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**Office of Inspector General**  
**United States Department of State**

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ISP-I-23-09

Office of Inspections

June 2023

**Inspection of Embassy Abuja and  
Constituent Post, Nigeria**

BUREAU OF AFRICAN AFFAIRS

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# HIGHLIGHTS

## Office of Inspector General

United States Department of State

ISP-I-23-09

### What OIG Inspected

OIG inspected the executive direction, policy and program implementation, foreign assistance, resource management, and information management operations of Embassy Abuja. The inspection included Consulate General Lagos.

### What OIG Recommends

OIG made 40 recommendations: 37 recommendations to Embassy Abuja, 1 recommendation to the Bureau of Administration, 1 recommendation to the Bureau of Consular Affairs, and 1 to the Bureau of Overseas Buildings Operations. In its comments on the draft report, the Department concurred with 37 recommendations, partially concurred with 1 recommendation, and disagreed with 2 recommendations. OIG considers 39 recommendations resolved and 1 recommendation unresolved. The Department's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The Department's formal responses are reprinted in their entirety in Appendix B.

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### What OIG Found

- The Ambassador and the Deputy Chief of Mission maintained appropriate communications and led Mission Nigeria in a strategic and attentive manner consistent with Department of State leadership and management principles.
- The mission's Political and Economic Sections collaborated with other agencies to advance the embassy's Integrated Country Strategy and other Department priorities.
- Mission Nigeria did not meet Department standards for documenting the monitoring and evaluation of federal assistance awards.
- The Consular Sections at Embassy Abuja and Consulate General Lagos were focused on resolving the long backlogs for nonimmigrant visas.
- Consular personnel were not fully prepared to respond to a crisis due to a lack of training and insufficient attention on crisis planning.
- The U.S. President's Emergency Plan for AIDS Relief enabled more than 643,000 Nigerian residents to receive treatment despite challenges that arose due to the COVID-19 pandemic.
- Gaps in the oversight of Mission Nigeria's management operations created shortcomings in bulk fuel management, property management, fire protection, travel management, human resources, and government vehicle operations.
- The Department lacked guidance for the management and operation of watercraft used in an official transportation program, such as the one at Consulate General Lagos.
- Spotlight on Success: During the COVID-19 pandemic, staff from Mission Nigeria's American Spaces and EducationUSA used virtual outreach to increase the number of Nigerian students studying in the United States.

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## CONTEXT

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With Africa's largest economy and population, the Federal Republic of Nigeria is one of the most important strategic partners for the United States on the continent. The country's population of 225 million people is expected to reach 400 million by 2050, which will make it the third most populous in the world after India and China. About one in six Africans live in Nigeria, 60 percent of whom live in extreme poverty, and the country's extensive diaspora spans the globe. Nigeria's gross domestic product of \$504 billion in 2022 significantly eclipsed that of all other African countries. Although it is principally reliant on oil as its main source of foreign exchange earnings and government revenues, Nigeria has a strong agriculture sector and vibrant film, banking, and information technology industries. The United States is the largest foreign investor in Nigeria and two-way trade totaled more than \$10 billion in 2019, with Nigeria being the second largest U.S. export destination in sub-Saharan Africa.

Despite its large economy, Nigeria has been hobbled by an inadequate power supply, lack of infrastructure, a weak legal and regulatory environment, and pervasive corruption. Additional challenges include widespread public health issues, large-scale unemployment, a significant disaffected youth population, and rampant insecurity in the forms of terrorism, armed criminal activity, and intercommunal violence.

Beyond assisting Nigeria in the fight against terrorism, supporting democracy and governance, promoting trade and investment, and furthering inclusive economic growth, the United States is the largest bilateral donor of humanitarian assistance in Nigeria. In FY 2022, the United States spent \$627.7 million in bilateral foreign assistance in Nigeria, including \$349.2 million for the U.S. President's Emergency Plan for AIDS Relief (PEPFAR) program and \$271 million for U.S. Agency for International Development (USAID) programs, mostly in health-related fields. This longstanding and deep involvement in Nigeria's health sector positioned the United States as a major partner supporting Nigeria's COVID-19 response and vaccination efforts.

Mission Nigeria's top three strategic objectives, as outlined in the FY 2022 Integrated Country Strategy (ICS), are to:

- Partner with Nigeria to support stronger democratic institutions, governance, and respect for human rights.
- Work collaboratively to develop mutually beneficial trade and investment and strengthen human capital for inclusive Nigerian economic growth and development.
- Promote a united, peaceful, and stable Nigeria and protect U.S. borders and interests against security threats.

The U.S. diplomatic mission to Nigeria consists of Embassy Abuja and Consulate General Lagos. At the time of the inspection, Mission Nigeria had 301 authorized U.S. direct-hire, 1,003 locally employed (LE) staff, and 58 eligible family member positions. The Departments of Agriculture, Commerce, Defense, Health and Human Services, Homeland Security, and Justice, and USAID also were represented at the mission.

OIG evaluated the embassy's executive direction, policy and program implementation, foreign assistance, resource management, and information management operations consistent with Section 209 of the Foreign Service Act of 1980.<sup>1</sup> A related classified inspection report includes discussion of the mission's security program and issues affecting the safety of mission personnel and facilities and Sensitive But Unclassified findings related to the mission's information management program.

## **EXECUTIVE DIRECTION**

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

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

The Ambassador, who also was accredited to the Economic Community of West African States,<sup>2</sup> arrived in Nigeria in November 2019. A career member of the Senior Foreign Service, she previously served as Ambassador to the African Union and to Mali. The Deputy Chief of Mission (DCM) arrived in August 2022 following an assignment as DCM and Chargé d'Affaires in Morocco. The Consul General in Lagos arrived in August 2022, after having served as acting Consul General in Cape Town, South Africa.

OIG found that the Ambassador and the DCM modeled the leadership and management principles found in 3 Foreign Affairs Manual (FAM) 1214b<sup>3</sup> by displaying decisiveness and self-awareness and by communicating clearly. For example, mission staff said that the Ambassador and the DCM took quick action to address potential employee misconduct and possible misuse of the embassy cashier's foreign exchange service. Mission staff also told OIG that the Front Office strongly encouraged employees to provide feedback to inform the Front Office of their opinions.

OIG determined the Ambassador kept apprised of developing issues and communicated her priorities through meetings with section and agency heads that included weekly Country Team meetings, quick Monday "huddles" with section heads, and weekly group meetings with Department of State (Department) section heads. Additionally, she and the DCM held weekly or biweekly individual meetings with heads of sections or agencies. Country Team members told OIG the Ambassador was always available should issues need to be discussed outside of normal meetings.

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<sup>1</sup> See Appendix A.

<sup>2</sup> The Economic Community of West African States is a regional political and economic union of 15 countries in West Africa.

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

Embassy Abuja coordinated with leadership at Consulate General Lagos through biweekly joint Country Team meetings, a weekly telephone call between the Ambassador, the DCM, and the Consul General, and regular travel and email communications between the two posts. At the time of the inspection, the DCM also planned to institutionalize his own weekly telephone call with the Consul General. Staff members at Consulate General Lagos told OIG that the Consul General maintained contact with section and agency heads through the consulate general's Country Team weekly meetings, biweekly joint country team meetings with Embassy Abuja, and weekly individual meetings with section heads and senior staff.

Employees throughout the mission told OIG that the Ambassador, the DCM, and the Consul General maintained contact with and received feedback from U.S. and LE staff through town hall meetings, notices, emails, walk-about, and participation in section or community events, including programs for diversity, equity, inclusion, and accessibility (DEIA) and for First- and Second-Tour (FAST) employees.

OIG observed the Ambassador and the DCM in meetings and found they encouraged an open exchange of ideas and fostered an inclusive atmosphere. For example, staff told OIG that the Front Office encouraged feedback and contrary opinions. Mission staff also told OIG that the Ambassador, the DCM, and the Consul General frequently reiterated their expectations that all employees adhere to high standards of conduct during meetings with their colleagues.

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

OIG determined that the mission prepared its FY 2022 ICS in accordance with 18 FAM 301.2-1(b). The previous DCM established interagency working groups with representatives from relevant agencies and sections to discuss and draft the ICS, and staff told OIG that the Ambassador, the DCM, and the Consul General participated in these meetings. The Department cited Mission Nigeria for its excellent work in formulating an ICS that was "specific, measurable, achievable, realistic, and time bound."<sup>4</sup> Once the ICS was in place, the Ambassador and the Consul General, along with their section heads, regularly reviewed the mission's progress in meeting ICS goals. Additionally, OIG found that the Ambassador successfully advanced U.S. interests articulated in the ICS through her contacts with Nigerian government officials. These engagements resulted in the sale of aircraft and helicopters to the Nigerian military, Nigeria's accession to the Budapest Agreement on Cybercrime,<sup>5</sup> and Nigeria's agreement to support the U.S. candidate for a key position in the International Telecommunications Union.

## **Adherence to Internal Controls**

The Ambassador oversaw the mission's preparation of its FY 2022 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1) and (5), which

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<sup>4</sup> Cable 22 STATE 88208, "Recognizing Missions that Developed Exceptional Integrated Country Strategies and Shifting the Focus to Implementation," August 9, 2022.

<sup>5</sup> The Budapest Convention on Cybercrime is the first international treaty to address internet and computer crime by harmonizing national laws, improving investigative techniques, and increasing cooperation. It took effect on July 1, 2004.

require chiefs of mission to develop and maintain appropriate systems of management control. In preparing the Statement of Assurance, the Management Officers at Embassy Abuja and Consulate General Lagos collected input from relevant sections and briefed the embassy Front Office on weaknesses and deficiencies, which were incorporated in the statement. Staff told OIG that mission leadership at Embassy Abuja and Consulate General Lagos emphasized the importance of management controls in Country Team meetings and town halls. In addition, OIG found that the embassy and consulate general reviewed internal controls as part of their normal oversight of operations.

Additionally, OIG determined that the Ambassador, the DCM, and the Consul General demonstrated their commitment to properly managing resources and avoid waste, fraud, and mismanagement in statements at town hall and Country Team meetings and worked closely with the Management Sections to reinforce this message. The Ambassador, the DCM, and Embassy Abuja's Management Officer reviewed major areas of possible internal control vulnerabilities in Country Team and other meetings to forestall internal control weaknesses and put into place a system of management controls. During the inspection, OIG found internal control issues, which are addressed in the Public Diplomacy, Consular Operations, Foreign Assistance, Resource Management, and Information Management sections of this report.

The DCM conducted reviews of the Country Consular Coordinator's nonimmigrant visa adjudications in accordance with 9 FAM 403.12-2c.

## **Security and Emergency Planning**

The Ambassador, the DCM, and the Consul General generally conducted their security responsibilities in accordance with requirements in 12 Foreign Affairs Handbook (FAH)-1 H-762a and 22 STATE 68256.<sup>6</sup> They underscored the importance of security and emergency preparedness during Country Team and other staff meetings, through management and security notices, and through exercises and drills that took place throughout the past year.

Mission Nigeria's leadership encouraged employees to participate in all security drills and exercises, and the Regional Security Officers reported compliance with weekly radio checks to section chiefs and to the DCM. The Ambassador, the DCM, and the Consul General also led by example and participated in all drills, radio checks, and emergency preparedness exercises. In February 2022, the emergency action committee reviewed the security memorandum of agreement between the chiefs of mission and the geographic combatant commander. Additionally, following a change in command of the geographic commander in August 2022, the Ambassador signed and submitted a new security memorandum of agreement, as required by 2 FAH-2 H-116.4b.

During a series of security incidents that occurred in Abuja in October 2022, OIG observed the Ambassador and the DCM exercising their security responsibilities by calling two Emergency

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<sup>6</sup> Cable 22 STATE 68256, "Your Obligations Regarding Emergency Action Planning and Post-Wide Drills and Exercises," June 17, 2022.

Action Committee meetings, communicating with the Department and other agencies, holding a town hall meeting, and sending emails to U.S. and LE staff. Though Consulate General Lagos was not directly affected by the security concerns in Abuja, the Consul General held a town hall meeting to explain the situation and its possible impact on Lagos.

Although Mission Nigeria's leadership generally conducted security responsibilities as required, OIG found that the mission's consular crisis preparedness did not meet Department standards. This issue is addressed in the Consular Operations section of this report.

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

The Ambassador, DCM, and Consul General promoted Equal Employment Opportunity (EEO) and DEIA principles as required in 3 FAM 1514 and 22 STATE 13392.<sup>7</sup> Mission staff told OIG that the Ambassador, the DCM, and the Consul General voiced their support of the EEO principles in meetings with section chiefs, in Country Team and town hall meetings, and in management notices.

The DCM and the Consul General met and interacted with the embassy and consulate general DEIA Councils. During the inspection, OIG observed the embassy's monthly DEIA Council meeting, which was attended by the DCM, who suggested during the meeting that the number of council members should have no "upper limit" to fully embrace the concept of inclusiveness. Mission staff told OIG the DEIA Councils organized between two to five events monthly, such as discussion panels, information sessions, film screenings, and representational and cultural events. The Ambassador, the DCM, and the Consul General supported, and usually participated in, these events.

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

OIG found that mission leadership mentored First- and Second-Tour Foreign Service employees, as required by 3 FAM 2713b. Specifically, the Ambassador, in coordination with the DCM and the Consul General, initiated a monthly Professional Development Day on the last Wednesday of every month for section chiefs to work with their staff on training and mentoring. During these days, which were the primary activity in the FAST program, section chiefs used the mornings to work on professional development with their U.S. and LE staff; the afternoons were set aside for mission-wide mentoring and events, including security drills and sessions devoted to DEIA. Some of the topics covered during the afternoon sessions were based on FAST employee suggestions and included writing and speechwriting workshops, an EEO information session, and discussions on what managers and subordinates expect in their dealings with each other, sessions that the FAST employees told OIG they found useful. The Ambassador and the DCM frequently participated in Professional Development Day events.

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<sup>7</sup> Cable 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices," February 11, 2022.

## POLICY AND PROGRAM IMPLEMENTATION

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OIG assessed Mission Nigeria's policy and program implementation through a review of the advocacy and analysis work of the Political, Economic, and Public Diplomacy Sections, the U.S. citizen and visa services provided by the Consular Section, and the embassy's coordination and implementation of foreign assistance programs. OIG found the mission generally met Department requirements for policy and program implementation. However, OIG made recommendations to address issues in the Public Diplomacy and Consular Sections and issues related to the coordination and implementation of foreign assistance programs, as discussed below.

### **Political and Economic Sections**

OIG reviewed Mission Nigeria's Political and Economic Sections<sup>8</sup> through an assessment of leadership and management, policy engagement and coordination, reporting, Leahy vetting,<sup>9</sup> and commercial promotion. During the inspection, the mission updated and received Department approval for its Leahy vetting standard operating procedures as required by the Bureau of Democracy, Human Rights and Labor's 2017 Leahy Vetting Guide.

