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Office of Inspector General  
United States Department of State

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ISP-I-23-20

Office of Inspections

July 2023

# Inspection of Embassy Cotonou, Benin

BUREAU OF AFRICAN AFFAIRS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-23-20

## What OIG Inspected

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

## What OIG Recommends

OIG made 12 recommendations to Embassy Cotonou. In its comments on the draft report, the embassy concurred with all 12 recommendations. OIG considers all 12 recommendations resolved. The embassy's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. The embassy's formal response is reprinted in its entirety in Appendix B.

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OFFICE OF INSPECTIONS

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## Inspection of Embassy Cotonou, Benin

### What OIG Found

- The Ambassador and the Deputy Chief of Mission led Embassy Cotonou in a strategic, inclusive manner consistent with Department of State leadership and management principles.
- In the absence of resident Department of Defense personnel, the Political-Economic Section managed a substantial increase in security training and assistance in response to the growing threat from violent extremist organizations in northern Benin.
- The Consular Section was not fully prepared to respond to a crisis and had not prioritized setting up an American Liaison Network.
- Gaps in overseeing Embassy Cotonou's management operations contributed to several shortcomings in general services and facility management.
- Spotlight on Success: The Locally Employed Staff Association's inclusive organizational approach strengthened embassy community relations.
- Spotlight on Success: Embassy Cotonou's Consular Section developed a text messaging process that resulted in applicants arriving better prepared for consular appointments.

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## CONTEXT



**Figure 1:** Map of Benin. (Source: CIA World Factbook.)

Nestled between Nigeria and Togo to the east and west and the Niger River and Atlantic Ocean to the north and south, Benin is a francophone country of approximately 13.8 million. It played a significant historical role, including in the transatlantic trade in enslaved persons, as the seat of an influential medieval kingdom called Dahomey—the official name of Benin until 1975. After independence from France in 1960, the country experienced multiple coups d'état and constitutions before the installation of a Marxist dictatorship between 1972 and 1990. Economic collapse prompted a transition to democratic governance, and in 1991 Benin's leader became the first African president to cede power through an election. Patrice Talon, a wealthy businessman, took office in 2016; he has

prioritized economic development over strengthening democratic institutions, and as a result the space for pluralism, dissent, and free expression has narrowed under his administration. In April 2021, Talon won a second term, during which the government has faced the new challenge of rising activity by violent extremist organizations in northern Benin.

Embassy Cotonou's Integrated Country Strategy (ICS), updated in August 2022, identifies three strategic policy goals:

- Promote democratic values and interests, strengthen institutions, improve governance, and advance adherence to international human rights standards.
- Partner with Benin and like-minded partners to counter transnational, maritime, and environmental crime and improve regional stability.
- Support Benin's efforts to expand opportunity, reduce poverty, and implement transparent, effective, and climate friendly development and health initiatives.

At the time of the inspection, Embassy Cotonou had 29 U.S. direct-hire authorized positions, 148 locally employed (LE) staff, and 6 eligible family members (EFM) working for the Department of State. The other resident U.S. government agencies—U.S. Agency for International Development (USAID), Millennium Challenge Corporation, and Peace Corps—had a total of 14 U.S. direct-hire authorized positions and 22 LE staff.

OIG evaluated Embassy Cotonou's policy implementation, resource management, and management controls consistent with Section 209 of the Foreign Service Act of 1980.<sup>1</sup> A related classified inspection report discusses the embassy's security program and issues affecting the safety of embassy personnel and facilities.

## **EXECUTIVE DIRECTION**

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

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

The Ambassador arrived in Cotonou on March 31, 2022, after serving as Chief of Mission at the U.S. Embassy in Khartoum, Sudan. His other previous senior overseas assignments included Chargé d'Affaires and Deputy Chief of Mission (DCM) at the U.S. Embassy in Haiti, and Principal Officer at the U.S. Consulate General in Casablanca, Morocco; he also had an earlier posting in Cotonou as an entry-level officer from 1996–1998. The DCM arrived in Cotonou in September 2020 after serving as the Senior Deputy Foreign Policy Advisor at the U.S. European Command in Stuttgart, Germany. She held consular leadership positions in Senegal and Brazil, and had earlier assignments in France, Haiti, and Washington, DC.

Embassy staff described the Ambassador and the DCM as engaged, respectful diplomats who projected integrity and professionalism consistent with the leadership principles in 3 Foreign Affairs Manual (FAM) 1214b.<sup>2</sup> Staff characterized the Ambassador as a good listener who was open to multiple points of view, very detail-oriented, and consistently even-tempered. The DCM was seen as supportive, readily accessible, and an empathetic mentor. Following the traditional division of labor between the two roles as outlined in 2 FAM 113.1 and 2 FAM 113.2, the Ambassador generally took the lead on engaging external contacts and directing the policy agenda; the DCM backed up that role while assuming primary responsibility for overseeing internal embassy operations. They consistently fostered collaboration among sections and agencies through Country Team meetings and thematic working groups, as well as in regularly scheduled meetings with all section chiefs and agency heads. For example, in December 2022, the embassy launched a monthly Security Working Group chaired by the Regional Security Officer and attended by both the Ambassador and the DCM to track the evolving security situation in northern Benin and coordinate the expanding range of embassy activities in this area, including the increased tempo of U.S. military visitors and training exercises. The Front Office also convened a monthly strategic communication working group that included U.S. direct-hire and LE staff from all agencies to help synchronize embassy messaging and public activities with ICS objectives.

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

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

The Ambassador and the DCM also encouraged peer-to-peer engagement between the U.S. direct-hire and LE staff. For example, the Ambassador instituted regular press briefings for senior staff led by LE staff from the Public Diplomacy Section, and he and the DCM met monthly with the LE Staff Committee. The DCM held quarterly small group sessions with LE staff (divided by section and grade) and hosted weekly office hours outside the embassy's classified workspace so that LE staff could more easily share concerns and questions.

Both the Ambassador and the DCM were sympathetic to work-life balance and mindful of the effect of high workloads on a small embassy staff. Nonetheless, multiple sections cited the challenge of meeting Front Office requirements for preparatory memos and briefing papers, often with short deadlines. In addition, a lack of clear guidance and prioritization sometimes created extra work. The Front Office was receptive to OIG's suggestions for ways to improve forward planning, task tracking, and work product management, and began implementing those changes during the inspection.

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

Pursuant to the Ambassador's responsibilities to oversee the embassy's strategic activities as defined in 2 FAM 113.1c, OIG found the Ambassador personally engaged in updating both the ICS and the USAID bilateral assistance strategy in the initial months after his arrival. The Ambassador hosted a strategic planning offsite with the Country Team in November 2022 to review the updated areas of focus, including the evolving security and developmental challenges in northern Benin. The Ambassador also helped shape the framework document for implementing the 10-year Strategy to Prevent Conflict and Promote Stability, a regional initiative under the Global Fragility Act involving Benin and four other west African nations.<sup>3</sup> His efforts, together with those of his counterpart at U.S. Embassy Lomé, Togo, included the successful advocacy for \$700,000 in FY 2023 seed money to launch Voice of America radio broadcasts in the local dialect to better reach the marginalized communities in areas such as northern Benin that are most susceptible to recruitment by violent extremists.

