCM as decisive and a problem-solver in dealing with internal embassy operations. The DCM held regular open office hours during which he met with U.S. and LE staff, individually and in groups, to hear ideas and suggestions, provide individual professional consultations, and solicit and provide feedback regarding embassy operations and procedures. Staff and most section heads generally indicated to OIG that the DCM's regular open office hours contributed positively to morale and professional development.

Execution of Foreign Policy Goals and Objectives

OIG determined the Ambassador fulfilled her responsibilities to oversee the embassy's strategic activities as defined in 2 FAM 113.1c. She advanced key embassy and U.S. goals as defined in the embassy's ICS, as required in 2 FAM 113.1b and 18 FAM 301.2-4c and d. Embassy staff were knowledgeable regarding ICS goals and told OIG they appreciated an October 2022 off-site, where the Ambassador reviewed the ICS and opportunities to advance its goals and how to ensure the goals continued to address Lebanon's challenges. Embassy staff also commended the Ambassador and the DCM for their coordination with members of the Country Team on advancing ICS goals, including advocating for economic and political reforms required by the International Monetary Fund to implement a significant aid package.

Department officials praised the Ambassador and embassy staff for their role in advancing strategic goals. For example, the Ambassador's facilitation of U.S.-led negotiations helped the parties reach an agreement in October 2022 on the Lebanon-Israel maritime boundary that had positive implications for Lebanon's security and economy. At the time of the inspection, the Ambassador and the DCM were in the process of leading the embassy's development of an interagency-approved program to provide temporary livelihood support to members of the Lebanese Armed Forces and Internal Security Forces to relieve pressure on the government of Lebanon and help stave off state failure. They also were leading the embassy's facilitation of regional energy deals to assist Lebanon with importing gas from Egypt and excess electricity from Jordan's power grid into the country.

Department officials commended the Ambassador on excellent communication and coordination with Washington, and the embassy's timely and detailed economic and political reporting. They described the Ambassador as a strong leader who engaged well with her staff to advance U.S. interests in Lebanon. Washington officials commended the embassy on its work regarding the development of the aforementioned Egypt-to-Lebanon gas pipeline to ameliorate Lebanon's energy crisis, including the Ambassador's efforts to gain the cooperation of Lebanon's senior officials.

Adherence to Internal Controls

OIG determined that the Ambassador and the DCM prepared the FY 2022 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1),

which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. The DCM was involved throughout the Statement of Assurance process and reviewed each section's submission with the section chief. Although the Statement of Assurance affirmed that the embassy complied with requirements related to information systems security officer duties, OIG found they were not carried out. That deficiency, and several other internal control issues that OIG found during the inspection, are addressed in the Resource Management and Information Management sections of this report.

The DCM conducted reviews of the Consular Section's nonimmigrant visa adjudications in accordance with 9 FAM 403.12-1 and 2.

Security and Emergency Planning

The Front Office's leadership of the embassy's security and emergency preparedness programs generally was consistent with the Department's guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-762a, requiring the Ambassador to take responsibility for the security of mission personnel. The DCM met weekly and the Ambassador biweekly with the Regional Security Officer to review security issues. Embassy staff told OIG the Ambassador and the DCM participated in regular radio checks and emergency drills. The DCM also routinely monitored the embassy staff's participation in radio checks and reminded them to participate. OIG found the embassy's emergency action plan was up to date at the time of the inspection. The embassy engaged in evacuation planning with the Department of Defense and held Emergency Action Committee meetings as needed. Washington officials told OIG that they were satisfied with the embassy's emergency planning. The related classified report contains additional information regarding the embassy's security program and the Ambassador's handling of information.

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

OIG found that the Ambassador and the DCM supported Equal Employment Opportunity (EEO) practices consistent with 3 FAM 1511.1a, 3 FAM 1514c(3)a and c, and cable 21 STATE 60514.³ Embassy staff indicated that both the Ambassador and the DCM encouraged them to apply for EEO counselor and liaison positions. The embassy's EEO counselor and LE staff EEO liaisons confirmed they had received required training to carry out their responsibilities. Information on the EEO program and who to contact was posted throughout the embassy compound, including in work areas for staff with limited access to Department intranet accounts.

OIG also determined that the Ambassador and the DCM supported Diversity, Equity, Inclusion and Accessibility practices consistent with cable 22 STATE 13392.⁴ The Ambassador frequently

³ Cable 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment 6-11-2021" June 11, 2021.

⁴ Cable 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices", February 22, 2022.

engaged on diversity, gender, and inclusion issues at town hall meetings and by participating in embassy programs addressing these themes. The embassy had an active Diversity, Equity, Inclusion and Accessibility Council and Federal Women's Program. The council members and the program coordinator engaged with the embassy community, frequently through activities supported by the Front Office, and the council met once a month with the DCM. For example, in March 2022, the Ambassador gave the opening remarks for a women's history event that featured Lebanese panelists. For National Disability Employment Awareness Month in October 2022, the DCM opened an event that featured speakers with disabilities who participate in, and contribute to, their communities. Several staff members pointed to the October 2022 ribbon-cutting by the Ambassador on a new wheelchair ramp at the Consular Section's American Citizen Services entrance as a significant effort in improving accessibility on the embassy compound. Embassy staff attributed the idea for and construction of the ramp to the DCM.

Developing and Mentoring Foreign Service Professionals

The DCM oversaw the activities of the embassy's First- and Second-Tour (FAST) program in accordance with 3 FAM 2713b and 3 FAM 2242.5⁵. FAST staff told OIG they generally were pleased with their engagement with the DCM and the Ambassador, pointing to the DCM's support for the professional development activities suggested by FAST employees and Front Office efforts to include them in embassy events. They told OIG they gained useful organizing experience from arranging events with other diplomats in Beirut, as encouraged by the DCM. The DCM met every first Wednesday with FAST staff and the employees for whom he was the reviewing officer. The DCM also conducted professional development sessions on issues such as employee evaluation reports, bidding strategies, and cable writing. In addition, the DCM ensured FAST staff could meet with him individually during his regular open office hours for career and professional advice. However, some FAST staff members believed programming leaned more toward relevance for Foreign Service generalists than specialists. Additionally, FAST staff members told OIG they would appreciate more opportunities from embassy sections to participate in events to enhance their professional development, and support from their own section heads to take the time to participate.

POLICY AND PROGRAM IMPLEMENTATION

OIG assessed Embassy Beirut's policy and program implementation work performed by the Political-Economic, Public Diplomacy, and Consular Sections, and the embassy's coordination of foreign assistance activities and programs. OIG found the embassy generally met Department requirements for policy and program implementation. However, OIG made recommendations to address issues in the Consular Section, as discussed below.

⁵ This section of the FAM was updated in November 2022, after fieldwork for this inspection concluded. The new citation is now 3 FAM 2242.5 with no change in the requirements.

