

UNCLASSIFIED



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

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ISP-I-24-18

Office of Inspections

June 2024

# **Inspection of Embassy Warsaw and Constituent Post, Poland**

BUREAU OF EUROPEAN AND EURASIAN AFFAIRS

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

ISP-I-24-18

## What OIG Inspected

OIG inspected the operating environment, executive direction, policy and program implementation, resource management, and information management operations of Embassy Warsaw, Poland. The inspection included Consulate General Krakow and Consular Agency Poznan.

## What OIG Recommends

OIG made 38 recommendations: 36 to Embassy Warsaw, 1 to the Bureau of European and Eurasian Affairs, and 1 to the Bureau of International Narcotics and Law Enforcement Affairs. In its comments on the draft report, the Department concurred with 37 recommendations and neither agreed nor disagreed with 1 recommendation. OIG considers all 38 recommendations resolved. 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.

June 2024

OFFICE OF INSPECTIONS

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## Inspection of Embassy Warsaw and Constituent Post, Poland

### What OIG Found

- The Ambassador and Deputy Chief of Mission led Mission Poland in a professional and collaborative manner consistent with the Department of State's leadership and management principles.
- Three areas significantly impacted the mission's operations: (1) the effects of, and the mission's response to, Russia's war against Ukraine; (2) the mission's outdated and inadequate facilities; and (3) locally employed staff wages not keeping pace with the cost of living and high inflation in Poland.
- Regional bureau guidance on how to expend Ukraine supplemental funds was not always sufficient and clear. Additionally, the embassy lacked some supporting documentation and justifications for its use of Ukraine supplemental funds.
- In response to the increase in foreign assistance due to Russia's full-scale invasion of Ukraine, the mission created new coordination mechanisms.
- The mission's public diplomacy grants management record keeping for closed awards did not fully comply with Department standards.
- The mission had deficiencies in the safety, health, and environmental management program and the fire protection program. Additionally, the motor vehicle, property, contracting officer's representative, and financial management programs did not fully comply with Department standards.
- Mission Poland also had deficiencies related to information security, non-enterprise networks, telephone system operational readiness, and mobile devices management.
- Spotlight on Success: Embassy Poland's Economic Section automated the production of reporting cables, saving time, improving predictability, and fostering staff collaboration on reporting, resulting in products Washington end users praised.
- Spotlight on Success: Embassy Warsaw's Strategic Messaging Working Group enabled well-coordinated, timely public messaging for mission-wide deployment.

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## CONTEXT



**Figure 1:** Map of Poland showing major cities, neighboring countries, and the Baltic Sea (Source: CIA World Factbook).

The United States views the Republic of Poland as a steadfast and reliable national security ally and economic partner, fostering security and prosperity regionally, throughout Europe and the world. Ranking seventh in Europe in area and population, the 120,000 square miles of mostly lowland plains contains a populace of 38.6 million who are 90 percent Roman Catholic. Poland borders Belarus, Lithuania, Germany, Russia, Slovakia, Czechia, Ukraine, and the Baltic Sea.

Poland's gross domestic product in 2022 was \$716.3 billion. Since 1995, Poland has had the second fastest growing economy in the world. Poland has been a member of

the North Atlantic Treaty Organization (NATO) since 1999 and entered the European Union in 2004. The economic relationship between the United States and Poland is robust. More than half of the top 100 U.S. companies operate in Poland, employing approximately 292,000 Poles. The United States is the top non-European Union investor in Poland and the top investor in business services. In 2022, the U.S.-Poland bilateral trade in goods reached \$23.2 billion.

Embassy Warsaw's four goals, as outlined in the Integrated Country Strategy (ICS) for Poland, approved on October 31, 2023<sup>1</sup> are:

- Poland remains a responsive and effective partner on regional security and actively addresses global security challenges.
- Poland's economic growth is sustainable, carbon neutral, resilient, and benefits American workers and families by contributing to U.S. economic growth and prosperity.
- Poland respects and revitalizes the rule of law, independence of the judiciary, media, and other democratic institutions at home; uses its transition experience to promote democracy abroad; and shows greater respect for and acceptance of minorities and socially marginalized groups within its borders.
- Poland's emerging leaders are connected to the United States and the American people and actively advance shared values in their communities.

<sup>1</sup> Bureau of European and Eurasian Affairs, Embassy Warsaw, Poland, "Integrated Country Strategy," October 31, 2023.

The U.S. diplomatic mission to Poland consists of Embassy Warsaw and Consulate General Krakow. The mission also has a consular agency in Poznan.<sup>2</sup> At the time of the inspection, Mission Poland had 211 U.S. direct-hire positions. Of these, 153 were Department of State (Department) positions. The remaining 58 positions were filled by other U.S. government agency employees, including staff from the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, Justice, and Transportation, as well as the Drug Enforcement Administration, Federal Aviation Administration, and U.S. Agency for International Development. Mission Poland also had 385 locally employed (LE) staff members.

OIG evaluated Mission Poland's operating environment, executive direction, policy and program implementation, resource management, and information management consistent with Section 209 of the Foreign Service Act of 1980.<sup>3</sup> This inspection related to Overseas Contingency Operation Atlantic Resolve and was completed in accordance with OIG's oversight responsibilities described in Section 8L of the Inspector General Act of 1978, as amended. A related classified inspection report includes discussion of the mission's security program, issues affecting the safety of mission personnel and facilities, and certain aspects of the information management program.

## OPERATING ENVIRONMENT

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OIG assessed there were three areas that significantly impacted Mission Poland's operating environment. As described below, these were the effects of, and the mission's response to, Russia's war against Ukraine; the mission's outdated and inadequate facilities; and LE staff wages not keeping pace with growth in the cost of living and 3 years of high inflation in Poland.

### **Effects of and Responses to the Ukraine Crisis**

Russia's February 2022 full-scale invasion of Ukraine significantly impacted Poland, given its roughly 535-kilometer border with Ukraine. For example, the war set off the largest and fastest displacement of people since World War II. From February through early November 2022, approximately 1.7 million refugees registered for temporary protection in Poland. Ultimately, many refugees moved on to other destinations, including some who later returned to Ukraine. As of October 2023, the country was still supporting and hosting approximately 957,000 Ukrainian refugees. Poland is also the primary transit hub for security and humanitarian assistance to Ukraine.

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<sup>2</sup> According to 2 FAM 111.2, a consular agency is the "office of a consular agent, who is appointed by the Secretary of State and serves under the supervision of the principal consular officer in the district." Furthermore, 3 FAM 8911 states, "Consular agents (including temporary consular agents) are appointed by the Department to assist the post having territorial jurisdiction (the supervisory post) in the performance of limited consular services, which are defined and authorized by certain international agreements (primarily the Vienna Convention on Consular Relations), statutes and regulations."

<sup>3</sup> See Appendix A.

Like the host nation, Mission Poland was also immediately affected by Russia's full-scale invasion of Ukraine. In fact, even before hostilities began, the mission began contingency planning to gather information on border crossing points, border cities and their capabilities, and railways, airports, and hotels in southern Poland. Because of its early work, Mission Poland was able to set up a welcome center in Przemysl, Poland to support the estimated 3,000 American citizens who fled from Ukraine to Poland in the first weeks of the war.

Additionally, in the days before and immediately after hostilities began, Mission Poland managed the travel, transportation, hotels, temporary housing, office space, and information management (IM) needs for the temporary relocation of Embassy Kyiv staff and operations to Rzeszow, Poland. The mission's support of Embassy Kyiv and its staff was ad hoc for well over a year, but in June 2023, the two missions signed a memorandum of understanding<sup>4</sup> that described their respective roles and responsibilities in providing operational and management support to Embassy Kyiv in Poland in what was called the Mission Ukraine Transit Center. In August 2023, the mission renamed this temporary support platform as the Kyiv Transit Platform (KTP) and moved it from Rzeszow to Krakow. Concurrent to this inspection, OIG also reviewed the KTP's operational effectiveness, accountability and security, and collaboration between Embassy Kyiv, Embassy Warsaw, Consulate General Krakow, and the KTP.<sup>5</sup>

Mission Poland's Ambassador, Deputy Chief of Mission (DCM), and Principal Officer in Krakow all reported to OIG that Russia's war against Ukraine had increased the mission's workload. For example, the number of refugees, the increase in the number of U.S. troops stationed in Poland, and the billions of dollars in defense sales to Poland, created new lines of work for the mission. But nothing created more work than the exponential increase in high-level U.S. government visitors to Poland, which is discussed in more detail below. These visitors were advancing vital U.S. foreign policy goals, but initially the mission did not have sufficient resources to perform its own work and meet all the Ukraine-related requirements. They met the demand with support from temporary duty (TDY) staff and Mission Poland staff working extremely long hours. The situation improved somewhat after the Department temporarily transferred some Embassy Kyiv positions to Mission Poland and provided additional positions to the mission.<sup>6</sup> As a result of the additional personnel, embassy staff felt less pressure. However, the consulate general, with limited office space to accommodate additional staff, continued to host a high volume of official visits.