OIG's review of the Ambassador's calendar indicated broad and ready access to senior government of Benin officials and other political actors as well as Benin's business, media, civil society, and community leaders. Washington stakeholders and embassy staff described the Front Office as effective advocates for policy priorities, using their access to advance key goals. For example, the Ambassador used meetings with the president and senior ministers over several months to stress the costs to Benin of backsliding on its commitment to democratic principles. The U.S. engagement, together with that of like-minded members of the international community, contributed to the successful efforts by the country's pro-democratic voices to allow for opposition participation in the January 2023 legislative elections. In another

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<sup>3</sup> In 2019, Congress passed the Global Fragility Act "to establish the interagency Global Fragility Initiative to stabilize conflict-affected areas and prevent violence." The Department then selected priority countries and regions for implementation. Under this framework, President Biden in April 2022 announced the U.S. government's partnership with the coastal west African countries of Benin, Côte D'Ivoire, Ghana, Guinea, and Togo to advance the U.S. Strategy to Prevent Conflict and Promote Stability.

example, the Ambassador, supported by the DCM and the Political-Military Officer, interceded at various levels with Department of State and Defense officials to help the embassy address growing security challenges in Benin through increased training, personnel, and engagement. This is described in more detail in the Policy and Program Implementation section of this report.

## **Adherence to Internal Controls**

OIG determined that the Ambassador and the DCM prepared the FY 2022 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7(1), which requires chiefs of mission to develop and maintain appropriate systems of management control for their organizations. The embassy submitted its most recent Statement of Assurance in August 2022; it revealed no significant deficiencies or material weaknesses. The DCM ensured that all sections completed their full checklists, and the Ambassador closely reviewed the complete package, adding detailed questions for the Management Section to discuss in multiple review sessions before signing.

The DCM conducted reviews of the Consular Section's nonimmigrant visa adjudications in accordance with 9 FAM 403.12-1 and 2. In addition, the Front Office agreed with OIG's suggestion that officers who serve as acting DCM for extended periods be trained and given access to the relevant consular data systems so the reviews can continue as required.

## **Security and Emergency Planning**

The Front Office's leadership of the embassy's security and emergency preparedness programs generally was consistent with the Department's guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-721a, requiring the Ambassador to take responsibility for the security of embassy personnel. The DCM met weekly and the Ambassador monthly with the Regional Security Officer to review security issues. In addition, both participated in security drills and exercises, including hosting senior Benin government officials for a demonstration exercise in September 2022 that showed embassy and local police elements working together in response to a simulated crisis on the compound. During the inspection, embassy staff worked to update and certify the emergency action plan prior to the January 31, 2023, deadline. The related classified report contains additional information regarding the embassy's security program.

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

OIG found that the Ambassador and the DCM supported Equal Employment Opportunity practices consistent with 3 FAM 1511.1a and 3 FAM 1514c(3)a and c. The embassy did not have an Equal Employment Opportunity counselor following the departure of the previous incumbent. It was unable to appoint new counselors because the Department was not accepting new nominations for training, but it retained two LE staff Equal Employment Opportunity liaisons.

Embassy staff consistently described the Ambassador and the DCM as personally invested in making diversity, equity, inclusion, and accessibility (DEIA) principles an area of special emphasis for the embassy, consistent with recent Department guidance.<sup>4</sup> The embassy had a DEIA Council co-chaired by representatives from the Department and USAID, with active DCM participation. Council events prior to and during the inspection included a Hispanic Cultural Day, a trans-rights awareness panel, and a series of activities for Black History Month. The Front Office included a special session on DEIA principles as part of the embassy's strategic planning off-site meeting noted above and asked the DEIA Council's co-chair to review the updated ICS to ensure it incorporated these principles where appropriate.<sup>5</sup> On June 8, 2022, the Ambassador invited Beninese LGBTQI+ leaders and activists to the chancery to mark the start of Pride Month and, with the embassy flying the Pride flag for the first time ever, he delivered remarks affirming the U.S. position that LGBTQI+ rights are fundamental human rights, in the United States, Benin, and around the globe.

The DCM also stressed the importance of integrating DEIA principles in embassy job recruitment and hiring practices. For example, she instituted more diverse interview panels by including U.S. direct-hire personnel and LE and EFM staff for both local job applicants and foreign service bidders. She also filled the long-vacant embassy Federal Women's Program Coordinator position.

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

Embassy First- and Second-Tour (FAST) officers and specialists uniformly praised the DCM's role as mentor and her support for professional opportunities and development, consistent with the oversight responsibilities outlined in 3 FAM 2713b and 3 FAM 2242.5. She met one-on-one monthly with every employee she reviewed, including all FAST officers and specialists. The Front Office supported a joint Embassy Cotonou-Embassy Lomé conference for FAST professionals hosted by Embassy Lomé in November 2022, with participation in-person for FAST staff members and virtually by the Ambassador. The DCM hosted a professional development brown bag session for all interested direct-hire Americans who currently or in the future might serve as acting DCM to discuss typical duties and a range of topics. These included interoffice relationships, the importance of accountability, crisis preparedness, and staff and family safety and welfare responsibilities. The embassy also was forward leaning on efforts to improve the processes governing EFM employment. It joined with neighboring embassies in October 2021 to form the West Africa EFM Working Group to advocate for a more inclusive, transparent, and efficient approach to EFM employment. Together they produced a series of webinars to help potential applicants more successfully navigate the hiring process.

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<sup>4</sup> See 22 STATE 13392, "Diversity, Equity, Inclusion, and Accessibility (DEIA) Council Best Practices," February 22, 2022; and 21 STATE 60514, "Policy Statements on Diversity and Inclusion and Equal Employment Opportunity and Harassment," June 11, 2021.

<sup>5</sup> See 21 STATE 109880, "Guidance on Integrating Diversity, Equity, Inclusion, and Accessibility into Integrated Country Strategy Management Objectives and Sub-Objectives," October 29, 2021.

## Spotlight on Success: Locally Employed Staff Association's Inclusive Organizational Approach Strengthened Embassy Community Relations

Embassy Cotonou Locally Employed Staff Association's bottom-up commitment to diversity, equity, and inclusion helped foster a more harmonious workplace community and served as a resonant example of democratic values put into practice, consistent with the embassy's external policy messaging on the same theme. The full LE workforce forms an association that actively sponsors popular community events throughout the year. The association elects an administrative council of 33 delegates, with rigorous attention to full section and agency representation and gender balance. That council in turn elects the five-person executive committee that represents the LE staff to embassy management. The executive committee includes at least one member drawn from the lower grade employees who represent more than 50 percent of the LE staff (mostly in general services, motor pool, and facility maintenance). The committee described its relationship with the Front Office as a "partnership" and met with them monthly. When issues arise, the committee carefully researches options and brings specific recommendations to the table. Together, the committee and Front Office have worked through a variety of difficult issues involving salary, local taxes, and improvements in health insurance coverage. Many embassy staff members lauded the positive esprit de corps and community relations of the embassy community, thanks at least in part to the LE staff's organizational values and practices.