Political-Economic Section

OIG reviewed the Political-Economic Section's leadership and management, policy engagement and coordination, reporting, Leahy vetting,⁶ commercial promotion, and end-use monitoring functions. OIG found the section generally complied with Department standards.

OIG reviewed more than 80 embassy cables sent in 2021 and 2022 and found reporting was linked to ICS and Department goals and appropriately sourced. In interviews with OIG, Department and interagency stakeholders commended the section's reporting for its quality, timeliness, and relevance. They noted reports on Lebanese internal politics and economic issues as being particularly strong and useful.

OIG also determined that the section helped advance U.S. foreign policy priorities by maintaining strong working relationships with bureaus throughout the Department and by cooperating closely with interagency colleagues at the embassy. For example, collaboration on political-military and security issues was excellent, with the section playing a leading role in developing a proposal to repurpose U.S. security assistance in response to the negative impact of Lebanon's economic crisis on the country's security forces.

To help ensure timely responses to Leahy vetting requests, the section instituted a weekly email sent to all vetting participants at the embassy that tracks the status of each batch of requests, including due date and prioritization of importance. To aid in the vetting process, the section also drafted a comprehensive document analyzing the credibility of allegations of human rights abuses against specific Lebanese security force units.

Public Diplomacy

OIG reviewed the Public Diplomacy Section's strategic planning and reporting, resource and knowledge management, media engagement, programming and exchanges, and grants administration. OIG determined that public diplomacy programs and activities were well aligned with the embassy's policy priorities. Additionally, the three American officers in the section modeled inclusive leadership with a team-oriented LE staff that showed a strong commitment to mission goals. As detailed below, OIG identified two public diplomacy Spotlights on Success: the section leveraged English language programs to reach marginalized communities, and the section used program evaluation and data analytics to inform its outreach to target audiences.

⁶ 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. Leahy vetting is the process of determining if the Department has credible information that units or individuals proposed to benefit from certain assistance have committed a gross violation of human rights. See 22 U.S.C. § 2378d and 9 FAM 303.8-5(B). The Department also helps implement a similar law applicable to "amounts made available to the Department of Defense" for assistance to foreign security forces. See 10 U.S.C. § 362.

Public Diplomacy Grants Supported by Close Engagement With Implementing Partners

OIG found the Public Diplomacy Section worked closely with its implementing partners throughout the life cycle of each grant to maximize program effectiveness despite the difficult country environment. OIG reviewed all grants valued at \$100,000 or more issued between October 1, 2020, and September 12, 2022,⁷ and found they generally met Department requirements with the two exceptions below. OIG found the section actively engaged selected grantees during the pre-award phase to ensure feasible program design and budgeting. The grants officer representatives also engaged with grantees during the post-award phase with monitoring and evaluation of grantee performance that generally was well documented in the official awards file, including review notes and correspondence following each grantee quarterly report.

During the inspection, the section improved two areas of grants administration that OIG identified as not fully meeting Department requirements. First, the section brought its award selection merit review process into compliance with Department guidelines by updating its standard operating procedures and review panel scoring templates.⁸ In addition, some awards—while advancing ICS goals—did not clearly include the American content component explicitly required of public diplomacy grants.⁹ Section grants staff acknowledged that the guidance language on this element of their pre-award review process was overly broad and vague. During the inspection, staff revised it with clearer, more specific language and incorporated that into the section’s technical and merit review processes, including the scoring templates used for award selection.

⁷ OIG reviewed 18 public diplomacy grant awards (total value \$5.17 million) out of a universe of 80 grant awards (total value \$6.5 million).

⁸ The Department’s Federal Assistance Directive 6.0 (Chapter 2; Section H) stipulates that for a federal assistance award to qualify as full and open, applications received from the Notice of Opportunity to Fund must be subject to an impartial merit evaluation by a review panel. A summary of the review panel’s discussion and copies of written reviews are maintained in the official federal award file.

⁹ Awards funded with congressionally appropriated public diplomacy funds must meet the terms of 2 FAM 961.4 (4), which defines public diplomacy purposes abroad consistent with statutory authorities as “programs or initiatives which advance the Department’s mission by engaging with foreign publics through informational, educational and/or cultural programs and similar outreach efforts in order to strengthen understanding of the United States, including its society, culture, politics and values; build public support for U.S. policies; and further mutual understanding.” This definitional standard normally is met via the participation of U.S. experts, U.S. curricular/program content, and/or a U.S.-host country exchange component.

Spotlight on Success: Leveraging English Language Programs and Alumni to Reach Marginalized Communities

Through its English Access micro-scholarship program, Embassy Beirut's Public Diplomacy Section reaches 500 at-risk youth each year in politically contested communities across the country. The twin challenges of COVID-19 and national electricity shortages shuttered Lebanon's public schools for much of 2020-2022. With a successful pivot to virtual classes, Access became one of the country's only educational offerings to continue without interruption during that period; students and teachers even moved some classes to midnight to take advantage of available electricity. The accomplishments of the program's student alumni represent an additional multiplier impact. For example, a section grant helped an Access graduate create a language and leadership skills program for women in the Hizballah-dominated Bekaa valley. Section staff connected that graduate with another who drew on that initiative to develop "Digital Mothers," a program that teaches language and computer skills to help mothers and their children with online literacy and virtual learning. These efforts show how creative use of English language programs and continued engagement with program alumni can help embassies reach difficult-to-access strategic audiences in challenging program environments.



Figure 2: Scenes from an October 2022 English Access program graduation ceremony in Byblos, Lebanon. (Source: OIG)

Spotlight on Success: Using Program Evaluation and Data Analytics to Inform Public Diplomacy Outreach

The Public Diplomacy Section used program evaluation and data analytics to fact-check its strategic planning targets and assumptions and to sharpen social media outreach. The section developed a uniform survey instrument to measure before-and-after opinions of all grant and exchange program participants. The data included participant demographics, changes in perceptions of the United States, and opinions on what future embassy programming could most help Lebanon. The findings helped identify which embassy policy priorities best resonated with target audiences while also tracking section progress in meeting its program participant diversity goals. For example, the data showed that 73 percent of the 6,982 participants in FY 2021 grant-funded programs were from outside the capital; 59 percent were women and girls; and 70 percent finished their programs with positive views of the United States (a 20-percentage point increase compared to pre-program views). Analytics also informed choices on content themes and delivery platforms. Leveraging participation feedback and online engagement data, the section shifted content placement from Facebook to Instagram and YouTube, focusing on themes identified as most resonant with target youth audiences. As a result, followership on each platform increased during FY 2021 by 31 and 120 percent, respectively.