Due to its strategic partnership with the United States and its central role supporting Ukraine, Poland has attracted significant, sustained interest from the highest levels of the U.S. government in the form of VIP visits. Since February 2022, the President, the Vice President, the

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<sup>4</sup> Department of State, "Memorandum of Understanding Between the U.S. Mission to Ukraine and the U.S. Mission to Poland Regarding the Mission Ukraine Transit Center (MUTC)," June 20, 2023.

<sup>5</sup> OIG, *Review of the Kyiv Transit Platform* (ISP-I-24-17, April 2024).

<sup>6</sup> Among these were four positions at Embassy Warsaw: (1) U.S. Agency for International Development Senior Development Advisor; (2) USAID Global Partnerships Director; (3) Regional Refugee Coordinator, from the Bureau of Population, Refugees, and Migration; and (4) Regional Assistance Coordinator, from the Bureau of Europe and Eurasia's Office of the Coordinator of U.S. Assistance to Europe and Eurasia.

Secretaries of State, Defense, Treasury, Agriculture, and Transportation, the Chairman of the Joint Chiefs, numerous combatant commanders, the National Security Advisor, Secretaries and Service Chiefs (Army, Air Force), the Director of the Central Intelligence Agency, the Director of National Intelligence, 170 members of Congress, and numerous other senior-level officials have visited Poland. To ensure the continued success of official visits to Poland, OIG determined that Mission Poland would benefit from improvements to the mission's guidance and processes for planning official visits, as described below.

***Embassy Lacked Adequate Guidance and Processes for Planning Official Visits***

OIG found Embassy Warsaw lacked adequate guidance and processes for planning official visits. Embassy staff assigned as control officers<sup>7</sup> for official visits told OIG they lacked clear guidance on how to plan the visits. The embassy had a Control Officer Handbook, drafted by its Travel and Visitor Unit.<sup>8</sup> However, it had not been updated since 2021, prior to Russia's full-scale invasion of Ukraine. As a result, the handbook did not include specific guidance on planning visits in Rzeszow. The handbook also did not detail key processes, such as the procurement process for renting vehicles for locations outside Warsaw. Furthermore, based on interviews, OIG found control officers were often unaware of the handbook's existence or viewed it as outdated or incomplete. They told OIG the handbook did not have sufficient information on how to plan lower-level visits that did not have advance teams, which required the control officer to manage almost all aspects of the visit. Instead, control officers relied on their colleagues to guide them on visit planning.

OIG also found the embassy's visit planning processes were inadequate. Key Management Section staff were not always included in initial visit planning meetings, which led to mistakes and inefficiencies. For example, control officers, who were responsible for preparing cost estimates for each visit, had no mentoring or training in how to prepare the estimates, resulting in repeated mistakes and inefficiencies in preparing the estimates. According to the Control Officer Handbook, the control officers should have obtained input from the Financial Management Office and General Services Office motor pool, travel, and procurement staff to arrive at the cost estimates. Staff told OIG that control officers sometimes submitted the budget estimates to the Bureau of European and Eurasian Affairs' (EUR) Executive Office with errors. As a result, the Financial Management Office had to correct accounting errors and track down missing information.

The Government Accountability Office's *Standards for Internal Control in the Federal Government*, Principle 3.03, call for management to develop an organizational structure that

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<sup>7</sup> Guidance in the Foreign Affairs Handbook, 6 FAH-5 H-361b, defines a control officer as the point of contact for coordinating a successful TDY visit. A control officer facilitates communication between the visitor and the embassy and is typically responsible for setting up meetings and coordinating administrative support requirements.

<sup>8</sup> According to the embassy's internal SharePoint site, the Travel and Visitor Unit's stated responsibilities were to "make and coordinate accommodation and other logistical arrangements for official visitors, delegations, and High-Level Visits to Poland." The unit, under the purview of an Assistant General Services Officer, consisted of four LE staff. Embassy Warsaw's Travel and Visitor Unit was comparable in size to similar units at large embassies.

assigns responsibilities to discrete units to enable the organization to operate in an efficient and effective manner.<sup>9</sup> Department leadership and management principles outlined in the Foreign Affairs Manual (FAM), 3 FAM 1214b(7), require employees to establish constructive working relationships with all mission elements to further goals. OIG determined the lack of adequate guidance and processes resulted from a failure to not only maintain but also implement the Control Officer Handbook. The handbook stipulated that control officers should hold a “lessons learned” meeting for every cabinet-level or problematic visit with everyone involved, which would have provided an opportunity for control officers and other staff to raise concerns and for the embassy to address them. However, despite 18 cabinet-level visits, the embassy had organized only one mission-wide after-action review from September 2022 through September 2023.

OIG determined that the embassy did take some steps to improve visit management. Staff told OIG the arrival of a second Assistant General Services Officer in Warsaw in August 2023, who was responsible for travel and procurement, improved Management Section support for visits. The embassy also conducted a training session in November 2022 for first- and second-tour officers on how to be a control officer, and in February 2023, circulated a “Top Ten Tips” document addressing how to execute control officer responsibilities for events involving the Ambassador. Additionally, during the inspection, Consulate General Krakow disseminated standard operating procedures for planning congressional delegation and VIP visits to Rzeszow, which officers told OIG was helpful. In addition, the embassy updated the finance section of its Control Officer Handbook.

Despite these positive steps, staff told OIG the visit workload and lack of clear guidance negatively affected staff morale and contributed to burnout. OIG also found the visit workload reduced time spent on core duties such as reporting and contact management, as detailed later in the report. Embassy and Department leadership expressed concern to OIG about the grueling pace of the visits and staff exhaustion. Even as the embassy executed many successful visits, without adequate guidance and visit planning processes, the embassy risks wasting government funds and undermining staff morale.

**Recommendation 1:** Embassy Warsaw should update and implement planning guidance and processes for official visits. (Action: Embassy Warsaw)

In addition to what was described above, Mission Poland was also affected by and responded to Russia’s 2022 full-scale invasion of Ukraine in various other ways. These include:

- Demand for consular services increased sharply. The Consular Sections in Warsaw and Krakow saw a 414 percent increase in nonimmigrant visa cases, mostly from Russians, Ukrainians, and Belarusians, from FY 2021 (13,786 cases) to FY 2023 (70,829 cases). Immigrant visa cases also increased from 1,845 in FY 2021 to 6,013 in FY 2023, an increase of 226 percent. Demand for U.S. citizen services—Consular Reports of Birth

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<sup>9</sup> Government Accountability Office, *Standards for Internal Control in the Federal Government*, pages 27–28 (GAO-14-704G, September 2014).

Abroad and passports—also increased in FY 2021 and FY 2022 but began to subside somewhat in FY 2023. The Consular Sections were only able to meet the increased demand for services because they had help from 75 TDY staff who rotated through the two sections the past two fiscal years.