OIG determined that the mission's reporting and diplomatic engagement supported ICS and Department goals. Specifically, OIG reviewed 114 mission cables sent between September 2021 and November 2022 and found reporting to be tied to goals, generally completed in a timely manner, and appropriately sourced. Additionally, Department and interagency officials uniformly praised the quality and quantity of the mission's political and economic reporting, particularly with respect to security and economic challenges in Nigeria. They cited as examples Embassy Abuja's cables on the 2023 national elections, religious tensions, actors in northern Nigeria, reforms in the petroleum industry, and climate change as well as Consulate General Lagos' cables on oil theft and Niger Delta issues. However, Department officials and mission staff noted that insecurity in Nigeria's northeastern region, which precluded or complicated travel, negatively affected the mission's ability to report on events there.

OIG found the mission's political and economic staffs collaborated with other agencies in the mission to advance ICS and Department priorities, including advocating, coordinating, and reporting on country-wide activities in the areas of defense, trade, health, and climate cooperation. The embassy's Political and Economic Sections led or co-led active interagency

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<sup>8</sup> Embassy Abuja has separate Political and Economic Sections; Consulate General Lagos has a combined Political-Economic Section.

<sup>9</sup> The Leahy Amendment to the Foreign Assistance Act of 1961 prohibits the United States from furnishing certain assistance to a unit of a foreign security force if the Department has credible information that the unit has committed a gross violation of human rights. 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 United States Code (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.

working groups on trade, security, elections, health, and other priority areas.<sup>10</sup> Department and other agency officials credited this collaboration and political-economic advocacy as playing an important role in key U.S. successes. These included enhancing security cooperation through the sale of two U.S. weapons systems and improving the professionalism of Nigerian armed forces; securing the United States as Nigeria's climate partner of choice in working together on methane gas limits and regulatory reform in the oil and natural gas sector; expanding power generation; and increasing U.S. commercial opportunities, including the multi-billion dollar sale in 2022 of solar power equipment to a Nigerian power producer.

Despite the above successes, OIG determined that the lack of section administrative support at both Embassy Abuja and Consulate General Lagos hampered the mission's political and economic reporting and advocacy. At the time of the inspection, all three direct-hire office management specialist positions were vacant, and the mission had been unable to temporarily fill them with eligible family members or by other means.<sup>11</sup> As a result, staff told OIG they spent time on routine administrative tasks, including handling requests from important mission contacts for assistance in obtaining nonimmigrant visa appointments, which detracted from their ability to carry out their political and economic duties. This issue is discussed in greater detail in the Consular Operations section of this report.

## **Public Diplomacy**

OIG reviewed Mission Nigeria's public diplomacy operations, including strategic planning and reporting, resource and knowledge management, media engagement, policy programming and exchanges, and grants administration. OIG determined that the Public Diplomacy Sections at Embassy Abuja and Consulate General Lagos linked their work to mission ICS goals. Washington stakeholders applauded the sections' engagement and noted the mission's media outreach and use of the full spectrum of cultural and exchange programs. Mission Nigeria maintained a network of 12 American Spaces.<sup>12</sup> According to Department and mission staff, security concerns, particularly in northern Nigeria, as well as COVID-19 restrictions limited outreach and in-person monitoring and oversight of the American Spaces, which the Public Diplomacy Sections compensated for by using virtual platforms.

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<sup>10</sup> Other priority area interagency working groups included China and wildlife trafficking.

<sup>11</sup> At the time of the inspection, the office management positions in the Embassy Abuja Political and Economic Sections had been vacant for 6 months and 3 months, respectively, and for more than a year in the Consulate General Lagos Political-Economic Section. Staff told OIG these positions likely would not be filled until at least summer 2023.

<sup>12</sup> American Spaces are Department-operated or -supported public diplomacy facilities that provide digitally enhanced physical platforms for engagement with foreign audiences in support of U.S. foreign policy objectives. Mission Nigeria's American Spaces included 2 American Centers inside Embassy Abuja and Consulate General Lagos, and 10 Department-supported American Corners in locations across Nigeria. Additionally, there were 13 smaller partner-operated American Windows in Nigeria funded by the mission. Nigeria's American Spaces programs and services focused on alumni engagement, educational advising, information about the United States, and community outreach.

Overall, OIG found the mission's public diplomacy activities met Department standards and guidance, with the exceptions noted below.

### ***Public Diplomacy Grant Files Did Not Consistently Meet Department Standards***

Mission Nigeria's public diplomacy grant files did not consistently meet the Department's Federal Assistance Directive standards for documentation.<sup>13</sup> OIG's review of 20 public diplomacy grants made or amended from October 2020 through August 2022 (total value \$4.02 million)<sup>14</sup> found that while all files contained a notice of award, award provisions, and payment documentation, there were significant gaps in three areas—written designation of a grants officer representative,<sup>15</sup> evidence of grantee performance progress and financial reports,<sup>16</sup> and documentation of grants officer or grants officer representative monitoring or written assessments of the programs.<sup>17</sup> In addition, the Department's Office of the Procurement Executive in August 2022 identified 538 expired grants from as far back as 2017 that had not been closed out by the embassy.<sup>18</sup> Public Diplomacy Section staff told OIG that COVID-19 pandemic interruptions, including an inability to conduct site visits and the frequent changeover of U.S. direct-hire staff, along with a lack of understanding of grants officer representative responsibilities, resulted in a breakdown of oversight and documentation. Despite these issues, the Public Diplomacy Sections provided sufficient information for OIG to determine that grant funds were used as intended. During the inspection, the Public Diplomacy Section closed out 465 of the expired grants, leaving 73 grants that still needed to be closed out. The staff also took steps to upload evidence of program monitoring, which had been saved in local folders, to complete the grants database files. Failure to document the full lifecycle of a grant impairs the ability of grants officers to identify and mitigate risk, monitor program implementation, evaluate program results, and ensure accountability for resources.

**Recommendation 1:** Embassy Abuja should comply with Department standards for grant file documentation. (Action: Embassy Abuja)

### ***Lack of Coordination Between Embassy and Consulate General Public Diplomacy Sections***

OIG found a lack of coordination between the embassy's and consulate general's public diplomacy staffs. Staff sometimes collaborated to engage national audiences in, for example,

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<sup>13</sup> The Department's Federal Assistance Directive (FAD) establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department of State administering Federal financial assistance. Grants reviewed by OIG were subject to FAD, Version 4.0, effective October 1, 2019, through October 20, 2020; FAD Version 5.0, effective October 21, 2020, through October 7, 2021; and FAD, Version 6.2 which took effect on October 8, 2021.

<sup>14</sup> The selection included 20 grants, cooperative agreements, and fixed amount awards over \$75,000 out of a total universe of 256 grants (total value \$8.9 million) made or amended by Embassy Abuja and Consulate General Lagos from October 1, 2020, through August 31, 2022.

<sup>15</sup> FAD, Chapter 2, Section P (October 2019, and later revisions).

<sup>16</sup> FAD, Chapter 4, Section D (October 2019, and later revisions).

<sup>17</sup> FAD, Chapter 4, Section D (October 2019, and later revisions).

<sup>18</sup> FAD, Chapter 5, Section A (October 2019, and later revisions).

American Spaces outreach where they merged Facebook pages, shared one internet site, and jointly offered approximately 35 percent of American Spaces programming. Despite this collaboration, overall, the two sections did not share planning and activity calendars, leading a section to be unaware of the other's programs or finding out too late to contribute or amplify engagements. Moreover, each Public Diplomacy Section produced daily media summaries, which duplicated effort and wasted staff time. In addition, although the two sections shared most of the digital media platforms, Embassy Abuja and Consulate General Lagos maintained separate EducationUSA<sup>19</sup> websites and social media pages, using valuable staff time and, as staff reported, not consulting with the other Public Diplomacy Section to expand impact on local audiences. According to 3 FAM 1214b(7), all employees should establish constructive working relationships with all mission elements to further goals and share best practices, quality procedures, and innovative ideas to eliminate redundancies and reduce costs. Staff told OIG that previous workshops for joint planning had been canceled due to the COVID-19 pandemic and that public diplomacy leadership in both sections had not stressed cooperation. Failure to coordinate programs and activities results in duplicating work and puts the Public Diplomacy Sections at risk of failing to meet ICS goals.

**Recommendation 2:** Embassy Abuja should develop and implement a plan to institutionalize coordination between the mission's Public Diplomacy Sections in accordance with Department guidelines. (Action: Embassy Abuja)

***Public Diplomacy Reporting and Analysis Did Not Reach a Broad Audience***

The Public Diplomacy Sections did not contribute to the mission's analytical reporting to reach a broad Department-wide audience. An OIG analysis of Mission Nigeria's cable reporting from January 2021 through July 2022 found that Embassy Abuja sent 10 cables describing public diplomacy activities. However, OIG found an additional four embassy analytic cables on topics in which the Public Diplomacy Section had experience and networks, but only one mentioned public diplomacy youth engagement and the others had no section input or clearance. During the same time period, Consulate General Lagos sent eight cables reporting on the Public Diplomacy Section's work, but OIG found an additional four cables connected to public diplomacy topics that lacked section input and clearance. Cable 18 STATE 17160<sup>20</sup> states that Public Diplomacy Sections "must report on the impact our programs are having in support of U.S. foreign policy goals," whether through cables, Public Diplomacy Tools, or emails to Washington. Mission staff, as well as Washington officials, said insufficient collaboration with other sections and agencies caused "stove-piped" reporting plans. Limited contributions to the mission's analytical reporting hampered communication to Washington and embassy audiences worldwide on the Public Diplomacy Section's advancement of ICS goals in Nigeria.

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<sup>19</sup> EducationUSA is a Department-funded network of international student advising centers that promote U.S. higher education opportunities by offering accurate, comprehensive, and current information about opportunities to study at accredited post-secondary institutions in the United States. EducationUSA is funded by the Bureau of Educational and Cultural Affairs through a cooperative agreement with the Institute of International Education.

<sup>20</sup> Cable 18 STATE 17160, "PD ISSUES, February 2018," February 23, 2018.

**Recommendation 3:** Embassy Abuja should incorporate public diplomacy analysis in cable reporting in accordance with Department guidelines. (Action: Embassy Abuja)

### **Spotlight on Success: American Spaces and EducationUSA Teamwork Enhanced Programming, Increased Number of Students**

During the COVID-19 pandemic, Mission Nigeria's American Spaces and EducationUSA staffs joined forces to pivot to virtual outreach to engage audiences throughout Nigeria and assist students interested in studying in the United States. American Spaces staff at Embassy Abuja and Consulate General Lagos merged their websites and Facebook pages and offered approximately 35 percent of their programs virtually to audiences throughout Nigeria. When pandemic restrictions eased, they reinstated on-site programming through a hybrid model that invited audiences physically to a local American Space for virtual engagement with a speaker in Nigeria or the United States. Additionally, EducationUSA and American Spaces staff collaborated to virtually engage with prospective students and provide information to facilitate their university applications. As a result, EducationUSA contributed to an increase of 1,578 Nigerian students studying in the United States, from 12,860 in the 2020-2021 academic year to 14,438 in the 2021-2022 academic year.

### **Consular Operations**

OIG reviewed Mission Nigeria's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. Due to U.S. and LE staff vacancies and restrictions imposed by the COVID-19 pandemic, the mission faced backlogs for immigrant visa services and long wait times for nonimmigrant visa appointments. Staff throughout the mission told OIG that the long wait time for nonimmigrant visa appointments was a hindrance to bilateral engagements and required them to devote considerable time to manage inquiries and submit requests for expedited appointments from Nigerian counterparts and contacts. Mission Nigeria devoted additional staffing to reduce the immigrant visa backlog and prioritized emergency appointments to mitigate the wait time for nonimmigrant visa appointments, but mission staff told OIG these efforts were complicated by third party actors who buy up blocks of visa appointments and then re-sell them, as discussed below.

During the inspection, Mission Nigeria corrected two issues identified by OIG. Specifically, the mission:

- Updated its posted Schedule of Fees (7 FAH-1 H-713b).
- Identified and closed pending passport and Consular Report of Birth Abroad cases that had been open for more than 90 days (8 FAM 801.1-2).

OIG determined Mission Nigeria's consular operations complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions noted below.

### ***Global Support Strategy Vendor's Appointment System Compromised Public Service and Transparency***

Vulnerabilities in the appointment services provided to Mission Nigeria by the Department's Global Support Strategy (GSS)<sup>21</sup> vendor, specifically the ability to reserve appointments in bulk and easily edit biographic data associated with an appointment, eroded public trust in the visa system, compromised transparency, and provided an incentive for visa applicants to pay visa "fixers" to secure appointments. Consular personnel told OIG that third party visa "fixers" were able to exploit these vulnerabilities to reserve blocks of appointments within minutes of them being made available and then re-sell them. At the time of the inspection, all available nonimmigrant visa appointments offered by Embassy Abuja and Consulate General Lagos had been booked for the next 786 days and 708 days, respectively. Mission personnel reported regular complaints from host government contacts and members of the public who were unable to find available appointments unless they paid a visa fixer. Applicants who booked appointments through fixers told consular personnel they paid up to \$2,000 to secure an appointment. Mission Nigeria contacted the Bureau of Consular Affairs several times to request that the GSS vendor enact additional safeguards in the appointment system to limit visa fixer exploitation, but the vendor was unable or unwilling to make the changes requested. Mission Nigeria cannot address the problems without the vendor's cooperation. In its response to the draft report, the Bureau of Consular Affairs told OIG that it directed the vendor to conduct an analysis of Mission Nigeria's visa appointment system and concluded that biographic data was not being routinely edited and that, contrary to what the mission noted, appointments were not being sold. The bureau advised that the mission manage demand by opening more appointments. However, at the time of the inspection, mission staff told OIG that the vulnerabilities in the appointment system had eroded public trust in the visa system and undermined U.S. anti-corruption messaging to the host government. Guidance in 9 FAM 601.1-4 and 7 FAH-1 H-821 sets expectations for public service in consular sections and includes a requirement for transparency of operations that avoids the appearance of impropriety and demonstrates the ideals of democracy to a host government and its citizens. Failure to maintain transparency and public service standards can negatively affect public perception of the U.S. visa process and impede legitimate travel.

**Recommendation 4:** The Bureau of Consular Affairs should require that the visa appointment system provided to Mission Nigeria by the Global Support Strategy vendor complies with the Department's public service and transparency standards. (Action: CA)

### ***Insufficient Oversight of Global Support Strategy Vendor***

Mission Nigeria Consular Section personnel did not perform all recommended management oversight functions for the GSS vendor. For example, consular managers did not spot check

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<sup>21</sup> GSS is a Bureau of Consular Affairs worldwide program to provide support services that are not inherently governmental functions for nonimmigrant and immigrant visa operations. These may include information services, appointment systems, offsite fee collection, document delivery, onsite greeters, and offsite biometric data collection. The program requires posts to provide management oversight of the services they receive.

applicant registrations in the vendor's system or audit customer service calls. Guidance in 7 FAH-1 H-263.3 and the checklist of oversight responsibilities available through the Bureau of Consular Affairs' GSS Hub specify the oversight tasks that consular managers should perform to ensure their GSS vendor is correctly assessing fees, providing information to the public, and otherwise fulfilling the terms of its contract. The Consular Country Coordinator told OIG the mission did not carry out these functions because GSS oversight was not a priority during a period of limited staffing. Failure to complete all required oversight functions can increase the risk of vendor malfeasance and degrade the customer service provided to applicants for consular services.