Consular Operations

OIG reviewed Embassy Beirut's consular operations, including U.S. citizen services, crisis preparedness, management controls, visa services and processing, and fraud prevention programs. The Consular Section reduced services beginning in March 2020 due to the COVID-19 pandemic, resulting in backlogs in U.S. citizen services and immigrant visa services, and long waits for nonimmigrant visa appointments. By the time of the inspection, the section had eliminated backlogs in citizenship services, as well as much of the immigrant visa processing backlog, both of which were priorities of the Bureau of Consular Affairs. Consular managers and staff also initiated a plan to shorten wait times for nonimmigrant visa appointments.

OIG found that Consular Section staff collaborated well to serve U.S. citizens and other consular applicants. Consular Section leaders cross-trained staff in consular duties beyond their primary assignment, including in crisis preparation and management. During the inspection, staff corrected two internal control issues and a public information issue identified by OIG. Specifically, the section:

- Developed written standard operating procedures for working with the Regional Security Office and conducting fraud interviews and site visits, and revised the procedure for referring suspected fraud cases to the Fraud Prevention Unit (7 FAH-1 H-943.7b).
- Reconnected an alarm at the emergency exit to the U.S. citizen services waiting room to alert guards if the exit was used and to better control access to the embassy compound (7 FAH -1 H-284a).
- Designed and ordered a sign with information on consular hours, services, and fees to post at the public entrance to the embassy (7 FAH-1 H-282(1)(b)).

OIG determined that Embassy Beirut's consular operations complied with the guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions discussed below.

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



Figure 3: Consular customers awaiting admittance to embassy compound, October 31, 2022. (Source: OIG)

OIG found the embassy made insufficient accommodations for the safety and comfort of consular applicants and visitors waiting outside the embassy compound's pedestrian gate, as prescribed in 7 FAH-1 H-281. The only area where applicants and visitors could line up while awaiting admittance to the embassy compound was alongside a busy road with no sidewalk and no curb separating the visitors from the road. Consular managers were unaware that the requirement to accommodate the public safely and efficiently extends to the point where consular customers line up to enter the embassy compound. In conversations with OIG, consular managers identified procedural changes that could address the issue. Although the embassy has no control over traffic, the lack of space outside the compound's pedestrian gate could be hazardous to consular customers and negatively affected the host country's image of the United States.

Recommendation 1: Embassy Beirut, in coordination with the Bureau of Consular Affairs, should implement a plan to mitigate, to the maximum extent practicable, safety risks associated with the area outside the pedestrian gate used by consular customers, in accordance with Department guidelines. (Action: Embassy Beirut, in coordination with CA)

Walkway for Consular Applicants Did Not Comply With Department Standards

The walkway between the pedestrian gate and the consular waiting room did not provide protection from the elements. Guidance in 7 FAH-1 H-281a states that every effort should be made in consular lines and waiting areas to accommodate the public as efficiently, safely, and pleasantly as possible. In addition, 7 FAH-1 H-282e specifically recommends a dedicated, covered pedestrian walkway for consular applicants. OIG observed that during the rainy season, applicants were exposed to rain when walking from the pedestrian gate to the waiting room. Section leadership told OIG the embassy had attempted to provide overhead cover, but funding had been denied. However, embassy staff did not have documentation that specified which bureau had denied funding. Failure to provide cover for consular applicants leaves them exposed to inclement weather and limits the use as of the walkway as an overflow waiting area if needed.

Recommendation 2: Embassy Beirut, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide protection from the elements for consular applicants, in accordance with Department standards. (Action: Embassy Beirut, in coordination with CA and OBO)

Consular Officers Lacked Line of Sight of U.S. Citizen Services Production Area

The U.S. Citizen Services chief did not have line of sight from his office to the workstation used to print passports. Guidance in 7 FAH-1 H-282(2)(g) states that production areas for visas and passports should be separate from the rest of the consular work area but within the supervisor's line of sight. Consular managers told OIG that, during the August 2022 reconfiguration and renovation of the U.S. citizen services office space, the passport printing station was moved to a location that did not allow line-of-sight supervision from the U.S. Citizen Services chief's office. Lack of line of sight to a consular production area increases the risk of malfeasance. During the inspection, consular managers opened a work order to install a window in the supervisor's office that would allow full line-of-sight supervision of the production area. Therefore, OIG did not make a recommendation to address this issue.

U.S. Citizen Services Unit's Waiting Room and Interview Windows Were Not Fully Wheelchair-Accessible

The U.S. Citizen Services Unit's waiting room and interview windows did not meet Department standards for wheelchair accessibility. Minimum barrier-free accessibility requirements in 7 FAH-1 H-282(1)(m) include an accessible route linking the Consular Section entrance to waiting spaces, the teller window areas, and toilet rooms; a designated wheelchair space in each separate waiting area; and an accessible portion of the counter. In September 2022, the embassy installed a ramp from street level to the waiting area for better accessibility. However,

the prefabricated containers installed in 1996 that currently serve as the U.S. Citizen Services Unit lacked accessibility for toilet rooms or the appropriate counter height for customers in wheelchairs. Considering the ongoing construction of a new embassy compound, due to be completed in FY 2025, OIG did not make a recommendation regarding waiting room and interview window accessibility. Additionally, a toilet room just inside the embassy compound's pedestrian gate could be made accessible with minor modifications, which the embassy began addressing at the end of the inspection. Therefore, OIG did not make a recommendation to address this issue.

Foreign Assistance

Embassy Beirut is the focal point for 78 centrally managed foreign assistance activities administered from nine Washington-based bureaus and offices¹⁰ with a total value between 2017 and 2022 of more than \$1.6 billion. During this period, three other federal agencies also contributed assistance to Lebanon: the U.S. Agency for International Development provided approximately \$744 million in humanitarian and developmental assistance; the Department of Defense provided approximately \$963 million in security services through assistance and arms transfers; and the Department of Energy provided \$29.1 million in border and port security assistance.

OIG reviewed the embassy's coordination with the bureaus, offices, and agencies managing foreign assistance activities in Lebanon. Washington-based program officers, embassy-based program managers, and embassy staff told OIG that intra-office and interagency communication to coordinate these activities was continuous and routine. OIG noted that embassy-based program managers demonstrated frequent oversight and monitoring of U.S. awards to both non-governmental and international organizations. One particularly noteworthy coordination mechanism, described below in a Spotlight on Success, was the embassy's Foreign Assistance Working Group, which centralized oversight of new programming proposed by Washington-based program offices. Additionally, the embassy's Front Office maintained a process for its review of newly proposed foreign assistance programs to ensure alignment with ICS objectives. However, despite Embassy Beirut's strong coordination of foreign assistance activities, OIG found that the embassy's foreign assistance award files were missing some required documentation, as discussed below.

¹⁰ The Washington-based bureaus and offices are: the Bureaus of Population, Refugees and Migration; International Narcotics and Law Enforcement Affairs; Near Eastern Affairs' Office of the Middle East Peace Initiative; Diplomatic Security's Office of Anti-Terrorism; Counterterrorism; Political Military Affairs; International Security and Non-Proliferation; Democracy Human Rights and Labor; and the Office to Monitor and Combat Trafficking in Persons.