- The Political and Economic Sections of Embassy Warsaw increased their reporting on topics such as refugees, military support, Ukraine reconstruction, trade, border issues, countering Russia’s influence, and cross-cutting issues in support of the numerous high-level U.S. visitors who traveled to Poland after February 2022.
- Consulate General Krakow doubled its U.S. direct-hire staff in the past year, from 8 to 16.
- Despite having previously graduated from receiving U.S. foreign assistance, Poland began to again receive significant assistance in 2022 when Russia’s war against Ukraine started. For example, Poland received almost \$349 million in Foreign Military Financing (FMF) in FY 2022, and Poland and the United States agreed to a \$2 billion FMF direct loan in September 2023, to support the country’s defense modernization efforts.<sup>10</sup> Similarly, according to mission data, Poland benefitted from a significant increase in U.S. foreign military sales since 2022, with this period representing more than 30 percent of total U.S. foreign military sales to the country since 1995.
- To help address refugee-related issues in Poland and the broader region, the Department’s Bureau of Population, Refugees, and Migration established a full-time regional refugee coordinator position at Embassy Warsaw in summer 2023, replacing what had initially been a temporary position created in response to the immediate emergency. The Bureau of Population, Refugees, and Migration also provided almost \$179 million since FY 2022 to help address refugee needs in Poland.
- The workload of Embassy Warsaw’s Human Resources Office increased due to processing approximately 20 accreditations for Embassy Kyiv’s U.S. direct hires to be dually accredited to Poland. The number of emails into the office also increased with TDY staff asking visa-related questions. Additionally, the Human Resources Office assisted TDY staff who exceeded their 90-day authorized stays in Poland to resolve their status with the Polish government.
- For over a year following Russia’s full-scale invasion of Ukraine, there was neither a financial structure in place to track expenses incurred for support services to Embassy Kyiv that were paid by Mission Poland, nor a process to capture workloads for the Ukraine-related work. To address this, the Management Section established a custom solution working with the myServices team in Washington to track tasks being performed for Mission Ukraine using the mission’s existing MyServices platform. This effort started in December 2022, and continued until an International Cooperative Administrative Support Services (ICASS) agreement was established. The Financial Management Officer worked with Embassy Kyiv to establish an ICASS memorandum of

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<sup>10</sup> FMF is the U.S. appropriation for financing the acquisition of U.S. defense articles, services, and training through grants or loans. It supports U.S. regional security goals and enables allies and friendly foreign countries to improve their defense capabilities. Congress appropriates FMF funds in the International Affairs budget, the Department of State allocates the funds for eligible allies and friends, and the Department of Defense implements the program.

understanding that assigned an ICASS agency code to Embassy Kyiv and designated it as an ICASS customer of Embassy Warsaw.

- From the start of Russia's war against Ukraine through October 31, 2022, Mission Poland's IM staff managed mobile IT needs and network drops for hundreds of TDY staff, dramatically driving up the number of workstations managed by the mission. The number of cellphone numbers being managed by Mission Poland increased significantly.
- In support of Embassy Kyiv's drawdown and evacuation, Embassy Warsaw's IM staff set up an additional pouch hub in Warsaw and moved thousands of pounds of materials, including personnel records and mission essential support equipment, between Germany, Ukraine, and Poland. However, the embassy's courier-escorted pouch support did not abate after the initial surge to remove materials from Ukraine. Specifically, inbound courier-escorted pouch to Poland in the first 7 months of 2022 was 150 percent higher than the same period in 2019 (prior to the pandemic). Outbound courier-escorted pouch from Poland was 240 percent higher over the same period. As secure pouch requires cleared American staff to process, the surge in this workload diverted the IM staff away from their primary duties in support of Mission Poland.

### **Outdated and Inadequate Mission Facilities**

Embassy Warsaw and Consulate General Krakow were in outdated facilities. OIG found infrastructure concerns and issues in both locations, including increased maintenance, replacement, and repair needs for aging key building systems; significant security, fire, and safety vulnerabilities; and a lack of compliance with requirements in the Americans with Disabilities Act of 1990. The life safety, fire, and security deficiencies and vulnerabilities are discussed further below, later in this report, and in the companion classified report.

Embassy Warsaw's chancery was constructed in 1963 and the annex, adjacent to the chancery, was built in 1968. The annex was originally constructed as staff housing but was later converted for office use. At the time of the inspection, both buildings had a long list of infrastructure update and repair needs. For example, the chancery windows, part of the original structure, were a source of constant problems involving temperature, noise, and outside pollutants. Many windows were sealed with duct tape to prevent cold air entering the chancery (see Figures 2 and 3, below).



**Figures 2 and 3:** Photos of duct-taped windows (Source: Embassy Warsaw, December 14, 2023).

The annex air handler system, which was designed for an apartment building with limited occupants, struggled to regulate air temperature and the circulation of air in an office building with many employees. In addition, the lower chancery roof had numerous leaks, including one that sent water into the elevator shaft. The chancery elevators had constant issues, which will require replacement.

Consulate General Krakow's offices are set in two adjoining buildings that date to the 14th and 17th centuries and are protected historical structures.<sup>11</sup> At the time of the inspection, neither building met accessibility standards or Department fire standards. For example, both buildings lacked the required certification from the Post Occupational Safety and Health Officer because they did not have a secondary means of egress, a protected interior stairway, a fire suppression system, or an annual contract to provide inspection, testing, and maintenance of the fire alarm system.<sup>12</sup>

In addition to the facilities being outdated, they were also inadequate for the current embassy and consulate general staffing levels and had little to no options for future growth. For example, due to the need for more storage in the chancery, Embassy Warsaw remodeled an

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<sup>11</sup> Buildings and sites with unique cultural value that are declared heritage assets are included on the Bureau of Overseas Buildings Operations' List of Significant Properties, have a protected status by the host-nation or the U.S. government, or are a World Heritage Site, as designated by the UN Educational, Scientific and Cultural Organization or UNESCO. All work—whether maintenance, renovation, or new construction—should follow the Secretary of the Interior's Standards for the Treatment of Historic Properties and respect host-country laws and procedures for handling architectural and cultural heritage property.

<sup>12</sup> The Bureau of Overseas Buildings Operations (OBO) is responsible for providing an approved contractor to inspect, test, and maintain the fire alarm systems. However, due to past travel restrictions, OBO had a backlog and was working to get caught up. In the interim, Consulate General Krakow had no records showing when its fire alarm systems were last inspected, tested, or maintained.

unused elevator shaft, without Department authorization. Consulate General Krakow, at the time of the inspection, housed the KTP employees in a room that also served as a kitchen and a computer room for TDY staff.

Starting in FY 2024, the Bureau of Overseas Buildings Operations (OBO) implemented a new capital planning process, which involves annually producing a 6-year capital plan.<sup>13</sup> The FY 2024 to FY 2029 capital plan was approved in October 2023. However, neither Embassy Warsaw nor Consulate General Krakow were included. The issues discussed in this report will remain until OBO is able to include the facilities at Embassy Warsaw and Consulate General Krakow in its capital plan.

In the near term, Embassy Warsaw said its facility management staff would focus on a set of projects in FY 2024, funded by OBO and the Bureau of Information Resource Management (IRM),<sup>14</sup> to improve Embassy Warsaw's facilities as well as modernize outdated systems and equipment. These projects, which total approximately \$64.3 million, include a compound security upgrade; a sewage and storm pipe assessment and replacement project; a cabling upgrade project; replacement of the chancery's lower roof; and a new chiller and building automation system. At the time of the inspection, no projects were slated for Consulate General Krakow's facilities. For further discussion of OIG's findings on the mission's facilities, refer to the Facility Management section of this report.

### **Locally Employed Staff Wages Not Keeping Pace**

Wages for Mission Poland's LE staff have been relatively stagnant for many years despite regular growth in the cost of living and most recently, 3 years of high inflation in Poland. The mission reported that many LE staff were struggling financially as a result. In an October 2023 survey<sup>15</sup> of Mission Poland's LE staff, 57 percent of respondents said that they regularly or occasionally took on additional work to supplement their income. Thirty-nine percent of respondents reported that they cannot make ends meet on their current salary, and 58 percent reported that a bank would not give them a mortgage based on their current earnings. Just 2 percent of respondents said that their salary was competitive when compared with similar roles on the local market. As an example of how the stagnation in LE staff wages had affected salaries, in 2006, the embassy advertised for an FSN-9 Interpreter with a salary of 106,173

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<sup>13</sup> According to OBO, the capital planning process (CPP) is an annual process designed to optimize finite fiscal and human resources, manage capital portfolio risks, and make the Department more efficient in executing its mission. The CPP better aligns capital planning efforts with Department goals and objectives, Office of Management and Budget capital planning policy, and the best practices of other federal agencies. The CPP leverages established data sets to evaluate individual functional facilities (chanceries, consulates, warehouses, and annexes) and identify facilities with the greatest need for solutions addressing deficiencies in key performance areas. OBO evaluates facilities for replacement or major renovation based on the following four factors: (1) security, (2) resilience, (3) stewardship and condition of current facility, and (4) degree to which the current mission location best serves the conduct of diplomacy.

<sup>14</sup> In May 2024, after OIG concluded the fieldwork for this inspection, the Department changed the name of the bureau to the Bureau of Diplomatic Technology. Throughout this report, the bureau is still referred to as IRM.

<sup>15</sup> The survey received 228 responses, a 71 percent response rate.

PLN,<sup>16</sup> which Polish inflation calculators estimate would amount to 192,638 PLN in 2023. However, the embassy's current salary for an FSN-9 position is only 116,000 PLN, or about 40 percent less than the inflation-adjusted amount.