**Recommendation 5:** Embassy Abuja should perform the required oversight of services provided by the Global Support Services vendor in accordance with Department standards. (Action: Embassy Abuja)

***Mission Nigeria Did Not Meet Department Standards for Consular Crisis Preparedness***

Mission Nigeria's consular crisis preparedness did not fully comply with Department guidance. While the Consular Sections at the embassy and consulate general undertook some recent planning, such as cross-training staff on passport acceptance and adjudication, Mission Nigeria consular personnel told OIG they were unfamiliar with the Emergency Action Plan, did not know what their roles might be in a crisis, had not received consular crisis preparedness training, and did not believe either Consular Section was fully prepared to respond to a crisis. Guidance in 7 FAM 1812.5 and 7 FAM 1814.3 addresses consular crisis preparedness in these specific areas to ensure consular employees can effectively manage an emergency. Mission consular staff told OIG they did not make time for more crisis management training or exercises due to staffing gaps and demanding workload. Without adequate planning, mission personnel may be unprepared to carry out their duties effectively in a crisis.

**Recommendation 6:** Embassy Abuja should comply with the Department standards for consular crisis preparedness. (Action: Embassy Abuja)

***Mission Improperly Processed Consular Reports of Birth Abroad Before Fees Were Paid***

OIG found that both Embassy Abuja and Consulate General Lagos required applicants for Consular Reports of Birth Abroad<sup>22</sup> to submit their qualifications for review prior to paying for the service. This review involved consular staff examining the entirety of the applicant's documentation and written record of physical presence in the United States. Guidance in 7 FAH-1 H-645.1b states that consular staff should verify payment of the required fee prior to providing a service. Mission personnel reported this practice originated as an effort to ensure applicants were prepared for their appointments. Engaging in case processing prior to collecting a fee could deprive the Department of the fees for service it rightfully charges.

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<sup>22</sup> Consular Reports of Birth Abroad are defined in 8 FAM 101.1-2 as "a formal document certifying the acquisition of U.S. citizenship at birth by a person born abroad to a U.S. citizen parent(s)" and that "it is proof of U.S. citizenship—in legal terms, it establishes a "prima facie case" of U.S. citizenship."

**Recommendation 7:** Embassy Abuja should discontinue the practice of adjudicating Consular Reports of Birth Abroad before fees are paid. (Action: Embassy Abuja)

***Referrals to Fraud Prevention Unit Not Completed in Required Timeframe***

At the time of inspection, 185 cases at Embassy Abuja and 1,017 cases at Consulate General Lagos that had been referred to the Fraud Prevention Units for review or action had been pending for more than 60 days. Guidance in 7 FAH-1 H-941.3b states that cases referred to fraud prevention units should be processed to conclusion within 60 days of receipt. Mission Fraud Prevention Managers told OIG that their units accumulated these backlogs due to COVID-19 pandemic disruptions, including a shortage of staff to process them. Failure to resolve referrals to the Fraud Prevention Unit in a timely fashion delays the final adjudication of services for U.S. citizens applying for passports and other citizenship documentation and for foreign nationals applying for visas.

**Recommendation 8:** Embassy Abuja should resolve referrals to Fraud Prevention Units in accordance with Department standards. (Action: Embassy Abuja)

***Embassy Lacked Adequate Consular Signage***

Embassy Abuja lacked adequate signage with consular hours and after-hours contact information for U.S. citizen services. Guidance in 7 FAH-1 H-263.8b requires an outdoor sign indicating the consular entrance, hours, and emergency contact information. Failure to post proper signage may result in U.S. citizens being unable to contact the mission after hours or in an emergency and can cause difficulty for consular patrons in navigating the intake and waiting areas.

**Recommendation 9:** Embassy Abuja should post consular signage in accordance with Department guidance. (Action: Embassy Abuja)

**Foreign Assistance**

In FY 2022, Nigeria received approximately \$627.7 million in bilateral foreign assistance resources from the United States. Of this amount, PEPFAR received \$349.2 million and Bureau of International Narcotics and Law Enforcement Affairs (INL) projects focusing on citizen security, law enforcement, and rule of law issues in the country received \$6.4 million.<sup>23</sup> OIG reviewed a sample of Mission Nigeria's award files for its foreign assistance projects and, as described below, found the files lacked required documentation.

OIG also assessed the mission's foreign assistance implementation and coordination efforts through a review of the activities of the mission's PEPFAR Coordination Office and INL Section. With respect to PEPFAR, as discussed below, OIG determined that the program was making progress toward achieving epidemic control goals. However, in reviewing the foreign assistance

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<sup>23</sup> Of the remaining funds, USAID managed \$271.1 million, primarily for health-related programs, and the Department of Defense managed \$1 million through the International Military Education and Training program.

implementation and coordination efforts of the mission's INL Section, OIG found the section's letter of agreement<sup>24</sup> with the Nigerian government was out of date and the section did not fully meet Department standards for implementation of the agreement. Additionally, although INL's projects largely were managed by staff based in Washington, OIG determined that the in-country personnel who were responsible for day-to-day project support, liaising with Nigerian government officials, and performing end-use monitoring of certain equipment provided to the Nigerian government, would benefit from clear identification of staff roles and responsibilities, and from improvements to the mission's end-use monitoring-related procedures and training. OIG's findings with respect to the INL Section are discussed more fully below. Finally, OIG found that, overall, the mission's coordination and collaboration mechanisms were insufficient to address certain aspects of its foreign assistance activities. This finding also is discussed below.

***Federal Assistance Award Files Lacked Required Documentation***

OIG found that the mission did not maintain documentation for its federal assistance awards as required in Department standards. OIG reviewed a sample of 20 active and expired federal assistance awards with a total value of approximately \$709,000.<sup>25</sup> OIG initially determined that 19 of the 20 award files reviewed lacked required documentation, such as evidence of monitoring by mission staff and program and financial reporting from award recipients. The mission's awards management staff subsequently uploaded missing documentation into 9 award files but were unable to do so for 10 other awards that had been overseen by grants officers and grants officer representatives who no longer worked at the mission.

Among these 10 awards was one \$9,471 award issued in September 2020 to provide socioeconomic support to children orphaned by AIDS and other vulnerable children in Lagos.<sup>26</sup> OIG found that the grants officer's representative's final evaluation of the award indicated that the recipient did not fully complete any of the project's intended activities and failed to return the \$6,405 that the embassy initially disbursed.<sup>27</sup> OIG was unable to determine the final status of these funds—including the amount spent as intended on project activities and whether the embassy sought to recover any portion of the funds—due to the lack of related documentation in the award's official file and the departure of the relevant award oversight staff. As a result, OIG questions \$6,405 of the award's expenditures. Other than this instance, OIG found no evidence that the other work called for in the reviewed awards was not completed.

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<sup>24</sup> Letters of agreement serve three purposes: (1) to specify the terms of the agreement between the United States and the partner foreign government; (2) to stipulate the necessary legal basis to which the partner foreign government must agree in order to receive security sector assistance; and (3) to serve as the primary instrument to legally obligate foreign assistance funds.

<sup>25</sup> OIG reviewed 20 of the 58 awards (total value approximately \$1.2 million) issued from FY 2019 through FY 2022. In selecting awards for review, OIG excluded awards that had funding of less than \$1,000 and those not managed by either Embassy Abuja or Consulate General Lagos.

<sup>26</sup> According to the award, intended project activities included establishing a youth training and recreation center, providing back-to-school kits for children, providing business grants to caregivers, and helping children obtain birth certificates and health cards.

<sup>27</sup> Of the total \$9,471 initially awarded to the recipient, the embassy de-obligated \$3,066 prior to disbursement.

The Federal Assistance Directive requires that documentation supporting the issuance and management of federal awards be present and complete in the official award file.<sup>28</sup> According to the mission's awards management staff, the mission lacked standard operating procedures for managing its federal assistance awards, which contributed to the identified deficiencies. Staff also said that additional training would be useful for them to ensure that all required documentation is included in award files. By not maintaining complete federal assistance award files, the mission undermines its ability to demonstrate the effectiveness of its assistance projects and increases the risk that potential waste or fraud may go undetected.

**Recommendation 10:** Embassy Abuja should verify and document whether \$6,405 in award funds were used for their intended purpose. If the funds were not used for their intended purpose, Embassy Abuja should recover the funds in accordance with the award agreement. (Action: Embassy Abuja)

**Recommendation 11:** Embassy Abuja should develop and implement standard operating procedures for management of federal assistance awards to ensure compliance with Department standards. (Action: Embassy Abuja)

### ***U.S. President's Emergency Plan for AIDS Relief Program Making Progress in Nigeria***

OIG found that the mission's PEPFAR Coordination Office worked with mission stakeholders to advance the PEPFAR program and make progress toward achieving epidemic control goals. For example, as of April 2022, the PEPFAR Coordination Office projected that Nigeria was close to achieving HIV testing, treatment, and viral suppression goals of the Joint United Nations Programme on HIV/AIDS.<sup>29</sup> Specifically, it estimated that in Nigeria, as of the beginning of FY 2022, 89 percent of people living with HIV knew their status, 97 percent of those who knew their status were on antiretroviral treatment, and 95 percent of those on antiretroviral treatment were virally suppressed—close to or exceeding the goals of 95 percent in each category. PEPFAR's use of data from a 2018 population survey helped to facilitate this progress, in part through efforts beginning in FY 2020 to target patient services in geographic regions with low treatment rates.<sup>30</sup> According to Department documentation, Nigeria succeeded in placing more than 643,000 people on treatment since these activities began, despite challenges posed by the COVID-19 pandemic. Department and mission stakeholders consistently credited the PEPFAR Coordination Office for its effective coordination and implementation efforts that helped to achieve these outcomes.

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<sup>28</sup> Federal Assistance Directive, Chapter 2, Section I (October 2017 and later revisions).

<sup>29</sup> These goals call for ensuring that, by 2025, 95 percent of people living with HIV know their status, 95 percent of those who know their status are on antiretroviral treatment, and 95 percent of those on antiretroviral treatment are virally suppressed and thus less able to transmit the virus.

<sup>30</sup> The Nigerian government conducted the 2018 survey with funding from PEPFAR and the Global Fund to Fight AIDS, Tuberculosis and Malaria. The U.S. Centers for Disease Control and Prevention also provided technical assistance for the survey.

### ***Letter of Agreement for Bureau of International Narcotics and Law Enforcement Foreign Assistance Projects Was Out of Date***

OIG found that the letter of agreement under which INL funds its foreign assistance projects in Nigeria was out of date. According to INL's acquisitions handbook, new letters of agreement should be established when proposed projects differ significantly from those covered under the prior agreement.<sup>31</sup> OIG determined, and INL staff confirmed, that the mission's letter of agreement, signed in 2014 and last amended in 2016, did not reflect the current INL-funded project portfolio. Additionally, INL notified the mission in April 2020 that the agreement should be updated, citing a lack of evidence of host-country buy-in and involvement in projects. Since then, according to INL documentation, INL obligated at least an additional \$33.5 million through 11 awards without updating the mission's letter of agreement to obtain the Nigerian government's formal agreement. The mission corresponded with the Nigerian government to update the agreement in February 2022 but did not receive a reply and did not follow-up. INL staff told OIG that updating the agreement was not a priority for the section due in part to staffing shortages. Without an updated letter of agreement, the mission lacks goals, metrics, and commitments for its current projects that are agreed to by both governments. In addition, without a letter of agreement that reflects the current INL-funded project portfolio in Nigeria, the mission may face difficulties ensuring accountability and measuring project progress and performance against strategic goals.

**Recommendation 12:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should update the letter of agreement with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects. (Action: Embassy Abuja, in coordination with INL)

### ***Mission Did Not Comply With Project Evaluation Requirements***

OIG found that the mission did not fully implement requirements in its letter of agreement with the Nigerian government to regularly hold joint evaluations of INL-funded projects in the country.<sup>32</sup> The agreement requires U.S. and Nigerian government officials to meet at least every 3 or 6 months, depending on the project, to review and report on "progress towards achievement of the project goals and objectives" and evaluate the project based on agreed-upon indicators. However, INL staff told OIG that the mission likely had never conducted joint evaluations with the Nigerian government and stated that staffing shortages had, in part, prevented the section from pursuing these activities as priorities. For example, according to INL staff, a project to develop a transitional police unit within Nigeria's Police Force was behind schedule, in part due to Nigerian government delays in selecting police officers to participate in

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<sup>31</sup> INL, *INL Acquisitions and Assistance Reference and Handbook*, revised March 2022, pages 9-10.

<sup>32</sup> OIG reported similar findings in its inspection of INL in 2023 and of individual embassies in 2017 and 2019. See OIG, *Inspection of the Bureau of International Narcotics and Law Enforcement Affairs* (ISP-I-23-08, January 2023); *Inspection of Embassy Nassau, The Bahamas* (ISP-I-19-19, August 2019); *Inspection of Embassy Paramaribo, Suriname* (ISP-I-19-20, July 2019); *Inspection of Embassy Port-au-Prince, Haiti* (ISP-I-19-18, June 2019); and *Inspection of Embassy Freetown, Sierra Leone* (ISP-I-17-16, May 2017).

INL-funded training for the new unit.<sup>33</sup> Despite obligating approximately \$11.8 million for the project through two awards issued in September 2021 and April 2022, INL staff estimated that training for the transitional police unit would not begin until after Nigerian elections in February 2023 even though U.S. trainers for the project were in the country. Further complicating the project was the fact that the training contract for the unit was scheduled to end in March 2023 and likely would have to be extended or re-competed to ensure training for the transitional police unit is completed. Had the mission regularly held joint progress reviews and evaluations with the Nigerian government as required in the letter of agreement, it would have had increased opportunities to work with the government to identify and mitigate project delays. Without regular joint evaluations of INL-funded projects as required by the agreement, Mission Nigeria risks inefficient and ineffective use of funds, potentially wastes resources, and foregoes data to help it determine progress in achieving mission goals and INL project objectives.

**Recommendation 13:** Embassy Abuja should conduct joint evaluation reviews with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects in accordance with the letter of agreement. (Action: Embassy Abuja)

***International Narcotics and Law Enforcement Staff Roles and Responsibilities Were Unclear***

OIG found that INL staff were unclear about the division of roles and responsibilities between staff based in Washington and those at the mission. According to INL Section documentation, the INL Program Officer for Nigeria, based in Washington, oversaw at least 16 different grants, contracts, and agreements for bilateral or regional INL-funded programs that include activities in Nigeria. Mission INL staff did not have a formal oversight role for these programs but supported them through monitoring efforts, working with implementing partners and Nigerian government officials, and developing and managing day-to-day program tasks. INL staff told OIG that the divided structure resulted in a division of roles and responsibilities between Washington and Mission Nigeria staff that sometimes could be unclear. For example, OIG found that neither the Washington-based nor mission-based INL staff were aware of certain reporting documentation that INL was to receive under an interagency agreement, with each office believing the other to have responsibility for the documents.<sup>34</sup> Additionally, INL staff told OIG that the section did not have access to certain documentation for Nigeria-based projects managed in Washington, and lacked training and certifications that may be required for new roles as INL's portfolio in Nigeria continues to expand.<sup>35</sup> INL staff told OIG that the lack of clarity regarding staff roles and associated requirements was due in part to neither INL nor the mission

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<sup>33</sup> The transitional police unit is intended, in part, to fill a role in high-risk areas that falls between military forces combatting insurgents and local officers performing day-to-day policing duties. According to project documentation, as security in these areas stabilizes, the police would be able to transition to more regular operations, allowing the transitional police unit to draw down and leave traditional policing functions intact.