## POLICY AND PROGRAM IMPLEMENTATION

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OIG assessed Embassy Cotonou's coordination of foreign assistance and the policy and program implementation work performed by the Political-Economic, Public Diplomacy, and Consular Sections. OIG found the embassy generally met Department requirements for policy and program implementation but found issues in foreign assistance management and consular operations, as discussed below.

### Foreign Assistance

U.S. assistance to Benin, which increased from \$30.3 million in FY 2017 to \$38.7 million in FY 2021, primarily was administered by USAID, the Millennium Challenge Corporation, and the Departments of Agriculture and Defense. Embassy Political-Economic Section staff managed limited foreign assistance programming, including a \$674,104 grant from the Africa Regional Democracy Fund and eight small grants supported by the Ambassador's \$50,000 Self-Help Fund. The embassy also managed the Bureau of International Narcotics and Law Enforcement Affairs' (INL) \$2.8 million police training program until October 2022, when bureau personnel in Washington assumed grants officer representative responsibilities for the program.

OIG reviewed the Ambassador's Self Help Fund grants and the Africa Regional Democracy Fund grant and found they complied with the Federal Assistance Directive.<sup>6</sup> OIG also reviewed

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<sup>6</sup> The Department's Federal Assistance Directive establishes internal guidance, policies, and procedures for all domestic and overseas grant-making bureaus, offices, and posts within the Department administering federal

Embassy Cotonou's management, oversight, and coordination of foreign assistance programs.<sup>7</sup> As described below, OIG determined that the embassy generally managed and coordinated foreign assistance in accordance with Department standards, but did not conduct required joint evaluation reviews with the government of Benin for in-country activities funded by INL.

***Embassy Demonstrated Effective Coordination on Foreign Assistance***

OIG found that the Front Office coordinated foreign assistance in accordance with 1 FAM 013.2k(6) and 2 FAM 113.1c(3) and (4). The Front Office and Political-Economic Section staff coordinated with interagency representatives in weekly Country Team meetings, via frequent informal interaction, and at critical decision points, which agencies told OIG they recognized and valued. In addition, the Political-Economic Section kept embassy leadership informed about the equities of the Washington-managed assistance programs. OIG saw strong collaboration between the Political-Economic Section, INL, and Regional Security Office staff to ensure complementarity between INL's existing community policing program and a Bureau of Counterterrorism program being developed to train and equip Benin's border police. The Political-Economic and Public Diplomacy Sections also collaborated closely with USAID and the Millennium Challenge Corporation on democracy and human rights programming and advocacy.

***Joint Evaluation Reviews Not Conducted as Required***

The embassy did not conduct required joint evaluation reviews from FY 2020 through FY 2022 with the government of Benin for in-country activities funded by INL. Amendments approved in 2018 and 2022 to a 2013 letter of agreement between the United States and Benin specify that the two governments should conduct an annual joint evaluation review and jointly prepare a corresponding written report. INL's Regional Coordinator, based at Embassy Cotonou but also responsible for INL programming in Togo, took up his assignment in October 2022 after a 14-month gap in the position. INL's sole LE staff member passed away in mid-2022. Staff acknowledged that the required joint evaluation reviews did not occur from 2020 to 2022 but said that with the new INL Regional Coordinator and LE staff member on board, they expected to resume evaluations in FY 2023. OIG, in its January 2023 inspection report of INL,<sup>8</sup> recommended that the bureau implement a system to track and ensure adherence to the requirement in letters of agreement with partner governments for joint evaluation reviews. The lack of joint reviews to evaluate progress could hinder the efficient use of funding and hamper the measurement of results against both the embassy's ICS objectives and INL's program objectives.

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financial assistance. It is updated annually by the Department's Bureau of Administration (Office of the Procurement Executive/Office of Acquisitions Policy/Federal Assistance Division).

<sup>7</sup> OIG did not review the U.S. President's Emergency Plan for AIDS Relief (PEPFAR) program in Benin, which started in FY 2021 and is part of the West Africa regional PEPFAR program. The PEPFAR Regional Coordinator for West Africa, who is based at Embassy Accra and works with staff from the Centers for Disease Control and Prevention, the Department of Defense, and USAID, manages the regional program.

<sup>8</sup> OIG, *Inspection of the Bureau of International Narcotics and Law Enforcement Affairs* (ISP-I-23-08, January 2023).

**Recommendation 1:** Embassy Cotonou should comply with the requirements of the 2013 letter of agreement (and subsequent amendments) between the United States and Benin. (Action: Embassy Cotonou)

## **Political-Economic Section**

OIG reviewed the Political-Economic Section's leadership and management, policy implementation, reporting and advocacy, and Leahy vetting<sup>9</sup> and found the section generally complied with Department standards. Based on interviews with Washington stakeholders and interagency partners at Embassy Cotonou, as well as observations of meetings, OIG found that the section demonstrated good interagency cooperation. OIG also determined that the embassy's reporting and diplomatic engagement supported ICS and Department goals. Specifically, OIG reviewed 70 embassy cables from January through December 2022 and found reporting to be timely, relevant, and appropriately sourced. Washington end-users told OIG that the section's reporting was of good quality and responsive to policy, particularly on elections and associated concerns about restrictions on democracy and pluralism. In addition, they praised the section's advocacy in shaping the Global Fragility Act strategy, as discussed above in the Executive Direction section. The embassy's Leahy vetting policy was current and implemented in compliance with Department standards.

### ***Section Managed Surge in Operational Tempo in Response to Worsening Security Situation***

The operational tempo of the embassy as a whole and within the section grew substantially in 2022, with increased attacks and threats from violent extremist organizations in northern Benin. Responding to the threats generated a surge in policy and resource advocacy, coordination, program development, and official visits throughout 2022 and early 2023. The section effectively managed the significant challenge of coordinating with non-resident Defense Attaché and Security Cooperation offices (based in Accra, Ghana) on increased security cooperation, including the initial deployment of a Special Operations Command Africa training detachment to increase Benin's counter-terrorism capacity. In addition, the section assumed the duties of the INL Regional Coordinator during a 14-month gap in the position. While the section faced an acute staffing shortage in the first half of 2023 due to a resignation and a curtailment, reducing U.S. direct hire staff from three to one, the embassy's successful advocacy for new positions<sup>10</sup> promised relief by late summer 2023.

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<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 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.

<sup>10</sup> The new positions included a third officer for the Political-Economic Section, as well as three positions outside the section: a contract counterterrorism advisor; a country coordinator for the Global Fragility Act; and a National Guard Bilateral Affairs Officer (the latter arrived in 2022). The new positions outside the Political-Economic Section were expected to assume work currently performed by the section and expand embassy capacity to advance ICS objectives and manage foreign assistance.