As of November 2023, Poland's unemployment rate was 2.8 percent, representing full employment and a tight labor market. As a result, employers have had to raise wages and offer bonuses and other incentives to keep staff. According to data from Poland's Central Statistical Office, in May 2023, business sector wages increased 12.2 percent in annual terms, and in September 2023, business sector wages reported 11.9 percent growth on an annual basis. At the time of the inspection, the last completed review of the mission's LE staff wages began in 2021, with the results announced in October 2022. Some grades were found not eligible for a raise and others received a raise of just 1 percent.<sup>17</sup> In response to rising wages across Poland, in 2023, the Polish government raised the minimum wage twice, a cumulative 28 percent increase. In the leadup to the October 2023 Polish parliamentary election, the government announced two more increases to the minimum wage effective in 2024, amounting to another 23 percent. Once the 2024 increases to the minimum wage go into effect, the minimum wage will exceed the current salaries of Mission Poland's lowest grade LE staff positions, the first time that has ever happened at Mission Poland.<sup>18</sup>

Mission succession planning was hampered by the low unemployment rate in Poland, the ability of other employers to adjust salaries more quickly to account for inflation, and a high number of longtime LE staff nearing retirement—105 LE staff (28.3 percent) were eligible to retire in the next 5 years. In the October 2023 survey of Mission Poland's LE staff, when asked why they continue to work for the embassy or consulate, 27 percent (the largest category) said they were too old or close to retirement to leave. Another 16 percent said that they were actively looking for or transitioning to a new job. According to Mission Poland, it anticipates that without more competitive salaries, it will be difficult to attract and retain new hires, particularly in specific skillsets in high demand in the Polish labor market, such as IT; heating, ventilation, and air conditioning, or HVAC; and facility maintenance. In FY 2022, the mission had 11 positions that it had to advertise multiple times before a candidate accepted an offer. Of the 11 positions, 6 positions were advertised twice, 3 positions were advertised three times, and 2 positions were advertised four times. There was one position that was advertised five times

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<sup>16</sup> PLN, or Polish zloty, is the official currency and legal tender of Poland.

<sup>17</sup> In January 2024, the Deputy Secretary for Management and Resources (D/MR) announced, under the umbrella of the Department's Modernization Agenda, that the Department was committed to making LE staff compensation more predictable, equitable, and transparent because the "longstanding compensation structure [was] struggling to keep pace with high global inflation, fragile local economies, and strong market competition." The announcement listed several actions the Department intends to take. For example, the Department intends to "integrate into each budget formulation a request to Congress to fund at least a two percent increase for every LE staff member annually, as well as fund additional pay increases needed to maintain a baseline compensation target equal to or greater than 75 percent of our comparator organizations at each post." Finally, D/MR said he will provide quarterly updates on the Department's progress "in implementing these commitments and developing new reform initiatives."

<sup>18</sup> Mission Poland told OIG it will adjust the salaries for its LE staff to ensure compliance with Poland's minimum wage.

with no candidates accepting an offer. Although voluntary retirement was the most common reason for LE staff to separate from the mission in FY 2022, resignation to obtain better employment, salary, or benefits were the second most common reasons.

In a memo to Department staff, dated January 22, 2024, the Deputy Secretary for Management and Resources acknowledged receiving concerns from chiefs of mission that “longstanding compensation structure is struggling to keep pace with high global inflation, fragile local economies, and strong market competition.” According to the Deputy Secretary, the Department is reviewing these issues and taking action, “Work continues to implement LE Staff pay increases, within the limits set forth in the Foreign Service Act, to ensure we can recruit and retain an exceptionally qualified and motivated workforce at each post...But the compensation system itself—how we define our comparators, conduct compensation reviews, budget for raises, and communicate to all of you—also needs to be updated and improved.” The Deputy Secretary said in the memo the Department will provide updates every quarter on the progress in implementing these commitments and developing new reform initiatives. The Human Resources section of this report contains further discussion of the mission’s local compensation plan.

## EXECUTIVE DIRECTION

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OIG assessed Mission Poland’s leadership on the basis of interviews, staff questionnaires, and OIG’s review of documents and observations of embassy meetings and activities during the course of the on-site inspection.

The Ambassador, a non-career chief of mission, assumed his duties in Poland in January 2022, shortly before Russia’s full-scale invasion of Ukraine in February. He previously served as Ambassador to Sweden from 2011 to 2015 and had worked in the private sector and in other positions for the U.S. government. The DCM, a career member of the Senior Foreign Service, arrived at post in May 2022, after serving as Director of the Ukraine Task Force.<sup>19</sup> The Principal Officer at Consulate General Krakow arrived in August 2022. Prior to this role, she served in Washington as a Senior Watch Officer in the Executive Secretariat’s Operations Center.

The Ambassador, DCM, and Principal Officer termed the coordination between the embassy and the consulate general as strong. The Ambassador’s frequent visits to the consular district gave him opportunities to engage with consulate staff directly, and the Principal Officer participated in the embassy’s weekly Country Team meeting via secure video conference. She was also in contact with the DCM on a scheduled weekly call, and as needed. The DCM noted that consulate personnel remotely participated in embassy town halls and meetings of mission-wide bodies such as the Inclusion, Diversity, Equity, and Accessibility Council.

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<sup>19</sup> The Ukraine Task Force’s mandate included facilitating communication and coordination across multiple bureaus to support the Department’s response to Russian threats and aggression against Ukraine. Department Notice, “TFUA01: Ukraine Task Force,” February 12, 2022.

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

OIG determined that the Ambassador and the DCM generally led Mission Poland consistent with the Department's leadership and management principles in 3 FAM 1214b.<sup>20</sup> The Ambassador and DCM formed a close partnership, with the Ambassador interacting with the Polish government and the media on a strategic level, and the DCM putting into action the overarching strategy through Country Team and working group meeting discussions and ensuring that options presented to the Ambassador were well thought out.

In interviews and OIG's review of supporting documentation, both U.S. direct-hire and LE staff noted that the Ambassador and DCM's establishment of strategic goals developed in working group meetings were shared with staff. The Ambassador instituted a weekly email sent to all staff that highlighted his activities and those of the mission in meeting its objectives.

U.S. direct-hire and LE staff also told OIG that the Ambassador and DCM showed a commitment to communicating with mission staff. Besides their regularly scheduled meetings with staff and periodic formal engagement with mission personnel, they also interacted with staff by walking around the building and hosting events, showing that they were open and accessible.

Embassy staff also told OIG that the Ambassador and DCM frequently asked for feedback and took necessary action. For example, the Ambassador, in response to a concern raised by staff in the mission's Public Diplomacy Section, took appropriate action to ensure that personal and official social media accounts were separated (see additional details in the Public Diplomacy section of this report).

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

The Ambassador led the mission in deepening U.S. ties with the government of Poland in several areas, including support for democratic values, commercial investments, and military modernization. Some examples of support for democratic values included conveying U.S. positions on democracy, rule of law, and free and fair elections to senior government officials, defending media independence, expressing concern over anti-democratic parts of legislation, and encouraging the Human Rights Commissioner to continue engagement on equality for lesbian, gay, bisexual, transgender, queer, and intersex, or LGBTQI+, persons.

The Ambassador and the DCM promoted U.S. commercial and economic interests through their engagement with senior Polish officials and the U.S. business community. Among their successes was the purchase by Poland of three large civilian nuclear power reactors and the prospect of the sale to Poland of small modular nuclear reactors. The strongest example of the Front Office increasing ties with the government of Poland was its engagement on Poland's efforts to modernize its military, which resulted in Poland's purchase of substantial U.S.

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<sup>20</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.

weapons systems and \$2 billion in FMF loans. OIG found the Ambassador had access to all the top Polish officials, which increased the efficacy of his lobbying efforts.

On September 29, 2023, the Ambassador hosted a review and strategy session at his residence to assess the mission's progress in meeting its ICS goals and to determine whether the strategy required any revisions, as required by 18 FAM 301.2-4(D). The Ambassador and DCM oversaw the ICS review to determine what changes should be made, and it was attended by mission section and office heads who had background documents prepared for them by the strategy review facilitator, who was a member of the Public Diplomacy Section. Mission staff reported that the review and strategy session concluded with the participants agreeing that the major ICS goals were still valid, but minor changes were needed to update some of the strategy's objectives and sub-objectives. Using a working draft of the ICS, mission staff submitted line edits that were approved by the DCM and the revised ICS was sent to Washington for review in late October 2023.