<sup>34</sup> According to a September 2018 agreement with INL, the Drug Enforcement Administration agreed to provide appropriate INL regional program offices and embassy-based contacts with biannual evaluation reports on the status of certain programs.

<sup>35</sup> According to INL Section documentation, the mission had approximately \$50 million in INL-funded projects active as of October 2022. Mission staff told OIG that INL funding for Nigeria-based projects would likely increase in the coming years.

formally specifying intended roles and responsibilities for staff based in Nigeria and those in Washington.

As described in 1 FAM 014.1a, the Department's organizational structures should strive to achieve a proper balance among mission needs, efficiency of operations, and effective use of employees. Similarly, according to the Government Accountability Office's *Standards for Internal Control in the Federal Government*,<sup>36</sup> Principle 14.01, federal leaders should communicate necessary quality information to enable personnel to achieve the organization's objectives. By maintaining most program management responsibilities in Washington, and without establishing clear roles and responsibilities for INL Section staff based in Nigeria, INL risks gaps in oversight and certain program management requirements going unfulfilled and potentially prevents the mission from maintaining complete awareness of in-country INL activities and issues.

**Recommendation 14:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should specify and document the intended roles, responsibilities, and associated training and file access requirements for relevant staff, in accordance with Department standards. (Action: Embassy Abuja, in coordination with INL)

#### ***Mission's End-Use Monitoring Program Did Not Meet Requirements***

OIG found that the mission's end-use monitoring program did not fully meet Department standards.<sup>37</sup> For example, an April 2022 INL review of the mission's end-use monitoring practices identified several shortcomings, including a need for additional staff training and 2,651 items that were being maintained in the Department's end-use monitoring database that potentially could be removed. Additionally, OIG determined that the mission's standard operating procedures were insufficiently detailed to properly guide its efforts. For example, the procedures lacked specific processes for end-use monitoring-related tasks, including conducting inspections and entering resulting data into the Department's end-use monitoring database, transferring and documenting property provided to the Nigerian government, and documenting disposal or retirement of certain items, as required by INL's *Standard Operating Policy/Procedure for End Use Monitoring*.<sup>38</sup> During the inspection, INL staff based in Washington arrived at the mission to, in part, revise the mission's end-use monitoring-related procedures and provide additional training to staff on monitoring-related tasks. Based on the actions taken by INL, OIG did not make a recommendation to address this issue.

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<sup>36</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government*, page 60 (GAO-14-704G, September 2014).

<sup>37</sup> The Department requires certain property purchased with foreign assistance funds be monitored to ensure it is used for intended purposes, known as end-use monitoring. For instance, INL equipment valued at more than \$2,500 or items designated as defense articles, munitions, or dual-use items are subject to this requirement, a requirement posts are obligated to review and follow. See *INL Standard Operating Policy/Procedure for End Use Monitoring*, Sections 6.3.2 through 6.3.4, June 30, 2021. End-use monitoring fulfills the requirements of Section 484(b) of the Foreign Assistance Act of 1961, as amended, and Chapter 3A, Section 40A of the Arms Export Control Act. See 22 U.S.C. § 2291c(b) and 22 U.S.C. § 2785.

<sup>38</sup> INL, *INL Standard Operating Policy/Procedure for End Use Monitoring*, Section 6.1.2, June 30, 2021.

### ***Mission Lacked Comprehensive Foreign Assistance Coordination and Collaboration Mechanisms***

OIG found that the mission's foreign assistance coordination and collaboration mechanisms were insufficient to address certain aspects of its foreign assistance activities, such as those related to its security assistance efforts. According to 1 FAM 013.2e(1), the chief of mission is responsible for directing, coordinating, and supervising all executive branch activities and operations in their assigned country. Similarly, 1 FAM 013.2k(6) notes that the chief of mission has a "significant role in directing and supervising" foreign assistance programs and 2 FAM 113.1c(4) requires "establishing an effective system of internal controls" at the mission, in part to prevent waste and mismanagement. However, OIG found that the mission lacked a foreign assistance working group or other foreign assistance coordination mechanism. Although Mission Nigeria staff discussed foreign assistance issues in several different issue- and region-specific working groups, these mechanisms were insufficient to regularly cover all relevant activities.

Mission staff told OIG that assistance efforts would benefit from increased opportunities for collaboration in areas such as security assistance. For example, staff said that discussions in the Northeast Working Group, formed to coordinate programming and information related to efforts to combat terrorism in the northeastern region of Nigeria, often went beyond the intended regional scope of the meetings to discuss issues of national significance, indicating a need for other coordination venues to cover those topics. By using the Northeast Working Group to discuss issues other than those originally intended, the mission risks not having appropriate staff in attendance to ensure coordination with all involved offices and agencies. As noted in the *United States Strategy to Prevent Conflict and Promote Stability*, foreign conflict prevention and stabilization requires an integrated approach across federal agencies.<sup>39</sup> Without a comprehensive foreign assistance coordination mechanism, the mission foregoes potential opportunities to address aspects of insecurity in Nigeria through collaborating and building on the work of its constituent sections and agencies. Similarly, without full coordination of its activities, the mission risks duplication of efforts and wasted funds in its assistance efforts.

**Recommendation 15:** Embassy Abuja should establish a comprehensive foreign assistance coordination and collaboration mechanism, in accordance with Department standards.  
(Action: Embassy Abuja)

## RESOURCE MANAGEMENT

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OIG reviewed operations and internal controls in general management, facility management, general services, financial management, and human resources. During the inspection, the mission corrected multiple internal control issues that OIG identified. Specifically:

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<sup>39</sup> U.S. Departments of State, Defense, and the Treasury, and the U.S. Agency for International Development, *United States Strategy to Prevent Conflict and Promote Stability*, 2020, page 12.

- Mission Nigeria updated its management policies on contractor safety and safe electrical work practices (15 FAM 957.7).
- The mission incorporated Department of State Acquisition Regulation accident prevention clauses in all construction project statements of work (14 STATE 46762).<sup>40</sup>
- Consulate General Lagos strengthened its boat safety operations for its home to work transportation program by placing life vests on all boats, documenting boat pilots' certifications in personnel files, and ensuring the boats were registered with and inspected by the Nigerian Internal Waterways Authority (Federal Boat Management Guide).<sup>41</sup>
- Embassy Abuja began using Government Travel Requests for domestic travel (14 FAM 543).
- Consulate General Lagos updated its contracting officer's representative designations (14 FAH-2 H-143.1a).
- Mission Nigeria obtained Department authorization for its LE staff telework policy (3 FAM 7762a, b, and c).

Overall, OIG found the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance, with the exceptions noted below.

## **General Management**

### ***Embassy Provided Duplicate Motor Pool and Warehouse Services***

Embassy Abuja provided duplicate motor pool and warehousing services through the Management Section and USAID. Cable 12 STATE 11450<sup>42</sup> required the Department and USAID to consolidate 15 administrative services, including motor pool and warehouse services. Although the cable allowed the embassy to defer consolidation until the completion of a new office compound in 2015,<sup>43</sup> at the time of the inspection, the embassy had yet to consolidate either motor pool or warehouse services as directed. Embassy staff told OIG that the consolidation of the other 13 administrative services occurred so long ago that they did not realize it had not been completed. Failure to consolidate the embassy's warehouse and motor pool operations means the embassy is offering duplicative services and not taking advantage of efficiencies and cost savings.

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<sup>40</sup> Cable 14 STATE 46762, "Oversight of post contractor safety and health activities," April 22, 2014.

<sup>41</sup> Federal Boat Executive Guide and General Services Administration, Federal Boat Management Guide, (February 2010), Section E, Identifying and Registering Boats; Section F, Managing Boats; Section I, Inspecting and Maintaining Boats; Section J, Staffing and Training Boat Operators, and Section K, Managing Safety.

<sup>42</sup> Cable 12 STATE 11450, "Establishment of the JMB Implementation Committee," February 7, 2012.

<sup>43</sup> Cable 12 STATE 38782, "Abuja – Joint Management Board Implementation Committee (JMB IC) response to State/USAID consolidation planning," April 19, 2012.

**Recommendation 16:** Embassy Abuja should consolidate its motor pool and warehouse operations in accordance with Department guidance. (Action: Embassy Abuja)

## **Facility Management**

### ***Embassy and Consulate General Buildings Lacked Adequate Means of Emergency Egress***

The embassy chancery and the consulate general office building did not have an adequate means of emergency egress from the lobbies on floors with controlled access areas. Embassy and consulate general employees, contractors, and visitors used the buildings' main elevators to access all floors, including those with controlled access area suites. However, OIG observed that in the event of a fire, individuals in the lobbies of controlled access area floors would need to enter the controlled areas, which are restricted to cleared American employees, to reach an emergency exit. This prevents non-cleared employees, contractors, or visitors from safely exiting the buildings. Additionally, in Embassy Abuja, a sign by the controlled access area door informed people caught in the lobby to call the Marine Security Guard located at Post 1 in the event of a fire, but OIG found that the Marine Security Guards could not open the controlled access area doors.

Guidance in 15 FAM 846.2a states that occupants must be able to exit Department facilities quickly and safely in the event of an emergency and must be able to open exit route doors without keys, tools, or special knowledge. The mission's facility managers told OIG they were unaware of the fire safety hazard posed by the layout of the two buildings. Failure to provide an adequate means of emergency egress from Department facilities puts lives at risk.

**Recommendation 17:** Embassy Abuja, in coordination with the Bureau of Overseas Buildings Operations, should implement an emergency exit plan in the chancery and consulate general building that complies with Department guidance. (Action: Embassy Abuja, in coordination with the OBO)

### ***Consulate General Lagos Did Not Conduct Required Fire Mitigation Actions for its High-Rise Properties***

Consulate General Lagos leased residences in two high-rise buildings that did not meet Department fire standards. Guidance in 15 FAM 813.7c states that posts must use the minimum level of equivalency measures<sup>44</sup> in evaluating fire risks to determine when to acquire residences in high-rise properties that do not meet U.S. building and fire codes. In addition, 15 FAM 813.7e requires posts to coordinate decisions to lease properties that do not meet Department

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<sup>44</sup> According to 15 FAM 813.7a-c, occupying floors that are more than 75 feet (approximately six floors) from the lowest level of access for fire department vehicles presents an increased risk of injury or death due to the time it takes to evacuate from the higher floors. U.S. building and fire codes mandate prescriptive measures for these buildings to ensure that occupants can safely evacuate the premises in the event of a fire. Since it may be difficult to locate high-rise properties that meet U.S. building and fire code standards, embassies must use the minimum level of equivalency when evaluating risks to determine when to lease a property. Minimum level of equivalency measures prescribe requirements for fire alarm systems, sprinkler systems, and interior and exterior exit stairs.

standards with the Bureau of Overseas Buildings Operations (OBO), which provides overseas posts with property-specific mitigation measures. In October 2021, after it could not identify any compliant properties available for lease, the consulate general asked OBO for mitigation actions for the properties in the high-rise buildings. OBO immediately issued its fire mitigation memoranda letters for these properties. These letters detailed the fire risks associated with each high-rise building and listed specific mitigation measures that both the consulate general and residents must take to compensate for the fire risks. One mitigation measure required the consulate general to give residents of the high-rise buildings copies of the letters and notify them of the building's lack of fire protection features. However, OIG determined that, at the time of the inspection, the consulate general did not do this, nor did it complete any of the other mitigation measures. Facility Management staff told OIG that they did not know why action had not been taken on the mitigation measures recommended by OBO. Without appropriate notifications, embassy employees may be unaware of the steps needed to mitigate fire risks in their residences. Taking appropriate residential fire mitigation measures is critical for the life safety of occupants and failure to do so puts embassy staff and their families at risk.

**Recommendation 18:** Embassy Abuja should mitigate the fire and life-safety risks of the high-rise residential properties in Lagos that do not comply with Department standards. (Action: Embassy Abuja)

#### ***Unauthorized Use of Shipping Containers on Mission Compounds***

OIG found Mission Nigeria used approximately 30 unauthorized shipping containers on the embassy and consulate general compounds to store nonexpendable property and supplies and as office space for the embassy's local guard force. The Department issued guidance in September 2018 and October 2021<sup>45</sup> stating that it does not support using shipping containers as occupied structures or 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. Mission staff told OIG they were unaware of these requirements. Using unapproved shipping containers that do not meet the required building and fire codes for permanent storage and functional space needs increases the risk of damage to U.S. government property and puts employees' safety at risk.

**Recommendation 19:** Embassy Abuja should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage and office space or dismantle and remove them in accordance with Department. (Action: Embassy Abuja)

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<sup>45</sup> 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.

## General Services

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

Mission Nigeria did not manage its bulk fuel operations in accordance with the Department's Motor Pool Procedures Overseas Guide.<sup>46</sup> Specifically, OIG found that:

- There was no periodic oversight by an American officer of embassy fuel deliveries at the chancery and warehouse, diesel fuel deliveries to consulate general residential compounds, or the fuel dispensing process to U.S. government and personally owned vehicles at both the embassy and consulate general (Motor Pool Procedures Overseas Guide Section 1a).
- The mission did not designate embassy and consulate general fuel coupon coordinators to keep inventory records, sign for and record receipts, record issues, and conduct and reconcile monthly inventories with the records (Motor Pool Procedures Overseas Guide Section 2.3c).
- The mission did not keep keys to fuel-system locks in key boxes with access limited to authorized employees (Motor Pool Procedures Overseas Guide Sections 3b and 3.3d2).
- The mission did not conduct weekly checks for leaks in fuel dispensing equipment, such as pumps, underground piping, and tanks (Motor Pool Procedures Overseas Guide Section 3.3a).
- Embassy Abuja did not calibrate its warehouse fuel tanks to guard against inaccuracies which may result from tank deformity occurring gradually over time (Motor Pool Procedures Overseas Guide Section 3.3c).
- Although Consulate General Lagos had a fuel clerk to receive and verify fuel deliveries at the consulate general, it did not designate an employee to oversee and verify diesel fuel deliveries to residential complexes (Motor Pool Procedures Overseas Guide Section 1a).

OIG determined that these issues were due to a lack of management oversight and employee unfamiliarity with fuel program requirements. Failure to implement management controls for fuel operations increases the risk of mismanagement and theft.

**Recommendation 20:** Embassy Abuja should manage bulk fuel operations in accordance with Department standards. (Action: Embassy Abuja)

### ***Mission Did Not Fully Comply With Department's Motor Vehicle Safety Standards***

Mission Nigeria did not fully adhere to the Department's overseas motor vehicle safety standards. Specifically, OIG determined that drivers at Embassy Abuja and Consulate General Lagos regularly exceeded the 10-hour per day limit on duty shifts, contrary to guidance in 14 FAM 433.8a. OIG reviewed time and attendance records for three pay periods in August and

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<sup>46</sup> Bureau of Administration, *Motor Pool Procedures Overseas Guide*, updated October 2022.