However, staff told OIG that at times there was a lack of organization and forward planning with the Front Office relating to meetings, demarches, and support for official visitors, as well as with many short deadline taskings. As noted in the Executive Direction section above, the embassy agreed with OIG's suggestions on better prioritization of tasks and improved workload management procedures that could help this small section sustain its output and performance.

## **Public Diplomacy**

OIG reviewed the Public Diplomacy Section's leadership and management, strategic planning and reporting, American Spaces,<sup>11</sup> grants administration, educational and cultural programs, and media engagement. OIG determined that the section was strategically focused and well-integrated in embassy policy and public outreach activities. To improve communication and planning, at OIG's suggestion the section implemented monthly planning meetings with the Front Office beginning in February 2023. At the time of the inspection, the section's three Foreign Service officers, including two FAST officers, were in the process of filling 4 of the 11 LE positions due to recent and imminent staff departures. Additionally, one FAST officer served as the back-up Consular Section chief several weeks each quarter. Despite the LE staffing gaps and additional duty requirements, OIG found that, overall, the section met Department standards and guidance, with additional observations noted below.

### ***Public Diplomacy Grants Complied With the Federal Assistance Directive and Supported Embassy Goals***

OIG's review of the section's FY 2022 grants<sup>12</sup> found they complied with the Federal Assistance Directive and supported embassy goals. Due to its LE staff vacancies in key grant support positions, the section, with Department support, decided not to issue new grants in FY 2023. Instead, the section focused on overseeing FY 2022 grants that were still open, as well as a \$202,754 grant awarded by the Bureau of Educational and Cultural Affairs' Ambassadors Fund for Cultural Preservation that supported the embassy's Global Fragility Act implementation strategy with a focus on assisting rural women in northern Benin.

### ***Public Diplomacy Section Reported on Top Department Policy Issues***

OIG found that the Public Diplomacy Section kept the Department informed of policy developments and program activity. It produced two daily media products and reported through cables on significant policy developments, including threats to freedom of the press, Russian disinformation, and Chinese influence among the Beninese public. One of the section's Foreign Service officers served as the embassy's regional China officer, working closely with the Political-Economic Section chief. The Public Diplomacy Section also contributed to the

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<sup>11</sup> American Spaces are Department-operated or -supported public diplomacy facilities that host programs and use digital tools to engage foreign audiences in support of U.S. foreign policy objectives. The Public Diplomacy section operated one American Center and three American Corners in Benin.

<sup>12</sup> OIG reviewed 7 (total value \$122,710) of 17 grants (total value \$206,460) from FY 2022, including all grants valued at \$20,000 or greater.

embassy's monthly cable report "CotoNEWS" and sent public diplomacy highlights to the Bureau of African Affairs.

## **Consular Operations**

OIG reviewed Embassy Cotonou's consular operations, including section leadership, U.S. citizen services, crisis preparedness, management controls, visa services and processing, outreach, and fraud prevention programs. At the time of the inspection, demand for visas was growing in Benin, and the long wait times for visa appointments in Ghana and Nigeria drove applicants from those countries to seek appointments in neighboring countries, including Benin. These trends combined to produce a wait time for a nonimmigrant visa at Embassy Cotonou of 255 days at the time of inspection. The section also saw an increase in appointment requests from non-Beninese immigrant visa applicants. In addition, robust Beninese participation in the Diversity Visa Program<sup>13</sup> increased the number of U.S.-Benin dual nationals visiting Benin, including U.S. citizen children, and by extension increased the demand for services to American citizens. The embassy also told OIG that the demand for passport services had roughly doubled in the past 10 years. The embassy's sole consular officer focused on implementing scheduling structures to manage the increasing demand for services while maintaining the flexibility needed to respond to emergency cases involving U.S. citizens.

During the inspection, Embassy Cotonou corrected one issue identified by OIG. Specifically, the embassy instituted retention of panel physician inspection visit records in accordance with 9 FAM 302.2-3(E)(3). OIG determined Embassy Cotonou'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.

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

Embassy Cotonou's consular crisis preparedness did not fully comply with Department guidance. The Consular Section did not acquire a disaster assistance kit, did not maintain a crisis response planning handbook or a list of host country emergency contacts, and did not have an active American Liaison Network.<sup>14</sup> Guidance in 7 FAM 1811 and 7 FAM 1812.6-1 describes the importance of written crisis response materials including contacts lists, while guidance in 7 FAM 1814.1 and 3 directs consular sections to maintain crisis or disaster plan handbooks and disaster kits. Guidance in 7 FAM 071 and 7 FAM 073 discusses the role of the American Liaison Network and its important role in crisis response. Consular staff told the OIG that crisis preparedness had never been a priority for the section and that the American Liaison Network specifically had been neglected during prolonged shutdowns of most consular operations due

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<sup>13</sup> The Diversity Visa program allows additional applicants from countries with historically low rates of immigration to the United States to apply for immigrant visas.

<sup>14</sup> An American Liaison Network, formerly known as the warden system, is a country-based network of volunteers composed of representatives from key U.S. citizen constituencies, including faith groups, business communities, retirees, and students. The program facilitates regular two-way communication between embassies and U.S. citizen constituencies abroad on topics such as security, health, voting, and travel.

to the COVID-19 pandemic. Failure to properly prepare for a consular crisis could put U.S. citizens and consular staff at risk during an emergency.

**Recommendation 2:** Embassy Cotonou should comply with Department standards for consular crisis preparedness. (Action: Embassy Cotonou)

### ***Consular Section Did Not Manage all Asylee Records According to Department Standards***

The Consular Section did not manage all asylee records in accordance with Department standards. At the time of inspection, Embassy Cotonou held approximately 40 case files for spouses and children of asylees, known as Visas 92 cases,<sup>15</sup> on which no action had been taken for at least 8 years. Additionally, the section had no record showing whether the applicants had been invited, or appeared, for an interview. Guidance in, 9 FAM 203.6-3b(1) and (3) requires consular sections to give Visas 92 applicants two opportunities to appear for an interview. If the applicant does not appear or is otherwise found ineligible for a visa, guidance in 9 FAM 203.5-1b(1), (4) and (5) directs the consular section to return the case to U.S. Citizenship and Immigration Services (USCIS). Consular staff said they were unclear about the processing requirements for these cases and therefore did not return them to USCIS. Failure to manage these records according to Department standards can create confusion between USCIS and the Department as to the status of the cases and create delays for the applicants.

**Recommendation 3:** Embassy Cotonou should manage asylee files in accordance with Department guidance. (Action: Embassy Cotonou)

### **Spotlight on Success: Text Messages Increased Applicant Preparedness**

Consular staff, in concert with Embassy Cotonou's Information Management staff, developed an application to send text messages to applicants for passports and Consular Reports of Birth Abroad which improved applicant preparedness. Unprepared applicants drew additional staff time and resources because they required extensive email and phone communication following the appointment to help them produce the missing documents. The Consular Section found that in Benin, people check email infrequently but receive and read text messages much more consistently. To take advantage of this, the Consular Section used the application to send one-way text messages from the Consular Section-managed cell phone to applicants advising them to check their email for important pre-appointment information. Though the program was in its early stages, consular staff reported an increase in the number of applicants who appeared for interviews with all required documentation, and the section was considering expanding the program to applicants for other consular services.