OIG also found that the Ambassador and DCM used the ICS as the basis for discussions in Country Team meetings, as well as in embassy working groups, including the Strategic Messaging Working Group, which is discussed in more detail in the Public Diplomacy section of this report.

## **Adherence to Internal Controls**

OIG found the Ambassador and the DCM generally oversaw the preparation of the FY 2023 Annual Chief of Mission Management Control Statement of Assurance in accordance with 2 FAM 022.7 and 2 FAM 024d, which require chiefs of mission to develop and maintain appropriate systems of management control of their organizations. The Ambassador reported to OIG that he carefully reviewed the Statement of Assurance and its supporting documentation, and the DCM told OIG that he worked closely with the mission's management team to prepare the statement. In addition, he encouraged other section heads to carefully review their internal control assessments. The Statement of Assurance affirmed that Mission Poland had complied with requirements related to information systems security officer (ISSO) duties as outlined in the statement. However, during the inspection, OIG determined that ISSO duties had not been carried out by the mission. This should have constituted a significant deficiency in the Statement of Assurance. More information about this deficiency can be found in the IM section of this report. Additionally, as discussed later in this report, OIG found internal control issues in grants management, facility management, general services, and financial management.

Mission staff reported that the Ambassador, DCM, and Principal Officer frequently reiterated the need to be mindful of any possible instances of waste, fraud, or mismanagement. Additionally, the DCM and the Principal Officer in Krakow affirmed the Principal Officer had not issued or refused any nonimmigrant visas in the past year. However, if the Principal Officer had, OIG confirmed that the mission's nonimmigrant visa adjudication review process included the DCM's required review of the Principal Officer's nonimmigrant visa issuances and refusals in accordance with Department guidance in 9 FAM 403.12-1a and 9 FAM 403.12-2b.

## **Security and Emergency Planning**

OIG found the Ambassador, DCM, and Principal Officer fulfilled their responsibilities for security and emergency preparedness programs consistent with the Department's guidelines in 12 Foreign Affairs Handbook (FAH)-1 H-762a. OIG also determined the mission reviewed, updated, and certified its emergency action plan in a timely manner. Mission leadership also underscored the importance of security and emergency preparedness during Country Team and other staff meetings, as well as through mission security notices. However, OIG identified issues requiring attention, as discussed in the companion classified report.

Staff reported that mission leadership ensured that emergency drills and checks of the radio network occurred on a regular basis, and OIG determined that mission leadership also participated in the drills and radio checks and encouraged mission staff to do the same. For example, the Ambassador and DCM led by example by actively participating in a crisis management exercise held in December 2022 and other various drills in 2023.

In July 2023, the mission's Emergency Action Committee reviewed the security memorandum of agreement between the chief of mission and the geographic combatant commander that detailed the division of security responsibilities, as required by 2 FAH-2 H-110.

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

OIG determined that Mission Poland's Equal Employment Opportunity (EEO) program complied with Department standards contained in 3 FAM 1212.1. The mission named an EEO counselor and three LE staff EEO liaisons and publicized their identities and services in a mission-wide management notice in June 2023. However, OIG noted that the mission had not posted the management notice on bulletin boards in the embassy and consulate as required by 2 FAM 1572.2. When informed by OIG of this oversight, Mission Poland posted the notice as required.

OIG also found the mission advanced diversity, equity, inclusion, and accessibility. In August 2023, the Ambassador held a mission-wide town hall meeting on the new Inclusion, Diversity, Equity, and Accessibility (IDEA) Council.<sup>21</sup> In mid-September 2023, he sent an email to all mission staff to present the mission's IDEA Strategy and to reiterate the Front Office's support for the strategy. Staff told OIG that the IDEA Strategy was designed to better incorporate diversity, equity, inclusion, and accessibility tenets into the mission's work and make the process more inclusive. The IDEA Council, although based in Warsaw, also served Consulate General Krakow.

In addition to his support of EEO and the IDEA Strategy and Council, the Ambassador also voiced his support for mental health activities, including the mission's Mental Health Anti-Stigma Working Group. He agreed to speak at events to encourage better mental health, at

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<sup>21</sup> Prior to August 2023, the council was called the Diversity Council. It was formed in July 2020.

resilience training for Mission Poland staff, and at a meeting for managing seasonal affective disorder.

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

OIG found that the Ambassador and DCM oversaw the mission's First- and Second-Tour (FAST) program as required in 3 FAM 2242.5a and b. Although there was one FAST program for the entire mission, the Principal Officer acted as the informal FAST mentor in Krakow, because she interacted with the consulate's FAST employees frequently. The FAST program, led by two FAST officer co-chairs of the FAST Officer Committee, coordinated with the DCM on the program's activities to develop and enrich the FAST employees' skills and understanding of the Foreign Service culture.

The primary purpose of the program was to offer professional development opportunities for FAST employees. A variety of events were held in 2022 and 2023. Developmental opportunities for individuals typically included taking notes at Country Team meetings and serving as a control officer or site officer for visitors. After discussion between the FAST co-chairs and the DCM, the mission created a FAST mentoring program in September 2023 to supplement the FAST program. During the on-site portion of the inspection, the DCM said he planned to host a FAST mentoring event at his residence in November 2023. During the inspection, the DCM announced that Mission Poland plans to expand the mentoring program to mid-level employees, and he requested that Department section heads ask their employees for feedback on such a program and report back to him.

Despite these initiatives, in interviews with OIG, some FAST employees reported dissatisfaction with the FAST program, citing the need for increased Front Office involvement, more meaningful and substantial opportunities for career development, and acknowledgment of their contributions to the mission team. OIG shared this feedback with the Front Office, which responded positively and quickly. Specifically, the Front Office took steps to increase meaningful opportunities for FAST employees and, working together with the FAST Officer Committee, developed a FAST program charter that detailed Front Office engagement and the skills the program seeks to develop. Additionally, the Ambassador and DCM held a meeting with the mission's FAST employees, including the Krakow contingent participating remotely, to discuss the activities of the FAST program and how the Front Office could best support it.

## **Executive Direction at the Constituent Post**

Consulate personnel and the embassy Front Office told OIG that the Principal Officer managed and led Consulate General Krakow well, was accessible and familiar with mission-wide activities, and coordinated the consulate's actions closely with the embassy, consistent with 3 FAM 1214b leadership and management principles. Being in Krakow and hosting the KTP, a substantial portion of the Principal Officer's time was devoted to working on Ukraine-related issues. The DCM told OIG that he recognized that the extra activities related to Ukraine caused the Principal Officer to work under very difficult circumstances, and he complimented her ability to perform at a high level.

As the main interlocutor between consulate staff and the embassy, the Principal Officer shared information with her U.S. direct hires and LE staff in formal and informal meetings. She also hosted consulate-wide gatherings that offered an opportunity for feedback and developing closer working relationships. Staff told OIG that she often walked around the consulate to greet staff and share information. Finally, she successfully coordinated her staff's participation in mission-wide programs based at the embassy, including the IDEA Council, LE staff initiatives, and the recently launched mentoring program.

## **POLICY AND PROGRAM IMPLEMENTATION**

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OIG assessed Mission Poland's policy and program implementation based on the work performed by the Political and Economic, Public Diplomacy, and Consular Sections, as well as the mission's foreign assistance coordination. OIG found the mission generally met Department requirements for policy and program implementation. However, OIG made recommendations to address an issue in the Consular Section and an issue related to the Bureau of International Narcotics and Law Enforcement Affairs' foreign assistance projects in Poland, as discussed below.

### **Political and Economic Sections**

#### ***Embassy Warsaw's Political and Economic Sections Functioned According to Department Standards***

OIG reviewed Embassy Warsaw's Political and Economic Sections' leadership and management, policy implementation, reporting and advocacy, and Leahy vetting<sup>22</sup> and found the sections generally functioned in accordance with Department standards. Staff expressed satisfaction with their duties, the value and impact of their work, and with mission and section leadership. During interviews with OIG, Washington end users praised the quality, quantity, and timeliness of the Political and Economic Sections' reporting.

OIG determined that the sections collaborated with interagency counterparts in Poland and in Washington to advance U.S. government policy priorities in Poland. For example, when Congress made \$4 billion in FMF<sup>23</sup> available to NATO's eastern flank, Embassy Warsaw's Political Section engaged with Polish counterparts on requirements, advised U.S. stakeholders on legal and messaging issues, and coordinated with the Public Diplomacy Section, the Office of Defense Cooperation, and the Department's Bureau of Political-Military Affairs. The Political

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

<sup>23</sup> Additional Ukraine Supplemental Appropriations Act, 2022, Public Law 117-128, May 21, 2022.