September 2022<sup>47</sup> and found that the embassy's motor pool drivers exceeded 10 hours on duty on at least 34 occasions. At Consulate General Lagos, OIG found that the Marine Security Guard drivers worked 12 regularly scheduled 24-hour shifts each during the three reviewed pay periods, and Regional Affairs Office drivers exceeded the 10-hour limit on four occasions.

Embassy staff told OIG that although the Motor Pool Supervisor scheduled drivers for trips outside Abuja to stay within the 10-hour per day duty limit, employees in other offices often managed other aspects of the trips, such as routes, without regard to duty limits. For example, due to security threats, an LE staff member from the Regional Security Office was required to travel with the motor pool convoys for trips outside Abuja. That employee was responsible for deciding what routes were safest and when and where it was safe to stop for meetings or overnight. Consulate General Lagos staff told OIG that duty in excess of limits occurred because the Motor Pool Supervisor did not oversee the drivers for the Marine Security Guards or the Regional Affairs Office and was unaware of these drivers' hours. Failure to enforce driver duty limits increases the risk of injury to drivers, passengers, and the public, as well as of damage to U.S. government property.

**Recommendation 21:** Embassy Abuja should enforce duty driver limits for all mission drivers in accordance with Department guidelines. (Action: Embassy Abuja)

***Mission Did Not Consistently or Accurately Record Motor Vehicle Fleet Operational Data***

Mission Nigeria did not consistently or accurately record its motor vehicle use in the Department's Fleet Management Information System.<sup>48</sup> Guidance in 14 FAM 431.6-2b(7), 14 FAM 431.6-4a(3), and the mission's motor vehicle policy require the Motor Vehicle Accountable Officer to ensure the use of the Fleet Management Information System and that the Motor Pool Supervisor monitors the accuracy and timeliness of data entered into the system. OIG's review of the system found inaccurate or missing data on daily trips, fuel costs, and maintenance and repair costs for the mission's motor vehicles. For example, as of October 2022, Embassy Abuja had 304 driver trip tickets that each showed more than 1,000 kilometers driven in a single trip, with 25 of these tickets each showing more than 10,000 kilometers driven in a single trip. This occurred because drivers did not close out trip tickets at the end of each trip or each day, but instead kept them open for days, weeks or, in some cases, months before closing them. At Consulate General Lagos, OIG found that between January and October 2022, 39 of the consulate general's 98 vehicles did not have any maintenance or repair costs entered in the system. Section 6c of the Motor Pool Procedures Guide for Overseas Posts requires that each vehicle be inspected by a qualified mechanic at least every 12 months or more frequently if local operating conditions warrant.

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<sup>47</sup> OIG reviewed overtime records for embassy and consulate general drivers for pay periods 18, 19 and 20, including adjustments recorded from previous pay periods.

<sup>48</sup> The Fleet Management Information System, a module within the Integrated Logistics Management System, is the Department's enterprise system for managing all fleet operations. It is designed to capture key operational data on vehicle dispatch, maintenance, and fuel.

Furthermore, according to 14 FAM 437.2, operators of dispatched vehicles must complete a driver trip ticket report for each trip. OIG found that between May 12 and September 25, 2022, the system displayed 684 incomplete driver trip tickets for dispatched vehicles at Embassy Abuja.<sup>49</sup> Mission staff told OIG they were they were confused by some of the data input requirements for the Fleet Management Information System and that data entry was not a priority. Incomplete and inaccurate recording of milage, fuel consumption and maintenance records create a risk of misuse of government vehicles and misappropriation of fuel and spare parts.

**Recommendation 22:** Embassy Abuja should require that all mission vehicle usage be recorded in the Fleet Management Information System in accordance with Department standards. (Action: Embassy Abuja)

***Mission’s Motor Vehicle Policy Did Not Adhere to Department Requirements for Other Authorized Use of Mission Vehicles***

The mission’s motor vehicle policy, dated July 2022, did not comply with Department standards in 14 FAM 430. Specifically, the motor vehicle policy:

- Allowed for “other authorized use”<sup>50</sup> of mission vehicles and watercraft for non-business purposes on the basis that public transportation was unsafe, but neither the embassy nor the consulate general had the certifications required in 14 FAM 432. Specifically, the Emergency Action Committee must certify the reasons why official vehicles must be used in lieu of public transportation or private vehicles and the certification must be approved by the Ambassador, as required by 14 FAM 432.4(1). In addition, 14 FAM 432.4(2) requires the Motor Vehicle Accountable Officer to certify that public or alternate commercial transportation options do not exist and to describe both the parameters of the services that will be provided through the motor pool and the cost to agencies at post of providing such services. Both certifications must be added to the motor vehicle policy.
- Allowed for home-to-work transportation as an “other authorized use” of mission vehicles and watercraft in Lagos but did not collect charges for this transportation (14 FAM 432.8c).
- Did not contain a determination by the Regional Security Office whether armored or unarmored vehicles must be used for “other authorized use” of mission vehicles if public transportation is unsafe (14 FAM 432.4(1)).

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<sup>49</sup> Driver trip tickets are used to record the driver’s name, destination(s), beginning and ending mileage, and signature of any passengers.

<sup>50</sup> Other authorized use: Use of official vehicles overseas for transportation of U.S. government employees and their family members, including those under personal services agreements and eligible 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.

Mission personnel told OIG that the certifications previously used to justify “other authorized use” of U.S. government vehicles were on file; however, they were unable to provide OIG with the documents. In addition, mission personnel told OIG that they were unaware of the full scope of “other authorized use” requirements. Without a motor vehicle policy that reflects Department guidance for the use of official vehicles, the mission risks providing unauthorized services and improperly using official vehicles.

**Recommendation 23:** Embassy Abuja should revise its motor vehicle policy to adhere to Department requirements for “other authorized use” of U.S. government vehicles and watercraft. (Action: Embassy Abuja)

***Consulate General Lagos Did Not Record or Monitor Operational Records of its Boat Transportation Program***

Consulate General Lagos did not record or monitor any of the operational costs and maintenance data related to its official watercraft. The consulate general owned and operated four boats that were used for “other authorized use” transport, including approved home-to-work transportation. Guidance in 14 FAM 437.1a states that all accountability, use, fuel, and maintenance records must be kept on file in the Integrated Logistics Management System<sup>51</sup> (specifically in the Fleet Management Information System module) for all official vehicles. This includes recording trip tickets, fuel usage, preventive maintenance schedules, and maintenance and repair costs. Guidance in 14 FAM 430 discusses management of the Department’s official motor vehicles<sup>52</sup> but is silent on watercraft. Regardless, OIG concluded that a boat is a passenger carrier and therefore falls under Department standards on accounting for operational and maintenance data, just the same as motor vehicles. Consulate general staff told OIG that due to lack of FAM guidance regarding boat transportation, they did not know what operational and maintenance data to record for the four boats or where to record it. Failure to record and monitor operational and maintenance data for boats creates a risk of misuse and loss of control of valuable and easily pilferable government assets including fuel and spare parts.

**Recommendation 24:** Embassy Abuja should record all operational and maintenance data and costs for the mission’s watercraft into the Department’s Fleet Management Information System in accordance with Department guidelines. (Action: Embassy Abuja)

***Department Lacked Guidance for the Management and Operation of Watercraft***

OIG found that the Department lacked guidance on the management and operation of watercraft used as part of an official transportation program. As discussed in the previous

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<sup>51</sup> The Integrated Logistics Management System is an integrated web-based system that encompasses all Department supply chain functions in one system. It is designed to upgrade Department supply chain management by improving operations in areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

<sup>52</sup> Guidance in 14 FAM 431.4 defines a motor vehicle as any vehicle, self-propelled or drawn by mechanical power, designed and operated principally for roadway transportation of property or passengers.

finding, guidance in 14 FAM 430 discusses the management of official vehicles but focuses entirely on motor vehicles and does not mention watercraft. Furthermore, 15 FAM 900 “Safety, Health, and Environmental Management Program Abroad” does not contain guidance related to watercraft safety. United States Code § 1344<sup>53</sup> defines a passenger carrier as “any passenger motor vehicle, aircraft, boat, ship, or other similar means of transportation that is owned or leased by the U.S government.”<sup>54</sup> OIG found that in 2006, OBO produced a generic template for overseas posts to create a watercraft policy; however, it contained little information regarding watercraft safety. The lack of guidance for the management and operation of official watercraft jeopardizes the safety of personnel and the risk of mismanagement of government owned property.

**Recommendation 25:** The Bureau of Administration, in coordination with the Bureau of Overseas Buildings Operations, should update the Foreign Affairs Manual with specific guidance on the management and operation of watercraft. (Action: A, in coordination with OBO)

**Recommendation 26:** The Bureau of Overseas Buildings Operations should update and re-issue the generic watercraft policy template to include specific guidelines related to watercraft safety. (Action: OBO)

### ***Mission Maintained Excess Expendable Property***

OIG found the mission maintained excess expendable property<sup>55</sup> contrary to Department property management guidelines. Guidance in 14 FAH-1 H-112.2h requires the accountable property officer to identify unneeded items in the warehouse and discard unserviceable and obsolete items. In addition, 14 FAH-1 H-418.1(4) recommends that inactive or slow-moving items be removed from the stock program. At the time of the inspection, Consulate General Lagos had \$1.32 million in expendable supplies, of which 42 percent (valued at \$554,000) had not been issued in the last year. In addition, 37 percent (\$488,000) of the inventory had more than 2 years’ worth of supply, signifying that the consulate general had an excess supply of those items. Furthermore, Embassy Abuja had \$1.9 million in expendable supplies, of which 21 percent (\$399,000) had not been issued in the last year. In addition, 47 percent (\$893,000) of the inventory had more than 2 years’ worth of supply.<sup>56</sup>

OIG determined that these issues occurred due to a lack of management oversight. Embassy Abuja staff told OIG that they rarely analyzed existing property levels, while Consulate General Lagos staff said that the distance to the warehouse impeded frequent oversight visits from American General Services staff. Failure to adhere to Department property management standards results in the storing of unneeded and obsolete property and expendables in the

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<sup>53</sup> United States Code Title 31, Subtitle II, Chapter 13, Subchapter III § 1344 (h) (1).

<sup>54</sup> Authorities for 14 FAM 300 are outlined in 14 FAM 431.2 and include United States Code § 1344.

<sup>55</sup> Expendable supplies are items that are consumed during use, such as office supplies.

<sup>56</sup> The percentage of total inventory with more than 2 years of supply. A lower percentage shows that post is appropriately ordering quantities of items and not creating cases of excessive inventory.

warehouse and storerooms, which uses up valuable space, and creates additional oversight for section staff.

**Recommendation 27:** Embassy Abuja should dispose of excess expendable and nonexpendable property in accordance with Department guidelines. (Action: Embassy Abuja)

***Mission Did Not Adhere to Department Travel Regulations***

The mission did not adhere to the Department's travel regulations in 14 FAM 540. Specifically, based on a review of travel card and E2<sup>57</sup> records, OIG found that:

- Embassy Abuja and Consulate General Lagos purchased domestic tickets from local vendors on an ad-hoc basis or through blanket purchase agreements and not through an outsourced, contracted travel management center as required in 14 FAM 541a. Although both posts used the contracted travel management center to access and ticket U.S. government fares as required in 14 FAM 541c, the Department's center did not have access to the domestic market and therefore was unable to purchase tickets for travel within Nigeria.
- Consulate General Lagos did not use an approved payment method to pay for domestic travel tickets listed in 15 FAM 543 but rather used blanket purchase agreements and paid for the tickets through monthly invoices.
- Consulate General Lagos purchased international tickets for emergency visitation travel and some rest and recuperation travel directly from the airlines rather than through the Department's contracted vendor in South Africa, contrary to 14 FAM 541c.

Mission employees provided OIG several reasons for the posts' lack of adherence to Department standards. Consulate General Lagos employees said they were unaware of the list of approved payment methods. Embassy employees told OIG they were in the process of contracting with a local travel management center for their domestic travel needs. Regarding international travel, Embassy Lagos employees told OIG they purchased some tickets directly instead of using the contracted center because of the vendor's inability to respond in a timely manner, an inability to call South Africa directly from Nigeria, and the vendor's emergency after-hours number not working. Failure to adhere to Department travel regulations may lead to fraud, waste, and abuse of resources.

**Recommendation 28:** Embassy Abuja should adhere to travel regulations in accordance with Department standards. (Action: Embassy Abuja)

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<sup>57</sup> E2 Solutions is the Department's travel services software.

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

The mission's contracting officer's representative (COR) program did not comply with Department standards. The mission had 14 CORs who oversaw 44 multi-year contracts. OIG reviewed COR files for 10 contracts worth approximately \$18.9 million and found the following issues:

- Neither the CORs nor the contracting officer completed a mandatory contractor's performance review in the Contractor Performance Assessment Reporting System<sup>58</sup> for eight of the mission's contracts (14 FAH-2 H-572d and 48 Code of Federal Regulations § 42.1502a).
- COR files at Consulate General Lagos were either incomplete or nonexistent (14-FAH-2 H-142b(16) and 14 FAH-2 H-517).

In addition, a review of all 44 contracts found that:

- The contracting officers did not prepare COR delegation memoranda for 25 of the 44 contracts (14 FAH-2 H-143.2a(2)).
- None of the mission's 14 CORs had a current certification issued by the Department's Office of the Procurement Executive (14 FAH-2 H-143a).

These issues occurred because the mission's CORs were unaware of their responsibilities, and because of a lack of management oversight of the COR staff. Despite these issues, OIG's interviews with staff and reviews of other documentation showed the mission monitored the contracts, received the goods and services for which it had contracted, and addressed contractors' performance when issues arose. A non-compliant COR program increases the risk of poor contract administration and contract mismanagement.

**Recommendation 29:** Embassy Abuja should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Abuja)

### ***Foreign Per Diem Rates Were Not Current for Some Areas***

OIG found that the embassy's foreign per diem rates for Kaduna, Port Harcourt, and other locations in Nigeria were out of date. Specifically, the Bureau of Administration's Office of Allowances website showed that the embassy had not submitted a hotel and restaurant report for Kaduna since 2014 and since 2015 for Port Harcourt and other locations. Department of State Standardized Regulation 074.2 states that embassies should submit hotel and restaurant reports, which are used to review and establish foreign travel per diem rates, every 2 years. Embassy staff told OIG they were unaware these reports were overdue. Failure to submit

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<sup>58</sup> The Contractor Performance Assessment Reporting System is the government-wide evaluation reporting tool for all past performance reports on contracts and orders. An annual performance assessment must be done in the system for each contract above the simplified acquisition threshold of \$250,000, according to 48 Code of Federal Regulations § 42.1502(b) and § 2.101.

reports on a timely basis could result in overpayment or underpayment of travel expenses to U.S. government personnel.