Foreign Assistance Award Files Missing Some Documentation

OIG reviewed the five¹¹ foreign assistance award files maintained by grants officer representatives at the embassy and found they did not consistently include all required documentation. According to the Federal Assistance Directive,¹² federal assistance awards must be consistently monitored—including annual and quarterly program reviews and updates to the award risk assessments and monitoring plans—and that this be documented in the official award files. OIG confirmed that appropriate award monitoring had occurred, but due to coordination issues between the grants officers in Washington and the embassy grants officer representatives and their supervisors, the embassy stored some quarterly and annual financial and performance reports locally rather than uploading them into the State Administrative Management System, as required. During the inspection, the embassy-based program managers corrected the documentation lapses and implemented procedures to maintain award files according to Department standards. As a result of these actions, OIG did not make a recommendation to address this issue.

Spotlight On Success: Using Foreign Assistance Working Group to Centralize Department and Interagency Funding Oversight

In 2019, Embassy Beirut established the Foreign Assistance Working Group to centralize oversight of new programming proposed by Washington-based program offices. These programs typically use Department and interagency funding issued outside the normal cycle of foreign assistance funding approved in the Office of Foreign Assistance Operational Plan. The working group was comprised of all embassy sections and agencies involved in assistance programming. The process was supported by the Bureau of Near Eastern Affairs' Office of Assistance Coordination, which ensured the working group's decisions were coordinated with Washington-based offices. Embassy-based program managers routinely participated in deliberations on the compatibility of new proposals with the embassy's economic and security policy priorities. Washington-based offices formally participated by routinely providing the working group with Notice of Funding Opportunities for awards. The DCM chaired the working group and documented proposal approvals in decision memos. Because of the working group's efforts, the embassy was aware of all new program proposals, was able to modify proposals if needed, and was able to provide Washington program managers with "on-the-ground" feedback on proposals to strengthen them prior to implementation.

RESOURCE MANAGEMENT

OIG reviewed Embassy Beirut's operations and internal controls in facility management, general services, general management, human resources, and financial management, as well as the embassy's health unit and the Community Liaison Office. OIG noted that the Management Section experienced numerous operational challenges due to the unique nature of the embassy

¹¹ The five foreign assistance awards included two grants and three cooperative agreements. Other award files for foreign assistance activities and programs in Lebanon were maintained by Washington-based bureaus and offices and were out of scope for this inspection.

¹² Federal Assistance Directive (May 20, 2017, and later revisions) Chapter 2, Sections K and O.

compound. The new embassy compound will address many deficiencies with the embassy's facilities and infrastructure. For example, OIG found that while the embassy is in a very high-risk seismic zone, it had not completed the required seismic assessments to determine the level of seismic risk for its residences. OBO told OIG that fully compliant housing will be built as part of the new embassy compound.

During the inspection, the embassy corrected multiple internal control issues that OIG identified. Specifically, the embassy:

- Completed 76 percent of previously missing Post Occupational Safety and Health Officer certifications for non-residential properties and 100 percent of certifications for residential properties in the Post Occupational Safety and Health Officer Certification Application¹³ (15 FAM 971).
- Secured a diesel tank fuel spigot to prevent theft (Motor Pool Procedures Overseas, Section 3b and Section 3.3d(1-2)).
- Implemented a process to ensure Accountable Property Officer oversight of the embassy's bulk-purchased representational wine inventory (3 FAM 3246.3-6a).
- Worked with the Bureau of Administration to increase the size of the embassy's authorized motor vehicle fleet so the current fleet size matched its target size (14 FAM 436.2a-b).
- Documented chief of mission authorization for in-house accommodation exchange services provided by the embassy's cashier (4 FAM 361.5a).
- Adjusted timekeepers' access permissions in the Department's time and attendance system to prevent timekeepers from editing their own records (4 FAH-3 H-523.1(1-2) and 4 FAH-3 H-525.3-4a-b).
- Stopped facilitating the undocumented on-compound currency exchange services provided by a private individual using rates not recognized as official by the U.S. disbursing officer (3 FAM 4123.1(2)).
- Updated the post hardship differential report (Department of State Standardized Regulation, Section 075.1).

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

¹³ This application generates and documents the form used by Post Occupational Safety and Health Officer to certify that a residence meets the requirements of 15 FAM 252.5. The form lists the safety requirements that must be certified prior to occupancy. The application allows relevant documentation to be electronically attached to the form.

Facility Management

Embassy's Fire Protection Program Did Not Comply With Department Standards

OIG concluded that the embassy's fire protection program did not comply with Department standards. For example, the embassy could not provide documentation to prove it:

- Maintained an accurate fire extinguisher inventory (15 FAM 813.6b).
- Had an active fire watch program (15 FAM 813.5(b)).
- Performed daily checks of the fire alarm panel (15 FAM 841a).
- Completed monthly inspections of all residential and non-residential fire extinguishers (15 FAM 843c and d).
- Performed monthly tests of the emergency lighting systems (15 FAM 844).
- Conducted an annual survey of exit doors (15 FAM 846.4).

Additionally, six deficiencies identified by a 2019 OBO Office of Fire Protection review remained outstanding at the time of the inspection, three of which were repeat findings from a 2016 review. OIG determined these deficiencies occurred due to a lack of management oversight and failure to prioritize updates to the fire protection program given the pending move to a new embassy compound. Failure to comply with the Department's fire protection standards increases the risk of injury, loss of life, and damage to property.

Recommendation 3: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Beirut, in coordination OBO)

Embassy Did Not Obtain Prior Approval or Permits For Construction And Renovation Projects

The embassy did not comply with all Department requirements for several construction and renovation projects undertaken on the embassy compound between 2018 and 2022. OIG determined the embassy built at least three semi-permanent structures and renovated at least nine existing properties without requesting and obtaining the required approvals and confirmation of funds availability. According to 15 FAM 641, posts are required to obtain prior OBO approval for various projects including interior alterations (15 FAM 641b(2)), exterior works (15 FAM 641b(3)), construction of any facility (15 FAM 641b(5)), and excavation below or adjacent to existing buildings and wall foundations (15 FAM 641b(7)). OIG determined that the work was completed outside of the approval process due to embassy staff's misunderstanding of the requirements and the perceived urgency of the projects. Construction and subsequent use of structures without ensuring compliance with building code requirements poses significant life safety risks to employees working in or accessing these structures. Furthermore, not obtaining confirmation of funds availability before proceeding with a project could result in a violation of the Antideficiency Act¹⁴.