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<sup>15</sup> An asylee is a noncitizen in the United States or at a port of entry who is found to be unable or unwilling to return to their country of nationality, or to seek the protection of that country because of persecution or a well-founded fear of persecution. Persecution or the fear thereof must be based on the individual's race, religion, nationality, membership in a particular social group, or political opinion. Asylees are eligible to adjust to lawful permanent resident status after one year of continuous presence in the United States. A spouse or child identified on an approved Form I-730 filed by the principal asylee is often referred to as a follow-to-join asylee (FTJ-A), or a "Visas 92" or V92 beneficiary.

## RESOURCE MANAGEMENT

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OIG reviewed Embassy Cotonou's internal control systems and the Management Section's processes in General Services, Facility Management, Human Resources, Financial Management, and the Health Unit. During the inspection, the embassy corrected five internal control issues identified by OIG. Specifically, the embassy:

- Received clearance and approval from the Bureau of Global Talent Management's Office of Overseas Employment to award the embassy's new LE staff health insurance contract (23 STATE 11504),<sup>16</sup> eliminating potential Department liability in the event of a lapse in coverage.
- Began to pay American staff accounts receivable payments for privately owned vehicle fuel, home-to-work transportation fees, and personal cell phone usage via pay.gov to the Department of the Treasury (4 FAM 322a(2) and b(4)(b)).<sup>17</sup>
- Strengthened its property management internal controls by starting to conduct quarterly unannounced spot checks of personal property inventories (14 FAM 411.2-2b(8)) and performing semi-annual management reviews to mitigate separation of duties concerns (14 FAM 411.2c).
- Provided the Bureau of Overseas Buildings Operations with monthly embassy compound energy and water costs and consumption data (15 FAM 169.1(a)).
- Updated its purchase card program administrative controls by adding and designating the embassy's current purchase card program coordinator, approving officer, and designated billing officer in the Department's Purchase Card Management and Reporting System (4 FAM 455 and the Departments Purchase Card Manual).<sup>18</sup>

OIG found that the Management Section generally implemented required processes and procedures in accordance with applicable laws and Department guidance. However, OIG identified issues in General Services, Facility Management, and the Health Unit. Section staff attributed many of these issues to the limitations on management oversight caused by persistent staffing gaps in recent years and the lack of sufficient U.S. direct-hire positions to provide adequate backup and alternate coverage. For example, the General Services Officer departed in September 2022 with no replacement expected until May 2023. A similar gap was projected to begin in summer 2023 for the Facility Manager, meaning one FAST officer would continue to be responsible for both the General Services and Facility Management Offices until sometime in early 2024. The specific issues identified by OIG are described below.

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<sup>16</sup> Cable 23 STATE 11504, "Benin: LE Staff: Authorization to Implement Health Insurance Contract," February 3, 2023.

<sup>17</sup> The Department does not have specific statutory authority to retain the collection of funds for an employee's personal use of government property.

<sup>18</sup> The Bureau of Administration, Office of the Procurement Executive, administers the Department's purchase card program and provides program guidance through its Purchase Card Manual, last updated January 2023.

## General Services

### ***Embassy's Motor Vehicle Policy Did Not Meet Department Requirements for Other Authorized Use of Official Vehicles***

The embassy's motor vehicle policy did not comply with Department standards in 14 FAM 432 related to managing official vehicles. The motor vehicle policy allowed for fee-based other authorized use<sup>19</sup> of embassy vehicles for non-business purposes, specifically to provide transportation services for both arriving and departing staff. However, 14 FAM 432.3a states that other authorized use will only be available where the chief of mission authorizes it in the embassy motor vehicle policy. In addition, 14 FAM 432.4 states that other authorized use for non-business purposes not otherwise covered may only be provided when the embassy's Regional Security Office and mission vehicle accountable officer certify that public transportation (including taxicabs) is unavailable or unsafe, and documents that in the motor vehicle policy. OIG found that the embassy did not properly document its findings regarding the availability and safety of local transportation. Embassy staff told OIG they were unaware of the specific requirements for other authorized use. Without a motor vehicle policy that reflects Department guidance for the use of official vehicles, the embassy risks providing unauthorized services and improperly using official vehicles.

**Recommendation 4:** Embassy Cotonou should update and reissue its motor vehicle policy to adhere to Department requirements for other authorized use of U.S. government vehicles. (Action: Embassy Cotonou)

### ***Embassy Maintained Excess Expendable Property***

OIG found the embassy maintained excess expendable property<sup>20</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, Embassy Cotonou had 2,644 items in its expendables stock, with a value of approximately \$1.2 million, of which 55 percent (total value \$715,000) had not been issued in the expendables system in the previous 12 months. In addition, 26 percent of the embassy's expendable items (total value \$302,000), had more than 2 years' supply. OIG determined that this issue occurred because embassy property management staff rarely analyzed existing property levels due to competing priorities and staffing gaps in the General Services Office. Failure to adhere to Department property management standards creates an additional burden for section staff and increases the risk of property mismanagement and internal control issues.

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<sup>19</sup> The FAM uses the term "other authorized use" to describe any use of official vehicles overseas for transportation of U.S. government employees and their family members, including those under personal services agreements and EFMs, 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.

<sup>20</sup> Expendable supplies are items that are consumed during use, such as office supplies.

**Recommendation 5:** Embassy Cotonou should dispose of excess expendable property in accordance with Department guidelines. (Action: Embassy Cotonou)

## Facility Management

### ***Embassy Fuel Delivery Procedures Did Not Adhere to Department Standards***

Embassy Cotonou did not manage its bulk fuel operations in accordance with the Department's Motor Pool Procedures Overseas Guide<sup>21</sup> and the embassy's 2020 standard operating procedures on fuel ordering and delivery. Specifically, OIG observed a fuel delivery to the embassy compound that had:

- Multiple leaks from the fuel truck when fuel was being pumped (Motor Pool Procedures Overseas Guide 3.1(a)).
- Inadequate air-tight connection between the delivery truck fuel line and the receiving fuel tank (Motor Pool Procedures Overseas Guide 3.1(c)(1) and Embassy Cotonou standard operating procedure on fuel ordering and delivery).
- No fire extinguishers or spill kits present during the delivery (Motor Pool Procedures Overseas Guide 3.1(a) and Embassy Cotonou standard operating procedure on fuel ordering and delivery).
- No personal protective equipment available for spill clean-up (Embassy Cotonou standard operating procedure on fuel ordering and delivery).