**Recommendation 30:** Embassy Abuja should submit its foreign per diem reports in accordance with Department standards. (Action: Embassy Abuja)

## **Financial Management**

### ***Mission Cashiers Inappropriately Disbursed Fuel and Motor Pool Transportation Coupons***

The mission's two principal cashiers safeguarded and disbursed mission fuel and motor pool transportation coupons<sup>59</sup> in violation of Department standards. The cashiers were responsible for ensuring proper accountability of funds and documentation of the coupons as part of mission cashier operations. Guidance in 4 FAM 393.4-3e prohibits cashiers from safeguarding or disbursing any other money, checks, or documents that are not part of their authorized advance.<sup>60</sup> Embassy staff told OIG they were unaware they were prohibited from maintaining coupons as part of the cashier advance. Having the cashiers act as custodians for the embassy fuel and transportation coupons detracts from their primary responsibilities and increases the risk of accounting errors.

**Recommendation 31:** Embassy Abuja should manage the fuel and motor vehicle transportation coupon program in accordance with Department guidance. (Action: Embassy Abuja)

### ***Unliquidated Obligations Were Not Reviewed and De-Obligated in a Timely Manner***

OIG found that, as of October 2022, the mission had approximately \$1.2 million in unliquidated obligations with no activity in more than one year. According to Department standards in 4 FAM 225d, unliquidated obligations with no activity in more than one year must be targeted and de-obligated if they cannot be documented as valid obligations. In addition, the mission lacked a standard operating procedure defining responsibilities and processes for systematically reviewing unliquidated obligations, as required by 4 FAM 225a. Mission staff told OIG the lack of an approved procedure left them uncertain how to systematically review and de-obligate unliquidated obligations that were no longer valid. Failure to review and de-obligate unliquidated obligations in a timely manner results in an accumulation of funds that could be put to better use.<sup>61</sup>

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<sup>59</sup> Consulate General Lagos' principal cashier disbursed both fuel and motor pool transportation coupons. Embassy Abuja's principal cashier disbursed only fuel coupons.

<sup>60</sup> Authorized advance is the maximum amount of U.S. government funds authorized to be held by a cashier. This amount includes cash, checks or other negotiable instruments, including funds deposited or held in cashier bank accounts.

<sup>61</sup> In accordance with 1 FAM Exhibit 050(3)d(4), funds put to better use are funds that could be used more efficiently if management took certain actions, including de-obligating funds from programs or operations.

**Recommendation 32:** Embassy Abuja should review its unliquidated obligations in accordance with Department standards and put up to \$1.2 million to better use. (Action: Embassy Abuja)

***Mission Did Not Process Travel Advances as Required***

As of October 28, 2022, Department records showed Mission Nigeria had 142 overdue travel advances totaling \$275,838. Of these, 58 were more than 30 days overdue and 14 were outstanding for more than 90 days. According to 4 FAM 465.1a, each traveler is required to submit an expense report (voucher or claim) within 5 business days from the travel ending date to account for the travel performed and for the related authorized costs. If travelers do not submit their vouchers on time, the mission's financial management staff is responsible for debt collection, as outlined in 4 FAM 492.1a. According to 4 FAM 493.1-3a, in no case should a debt delinquent for more than 90 days remain with post for collection. Mission staff told OIG that the overdue travel advances occurred because travelers did not submit their vouchers on time despite receiving reminders. Overdue travel advances represent a loss of funds to the Department if they remain uncollected. Clearing overdue travel advances would allow the embassy to put any funds collected to better use.

**Recommendation 33:** Embassy Abuja should clear overdue travel advances in accordance with Department guidelines and put funds up to \$275,838 to better use. (Action: Embassy Abuja)

**Human Resources**

***Mission Provided Insufficient Human Resources Support for Consulate General Lagos***

OIG reviewed Mission Nigeria's human resources operations and internal controls and found the embassy did not provide sufficient human resource support to Consulate General Lagos. As reflected in the mission's human resources staffing management notice, LE staffing pattern, and Management Section organizational chart, Embassy Abuja had 16 human resources employees, including 2 American officers, for the embassy's 891 staff members, but only 2 human resources LE staff members at Consulate General Lagos, which had 471 staff members. One of the two American Human Resources Officers visited the consulate general on a quarterly basis for 2-day visits while an LE staff member visited Lagos monthly. However, these infrequent visits, particularly by an American human resources officer, contributed to delayed responses in managing disciplinary actions at Consulate General Lagos, including a termination which occurred during the inspection. In addition, the infrequent visits contributed to insufficient oversight of adherence to Department policies, including advance approval of overtime and posting of EEO officer and liaison contact information. OIG found that competing priorities led to the insufficient direct-hire support to the consulate general. According to 2 FAM 113.1b, chiefs of mission are responsible for integrating the activities of all posts under their supervision. Visits by direct-hire embassy staff help ensure this integration so constituent posts receive the necessary support and resources to operate effectively. Failure to do so can prevent the mission from meeting its objectives.

**Recommendation 34:** Embassy Abuja should implement standard operating procedures outlining human resources support services provided and increase the frequency of American officer visits to Consulate General Lagos. (Action: Embassy Abuja)

***Mission Nigeria Did Not Consistently Authorize Overtime in Advance***

Mission Nigeria did not comply with requirements for authorizing overtime. According to 4 FAH-3 H-523.2, 3 FAM 2332.4(5), and 3 FAM 2332.5(2), supervisors must approve overtime in writing and in advance. OIG's review of Mission Nigeria's overtime records for 12 pay periods in 2022<sup>62</sup> found that only 4 of 39 overtime forms submitted by 11 employees were approved in advance. One additional form was approved with a 3-month blanket approval, and 34 were approved after the overtime work had already been performed. OIG also found cases in Consulate General Lagos' Regional Security Office and Public Diplomacy Section where overtime was approved retroactively for periods of up to 3 months.

OIG determined that the mission did not comply with advance overtime approval because it did not establish management controls to monitor compliance with Department standards on overtime. Failure to approve overtime in advance is an internal management control weakness and may lead to fraud, waste, and abuse of resources.

**Recommendation 35:** Embassy Abuja should require supervisors to approve overtime in accordance with Department guidance. (Action: Embassy Abuja)

***Mission Nigeria's Locally Employed Staff Position Descriptions Did Not Comply With Department Standards***

Mission Nigeria did not review LE staff position descriptions for accuracy as required by Department standards. OIG reviewed 14 LE staff position descriptions and found 10 in the Management Section and 1 in the INL Section did not accurately reflect the employees' duties and responsibilities and were not classified in accordance with Department guidelines. Additionally, some of the position descriptions OIG reviewed had cover sheets dated in 2021 and 2022 signed by American supervisors, section heads, and the Human Resources Officer certifying that the information in the position description was accurate, even though some of the underlying position descriptions did not have grades or job titles or were last revised in 2009. According to 3 FAM 7313.1(4), supervisors of LE staff are responsible for ensuring that position descriptions adequately and accurately reflect assigned duties and responsibilities. Moreover, according to 3 FAM 7312.2, all LE staff positions must be classified according to the standards and guidelines contained in 3 FAH-2 H-400, which is the foundation for the equitable compensation of LE Staff.

Mission staff told OIG they had communicated to section heads the requirement to annually review and ensure that their respective LE staff position descriptions were accurate and

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<sup>62</sup> Pay periods 6 through 17, encompassing February 27 to August 13, 2022.

classified according to Department standards, but some section heads requested more time while others did not respond. Inaccurate position descriptions can directly affect LE staff members' level of compensation.

**Recommendation 36:** Embassy Abuja should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Abuja)

## INFORMATION MANAGEMENT

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OIG reviewed Mission Nigeria's unclassified and classified network operations, information systems, administration of mobile computing devices, mail and pouch services, cybersecurity practices, records management, telephone operations, and emergency communications systems. OIG determined Mission Nigeria's information management programs and services generally met the mission's day-to-day computing and communications needs, with the exceptions described below.

### ***Ineffective Active Directory Management Created Security Risks***

Mission Nigeria did not maintain its Active Directory<sup>63</sup> accounts and security groups for its unclassified and classified computer networks in accordance with 12 FAH-10 H-112.5-2(1) and 12 FAH-10 H-112.1-1a(2-3). As a result, OIG found instances of user accounts with elevated access privileges, active accounts that should have been disabled, accounts and groups with non-standard naming conventions, no designated security tier levels, and prohibited nesting in privileged security groups. This occurred because information management staff were unaware of these requirements, in part due to gaps in IT security training. Failure to accurately maintain Active Directory accounts and security groups increases the risk of a security breach, especially if a security group has been given inappropriate administrative privileges.

**Recommendation 37:** Embassy Abuja should manage its Active Directory accounts and security groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Abuja)

### ***Records Retirement Practices Did Not Comply With Department Standards***

The mission's records retirement practices did not comply with Department records management standards. According to the Department's 2022 Global Information Services Annual Post Retirement Report, Consulate General Lagos had not retired political, economic, and public diplomacy program files since 2000 and Embassy Abuja had not done so since 2016. Department standards in 5 FAM 451b and c require posts to maintain an active, continuing records retirement program that ensures records are retired in accordance with records disposition schedules. OIG determined this internal control issue occurred due to mission

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<sup>63</sup> 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.

employees being unfamiliar with records retirement requirements. The lack of an effective records retirement program increases the risk of loss of important data and historical records that could affect the Department's and the mission's ability to conduct policy analysis, decision-making, and archival research.

**Recommendation 38:** Embassy Abuja should retire records in accordance with Department records management standards. (Action: Embassy Abuja)

***Information Systems Security Officers Did Not Perform All Required Duties***

The mission's Information Systems Security Officers (ISSO) did not perform all required information systems security duties. According to 12 FAM 613.4 and 5 FAH-11 H-116a(1), ISSOs are responsible for implementing cybersecurity policies and procedures for information systems and for using the ISSO checklist to document all required duties. Specifically, OIG found the ISSOs did not use the ISSO checklist to review network logs monthly. They also did not monitor security controls. Information management staff told OIG they did not perform these duties due to staffing difficulties and competing priorities. OIG issued two management assistance reports, one in May 2017 and the other in December 2020,<sup>64</sup> that highlighted widespread Department failures to perform ISSO duties. Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

**Recommendation 39:** Embassy Abuja should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Abuja)

***Server Room Emergency Power Off Switches Were Incorrectly Installed***

Mission Nigeria's emergency power-off switches were installed outside its unclassified server rooms. However, according to 12 FAH-10 H272.8.1(2), an emergency power-off control must be located inside the server room adjacent to each egress door for access by authorized personnel. Information management staff relocated the switches outside the room in 2013 in accordance with Department standards in effect at the time but were unaware those standards changed in 2015. The current locations could prevent rapid disconnect during emergency situations, prolong emergency power off time, and permit accidental or intentional shutdown of all unclassified systems.

**Recommendation 40:** Embassy Abuja should install emergency power-off switches inside the server rooms adjacent to each egress door, in accordance with Department standards. (Action: Embassy Abuja)

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<sup>64</sup> OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017); OIG, *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

## RECOMMENDATIONS

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OIG provided a draft of this report to Department stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to Embassy Abuja, the Bureau of Administration, the Bureau of Consular Affairs, and the Bureau of Overseas Buildings Operations. The Department's complete responses can be found in Appendix B. The Department also provided technical comments that were incorporated into the report, as appropriate.

**Recommendation 1:** Embassy Abuja should comply with Department standards for grant file documentation. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of July 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja complies with Department standards for grant file documentation.

**Recommendation 2:** Embassy Abuja should develop and implement a plan to institutionalize coordination between the mission's Public Diplomacy Sections in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of August 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja developed and implemented a plan to institutionalize coordination between the mission's Public Diplomacy Sections in accordance with Department guidelines.

**Recommendation 3:** Embassy Abuja should incorporate public diplomacy analysis in cable reporting in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja incorporated public diplomacy analysis in cable reporting in accordance with Department guidelines.

**Recommendation 4:** The Bureau of Consular Affairs should require that the visa appointment system provided to Mission Nigeria by the Global Support Strategy vendor complies with the Department's public service and transparency standards. (Action: CA)

**Management Response:** In its May 2, 2023, response, the Bureau of Consular Affairs disagreed with this recommendation. The bureau noted it found no credible evidence that nonimmigrant visa appointments can be resold, and based on the features of the appointment system, it was not possible for users to change biographic data for an appointment.

**OIG Reply:** OIG considers the recommendation unresolved. OIG acknowledges that the Bureau of Consular Affairs reviewed vendor data on Mission Nigeria and concluded that appointments were not being sold and biographical data was not being edited. OIG also acknowledges that the bureau advised that the mission manage demand by opening more appointments. However, at the time of inspection, Mission Nigeria had already booked appointments for the next 786 days in Abuja and 708 days in Lagos. Opening additional appointments, should they be taken by genuine applicants, would still require applicants to wait nearly 2 years for an interview. In addition, the issue of “fixers” claiming and then re-selling appointments (with a shorter wait time) would persist. Furthermore, at the time of the inspection, Mission Nigeria reported significant actual and potential vulnerabilities in the appointment system, eroding public trust in the visa system and undermining U.S. anti-corruption messaging to the host government. As noted in the report, mission personnel told OIG of regular complaints from host government contacts and members of the public who were unable to find available appointments unless they paid a visa fixer, and applicants reported to the mission that they paid fixers up to \$2,000 to secure appointments. Mission personnel also observed and reported to OIG that certain biographical data in the appointment system appeared to be editable. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Consular Affairs has required that the visa appointment system provided to Mission Nigeria by the Global Support Strategy vendor complies with the Department’s public service and transparency standards.

**Recommendation 5:** Embassy Abuja should perform the required oversight of services provided by the Global Support Services vendor in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja performed the required oversight of services provided by the Global Support Services vendor in accordance with Department standards.

**Recommendation 6:** Embassy Abuja should comply with the Department standards for consular crisis preparedness. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

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

**Recommendation 7:** Embassy Abuja should discontinue the practice of adjudicating Consular Reports of Birth Abroad before fees are paid. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja discontinued the practice of adjudicating Consular Reports of Birth Abroad before fees are paid.

**Recommendation 8:** Embassy Abuja should resolve referrals to Fraud Prevention Units in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja resolved referrals to Fraud Prevention Units in accordance with Department standards.

**Recommendation 9:** Embassy Abuja should post consular signage in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja posted consular signage in accordance with Department guidance.

**Recommendation 10:** Embassy Abuja should verify and document whether \$6,405 in award funds were used for their intended purpose. If the funds were not used for their intended purpose, Embassy Abuja should recover the funds in accordance with the award agreement. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja verified and documented whether \$6,405 in award funds were used for their intended purpose or recovered the funds.

**Recommendation 11:** Embassy Abuja should develop and implement standard operating procedures for management of federal assistance awards to ensure compliance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of August 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja developed and implemented standard operating procedures for management of federal assistance awards to ensure compliance with Department standards.

**Recommendation 12:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should update the letter of agreement with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects. (Action: Embassy Abuja, in coordination with INL)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja updated the letter of agreement with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects.

**Recommendation 13:** Embassy Abuja should conduct joint evaluation reviews with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects in accordance with the letter of agreement. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of December 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja conducted joint evaluation reviews with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects in accordance with the letter of agreement.