¹⁴ According to 31 U.S.C. § 1341(a)(1)(B), the Antideficiency Act prohibits Federal agencies from involving the government in any obligation to pay money before funds have been appropriated for that purpose,

Recommendation 4: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Beirut, in coordination OBO)

Unauthorized Use of Shipping Containers on Embassy Compound

OIG found Embassy Beirut had 23 unauthorized shipping containers located on the embassy compound. The containers were stacked three levels high and were used for permanent storage. The Department issued guidance in September 2018 and October 2021,¹⁵ stating that it does not support using shipping containers to accommodate functional space needs. According to 15 FAM 641b(10), embassies must obtain prior approval from OBO to procure, place, or construct nonpermanent structures, including modular or prefabricated units. Embassy staff told OIG that they needed the containers because the embassy lacked adequate warehouse and storage space. Using unapproved shipping containers for permanent storage that do not meet the required building and fire code increases the risk of damage to U.S. government property.

Recommendation 5: Embassy Beirut should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them in accordance with Department requirements. (Action: Embassy Beirut)

General Services

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

OIG found that the embassy did not comply with the Department's motor vehicle operator and safety requirements in 14 FAM 433. A review of the Department's Fleet Management Information System¹⁶ showed:

- Two drivers had expired licenses (14 FAM 433.3c).
- Fifteen drivers held expired medical certifications (14 FAM 433.4a and e).
- Seventy-one drivers had expired safe driving training (14 FAM 433.5a-b and e).
- Only 46 of the 106 drivers requiring armored vehicle training had received such training (14 FAM 433.5d-e). The Department requires that all operators of armored

unless otherwise allowed by law.

¹⁵ Cable 18 STATE 98976, "Shipping Containers and Portable Structure Use and Occupancy Requirements," September 27, 2018, and cable 21 STATE 103606, "FY 2022 Bureau of Overseas Buildings Operations Financial and Operational Guidance," October 8, 2021.

¹⁶ 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.

vehicles complete safe-driver training and Department-approved armored vehicle training.

- The motor pool tracked 293 drivers, while the Department's Fleet Management Information System only showed 286 drivers. Motor pool supervisors are required to monitor the accuracy of data entered in the system and comply with the Department's safety program requirements (14 FAM 431.6-4(3-4)). Similarly, the mission vehicle accountable officer must ensure the use of Fleet Management Information System and periodically verify the integrity of data entered into it (14 FAM 431.6-2b(7)).

In accordance with 14 FAM 433.1a, provisions of the Department's motor vehicle safety management program must be implemented to ensure all official vehicles are operated safely. The embassy told OIG that the deficient training and certifications were due to difficulty in tracking statistics for drivers in other embassy sections and resource constraints. Failure to enforce motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. government property.

Recommendation 6: Embassy Beirut should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Beirut)

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

At the time of the inspection, the embassy had 15 contracting officer's representatives (COR) who oversaw 23 contracts valued at nearly \$16 million. OIG reviewed 11 electronic COR files (total value \$10.5 million) maintained by 11 different CORs and found that 82 percent (9 of 11 files) did not contain all required documents outlined in 14 FAH-2 H-517. Guidance in 14 FAH-2 H-142b(16) requires the contracting officer to ensure that contract files, including COR files, are maintained properly. Additionally, none of the CORs had certified to the contracting officer that they properly maintained their COR files, as required by 14 FAH-2 H-517c. Despite these shortcomings, discussions with embassy staff and reviews of documentation showed the embassy monitored the contracts, received the goods and services for which it had contracted, and addressed contractor performance when issues arose. The contracting officer told OIG they did not require CORs to provide the certification and that some employees prioritized other work above their COR responsibilities. A non-compliant COR program increases the risk of contract mismanagement.

Recommendation 7: Embassy Beirut should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Beirut)

General Management

Embassy Bodyguard/Driver Shifts Exceeded Operator Duty Limits

OIG reviewed time and attendance records for nine pay periods (covering workdays from January 2 through September 24, 2022) for the embassy's bodyguard/driver workforce

(positions which have both protective detail and driving responsibilities) and found that, on average:

- Ninety-seven percent of the bodyguard/drivers reported working more than 10 hours on at least one shift each pay period.
- Fifty-five percent of all shifts worked by the bodyguard/drivers exceeded 10 hours.

According to 14 FAM 433.8a, drivers may not spend more than 10 hours on duty. OIG determined this issue occurred because the embassy prioritized meeting operational support requirements with existing staff levels above compliance with the driver duty limitations. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers, passengers, and the public, as well as damage to U.S. government property.

Recommendation 8: Embassy Beirut should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Beirut)

Employee Association's Board of Directors Did Not Fulfill Its Oversight Responsibilities

OIG found that the Board of Directors of the Beirut Recreation Association did not fulfill its oversight responsibilities. Specifically, the board could not provide documentation of all board meetings and key decisions in the past 2 years, as required by Association bylaws, and was unable to provide documentation showing:

- Monthly random, unannounced counts of cash and inventory (6 FAM 531d).
- Monthly reviews of bank statements (6 FAM 531.2).
- Board approvals of annual budgets and overhead allocations (6 FAM 531e and 6 FAM 531.5).
- Minutes of annual membership meetings as required by the Association bylaws.

OIG determined the board failed to prioritize its oversight and records management responsibilities. Inconsistent or ineffective board oversight increases the risk of financial and operational mismanagement.

Recommendation 9: Embassy Beirut should require the Beirut Recreation Association Board of Directors to comply with Department standards and its own by-laws regarding its oversight responsibilities. (Action: Embassy Beirut)

Embassy Lacked Internal Controls to Limit Use of Government Resources for Personal Benefit

OIG found the embassy failed to monitor and limit use of government resources for personal benefit, contrary to Department standards and U.S. law regarding personal use of government property. For example, the embassy did not document exceptional approvals or collect funds to reimburse the U.S. government in the following situations:

- Mobile Phones: Embassy staff told OIG that since 2019 they have not consistently reviewed mobile phone invoices to identify use exceeding the monthly

allowance established in the embassy's mobile phone policy. Without a consistent review process, the embassy was unable to collect payments for personal use as prescribed in its policy and cannot hold employees accountable for the use of government property standard, as required by 5 CFR § 2635.704. Staff told OIG they did not review invoices because it would be a manual, labor-intensive process.