In addition, the embassy's standard operating procedure notes that a delivery should be stopped, and the embassy's post occupational safety and health officer consulted, if any safety concerns arise; however, this was not done during the delivery OIG observed. These incidents occurred because the U.S. direct-hire staff member responsible for this process was on leave and the replacement personnel did not follow the embassy's delivery procedures. Failure to enforce controls and safety protocols in fuel operations increases the risk of mismanagement of fuel and increases life safety risks to embassy staff and property.

**Recommendation 6:** Embassy Cotonou should manage its bulk fuel operations in accordance with Department standards and the embassy's standard operating procedure on fuel ordering and delivery. (Action: Embassy Cotonou)

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

OIG found that the embassy's residential fire protection program did not comply with Department standards. Guidance in 15 FAM 843a states that the embassy must properly place fire extinguishers and administer a maintenance program for them in all residential units occupied by government personnel. In addition, 15 FAM 843c requires that every fire extinguisher must be visually inspected monthly for operable condition. OIG found that the embassy did not monitor the monthly inspections of its residential fire extinguishers by the

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<sup>21</sup> Bureau of Administrations, *Motor Pool Procedures Overseas Guide*, updated October 2022.

occupants as required. For example, OIG spot checks of two senior officer residences found the fire extinguishers had not been inspected since June 2022. In addition, OIG found that the embassy had no documented process to monitor residential fire extinguisher inspections. Facility staff told OIG they believed the occupants were responsible for inspecting the fire extinguishers and did not think to verify that monthly inspections were conducted. Failure to comply with residential fire protection standards increases the risk of injury, loss of life, and damage to property.

**Recommendation 7:** Embassy Cotonou should operate its residential fire protection program in accordance with Department standards. (Action: Embassy Cotonou)

***Embassy's Safety, Health, and Environmental Management Program Did Not Comply With Department Standards***

OIG found that Embassy Cotonou's safety, health and environmental management program did not comply with Department standards. OIG found that the embassy did not have a designated, qualified staff member to monitor the embassy's contractor safety program as required in cable 14 STATE 46762.<sup>22</sup> The facility manager, who also was the Post Occupational Safety and Health Officer, told OIG he initially had considered taking the training to fill the role but decided that since he was leaving in summer 2023, it made more sense to designate an LE staff member to provide continuity in the role. He said the embassy was in the process of recruiting and hiring an LE assistant Occupational Safety and Health Officer, a position that would include monitoring the embassy's contractor safety program, but that the hiring action could take up to 4 months. Without a qualified employee overseeing contractor safety and health activities, the embassy cannot adequately mitigate all the safety and health risks related to post-managed construction and service activities.

In addition, the embassy did not inspect the embassy's mail screening facility as called for in 15 FAM 962(a), which requires semi-annual inspections of all high-risk work areas and activities to ensure the safety of the personnel involved.<sup>23</sup> Staff members told OIG they were unaware of this requirement because the Bureau of Overseas Buildings Operations' Safety Health and Environmental Management workplace operations SharePoint site did not include workplace inspection checklists for mailrooms or mail screening rooms among their list of checklists.<sup>24</sup> Failure to follow safety, health, and environmental management requirements increases safety and health risks to both embassy property and personnel.

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

<sup>23</sup> High-risk work areas include maintenance shops (e.g., carpentry, welding and automotive), printing operations, pouch handling areas, warehouses, and medical laboratories. A high-risk activity involves the potential for serious injury, illness, or fatality, or significant exposure to a physical, chemical, or biological hazard. This would include activities involving, but not limited to, construction, electrical work, work at heights above six feet, confined spaces, trenching or excavating, chemical use, materials storage and handling and maintenance work.

<sup>24</sup> The Bureau of Overseas Buildings Operations confirmed that checklists for mailrooms or mail screening rooms were missing from the SharePoint site and told OIG it was an oversight they planned to correct.

**Recommendation 8:** Embassy Cotonou should designate a qualified staff member to monitor the embassy's contractor safety program in accordance with Department standards. (Action: Embassy Cotonou)

**Recommendation 9:** Embassy Cotonou, in coordination with the Bureau of Overseas Buildings Operations, should perform semi-annual inspections of the embassy's mail screening facility in accordance with Department standards. (Action: Embassy Cotonou, in coordination with OBO)

## Health Unit

### ***Embassy Cotonou Did Not Properly Dispose of Medications and Controlled Substances***

Embassy Cotonou did not adhere to Department requirements for the proper destruction and disposal of medications<sup>25</sup> and controlled substances<sup>26</sup> as defined in the Bureau of Medical Services Standard Operating Procedures for Management of Medications in the Health Unit Pharmacy. Specifically, OIG found that the Health Unit:

- Processed 11 medication disposals from November 2022 to February 2023, including one disposal valued at \$937,758. Although the unit generated the required DS-132 property disposal authorization forms, its LE staff member manually signed the forms for the disposals, which did not have approval or signature of the Property Management Officer prior to disposal (Bureau of Medical Services Standard Operating Procedures for Management of Medications, Section 300 "Disposal").
- Did not document controlled substance disposals in the electronic Controlled Substances Logbook in MedEx<sup>27</sup> with both the disposer and witness electronically signing the dated log entry. In addition, of the Health Unit's three controlled substance disposals from 2017 to 2023, one lacked the required Property Management Officer's signature (Bureau of Medical Services Standard Operating Procedures for Management of Medications, Section 300 "Disposal").
- Disposed of non-liquid and non-controlled substance medications in the trash, rather than in a safe and secure manner.<sup>28</sup> In addition, the unit did not document the disposals

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<sup>25</sup> Medications which do not fall into the controlled substance category and can include prescription and non-prescription drugs.

<sup>26</sup> Controlled Substances are drugs or chemicals that have the potential to be addictive or cause the development of a physiological chemical dependence. Controlled substances must be maintained and stored in locked cabinets. The only personnel who may prescribe and dispense controlled substances are those Foreign Service Medical Providers who have a Drug Enforcement Administration registration certificate.

<sup>27</sup> MedEx is the medical expendables module in the Integrated Logistics Management System (ILMS) used to properly account for the use of all expendable medications and supplies. ILMS is an integrated web-based system that encompasses all Department supply chain functions in one system. ILMS is designed to upgrade Department supply chain management by improving operations in areas such as purchasing, procurement, warehousing, transportation, property management, personal effects, and diplomatic pouch and mail.

<sup>28</sup> "Safe and secure" methods of disposal are detailed in Bureau of Medical Services Standard Operating Procedures for Management of Medications, Section 300 "Disposal."

and forward the documentation to the Property Management Officer to be recorded (16 FAM 711b).

Health Unit staff members said they were unaware of the need to document disposal of medications with the embassy's Property Management Officer. Failure to dispose of medications and controlled substances in compliance with Department regulations is an internal management control weakness and may lead to fraud, waste, and abuse of resources.