**Recommendation 14:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should specify and document the intended roles, responsibilities, and associated training and file access requirements for relevant staff, in accordance with Department standards. (Action: Embassy Abuja, in coordination with INL)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of June 2024.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja specified and documented the intended roles, responsibilities, and associated training and file access requirements for relevant staff, in accordance with Department standards.

**Recommendation 15:** Embassy Abuja should establish a comprehensive foreign assistance coordination and collaboration mechanism, in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja established a comprehensive foreign assistance coordination and collaboration mechanism, in accordance with Department standards.

**Recommendation 16:** Embassy Abuja should consolidate its motor pool and warehouse operations in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of December 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja consolidated its motor pool and warehouse operations in accordance with Department guidance.

**Recommendation 17:** Embassy Abuja, in coordination with the Bureau of Overseas Buildings Operations, should implement an emergency exit plan in the chancery and consulate general building that complies with Department guidance. (Action: Embassy Abuja, in coordination with the OBO)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja implemented an emergency exit plan in the chancery and consulate general building that complies with Department guidance.

**Recommendation 18:** Embassy Abuja should mitigate the fire and life-safety risks of the high-rise residential properties in Lagos that do not comply with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja disagreed with this recommendation. The embassy noted that Consulate General Lagos provided the October 2021 mitigation letter to each high-rise resident in October 2021, and all required steps identified by the Bureau of Overseas Buildings Operations to mitigate the risks involved were complete, except for the Cameron Court sprinkler system, which has a scheduled completion date of July 1, 2023. Subsequently, each new occupant received the high-rise mitigation letter. Consulate General Lagos had receipt of these mitigation letters signed by occupants in its records. The embassy noted both high-rise property leases were being renewed in 2023, and new high rise mitigation letters will be updated for each property and provided to occupants.

**OIG Reply:** OIG considers the recommendation resolved. At the time of the inspection, OIG did not receive any documentation that Consulate General Lagos had completed the required steps identified by the Bureau of Overseas Buildings Operations to mitigate the risks at the high-rise buildings, nor did it receive evidence of the consulate general sending letters to occupants of the high-rise residential properties specifically informing occupants of the buildings' lack of fire protection features. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja mitigated the fire and life-safety risks of the high-rise residential properties in Lagos that do not comply with Department standards.

**Recommendation 19:** Embassy Abuja should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage and office space or dismantle and remove them in accordance with Department. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted it will dismantle and remove the shipping containers and estimated completion by October 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja dismantled and removed the shipping containers that it used for storage and office space.

**Recommendation 20:** Embassy Abuja should manage bulk fuel operations in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja partially concurred with this recommendation. The embassy noted it concurred with five of the six items listed in the finding and estimated completion by December 2023. However, in its response to the sixth item, OIG's finding that Consulate General Lagos did not designate an employee to oversee and verify diesel fuel deliveries to residential complexes, the embassy noted that the consulate general disagreed with the finding and stated that a fuel clerk accompanies its truck driver on all fuel deliveries to record and verify deliveries.

**OIG Reply:** OIG considers the recommendation resolved. OIG acknowledges that Consulate General Lagos had a fuel clerk to receive and verify fuel deliveries at the consulate general. However, at the time of the inspection, OIG observed that the consulate general did not have a

designated employee to physically verify diesel fuel deliveries on site at the residential complexes. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja managed bulk fuel operations in accordance with Department standards.

**Recommendation 21:** Embassy Abuja should enforce duty driver limits for all mission drivers in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of December 2023.

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

**Recommendation 22:** Embassy Abuja should require that all mission vehicle usage be recorded in the Fleet Management Information System in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja required that all mission vehicle usage be recorded in the Fleet Management Information System in accordance with Department standards.

**Recommendation 23:** Embassy Abuja should revise its motor vehicle policy to adhere to Department requirements for “other authorized use” of U.S. government vehicles and watercraft. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of August 2023.

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

**Recommendation 24:** Embassy Abuja should record all operational and maintenance data and costs for the mission’s watercraft into the Department’s Fleet Management Information System in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja recorded all operational and maintenance data and costs for the mission's watercraft into the Department's Fleet Management Information System in accordance with Department guidelines.

**Recommendation 25:** The Bureau of Administration, in coordination with the Bureau of Overseas Buildings Operations, should update the Foreign Affairs Manual with specific guidance on the management and operation of watercraft. (Action: A, in coordination with OBO)<sup>1</sup>

**Management Response:** In its May 1, 2023, response, the Bureau of Administration concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Administration updated the Foreign Affairs Manual with specific guidance on the management and operation of watercraft.

**Recommendation 26:** The Bureau of Overseas Buildings Operations should update and re-issue the generic watercraft policy template to include specific guidelines related to watercraft safety. (Action: OBO)

**Management Response:** In its April 27, 2023, response, Bureau of Overseas Buildings Operations concurred with this recommendation. The bureau noted an estimated completion date of September 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of Overseas Buildings Operations updated and re-issued the generic watercraft policy template to include specific guidelines related to watercraft safety.

**Recommendation 27:** Embassy Abuja should dispose of excess expendable and nonexpendable property in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja disposed of excess expendable and nonexpendable property in accordance with Department guidelines.

**Recommendation 28:** Embassy Abuja should adhere to travel regulations in accordance with Department standards. (Action: Embassy Abuja)

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<sup>1</sup> OIG revised the recommendation in response to the Bureau of Administration's comments on the draft report.

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja adhered to travel regulations in accordance with Department standards.

**Recommendation 29:** Embassy Abuja should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

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

**Recommendation 30:** Embassy Abuja should submit its foreign per diem reports in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of July 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja submitted its foreign per diem reports in accordance with Department standards.

**Recommendation 31:** Embassy Abuja should manage the fuel and motor vehicle transportation coupon program in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of September 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja managed the fuel and motor vehicle transportation coupon program in accordance with Department guidance.

**Recommendation 32:** Embassy Abuja should review its unliquidated obligations in accordance with Department standards and put up to \$1.2 million to better use. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of September 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja reviewed its unliquidated obligations in accordance with Department standards and put up to \$1.2 million to better use.

**Recommendation 33:** Embassy Abuja should clear overdue travel advances in accordance with Department guidelines and put funds up to \$275,838 to better use. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of September 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja cleared overdue travel advances in accordance with Department guidelines and put funds up to \$275,838 to better use.

**Recommendation 34:** Embassy Abuja should implement standard operating procedures outlining human resources support services provided and increase the frequency of American officer visits to Consulate General Lagos. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja implemented standard operating procedures outlining human resources support services provided and increased the frequency of American officer visits to Consulate General Lagos.

**Recommendation 35:** Embassy Abuja should require supervisors to approve overtime in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja required supervisors to approve overtime in accordance with Department guidance.

**Recommendation 36:** Embassy Abuja should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

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

**Recommendation 37:** Embassy Abuja should manage its Active Directory accounts and security groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated 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 Abuja managed its Active Directory accounts and security groups for its classified and unclassified networks in accordance with Department standards.

**Recommendation 38:** Embassy Abuja should retire records in accordance with Department records management standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of December 2023.

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

**Recommendation 39:** Embassy Abuja should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation.

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

**Recommendation 40:** Embassy Abuja should install emergency power-off switches inside the server rooms adjacent to each egress door, in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** In its April 26, 2023, response, Embassy Abuja concurred with this recommendation. The embassy noted an estimated completion date of September 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Abuja installed emergency power-off switches inside the server rooms adjacent to each egress door, in accordance with Department standards.

## PRINCIPAL OFFICIALS

Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Mary Beth Leonard	11/2019
Deputy Chief of Mission	David Greene	8/2022
<b>Constituent Post(s):</b>		
Consulate General Lagos, Principal Officer	William Stevens	8/2022
<b>Chiefs of Sections:</b>		
Management	Kirninder Braich	6/2021
Consular	Suzanne Grantham	8/2021
Political	Rolf Olson	8/2021
Economic	Ian Sheridan	8/2021
Public Affairs	Adnan Siddiqi	8/2021
Regional Security	Michael Vannett	12/2020
International Narcotics and Law Enforcement	Jason Smith	9/2021
<b>Other Agencies:</b>		
Federal Bureau of Investigation	Shane Hanson	7/2021
Centers for Disease Control	Adetunke Mary Boyd	10/2021
U.S. Agency for International Development	Anne Patterson	8/2020
Foreign Agricultural Service	Gerald Smith	8/2019
U.S. Commercial Service	David Russell	5/2021
Department of Defense	Col. William Schaum	6/2022
PEPFAR	Funmi Adesanya	4/2022

**Source:** Generated by OIG from data provided by Embassy Abuja.

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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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 mission, 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

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### FY 2023 Mission Nigeria OIG Draft Inspection Report Official Response

April 26, 2023

UNCLASSIFIED

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

FROM: David J. Greene, Chargé d’Affaires, a.i.

SUBJECT: Response to Draft OIG Report – [Inspection of Embassy Abuja and Constituent Post, Nigeria]

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

**OIG Recommendation 1:** Embassy Abuja should comply with Department standards for grant file documentation. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. The Public Affairs Section (PAS) in Mission Nigeria began training Grants Officer Representatives (GORs) in April 2023 on usage of a grants database developed by its EPAP Professional Associate to track grants documentation. PAS has also created a Standard Operating Procedure for grants management, and the Section is coordinating with the AF/PDPA grants team in Washington on a spot audit to ensure all grants file documentation is compliant with Department standards. The expected completion date is July 2023.

**OIG Recommendation 2:** Embassy Abuja should develop and implement a plan to institutionalize coordination between the mission’s Public Diplomacy Sections in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Since the arrival of a new Public Affairs Officer at U.S. Consulate General Lagos in August 2022, PAS Nigeria’s six Public Diplomacy officers based in Abuja and Lagos have been meeting virtually at least once a week to coordinate countrywide policy advocacy, media and cultural programming, strategic planning, and budgeting. PAS Nigeria has merged each post’s daily media summary into a single country-wide document, as well as each post’s EducationUSA (student advising) Facebook page. PAS has also initiated increased TDY travel and exchange/shadowing

opportunities for LE staff between the two posts to further institutionalize coordination and instill the concept of one Mission/one team. PAS is developing a shared Mission Public Diplomacy events calendar and will host a Lagos-Abuja workshop for joint forward planning later this year. The expected completion date is August 2023.

**OIG Recommendation 3:** Embassy Abuja should incorporate public diplomacy analysis in cable reporting in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Since September 2022, PAS has increased its contributions to POL, ECON, CONS, CG Lagos, and EAC/RSO reporting. PAS contributed weekly public messaging content to sitreps for Embassy Abuja's evacuation and media reaction and analysis for POL cables and Front Office emails to the Bureau of African Affairs. PAS regularly reviewed, added input, and cleared POL/ECON Nigerian elections-related cables. PAS has also increased its own analytical reporting with three 2023 cables already submitted and two more in the pipeline. Through this demonstrated closer collaboration, Mission Nigeria is more frequently including public diplomacy analysis in overall reporting, ensuring it reaches a broad Department-wide audience. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 4:** The Bureau of Consular Affairs should require that the visa appointment system provided to Embassy Abuja by the Global Support Strategy vendor complies with the Department's public service and transparency standards. (Action: CA)

**Management Response:** Mission Nigeria concurs with the recommendation. CA is the action office for this recommendation.

**OIG Recommendation 5:** Embassy Abuja should perform the required oversight of services provided by the Global Support Services vendor in accordance with Department standards (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation that it perform oversight of the GSS vendor; indeed, it was through such oversight that the vulnerabilities in Recommendation 4 were identified. Mission Nigeria actions include monitoring applicant registrations; identifying to the vendor and to CA the extensive fraud in applicant registrations and appointments; and regular communication with the GSS vendor to report concerns with its services. Efforts to resolve the systemic problems characteristic of the vendor's performance, such as the massive fraud plaguing the appointment system, took precedence over the conduct of routine spot checks on customer service calls. Successful resolution of the vulnerabilities identified in Recommendation 4 will have a direct and immediate impact on the Mission's ability to return to a regular routine of GSS vendor oversight. Mission Nigeria is in compliance with this recommendation.

**OIG Recommendation 6:** Embassy Abuja should comply with the Department standards for consular crisis preparedness. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation that it should comply with Department standards on consular crisis preparedness. The Consular Sections at both Embassy Abuja and Consulate General Lagos have undertaken numerous crisis preparedness activities, including but not limited to the activities in 7 FAM 1812.5 and 1814.3. Mission Nigeria will maintain this level of activity going forward to ensure that it continues to meet or exceed Department standards in this area. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 7:** Embassy Abuja should discontinue the practice of adjudicating Consular Reports of Birth Abroad before fees are paid. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria discontinued pre-screening documents for CRBA applications in September 2022. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 8:** Embassy Abuja should resolve referrals to Fraud Prevention Units in accordance with Department standards (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation, but notes that staffing is not sufficient to eliminate the ECAS backlog or keep up with new referrals; actions by Global Talent Management (GTM) and Diplomatic Security (DS) is necessary to ensure adequate staffing. Multiple RSO-I positions in Mission Nigeria – which are critical to addressing fraud referrals – have been vacant since (summer 2022?). Over 800 of the cases in the Lagos queue are USCIS DNA requests and hundreds more are received every month. Fraud referrals for I-604 orphan determinations frequently take more than 60 days to resolve due to the extensive fraud, corruption, and baby selling issues encountered in these cases; Mission Nigeria has recommended that the U.S. cease adoptions from Nigeria given these factors, and if this recommendation is approved, it will free staff time to address other fraud cases. The establishment of a new Country Fraud Prevention Coordinator position in 2024 will help, but even with the new position it is unlikely that the Mission will be able to clear the ECAS queue or keep up with incoming USCIS I-604 and DNA cases in 60 days. Additional cleared American staff will be required to resolve this recommendation.

**OIG Recommendation 9:** Embassy Abuja should post consular signage in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria has ordered additional signage. The expected completion date is June 2023.

**OIG Recommendation 10:** Embassy Abuja should verify and document whether \$6,405 in award funds were used for their intended purpose. If the funds were not used for their intended purpose, Embassy Abuja should recover the funds in accordance with the award agreement. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria is coordinating with the appropriate grants officer within the AF bureau to close out this grant and either document use of the funds for their intended purpose or recover them. The expected completion date is June 2023.

**OIG Recommendation 11:** Embassy Abuja should develop and implement standard operating procedures for management of federal assistance awards to ensure compliance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria's Economic Section will lead the drafting of an SOP document for federal assistance awards procedures to be cleared by the front office. The expected completion date is August 2023.

**OIG Recommendation 12:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should update the letter of agreement with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects. (Action: Embassy Abuja, in coordination with INL)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria in conjunction with INL Washington will update the letter of agreement with the new Nigerian government, expected to take office on May 29, 2023. Given the expected delays with Nigeria's new president naming a cabinet, the expected completion date is October 2023.