- Motor Pool: The embassy incurred other authorized use¹⁷ costs for its motor pool services of meal deliveries to U.S. direct hire staff. The embassy's motor pool policy¹⁸ states that because the embassy is in a high threat environment, the Department's Office of the Legal Adviser approved use of the motor pool to provide food delivery, pharmacy pick-up, and pet transportation services not normally provided at other embassies, without reimbursement under 14 FAM 432.3. However, the embassy was unable to provide documentation of the Office of the Legal Adviser's actual approval. During the inspection, the embassy initiated contact with the Office of the Legal Adviser for guidance on this issue.
- Mail Service: The embassy's mail and pouch policy included the use of homeward bound mail service, which is a mechanism to collect funds for sending packages to the United States through the diplomatic pouch (14 FAM 745 and 14 FAH-4 H-226). However, OIG could not find evidence that the employee association collected payment for this service and the mailroom could not determine if any of the 27 outgoing homeward-bound packages sent in the past 2 years were returned merchandise, which would make them exempt from payment under 14 FAM 742.2-2f(3). Home to Office Transportation: OIG identified an instance of potential misuse of official vehicles by an embassy employee, attributable to a lack of managerial oversight and internal communication. Specifically, OIG's review of Embassy Beirut's security operation center logs from October 19 through November 3, 2022, showed that one government vehicle returned to the embassy compound on 13 of 14 workdays between 6:00 am and 8:30 am, suggesting the vehicle was used for home-to-work transportation by the LE staff member driving that vehicle. This is contrary to both 14 FAM 432.6d, which states LE staff are not authorized home to work transportation, and 14 FAM 435.3 which requires official vehicles be parked overnight at a central U.S. government-controlled location for security concerns, accountability, and safekeeping purposes unless an alternate arrangement is approved by the motor vehicle accountable officer. The embassy acknowledged the vehicle was being used for home to work transportation and neither the driver's current section chief nor the current motor vehicle accountable officer had approved the arrangement.

¹⁷ According to 14 FAM 431.4, other authorized use is the use of official vehicles overseas for transportation of U.S. government employees and their family members, for other than business purposes when authorized by the chief of mission because public transportation is unsafe or not available, or because such use is advantageous to the U.S. government. Department guidance stipulates that the chief of mission can approve other authorized use provided it is consistent with the requirements contained in 14 FAM 432.3c. Meal delivery services are not included in the prescribed list.

¹⁸ "GSO Motor Pool Official Services," dated August 23, 2022.

Use of government resources for personal benefit prevents those resources from being applied toward the furtherance of mission objectives and potentially erodes the integrity and ethical values of the embassy.

Recommendation 10: Embassy Beirut should implement internal controls to ensure government resources are used in accordance with Department standards. (Action: Embassy Beirut)

INFORMATION MANAGEMENT

OIG reviewed Embassy Beirut's unclassified and classified network operations, information systems, administration of mobile computing devices, mail and pouch services, cyber security practices, records management, telephone operations, and emergency communications systems. The embassy's information management staff dealt with unique challenges due to the Lebanese financial crisis and a corresponding decline in infrastructure. Internet service providers in Lebanon suffered outages due to strikes, rising fuel costs, and deteriorated electrical infrastructure. Embassy redundant communications provided continuity of operations during internet service provider outages, but reduced user's productivity on applications vulnerable to transmission delays inherent to satellite communications. The embassy recently converted to on-compound generator power because city power normally only lasted 2 hours per day and inconsistent voltage often damaged embassy equipment.

The embassy's geographical layout, with staff spread throughout the 19-acre compound, also added to the challenging operating environment. This required an unusual level of staff attention to troubleshooting and repairing network and telephone cables vulnerable to outages caused by rodents and outside environmental conditions. Additionally, the section provided and maintained telephone services to 112 embassy residences spread throughout the compound, atypical for an embassy telecommunications staff.

During the inspection, embassy information management staff took the following steps to remedy issues identified by OIG. Specifically, the embassy:

- Configured the mission's Microsoft Active Directory¹⁹ privileged security groups to meet the principle of least privilege (12 FAH-10 H-112.5 and National Institute of Standards and Technology (NIST) Special Publication 800-53).
- Updated cyber incident response procedures (12 FAH-10 H-242.5-2).
- Requested approval from the Bureau of Diplomatic Security and Information Resource Management to operate previously installed Department-owned information systems in the Chief of Mission residence and the Deputy Chief of Mission residence (12 FAH-10 H-112.16-1.a and b).

¹⁹ Active Directory is a Microsoft technology used by the Department to manage users, computers, and other devices on its networks and assign permissions to access Department resources.

- Requested waivers from the Bureau of Information Resource Management for non-government employees²⁰ to access Department-owned information systems (5 FAM 1064.1-2(B)a & 12 FAH-6 H-542.5-8d).
- Configured Active Directory administrative groups in accordance with the Department's Systems Administration Guide. (5 FAH-12 H-115.6.b(13)).
- Requested waivers from the Bureau of Information Resource Management for password-only logons (12 FAH-10 H-132.1.b(4), E.O. 14028 section 3(d)).
- Enabled port security on OpenNet²¹ switches (12 FAH-10 H-222.5-2).
- Secured unclassified pouch seals (14 FAH-4 H-122.2.c).
- Updated the information systems security officer (ISSO) designation cable to include dedicated internet networks²² (12 FAH-10 H-352(2)).

OIG determined staff implemented most required information management and security controls in accordance with Department policies and applicable laws, with the exceptions discussed below.

Locally Employed Staff Lacked Training

OIG found that the LE staff who manage OpenNet and the dedicated internet networks (DIN) lacked mandatory role-based training required in 12 FAM 623.5.a(2). Specifically, only one of the five LE staff members identified as having significant information system security roles and responsibilities had the role-based training for users required by 12 FAH-10 H-212.2-1. Furthermore, only one of the five LE staff members received the specialized training needed to support consular systems. This could leave consular systems without any backup support staff if the trained employee was absent. Finally, the two LE staff members who manage the telecommunications systems tasked with providing and supporting audio-visual services for embassy events did not receive proper training. According to 13 FAM 101.2-2(E), supervisors are responsible for determining the specific needs of their employees and ensuring they receive the training needed for effective job performance (3 FAH-2 H-135.5.b(2)). Staff told OIG that travel restrictions delayed training for three new employees, hired just before or during the COVID-19 pandemic. After travel restrictions were lifted, many of the training classes offered and funded by the Department were filled. Untrained staff may unknowingly misconfigure systems or provide solutions that violate policy which risk systems' availability, confidentiality, and integrity. Untrained staff also may be unable to meet organization performance goals.

Recommendation 11: Embassy Beirut should train locally employed information management staff in accordance with Department standards. (Action: Embassy Beirut)

²⁰ Official Residence Expense staff and employee association staff are not Department employees.

²¹ OpenNet is the Department's Sensitive but Unclassified network.

²² A dedicated internet network provides dedicated internet access from a local 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.