Section's work resulted in a September 2023 announcement of a \$2 billion direct loan agreement, which Poland used to replace military equipment donated to Ukraine, as described later in this report.

The Economic Section also effectively advanced policy priorities. In February 2021, the U.S.-Poland agreement on a civil nuclear power program entered into force.<sup>24</sup> Warsaw's Economic Section and interagency stakeholders at the mission and in Washington collaborated closely to ensure follow-on work for U.S. firms. In September 2023, two U.S. corporations signed the first major contract in a deal valued at over \$20 billion with Poland's state nuclear company that will strengthen Poland's energy security while reducing carbon emissions by an estimated 26 million tons annually.

### ***Visit Workload Affected Morale and Reduced Time Spent on Core Duties, Including Reporting and Contact Management***

Washington officials and Mission Poland staff shared concerns with OIG that the heavy visitor workload created by Russia's February 2022 full-scale invasion of Ukraine affected the morale of staff in the Political and Economic Sections and reduced the staff's ability to execute core duties, including reporting and contact management. OIG reviewed Mission Poland's cable reporting for March to August 2023 and found Consulate General Krakow sent just two analytical cables and was unable to report on key issues, such as those related to the October 2023 national elections. Additionally, Political Section staff told OIG that support for official visits hindered reporting on important but less urgent issues, such as rule of law. According to mission staff, Polish contacts had also remarked they were not interacting with their U.S. counterparts as often as previously. Staff in the Political and Economic Sections took note of the previously described August 2023 arrival of a second Assistant General Services Officer in the embassy's Management Section to provide support for visits.<sup>25</sup> They expressed optimism that with the additional officer, the Management Section would be able to take over many of the logistical responsibilities for visitors that had fallen to the Political and Economic Sections, enabling them to increase their sections' reporting and contact management.

### **Spotlight on Success: Embassy Warsaw's Economic Section Automated Production of Daily Cable**

Embassy Warsaw's Economic Section, using Department enterprise IT tools, automated production of the daily cable update. Section leadership found that unscheduled absences among the daily cable's rotating editors and approvers at times slowed preparation work. Using the Department-provided Power Automate application, section staff automated the production of the reporting cable. Each workday, the section's automated system copied a template with basic cable tags, dated the new file, created a sharing link, and distributed an

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<sup>24</sup> "Agreement Between the Government of the United States of America and the Government Of The Republic Of Poland on Cooperation Towards The Development of a Civil Nuclear Power Program and the Civil Nuclear Power Sector in the Republic Of Poland," February 24, 2021.

<sup>25</sup> Additionally, the Kyiv Transit Platform facilitated official visitors' travel through Poland to Ukraine. See ISP-I-24-17.

updated draft cable package to all mission contributors, including useful material such as Front Office templates and visitors' schedules. The automated system saved time, improved predictability, and fostered staff collaboration on reporting, resulting in products praised by end users in Washington, D.C.

## Public Diplomacy

OIG reviewed public diplomacy operations in the areas of strategic planning, leadership, resource and knowledge management, federal assistance, reporting, media engagement, American Spaces,<sup>26</sup> and educational and cultural affairs programs conducted at Embassy Warsaw and Consulate General Krakow. OIG found that the Public Diplomacy Section focused on ICS goals while supporting a high tempo of Washington visitors. Following the COVID-19 pandemic, Russia's war against Ukraine abruptly changed the context of public diplomacy engagement in Poland, requiring additional human and financial resources. The new security and political environment resulted in an increase in the number of visitors, many of them requiring Public Diplomacy Section resources, and in funding for public diplomacy-related activities.

OIG also observed that the Public Diplomacy Section was in transition with new leadership and undergoing structural changes required by the Public Diplomacy Staffing Initiative,<sup>27</sup> which will be implemented in Poland in early 2024. The embassy and consulate general Public Affairs Officers have redoubled their strategic planning and collaboration efforts. Mission Poland's educational and cultural affairs activities include a Fulbright program, extensive American Spaces outreach, and a new Regional English Language Officer based in Warsaw. Overall, OIG found that the mission's public diplomacy activities generally met Department standards and guidance, with the exceptions and observations noted below.

### ***Public Diplomacy Award Files Were Missing Monitoring Documentation***

OIG found that, although the Public Diplomacy Sections' grant files generally complied with federal assistance regulations, staff did not consistently document monitoring and review of awards. OIG reviewed 20 grants valued at \$2.5 million—out of a total universe of 223 grants valued at \$9.4 million—with activity from October 1, 2020, through September 30, 2023.<sup>28</sup> Of these 20 award files, OIG found 7 files lacked evidence of interim monitoring and site visits as

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<sup>26</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.

<sup>27</sup> The Public Diplomacy Staffing Initiative is the Department's holistic review and realignment of the organizational structure of public diplomacy sections. The framework job descriptions for Public Diplomacy LE staff were authorized in January 2018. Global deployment was underway and scheduled for completion by the end of 2023.

<sup>28</sup> The sample included the full range of award amounts funded by both Diplomatic and Consular Programs Public Diplomacy and the Assistance for Europe, Eurasia, and Central Asia (AEECA) accounts, as well as grants focused on different public diplomacy areas and with different grants officer representatives. These grants were subject to the Federal Assistance Directive 5.0 (issued October 10, 2020, revised annually thereafter).

specified in the awards' risk and monitoring plans.<sup>29</sup> According to the Federal Assistance Directive, monitoring is mandatory "to ensure that programmatic and financial management performance has been adhered to and that the intended activities, goals, and objectives are being accomplished."<sup>30</sup> Mission Poland depended on one LE staff, the Resource Coordinator in the embassy's Public Diplomacy Section, to upload all documents to the award files, but it was the responsibility of each grants officer representative to document program reviews, site visits, or participation in grant-funded events. The Federal Assistance Directive states the grants officer and grants officer representative are responsible for ensuring that monitoring is conducted and documented for every award.<sup>31</sup> Because grants officer representatives did not work directly in the award files, they were unfamiliar with the grants management system and the requirement to document all program monitoring. The Public Diplomacy Section's U.S. direct hires faced competing priorities related to Russia's war against Ukraine with significant amounts of additional funding related to Ukrainians in Poland obligated to the mission, leaving little time for grants oversight. Starting in July 2023, additional LE staff began to upload documents, including monitoring reports and other award documents, to the award files. During the inspection, the section developed a standard operating procedure and expanded training to a wider group of LE staff in grants management.

**Recommendation 2:** Embassy Warsaw should bring its public diplomacy award files into compliance with Department standards for federal assistance award monitoring and evaluation. (Action: Embassy Warsaw)

***Ambassador Used a Personal Instagram Account for Official Messaging***

OIG found the Ambassador's use of a personal Instagram account for official messaging did not comply with Department standards. Although the mission uses an official X (formerly Twitter) account of over 100,000 followers for the Ambassador's messages, the Ambassador also maintained a personal Instagram account of approximately 14,800 followers with personal images and content, some of which was posted in an official capacity. As outlined in 10 FAM 182a, senior officials who engage in official communication on behalf of the Department must not use personal social media accounts to do so. During the inspection, the Ambassador removed official content and a link to the embassy website. As a result of these actions, OIG did not make a recommendation to address this issue.

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<sup>29</sup> The largest amounts of funding from the AEECA account were allotted to the Public Diplomacy Section in Warsaw for public diplomacy programs managed by Polish organizations that address Belarusian audiences. This Belarus-directed programming accounted for a total of \$7.6 million of Warsaw's total awards of \$9.4 million over 3 fiscal years. The section granted only \$349,344 in AEECA funds in FY 2023.

<sup>30</sup> See Federal Assistance Directive, Chapter 4, Section D (October 2020 and later revisions).

<sup>31</sup> Ibid.

### ***Mission Was Not Always Aware of the Department’s Public Diplomacy Programs in Poland***

OIG found the Public Diplomacy Section did not always have visibility into the Department’s public diplomacy programs for Belarusians and Ukrainians in Poland.<sup>32</sup> For example, public diplomacy staff told OIG they did not know about a cultural heritage program jointly organized by the Bureau of Educational and Cultural Affairs and Embassy Kyiv that would be held at Krakow’s Jagiellonian University, until informed by the university. In another instance, when newly assigned staff from the Vilnius-based Belarus Affairs Unit scheduled an orientation visit for Polish recipients of grants awarded by Warsaw’s Public Diplomacy Section, the Warsaw grants officer representative was not initially included in the meetings. The Public Diplomacy Section contacted the Belarus Affairs Unit and clarified coordination procedures related to their visits to Poland, so that all meetings with Polish recipients of grants awarded by Mission Poland were coordinated in advance with the grants officer representative.