**Recommendation 10:** Embassy Cotonou should dispose of medications and controlled substances in accordance with Department standards. (Action: Embassy Cotonou)

***Embassy Cotonou Did Not Maintain Proper Inventory Records of Medications***

The embassy did not maintain proper inventory records of its medications as required. In accordance with 14 FAM 410, 16 FAM 712.1b, and 16 FAM 742b, the Foreign Service Medical Provider at a post or, in that person's absence, the Regional Medical Officer, is responsible for ensuring that inventory-related records of prescription drugs are properly maintained. Specifically, OIG found that:

- Fifty-four percent of medications in the MedEx expendables system did not have cost information, substantially higher than the Department target of no more than 2 percent without cost information.
- Ten medications disposed of between November 2022 and February 2023 reflected no monetary value on the disposal forms.
- The inventory of 993 anti-malarial medication pills on hand reflected a value of \$2.78 million at the inaccurate cost of \$2,800 per pill recorded in the MedEx expendables system.<sup>29</sup>
- Forty medications had an excess of 36 months' supply inventory on hand and therefore were likely to expire, including 13 medications with an excess of 10 years' supply.

OIG found that the embassy's inaccurate medical inventory records resulted from the entry of inaccurate data caused by the Health Unit staff's lack of training in the MedEx expendables system. Failure to maintain accurate medication inventory records is an internal management control weakness and may lead to fraud, waste, and abuse of resources.

**Recommendation 11:** Embassy Cotonou should maintain accurate inventory records of medications in accordance with Department guidelines. (Action: Embassy Cotonou)

## **INFORMATION MANAGEMENT**

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OIG reviewed Embassy Cotonou's unclassified and classified network operations, information systems and mobile computing administration, mail and pouch services, cyber security

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<sup>29</sup> OIG found that the average per pill market cost for the same medication at the time of inspection was between \$2 and \$4 depending on country and vendor.

practices, records management, telephone operations, emergency communications systems, and physical and environmental protection of IT resources.

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

- Configured the mission's Microsoft Active Directory<sup>30</sup> privileged security groups to meet the principle of least privilege (12 FAH-10 H-112.5 and National Institute of Standards and Technology Special Publication 800-53 AC-6).
- Configured Active Directory administrative groups in accordance with the Department's Systems Administration Guide (5 FAH-12 H-115.6.b(13)).
- Created an IT Contingency Plan for classified operations (12 FAH-10 H-232.1-1).
- Removed workstations from the multifactor authentication exclusion group<sup>31</sup> that had been in the group for longer than 24 hours (12 FAH-10 H-132.1.b(4), E.O. 14028 section 3(d), 5 FAH-12 H-115.7b).
- Corrected mailroom delivery procedures for accountable items (14 FAH-4 H-255.2c).

OIG determined the embassy implemented most required IM and security controls in accordance with Department policies and applicable laws, with the exceptions noted below.

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

Embassy Cotonou's records management program did not comply with Department standards in 5 FAM 418.9 and the Department's Records Handbook.<sup>32</sup> The embassy published a records management plan in 2019 that included relevant details on the Department's records management policies, links to Department records disposition schedules, guidance on records management procedures, and points of contact for assistance. However, OIG found that the embassy did not:

- Archive program records of embassy sections to the Bureau of Administration in the 3 years prior to the inspection (5 FAM 451b and c(1)).
- Comply with electronic records retirement requirements (5 FAM 451). For example, OIG's review of files on SharePoint shared document libraries found that sections' electronic records contained files beyond the retention dates in records disposition schedules.
- Properly dispose of temporary records stored in the embassy warehouse (5 FAM 451d).

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<sup>30</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.

<sup>31</sup> The Department's Systems Administration Guide (Identity, Access, & Email) maintained by the Bureau of Information Resource Management allows exclusion from multi-factor authentication for a 24-hour period. Temporary exclusion from two-factor authentication is not authorized for multiple, concurrent days for any OpenNet workstation.

<sup>32</sup> The Department's Records Handbook for All Overseas Personnel is published by the Bureau of Administration Office of Information Programs and Services. The handbook summarizes the key elements of a successful records management program at an embassy.

OIG found these issues occurred due to a lack of management oversight. In June 2022, OIG issued a management assistance report<sup>33</sup> that highlighted continued widespread Department deficiencies in managing and retiring Department records. A deficient records management program can result in the loss of important data for historical insight into policy analysis, decision-making, and archival research.

**Recommendation 12:** Embassy Cotonou should bring its records management program into compliance with Department standards. (Action: Embassy Cotonou)

### ***Embassy Used Unauthorized Cloud-Based Software***

OIG found that Embassy Cotonou used a cloud application, iAuditor, that was not authorized for use as required in 5 FAM 1066.1-3 and 5 FAM 1114. The embassy used iAuditor to manage its routine inspections of embassy facilities and residences. The Bureau of Information Resource Management's Mobile and Remote Access Division approved iAuditor in 2015 for use on Department-owned mobile devices. However, Department standards in 5 FAH-8 H-354.2a stipulate that all cloud applications that process Department information must be categorized in accordance with Federal Information Processing Standards 199, registered in the Department's IT inventory system of records,<sup>34</sup> and authorized by the Department's authorizing official.<sup>35</sup> OIG was unable to find evidence that iAuditor had been categorized or had undergone a risk assessment required by 12 FAM 623.16. Despite being approved at the bureau level for installation on Department mobile devices, the Department's authorizing official had not approved the use of iAuditor to process Department information as required. Use of unauthorized cloud-based applications could result in unauthorized disclosure of sensitive Department information. The embassy agreed to discontinue using the application; therefore, OIG did not make a recommendation to address this issue.

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<sup>33</sup> OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

<sup>34</sup> The Integrated Management Analytics and Technology Resource for Information eXchange, or iMatrix, is the Department's tool for organizing and tracking its IT investments, projects, and assets, including services, systems, and products.

<sup>35</sup> The Chief Information Officer is the approving official for all cloud services for the Department. See 5 FAM 1114c.

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

**Recommendation 1:** Embassy Cotonou should comply with the requirements of the 2013 letter of agreement (and subsequent amendments) between the United States and Benin. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou 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 Cotonou complied with the requirements of the 2013 letter of agreement (and subsequent amendments) between the United States and Benin.

**Recommendation 2:** Embassy Cotonou should comply with Department standards for consular crisis preparedness. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou 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 Cotonou complied with Department standards for consular crisis preparedness.

**Recommendation 3:** Embassy Cotonou should manage asylee files in accordance with Department guidance. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou 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 Cotonou managed asylee files in accordance with Department guidance.

**Recommendation 4:** Embassy Cotonou should update and reissue its motor vehicle policy to adhere to Department requirements for other authorized use of U.S. government vehicles. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation. The embassy noted an estimated completion of September 30, 2023.

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

**Recommendation 5:** Embassy Cotonou should dispose of excess expendable property in accordance with Department guidelines. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation. The embassy noted an estimated completion date of October 15, 2023.

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

**Recommendation 6:** Embassy Cotonou should manage its bulk fuel operations in accordance with Department standards and the embassy's standard operating procedure on fuel ordering and delivery. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation. The embassy noted an estimated completion date of August 1, 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou managed its bulk fuel operations in accordance with Department standards and the embassy's standard operating procedure on fuel ordering and delivery.