Information Systems Security Officers Did Not Perform All Required Duties

Embassy Beirut's ISSOs did not perform all required systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing the security program for information systems, of which the minimum requirements are detailed in the Bureau of Information Resource Management ISSO checklist.²³ OIG found embassy ISSOs did not perform or document routine duties included in the ISSO checklist or outlined in 12 FAH-10.²⁴ OIG found that this occurred because of a lack of management oversight and conflicting priorities. OIG issued two management assistance reports, one in May 2017 and the other in December 2020,²⁵ that highlighted continued widespread Department failures to perform ISSO duties. Failure to perform these required responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

Recommendation 12: Embassy Beirut should perform information systems security officers' duties in accordance with Department standards. (Action: Embassy Beirut)

Embassy's Dedicated Internet Networks Lacked Security Controls

Embassy Beirut's 11 DINS did not comply with Department security control standards. Specifically, OIG found the DINS:

- Lacked approved firewalls (5 FAM 847 and 12 FAH-10 H-142.5-2(3)).
- Used unapproved wireless devices (12 FAH-10 H-152.1.c and d).
- Lacked required access control (12 FAH-10 H-112.1-2) and identity management (12 FAH-10 H-132.3-2).
- Lacked required monitoring by ISSOs (12 FAH-10 H-122.5-2, 12 FAH-10 H-222.1-3, and 12 FAH-10 H-292.1-3).
- Were not removed from the Department's IT asset database when retired (12 FAH-10 H-222.7-2(2)).

OIG found that the embassy installed multiple DINS ad hoc because embassy sections were not collocated. In addition, Information Systems Center staff were unaware the security requirements in 12 FAH-10 applied to DINS and the embassy did not designate an ISSO for the DINS as required by 12 FAH-10 H-352. Failure to configure, secure, and monitor DINS according to Department standards increases vulnerability to cyber-attacks.

²³ The ISSO checklist includes a description of 53 tasks, an explanation of minimum tasks to be performed, and how often they need to be performed.

²⁴ 12 FAH-10, the Department's Information System Security Controls and Procedures Handbook, establishes the minimum mandatory security controls and procedures for managing risk that results from threats and vulnerabilities that could impact the confidentiality, integrity, and availability of Department Automated Information Systems.

²⁵ OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017); and *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

Recommendation 13: Embassy Beirut should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Beirut)

Embassy's Records Management Did Not Comply With Department Standards

Embassy Beirut's records management program did not comply with Department standards in 5 FAM 418.9 and the Department's Records Handbook.²⁶ Prior to the inspection, the Information Management Officer presented an in-person briefing about records management to embassy sections, which included links to the Department's records management guidance, instructions on how to archive social media, disposition schedules, and other relevant information. However, OIG found that the embassy did not:

- Publish a post records management policy (5 FAM 418.9.b).
- Assign a responsible person from each section to manage the operations of the files, ensure the integrity of the data, and assist in access to, filing, and disposition of data (5 FAH-4 H-215.3-2b).
- Archive previous chief of mission and DCM records in the past 3 years (5 FAM 418.10-1, and 5 FAM 451.c(1)).
- Archive program section electronic records in the past 3 years (5 FAM 451.b).
- Archive all Diplomatic Notes (5 FAH-1 H-611.e).
- Comply with electronic records retirement requirements (5 FAM 451). For example, OIG's review of files on SharePoint shared document libraries found that sections' electronic records contained files beyond the retention dates in records disposition schedules.

OIG was unable to determine if all staff archived their external social media accounts because the accounts were not centrally managed. However, OIG observed Information Systems staff assisting Political-Economic Section staff with archiving WhatsApp messages.

OIG found these issues occurred due to a lack of management oversight. OIG issued a management assistance report in June 2022²⁷ that highlighted continued widespread Department deficiencies in managing and retiring Department records. A deficient records management program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

Recommendation 14: Embassy Beirut should implement a records management program in accordance with Department standards. (Action: Embassy Beirut)

²⁶ The Department's Records Handbook for All Overseas Personnel, published by the Bureau of Administration's Office of Information Programs and Services, summarizes the key elements of a successful records management program at an embassy.

²⁷ OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

Server Room Did Not Meet Safety Standards

OIG found that the embassy's unclassified server room did not meet the Department of Labor's Occupational Safety and Health Administration standards as required by 1 FAM 287.6(1-2), which state the minimum exit route width must be at least 28 inches. Due to its small size and the amount of IT equipment stored there, the server room had less than 24 inches of egress. The server room was built into a modular shipping container and was the information management staff's only climate-controlled storage space. The unit staff could not move the equipment to meet the safety standards because they did not have an alternate storage space. Inadequate emergency exit routes in the server room increases the risk of employee injury.

Recommendation 15: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should relocate stored items to climate-controlled storage outside the unclassified server room to conform to Department and Occupational Safety and Health Administration standards. (Action: Embassy Beirut, in coordination with OBO)

RECOMMENDATIONS

OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Beirut. 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 Beirut, in coordination with the Bureau of Consular Affairs, should implement a plan to mitigate, to the maximum extent practicable, safety risks associated with the area outside the pedestrian gate used by consular customers, in accordance with Department guidelines. (Action: Embassy Beirut, in coordination with CA)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut implemented a plan to mitigate, to the maximum extent practicable, safety risks associated with the area outside the pedestrian gate used by consular customers, in accordance with Department guidelines.

Recommendation 2: Embassy Beirut, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide protection from the elements for consular applicants, in accordance with Department standards. (Action: Embassy Beirut, in coordination with CA and OBO)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut provided protection from the elements for consular applicants, in accordance with Department standards.

Recommendation 3: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Beirut, in coordination OBO)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of October 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut brought its fire protection program into compliance with Department standards.

Recommendation 4: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Beirut, in coordination OBO)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut reported all unauthorized construction projects and rectified each project in accordance with Department standards.

Recommendation 5: Embassy Beirut should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them in accordance with Department requirements. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut obtained authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantled and removed them in accordance with Department requirements.

Recommendation 6: Embassy Beirut should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of May 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut complied with all Department Overseas Motor Vehicle Safety Management Program requirements.

Recommendation 7: Embassy Beirut should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of April 2023.

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

Recommendation 8: Embassy Beirut should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut enforced driver duty limits for all embassy drivers in accordance with Department guidelines.

Recommendation 9: Embassy Beirut should require the Beirut Recreation Association Board of Directors to comply with Department standards and its own by-laws regarding its oversight responsibilities. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of April 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut required the Beirut Recreation Association Board of Directors to comply with Department standards and its own by-laws regarding its oversight responsibilities.

Recommendation 10: Embassy Beirut should implement internal controls to ensure government resources are used in accordance with Department standards. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut implemented internal controls to ensure government resources are used in accordance with Department standards.

Recommendation 11: Embassy Beirut should train locally employed information management staff in accordance with Department standards. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of June 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut trained locally employed information management staff in accordance with Department standards.

Recommendation 12: Embassy Beirut should perform information systems security officers' duties in accordance with Department standards. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut performed information systems security officers' duties in accordance with Department standards.

Recommendation 13: Embassy Beirut should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of June 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut complied with Department standards for managing its dedicated internet networks.

Recommendation 14: Embassy Beirut should implement a records management program in accordance with Department standards. (Action: Embassy Beirut)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of May 2023.