OIG determined this issue was caused by the significant amount of funding allotted to multiple agencies, bureaus, and offices for programs for non-Polish audiences in Poland. According to established practice across the Department, it is the responsibility of bureaus and offices planning or executing public diplomacy or public diplomacy-related activities in Poland, to provide advance notification to the Public Diplomacy Section so that it can properly and fully carry out its mandate for maintaining and monitoring management controls over all Department public diplomacy-funded programs, as well as foreign assistance funding used for public diplomacy purposes in Poland. According to 2 FAM 022.12, the Public Affairs Officer should have full control over public diplomacy assets and resources, and regular communication with Washington offices organizing programs in country.<sup>33,34</sup> The lack of coordination had the potential to complicate Embassy Warsaw’s relationships with partners and added to the section’s workload, reducing the section’s effectiveness and ability to develop synergies and strengthen networks. During the inspection, the embassy established regular assistance coordination meetings, as described later in this report, therefore OIG did not make a recommendation to address this issue.

### **Spotlight on Success: Embassy Warsaw’s Strategic Messaging Working Group Enabled Coordinated and Timely Messaging**

Embassy Warsaw’s Public Affairs Officer led a bi-weekly Strategic Messaging Working Group meeting with an agenda organized by ICS goals that addressed key upcoming events,

<sup>32</sup> Since 2021, Embassy Warsaw, the Bureau of Democracy, Human Rights and Labor, and bureaus reporting to the Under Secretary for Public Diplomacy and Public Affairs received funding for programs in Poland directed toward Belarusian and Ukrainian audiences. From FY 2021 through FY 2023, Embassy Warsaw’s additional (not Diplomatic and Consular Programs) public diplomacy funding totaled \$8.7 million. Of that \$8.7 million, \$7.6 million was for programs directed to Belarusian audiences and \$64,000 for programs benefiting Ukrainian audiences.

<sup>33</sup> Department guidance in 10 FAH-1 H-021g4 and 6 also addresses this responsibility.

<sup>34</sup> For example, the Federal Assistance Directive states, “A domestic functional bureau initiating programs overseas should notify regional bureaus and coordinate with post during the design phase of the program, and prior to issuing assistance awards \$25,000 or above. This coordination will reduce duplication of efforts in the region and ensure that posts support the programs occurring in that country.” Federal Assistance Directive, Chapter 3, Section C (October 2022).

activities, and themes. While other missions often conducted press briefs, Embassy Warsaw's Strategic Messaging Working Group was unique. In addition to briefing on current political and economic affairs, the participants developed well-coordinated, timely messaging for mission-wide deployment. Participation included officer and LE staff leadership from the Public Diplomacy, Political, and Economic Sections, as well as the Ambassador and DCM. All members participated actively, including the Ambassador and DCM, with questions and feedback on mission messaging. In this fashion, participating staff developed well-coordinated, timely messaging for mission-wide deployment, which has been particularly effective given the mission's supporting role and engagement on Russia's war against Ukraine. For example, the Strategic Messaging Working Group decisions following the October 2023 national parliamentary elections created clear but nuanced messages for Polish interlocutors. On another topic, the group quickly found consensus when it proposed that the Ambassador give remarks at the annual meeting of the Auschwitz-Birkenau Foundation; he agreed and asked that his message include Secretary Blinken's recent mention of his stepfather and a discussion of tolerance.

## Consular Operations

OIG reviewed Mission Poland's consular operations, including U.S. citizen services, nonimmigrant and immigrant visa services, training, management controls, communication and outreach, fraud prevention programs, consular cashiering and fees, consular space, and crisis preparedness.

Mission Poland took on significant additional workload with the reduction of services in Embassies Moscow, Kyiv, and Minsk starting in 2021, after the dismissal of LE staff in Mission Russia and Russia's full-scale invasion of Ukraine in 2022.<sup>35</sup> For example, from FY 2021 to FY 2023, the mission saw a 414 percent increase in nonimmigrant visas, a 226 percent increase in immigrant visas, a 52 percent increase in Consular Reports of Birth Abroad, and a 24 percent increase in passport adjudications. To address this demand, Mission Poland hosted 75 TDY consular staff, including consular staff from Embassy Kyiv, and received additional LE staff positions, and three reallocated FAST officer positions—one position from Embassy Moscow and two originally assigned to Embassy Kyiv. With this assistance, Mission Poland was able to absorb the increase in visa and U.S. citizen services workload. At the time of the inspection, Mission Poland had low wait times for visa, passport, and Consular Report of Birth Abroad appointments. Mission Poland also served as a global fraud prevention resource since August 2022 for Russian fraud investigation cases, providing guidance to adjudicators who have no experience with Russian applicants applying in consular sections around the world.

During the inspection, the Consular Section corrected three issues identified by OIG:

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<sup>35</sup> Department of State, "Russian Government Actions Impacting U.S. Mission Russia," July 30, 2021, <https://www.state.gov/russian-government-actions-impacting-u-s-mission-russia/>; and Department of State, "Suspending Operations at U.S. Embassy Minsk and Change in Status for U.S. Embassy Moscow," <https://www.state.gov/suspending-operations-at-u-s-embassy-minsk-and-change-in-status-for-u-s-embassy-moscow/>.

- Embassy Warsaw and Consulate General Krakow began to visit U.S. citizen prisoners in pre-trial status monthly and prisoners in post-sentence detention at least every 6 months as required by 7 FAM 433.2-1 and 7 FAM 463.2-1, respectively.
- The Consular chief in Krakow began to conduct nonimmigrant visa adjudication reviews within 3 days as required by 9 FAM 403.12-1d.
- Consular Agency Poznan began to complete the monthly consular fee reconciliation report on the last working day of the month as required by 7 FAH-1 H-744.3.

OIG concluded Mission Poland's consular operations generally complied with guidance contained in 7 FAM, 9 FAM, 7 FAH, applicable statutes, and other Department policies, with the exceptions described below.

***Consular Spaces in Embassy Warsaw and Consulate General Krakow Did Not Comply With Department Standards***

OIG found the consular spaces at Embassy Warsaw and Consulate General Krakow did not comply with Department standards. Specifically:

- Embassy Warsaw did not have a privacy booth in the visa area and Consulate General Krakow did not have a privacy booth in the Consular Section in which to conduct sensitive consular interviews as required by 7 FAH-1 H-282(1)(k).
- The consular walkways in both Embassy Warsaw and Consulate General Krakow had two sets of doors into the Visas and U.S. Citizen Services Units and into the U.S. Citizen Services Unit, respectively, that did not have pneumatic door openers as required by 7 FAH-1 H-282(1)(m).
- The entrance to and exit from the Warsaw Visa Unit had pneumatic door openers but they were inoperable (7 FAH-1 H-282(1)(m)).
- Embassy Warsaw's Consular Section did not have Americans with Disabilities Act-compliant water fountains as required by 23 STATE 118710.<sup>36</sup>
- Consulate General Krakow did not have an enclosed booth for the consular cashier as required by 7 FAH-1 H-742a.

In all cases, consular managers were aware of these issues but were unable to procure funding or permission to make necessary improvements. In both Embassy Warsaw and Consulate General Krakow, staff informed OIG that the privacy booths had been authorized but the projects had stalled. Additionally, the Assistant Regional Security Officer told OIG that the inoperable pneumatic door openers at Embassy Warsaw's Visa Unit were not disengaged due to any security needs but were simply not functioning. Failure to provide a secure, accessible, and efficient consular workspace could impede access for clients with disabilities, reduce productivity, and increase the risk of malfeasance.

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<sup>36</sup> Cable 23 STATE 118710, "FY 2024 Overseas Consular Financial Guidance," November 2, 2023.

**Recommendation 3:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

## Foreign Assistance

The United States has increased its foreign assistance to Poland in recent years due to Russia's full-scale invasion of Ukraine in 2022 and Poland's donations of military equipment to help Ukraine respond to the war. Poland received almost \$3.3 million in bilateral foreign assistance in FY 2020 and \$614,000 in FY 2021. In contrast, it received more than \$349 million in bilateral foreign assistance in FY 2022, almost all of which was through the FMF program.<sup>37</sup> At the time of the inspection and as described earlier in this report, the U.S. and Polish governments also agreed to a \$2 billion direct loan through the FMF program to support Poland's defense modernization efforts.