**Recommendation 7:** Embassy Cotonou should operate its residential fire protection program in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou operated its residential fire protection program in accordance with Department standards.

**Recommendation 8:** Embassy Cotonou should designate a qualified staff member to monitor the embassy's contractor safety program in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou designated a qualified staff member to monitor the embassy's contractor safety program in accordance with Department standards.

**Recommendation 9:** Embassy Cotonou, in coordination with the Bureau of Overseas Buildings Operations, should perform semi-annual inspections of the embassy's mail screening facility in accordance with Department standards. (Action: Embassy Cotonou, in coordination with OBO)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou performed semi-annual inspections of the embassy's mail screening facility in accordance with Department standards.

**Recommendation 10:** Embassy Cotonou should dispose of medications and controlled substances in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation. The embassy noted an anticipated completion date of November 17, 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou disposed of medications and controlled substances in accordance with Department standards.

**Recommendation 11:** Embassy Cotonou should maintain accurate inventory records of medications in accordance with Department guidelines. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou concurred with this recommendation. The embassy noted an estimated completion date of November 17, 2023.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Cotonou maintained accurate inventory records of medications in accordance with Department guidelines.

**Recommendation 12:** Embassy Cotonou should bring its records management program into compliance with Department standards. (Action: Embassy Cotonou)

**Management Response:** In its June 7, 2023, response, Embassy Cotonou 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 Cotonou brought its records management program into compliance with Department standards.

## PRINCIPAL OFFICIALS

Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Brian W. Shukan	3/2022
Deputy Chief of Mission	Karen Gustafson De Andrade	9/2020
<b>Chiefs of Sections:</b>		
Consular	Sharon Cyr	6/2021
Political/Economic	Elliot Repko	7/2021
Management	Marc Trahan	7/2022
Political/Military	Matthew Briggs	8/2020
Public Affairs	Katherine Ntiamoah	6/2022
Regional Security	K. Joshua Potter	8/2021
<b>Other Agency Representatives:</b>		
U.S. Agency for International Development	Carl Anderson	8/2019
Millennium Challenge Corporation (MCC)	M. Christopher Broughton	11/2015
Office of Security Cooperation (in Accra)	James Lambright	9/2020
Peace Corps	Marguerite Roy	9/2020

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

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from January 3 to March 21, 2023, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM).

### Objectives and Scope

The Office of Inspections provides the Secretary of State, the Chief Executive Officer of USAGM, and Congress with systematic and independent evaluations of the operations of the Department and USAGM. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved and U.S. interests are accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy; and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; and whether instances of fraud, waste, or abuse exist and whether adequate steps for detection, correction, and prevention have been taken.

### Methodology

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

## APPENDIX B: MANAGEMENT RESPONSE

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June 7, 2023

### UNCLASSIFIED

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

CC: Bureau of African Affairs, Molly Phee, Assistant Secretary  
Bureau of Overseas Buildings Operations, William Moser, Director

FROM: Embassy Cotonou, Brian Shukan, Ambassador

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Cotonou, Benin

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

**OIG Recommendation 1:** Embassy Cotonou should comply with the requirements of the 2013 letter of agreement (and subsequent amendments) between the United States and Benin. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with the recommendation. Embassy Cotonou

INL coordinator position, which is currently incumbered, was vacant for 18 months prior to the OIG inspection. The embassy is working on the requirements of the 2013 LOA and subsequent amendments between United States and Benin. The expected completion date is September 2023.

**OIG Recommendation 2:** Embassy Cotonou should comply with Department standards for consular crisis preparedness. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with the recommendation. The American Liaison Network was relaunched in February 2023. Disaster assistance kits and an expanded list of host country emergency contacts will be completed by July 2023, and a disaster plan handbook by September 2023.

**OIG Recommendation 3:** Embassy Cotonou should manage asylee files in accordance with Department guidance (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with the recommendation. Corrective action will be completed by October 2023, as correctly processing these cases that were mishandled more than 5 years ago will take significant staff time that is not available during peak Diversity Visa and student visa processing periods.

**OIG Recommendation 4:** Embassy Cotonou should update and reissue its motor vehicle policy to adhere to Department requirements for other authorized use of U.S. government vehicles (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Embassy Cotonou will update and reissue its motor vehicle policy by September 30, 2023.

**OIG Recommendation 5:** Embassy Cotonou should dispose of excess expendable property in accordance with Department guidelines. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Embassy Cotonou will dispose of excess expendable property by October 15, 2023.

**OIG Recommendation 6:** Embassy Cotonou should manage its bulk fuel operations in accordance with Department standards and the embassy's standard operating procedure on fuel ordering and delivery. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Embassy Cotonou will train staff on Department standards and Post's operating procedures by August 1, 2023.

**OIG Recommendation 7:** Embassy Cotonou should operate its residential fire protection program in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Embassy Cotonou will be adequately staffed to administer its residential fire protection program in accordance with Department standards once an LE Staff A/POSHO is hired. Post anticipates filling its A/POSHO position by December 2023.

**OIG Recommendation 8:** Embassy Cotonou should designate a qualified staff member to monitor the embassy's contractor safety program in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou agrees with this recommendation. Post has been in compliance with Department standards because the Embassy's Facility Manager completed POSHO training on October 29, 2021 and is the designated qualified staff member to monitor the Embassy's contractor safety program.

**OIG Recommendation 9:** Embassy Cotonou, in coordination with the Bureau of Overseas Buildings Operations, should perform semi-annual inspections of the embassy's mail screening facility in accordance with Department standards. (Action: Embassy Cotonou, in coordination with OBO)

**Management Response:** Embassy Cotonou concurs with this recommendation. Post's POSHO inspected the Embassy's mail screening facility during the OIG inspection and will conduct subsequent screenings semi-annually.

**OIG Recommendation 10:** Embassy Cotonou should dispose of medications and controlled substances in accordance with Department standards. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Post began corrective actions 5/17/2023. Post anticipates completing required actions by 11/17/2023.

**OIG Recommendation 11:** Embassy Cotonou should maintain accurate inventory records of medications in accordance with Department guidelines. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Post began corrective action 5/17/2023 and will complete action by 11/17/2023.

**OIG Recommendation 12:** Embassy Cotonou should bring its records management program into compliance with Department standards. (Action: Embassy Cotonou)

**Management Response:** Embassy Cotonou concurs with this recommendation. Post has begun corrective actions and anticipates completing required actions by December 2023.

## ABBREVIATIONS

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DCM	Deputy Chief of Mission
DEIA	Diversity, Equity, Inclusion, and Accessibility
EFM	Eligible Family Member
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAST	First- and Second-Tour
ICS	Integrated Country Strategy
IM	Information Management
INL	Bureau of International Narcotics and Law Enforcement Affairs
LE	Locally Employed
USAID	U.S. Agency for International Development
USCIS	U.S. Citizenship and Immigration Services

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