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

Recommendation 15: Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should relocate stored items to climate-controlled storage outside the unclassified server room to conform to Department and Occupational Safety and Health Administration standards. (Action: Embassy Beirut, in coordination with OBO)

Management Response: In its March 16, 2023, response, Embassy Beirut concurred with this recommendation. The embassy noted a target completion date of April 2023.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Beirut relocated stored items to climate-controlled storage outside the unclassified server room to conform to Department and Occupational Safety and Health Administration standards.

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Chiefs of Mission:		
Ambassador	Dorothy Shea	3/2020
Deputy Chief of Mission	Richard Michaels	5/2021
Chiefs of Sections:		
Management	Marissa Gurfield	8/2022
Consular	Mark Marrano	9/2022
Political-Economic Section	Amy Smith ^a	7/2021
Public Affairs	Melissa O'Shaughnessy	8/2022
Regional Security	Jason H. Smith	5/2021
Other Agencies:		
Department of Defense	Col. Brian Dunn	9/2022
Department of Justice	Keeley Burgan	11/2021
U.S. Agency for International Development	Mary Eileen Devitt	8/2020

^a Amy Smith arrived at Embassy Beirut in July 2021 and became section chief in September 2022.

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

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

This inspection was conducted from August 29, 2022, to January 5, 2023, 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 reviewed the substance of this report and its findings and recommendations with offices, individuals, and organizations affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSES



*Embassy of the United States of America
Beirut, Lebanon*

March 16, 2023

UNCLASSIFIED

THRU: NEA – Barbara Leaf, Assistant Secretary

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

FROM: Embassy Beirut – Dorothy Shea, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Beirut, Lebanon

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

OIG Recommendation 1: *Embassy Beirut, in coordination with the Bureau of Consular Affairs, should implement a plan to mitigate, to the maximum extent practicable, safety risks associated with the area outside the pedestrian gate used by consular customers, in accordance with Department guidelines. (Action: Embassy Beirut, in coordination with CA)*

Management Response: Embassy Beirut, in coordination with CA, concurs with the recommendation. The Consular Section adjusted as of November 14, 2022, the number of appointments over a four-hour period vice two-hour period to ensure there is no longer a line of applicants outside the pedestrian gate. Embassy guards were instructed to allow applicants inside, also eliminating people waiting on the sidewalk.

OIG Recommendation 2: *Embassy Beirut, in coordination with the Bureaus of Consular Affairs and Overseas Buildings Operations, should provide protection from the elements for consular applicants, in accordance with Department standards. (Action: Embassy Beirut, in coordination with CA and OBO).*

Management Response: Embassy Beirut, in coordination with CA and OBO, concurs with the recommendation. The Consular Section purchased on February 15, 2023, umbrellas for

applicants to use walking the 14 uncovered yards between the security screening area and consular waiting area. This is an interim solution until moving to the New Embassy Compound.

OIG Recommendation 3: *Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Beirut, in coordination with OBO.)*

Management Response: Embassy Beirut, in coordination with OBO, concurs with this recommendation. Actions taken include: strengthening on-compound fire response infrastructure and fire department coordination, incorporating routine equipment checks into Facilities work plans, and scheduling installation of chancery fire panel. Target completion: October 2023.

OIG Recommendation 4: *Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Beirut, in coordination with OBO.)*

Management Response: Embassy Beirut, in coordination with OBO, concurs with this recommendation. Retroactive permit requests for the welding shop and storage container structure were submitted in November 2022. Post is working with our OBO Area Manager to identify the next set of retroactive permit requests. Target completion for the requests already submitted: May 2023.

Recommendation 5: *Embassy Beirut should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for permanent storage or dismantle and remove them in accordance with Department requirements. (Action: Embassy Beirut.)*

Management Response: Embassy Beirut concurs with this recommendation. OBO informed Post in November 2022 that Beirut was one of several posts worldwide with unpermitted container problems. OBO was updating its guidance for proper container permitting since 18 STATE 98976 did not detail criteria for retroactive permitting.

Recommendation 6: *Embassy Beirut should comply with all Department Overseas Motor Vehicle Safety Management Program requirements. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. Post accelerated driver safety training, and 98% of drivers are now compliant. Post is still working on updating drivers' medical clearances. Target completion: May 2023.

Recommendation 7: *Embassy Beirut should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. Post's contracting officer (the GSO) maintains electronic copies of COR training certificates and reviewed the

A/OPE COR data base. GSO confirmed that all CORs are current on training requirements. GSO is working with the CORs to bring all files into compliance. Target completion: April 2023.

Recommendation 8: *Embassy Beirut should enforce driver duty limits for all embassy drivers in accordance with Department guidelines. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. RSO personal protection staff also serve as chauffeurs for official Americans' off-compound moves. Sometimes distance and length of official trips require long duty days. Drivers who work beyond the 10-hour limit are not scheduled to work for at least 14 hours per FAM regulations.

Recommendation 9: *Embassy Beirut should require the Beirut Recreation Association Board of Directors to comply with Department standards and its own by-laws regarding its oversight responsibilities. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. The Management Counselor meets with the BRASS Board weekly with to improve oversight. Actions taken include: in-house accountant in the hiring process, previous consulting firm contract terminated, and outside firm contracted to complete 2022 audit. Target completion for audit and in-house accountant: April 2023.

Recommendation 10: *Embassy Beirut should implement internal controls to ensure government resources are used in accordance with Department standards. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. Actions taken include: Homeward Bound mail program cancelled on February 3, 2023; updated mobile phone policy published on February 27, 2023, with internal invoice review process under development; updated Vehicle Use and Motor Vehicle Safety Program published on March 2, 2023. Target completion for home-to-work transportation issue: April 2023.

Recommendation 11: *Embassy Beirut should train locally employed information management staff in accordance with Department standards. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. IMO staff is now registered for required training. Scheduled completion: June 2023.

Recommendation 12: *Embassy Beirut should perform information systems security officers' duties in accordance with Department standards. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. The ISSO began conducting and documenting required systems checks in November 2022.

Recommendation 13: *Embassy Beirut should comply with Department standards for managing its dedicated internet networks. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. Post is waiting for a server and software to connect the DINs into a single server from where they will be managed. Target completion: June 2023.

Recommendation 14: *Embassy Beirut should implement a records management program in accordance with Department standards. (Action: Embassy Beirut)*

Management Response: Embassy Beirut concurs with this recommendation. A standard operating procedure and implementation plan are under development. Target completion: May 2023.

Recommendation 15: *Embassy Beirut, in coordination with the Bureau of Overseas Buildings Operations, should relocate stored items to climate-controlled storage outside the unclassified server room to conform to Department and Occupational Safety and Health Administration standards. (Action: Embassy Beirut, in coordination with OBO)*

Management Response: Embassy Beirut, in coordination with OBO, concurs with this recommendation. Post has identified a climate-controlled space accessible to IT staff, which can be adapted into storage without requiring a permit. Target completion: April 2023.

ABBREVIATIONS

COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DIN	Dedicated Internet Network
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations

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