**OIG Recommendation 13:** Embassy Abuja should conduct joint evaluation reviews with the government of Nigeria for Bureau of International Narcotics and Law Enforcement Affairs-funded projects in accordance with the letter of agreement. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria is working with project implementers to coordinate dates for the joint evaluation reviews. The expected completion date is December 2023.

**OIG Recommendation 14:** Embassy Abuja, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should specify and document the intended roles, responsibilities, and associated training and file access requirements for relevant staff, in accordance with Department standards. (Action: Embassy Abuja, in coordination with INL)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria is reviewing existing and projected staffing needs for INL Nigeria in conjunction with INL Washington, updating position descriptions, documenting current and future training requirements, and file access requirements, to take the needed action. The expected completion date is June 2024.

**OIG Recommendation 15:** Embassy Abuja should establish a comprehensive foreign assistance coordination and collaboration mechanism, in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation as regards security assistance. Mission Nigeria has established a Counterterrorism Working Group (CTWG) to ensure effective coordination on security assistance; it first met in March 2023. This group complements longstanding interagency cooperation mechanisms which meet regularly, including:

- North East Working Group (NEWG)
- Law Enforcement Working Group (LEWG)
- Counter Wildlife Trafficking Working group (CWTWG)
- Elections Working Group (aka Democracy WG)
- PEPFAR Working Group
- COVID-19 Working Group
- Mission Nigeria Deal Team (for trade and investment)

**OIG Recommendation 16:** Embassy Abuja should consolidate its motor pool and warehouse operations in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation and will consult with Department and interagency stakeholders and assess current guidance, prevailing practices, and best practices in light of the specific circumstances and operational factors present in Nigeria. Mission Nigeria will complete this assessment and propose next steps by December 2023.

**OIG Recommendation 17:** Embassy Abuja, in coordination with the Bureau of Overseas Buildings Operations, should implement an emergency exit plan in the chancery and consulate general building that complies with Department guidance. (Action: Embassy Abuja, in coordination with the OBO)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will seek guidance from OBO/OPS/FIRE and Diplomatic Security to find an acceptable solution that meets the requirements of both fire life safety and controlled access area security restrictions. The expected completion date is October 2023.

**OIG Recommendation 18:** Embassy Abuja should mitigate the fire and life-safety risks of the high-rise residential properties in Lagos that do not comply with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria does not concur with the recommendation. Consulate General Lagos' GSO Housing section provided the October 2021 high-rise mitigation letter to each high-rise resident in October 2021, and all required steps identified by OBO to mitigate the risks involved are complete, except for the Cameron Court sprinkler system which has a scheduled completion date of July 1, 2023. Subsequently, each new occupant has received the high-rise mitigation letter. Consulate General Lagos has receipt of these mitigation letters signed by occupants in its records. Both high-rise property leases are being renewed in

2023 and new high rise mitigation letters will be updated for each property and provided to occupants.

**OIG Recommendation 19:** Embassy Abuja should obtain authorization from the Bureau of Overseas Buildings Operations to use shipping containers for storage and office space or dismantle and remove them in accordance with Department. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will dismantle and remove the containers. The expected completion date is October 2023.

**OIG Recommendation 20:** Embassy Abuja should manage bulk fuel operations in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with most points in this recommendation.

- Regarding bullet 1: An American officer from Embassy Abuja and Consulate General Lagos will periodically witness and document fuel deliveries. This process began December 2022 and is ongoing. Mission Nigeria is now in compliance with this point.
- Regarding bullet 2: Embassy Abuja and Consulate General Lagos will coordinate efforts to simplify coupon management for POV fuel distribution. The expected completion date is October 2023.
- Regarding bullet 3: Embassy Abuja and Consulate General Lagos are evaluating solutions to improve key management. The expected completion date is October 2023.
- Regarding bullet 4: Consulate General Lagos already has a process in place for weekly checks for fuel leaks; Embassy Abuja will implement the same procedures employed by Consulate General Lagos. The expected completion date is December 2023.
- Regarding bullet 5: Embassy Abuja will work with a vendor to calibrate fuel tanks as required. The expected completion date is July 2023.
- Regarding bullet 6: Consulate General Lagos does not concur with this bullet point. A fuel clerk accompanies the Consulate General's truck driver on all fuel deliveries to record and verify deliveries.

**OIG Recommendation 21:** Embassy Abuja should enforce duty driver limits for all mission drivers in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Consulate General Lagos is in the process of hiring eight new driver positions, a dispatcher, and a DriveCam coordinator position. This additional staffing will greatly assist in eliminating 10-hour rule violations. The expected completion date is December 2023. Embassy Abuja and Consulate General Lagos will implement a joint SOP and tracker to ensure accurate timekeeping on trips in coordination with the RSO team. The expected completion date is June 2023.

**OIG Recommendation 22:** Embassy Abuja should require that all mission vehicle usage be recorded in the Fleet Management Information System in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with this recommendation. At Embassy Abuja, processes have been changed to ensure daily reporting. Consulate General Lagos is in the process of hiring of an additional administrative clerk and will onboard a deputy motor pool supervisor and DriveCam coordinator along with an additional dispatcher. These positions will assist in accurate data entry in the FMIS system. The data are already being input into FMIS. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 23:** Embassy Abuja should revise its motor vehicle policy to adhere to Department requirements for “other authorized use” of U.S. government vehicles and watercraft. (Action: Embassy Abuja).

**Management Response:** Mission Nigeria concurs with the recommendation. The required certifications are on file and Consulate General Lagos and the Mission Nigeria Financial Management Officer are determining the cost of OAU of watercraft for home-to-office transportation. The expected completion date is August 2023.

**OIG Recommendation 24:** Embassy Abuja should record all operational and maintenance data and costs for the mission’s watercraft into the Department’s Fleet Management Information System in accordance with Department guidelines. (Action: Embassy Abuja).

**Management Response:** Mission Nigeria concurs with the recommendation. Consulate General Lagos is in process of adding the boats to the FMIS system and will be tracking their fuel and maintenance going forward. The expected completion date is June 2023.

**OIG Recommendation 25:** The Bureau of Administration should update the Foreign Affairs Manual and Foreign Affairs Handbook with specific guidance on the management and operation of watercraft in official vehicle programs. (Action: A)

**Management Response:** Mission Nigeria concurs with the recommendation and supports efforts by the Bureau of Administration to develop such guidance. (Action: A Bureau)

**OIG Recommendation 26:** The Bureau of Overseas Buildings Operations should update and re-issue the generic watercraft policy template to include specific guidelines related to watercraft safety. (Action: OBO)

**Management Response:** Mission Nigeria concurs with the recommendation and supports efforts by Overseas Buildings Operations (OBO) to update such guidance. (Action: OBO)

**OIG Recommendation 27:** Embassy Abuja should dispose of excess expendable and nonexpendable property in accordance with Department guidelines. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Embassy Abuja and Consulate General Lagos have begun the disposal process in a systematic manner and are working to reduce dead stock. To date, Consulate General Lagos has disposed of approximately \$425,000 of inventory and Embassy Abuja has disposed of approximately \$85,000 of inventory.

Mission Nigeria is working with the ILMS team on a tune-up to improve the process. The expected completion date of SOPs is July 2023.

**OIG Recommendation 28:** Embassy Abuja should adhere to travel regulations in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Consulate General Lagos is in the process of soliciting a contract to handle local travel and comply with travel regulations. Embassy Abuja will model a contract after Consulate General Lagos' once implemented with assistance from A/OPE. The expected completion date of the Lagos contract is July 2023.

**OIG Recommendation 29:** Embassy Abuja should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Embassy Abuja now requires a valid COR certificate before signing the COR designation. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 30:** Embassy Abuja should submit its foreign per diem reports in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. The updated foreign per diem report is in the post clearance process. Mission Nigeria is also in the process of updating its danger pay levels for travel to certain states, in coordination with the Department of State's office of Allowances. The expected completion date is July 2023.

**OIG Recommendation 31:** Embassy Abuja should manage the fuel and motor vehicle transportation coupon program in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will find an alternative solution to manage these fuel coupons, such as sale by the employee association. The expected completion date is September 2023.

**OIG Recommendation 32:** Embassy Abuja should review its unliquidated obligations in accordance with Department standards and put up to \$1.2 million to better use. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria reviews unliquidated obligations (ULO) and alerts CGFS to clear these obligations as appropriate. The Financial Management Center (FMC) will review and work with other sections to clear these ULOs. The expected completion date is September 2023.

**OIG Recommendation 33:** Embassy Abuja should clear overdue travel advances in accordance with Department guidelines and put funds up to \$275,838 to better use. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will alert employees who have not returned overdue advances. Employees currently get automated emails from E2 and FMC continues to close overdue advances. The expected completion date is September 2023.

**OIG Recommendation 34:** Embassy Abuja should implement standard operating procedures outlining human resources support services provided and increase the frequency of American officer visits to Consulate General Lagos. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation, noting that maintaining the frequency of American officer visits to Consulate General Lagos is contingent on adequate staffing of Embassy Abuja's two HRO positions. Mission Nigeria will create standard operating procedures outlining human resources support services for Consulate General Lagos including a regular visit schedule by American officers. The expected completion date is October 2023.

**OIG Recommendation 35:** Embassy Abuja should require supervisors to approve overtime in accordance with Department guidance. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will issue another Management notice to all personnel on the requirement to request and receive approval in advance before working overtime. Supervisors will also be reminded of this requirement to reinforce with their staff members. The expected completion date is June 2023.

**OIG Recommendation 36:** Embassy Abuja should review and revise locally employed staff position descriptions and classify them in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria will reclassify positions where there are substantial increases in the scope of workload, that are vacant, or have not been classified for over five years. The expected completion of internal reviews is October 2023, but completing needed reclassifications depends on the capacity of the regional classification center.

**OIG Recommendation 37:** Embassy Abuja should manage its Active Directory accounts and security groups for its classified and unclassified networks in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria is currently reviewing all security groups and making the necessary corrections. The expected completion date is June 2023.

**OIG Recommendation 38:** Embassy Abuja should retire records in accordance with Department records management standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria's Information Management Officer (IMO) will coordinate this effort with the respective program offices to bring our records retirement schedule up to date. The expected completion date is December 2023.

**OIG Recommendation 39:** Embassy Abuja should complete all information systems security officer responsibilities in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Mission Nigeria has started using the updated ISSO checklist to perform ISSO duties. Mission Nigeria is now in compliance with this recommendation.

**OIG Recommendation 40:** Embassy Abuja should install emergency power-off switches inside the server rooms adjacent to each egress door, in accordance with Department standards. (Action: Embassy Abuja)

**Management Response:** Mission Nigeria concurs with the recommendation. Embassy Abuja has already completed this action. Consulate General Lagos will complete it by September 2023.



United States Department of State

Bureau of Consular Affairs  
Washington, DC 20520

May 2, 2023

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

FROM: CA – Rena Bitter

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Abuja and Constituent Post, Nigeria

The Bureau of Consular Affairs has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG, together with requests for factual edits transmitted via separate memo:

**OIG Recommendation 4:** The Bureau of Consular Affairs should require that the visa appointment system provided to Embassy Abuja by the Global Support Strategy vendor complies with the Department’s public service and transparency standards. (Action: CA)

**Management Response:** The Bureau of Consular Affairs disagrees with the recommendation. The Bureau has found no credible evidence that NIV appointments can be resold, and based on the features of the appointment system, it is not possible for users to change biographic data for an appointment.

**OIG Recommendation 6:** Embassy Abuja should comply with the Department standards for consular crisis preparedness. (Action: Embassy Abuja)

**Management Response:** The Bureau of Consular Affairs concurs with the recommendation made to Mission Nigeria and notes that, per OIG recommendation, Mission Nigeria held a crisis exercise on April 13, 2023.

The point of contact for this memorandum is Consular Affairs’ Executive Director Josh Glazeroff.

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United States Department of State

Washington, D.C. 20520

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May 1, 2023

**TO:** OIG – Arne Baker

**FROM:** A/LM – John W. Dinkelman

**SUBJECT:** Response to Inspection of Embassy Abuja and Constituent Post,  
Nigeria  
(ISP-I-23-09)

The Bureau of Administration, Office of Logistics Management (A/LM), Logistics Management Policy (POL) has reviewed the draft OIG report, Inspection of Embassy Abuja and Constituent Post, Nigeria (ISP-I-23-09) and provides the following response.

**Recommendation 25: The Bureau of Administration should update the Foreign Affairs Manual and Foreign Affairs Handbook with specific guidance on the management and operation of watercraft in official vehicle programs. (Action: A)**

**Management Response:** A/LM concurs with the recommendation that the Department establish specific guidance on the management and operation of watercraft. However, A/LM requests that OBO be added as a coordinating office to the recommendation, since OBO's Office of Safety, Health, and Environmental Management (SHEM) will serve as the subject matter expert regarding safety and operational requirements for this policy.

Further, A/LM, the Office of the Legal Adviser (L), and SHEM recommend that this policy potentially be added to a new Foreign Affairs Manual (FAM) Chapter, 14 FAM 450, *Managing Official Vessels*. The Department maintains a distinction between OIG's definition of "official vehicle programs" and "passenger carriers" as related to vessel operations. Vessels may be passenger carriers as defined by

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31 USC 1344, but operation of watercraft is independent of an "official vehicle program." 14 FAM 431.4 defines an official vehicle as "any motor vehicle owned or leased by the Department of State or other U.S. Government Agency under chief-of-mission authority." Further, a motor vehicle is defined as "any vehicle, self-propelled or drawn by mechanical power, designed and operated principally for roadway transportation of property or passengers" (41 CFR 102-34.35).

Finally, A/LM and OBO recommend that the reference to the Foreign Affairs Handbook (FAH) be removed from the recommendation. A/LM and OBO will determine if a corresponding FAH entry is needed during its update of the FAM.

**To summarize, A/LM requests the recommendation be updated to the following: The Bureau of Administration, in coordination with the Bureau of Overseas Buildings Operations, should update the Foreign Affairs Manual with specific guidance on the management and operation of watercraft. (Action: A, in coordination with OBO)**

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United States Department of State

*Washington, D.C. 20520*

April 27, 2023

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MEMORANDUM

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

FROM:        OBO – Elizabeth A. S. Slaughter, Comptroller /s/

SUBJECT:     Response to Draft OIG Report – *Inspection of Embassy Abuja  
and Constituent Post, Nigeria*

OBO has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendation provided by OIG:

**Recommendation 26:** The Bureau of Overseas Buildings Operations should update and re-issue the generic watercraft policy template to include specific guidelines related to watercraft safety. (Action: OBO)

**OBO Response:** OBO concurs with the recommendation. OBO/OPS/SHEM is currently updating the watercraft policy template. The expected completion date is September 2023.

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## ABBREVIATIONS

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COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
DEIA	Diversity, Equity, Inclusion, and Accessibility
EEO	Equal Employment Opportunity
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
GSS	Global Support Strategy
ICS	Integrated Country Strategy
INL	Bureau of international Narcotics and Law Enforcement Affairs
ISSO	Information Systems Security Officer
LE	Locally Employed
OBO	Bureau of Overseas Buildings Operations
PEPFAR	President's Emergency Plan for AIDS Relief
USAID	U.S. Agency for international Development

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# HELP FIGHT

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