The U.S. government also provided foreign assistance through regional projects that benefit Poland, including projects to improve border security, respond to humanitarian needs stemming from the influx of Ukrainian refugees, and support democracy and civil society.<sup>38</sup> Since FY 2022, these regional projects included the following:

- The Bureau of Population, Refugees, and Migration provided almost \$179 million to address refugee needs in Poland, primarily through international organizations operating in the country.<sup>39</sup>
- From FY 2021 through FY 2023, Congress annually appropriated a regional \$20 million fund to support democracy and civil society in Central European countries.<sup>40</sup> These funds were overseen through EUR's Office of the Coordinator of U.S. Assistance to Europe and Eurasia and primarily implemented through other bureaus and agencies. For example, the Bureau of Democracy, Human Rights, and Labor; the U.S. Agency for International Development; and public diplomacy sections at Central Europe posts support their assistance projects in Poland and other regional countries in part with these funds.

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<sup>37</sup> In addition to bilateral foreign assistance through the FMF program, Poland also received \$647,000 through the International Military Education and Training program. Under that program, students from U.S. allies and friendly nations receive training and education on U.S. military practices and standards, including exposure to democratic values and human rights standards.

<sup>38</sup> The bureaus and agencies that provided foreign assistance in Poland primarily oversaw and implemented the funds from Washington.

<sup>39</sup> According to the Bureau of Population, Refugees, and Migration, the bureau's implementing partners addressed refugee needs primarily through the provision of food, safe drinking water, protection services, education, livelihoods, legal assistance, accessible shelter, and health care. The bureau official responsible for coordinating refugee-related programming in the Central Europe region noted that, as of November 2023, cash assistance the UN High Commissioner for Refugees provided in Poland had declined by almost 90 percent since 2022.

<sup>40</sup> Congress appropriated these funds annually beginning in FY 2021. See Public Law 116-260, "Consolidated Appropriations Act, 2021", § 7047(e); Public Law 117-103, "Consolidated Appropriations Act, 2022", § 7047(e); and Public Law 117-328, "Consolidated Appropriations Act, 2023", § 7047(e).

- The Bureau of International Narcotics and Law Enforcement Affairs (INL) managed almost \$2 million in regional projects that were initially designed to help Poland's and neighboring countries' border guard forces to increase their understanding of migrant activity. These projects have since expanded to include assessments of border-related criminal vulnerabilities and training to mitigate security gaps.

OIG assessed the embassy's management, oversight, and coordination of foreign assistance programs. As discussed below, OIG found that the embassy enacted new coordination mechanisms to help ensure sufficient oversight and communication regarding the foreign assistance projects that Washington-based bureaus and agencies implemented in Poland. However, in reviewing INL's assistance activities in the country, OIG found that the bureau conducted its projects under a letter of agreement that may no longer be the best mechanism for guiding its work in Poland.<sup>41</sup> This issue is also discussed below.

### ***Embassy Warsaw Created New Foreign Assistance Coordination Mechanisms***

The embassy created new mechanisms to help it coordinate foreign assistance activities in Poland, consistent with Department standards.<sup>42</sup> Initially, the embassy's coordination took place largely through email and other informal communication between embassy staff and staff at Washington-based bureaus and agencies. Embassy staff told OIG that these informal mechanisms were not sufficient to ensure that they were able to maintain awareness of all other foreign assistance activities taking place in Poland and that they did not have enough time to fully review proposed projects. During the inspection, the embassy welcomed several new staff with regional assistance coordination responsibilities.<sup>43</sup> Additionally, OIG observed that the DCM began convening regular assistance coordination meetings to discuss ongoing and proposed activities. These meetings included the new regional assistance coordinators and representatives of other sections throughout the embassy and incorporated discussions of methods to ensure better communication with Washington-based bureaus and agencies. Due to the embassy's actions, OIG did not make a recommendation to address this issue.

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<sup>41</sup> A letter of agreement is the agreement between the United States and the host government under which foreign assistance are provided for a specific project. Such letters include the necessary provisions to legally obligate INL funds to finance the project activities and allow for the sub-obligation of those funds into implementing mechanisms such as contracts, grants, interagency agreements, and letters of agreement with international organizations.

<sup>42</sup> 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. Additionally, 1 FAM 013.2k(6) states 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.

<sup>43</sup> These new staff included representatives from the Bureau of European and Eurasian Affairs' Office of the Coordinator of U.S. Assistance to Europe and Eurasia; the Bureau of Population, Refugees, and Migration; and the U.S. Agency for International Development.

***Bureau of International Narcotics and Law Enforcement Affairs Conducted Foreign Assistance Projects in Poland Under Potentially Outdated Letter of Agreement With Latvia***

OIG found INL conducted its foreign assistance projects in Poland under a letter of agreement with Latvia that was potentially outdated due to it not reflecting the full scope of the bureau's current and planned activities in the country. As described earlier in this section, INL managed almost \$2 million in regional projects. These projects, which were initially designed to help Poland's and neighboring countries' border guard forces to increase their understanding of migrant activity, have expanded to include assessments of border-related criminal vulnerabilities and training to mitigate security gaps.

INL's most recent letter of agreement with Poland had not been updated since 2002 and was no longer in use. In its place, the bureau conducted its assistance in Poland under a regional project that was detailed in a 2019 amendment to INL's letter of agreement with Latvia and initially expected to end by 2023. INL officials told OIG that when funding regional projects under a third-country letter of agreement, the "countries to be benefitted and the programs supported are clearly defined" in the letters of agreement with the third country. However, OIG's review of the Latvia letter of agreement found that the document only referred to "other European partner nations" and did not specifically mention Poland or any country other than Latvia.

According to INL's internal guidance to its staff regarding use of letters of agreement, the documents were intended to specify the terms, assistance, specific projects to be enacted, and the commitments that both parties make to accomplish project goals. The guidance further stated, in part, that new letters of agreement should be established when no previous agreement exists with the host government or when proposed projects differ significantly from those covered under the prior agreement. Similarly, according to the Government Accountability Office's *Standards for Internal Control in the Federal Government*, Principle 12.05, federal leaders should periodically review policies, procedures, and related activities for continued relevance and effectiveness and, in cases of significant change, review the changed process in a timely manner to determine whether activities were designed and implemented appropriately.<sup>44</sup>

INL's ongoing and planned assistance to Poland, including through its regional activities, has increased in size and scope since current activities began in 2022.<sup>45</sup> However, INL staff told OIG that the bureau has not substantively discussed whether an updated letter of agreement with Poland would be worthwhile. INL and embassy officials further told OIG that they did not know whether the current letter of agreement was still best suited to oversee the bureau's Poland-based activities, in part because INL does not have formal guidance regarding the use of

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<sup>44</sup> GAO-14-704G, September 2014, pages 56–57.

<sup>45</sup> According to INL and embassy officials, the bureau intended to increase its assistance to the region in coming years, in part through additional regional projects in collaboration with other agencies as well as through Poland-specific assistance. Embassy Warsaw officials told OIG the embassy intended to hire a locally employed staff member to help oversee INL's projects in Poland.

regional projects in bilateral letters of agreement. By using a regional project in a letter of agreement to which Poland was not a party, and without verifying whether planned future activities continued to fall within the original scope of that project, INL and the embassy risked not having in place formal joint accountability mechanisms, such as goals, metrics, and project commitments, to which both the Polish and United States governments have agreed.

**Recommendation 4:** The Bureau of International Narcotics and Law Enforcement Affairs, in coordination with Embassy Warsaw, should review the letter of agreement guiding the bureau's activities in Poland, as well as the bureau's current and planned foreign assistance to Poland, and implement any changes to the letter of agreement as required. (Action: INL, in coordination with Embassy Warsaw)

## RESOURCE MANAGEMENT

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OIG reviewed Mission Poland's internal control systems in facility management, general services, human resources, financial management, the health unit, and employee association operations. During the inspection, Embassy Warsaw corrected 13 issues identified by OIG. Specifically, the embassy:

- Began documenting monthly reviews of the LE staff contracting officer's transactions, as required in 14 FAH-3 H-342.1a.
- Completed a mandatory annual review of its blanket purchase agreements,<sup>46</sup> in accordance with Department of State Acquisition Regulation, Section 613.303-6.
- Required purchase card holders to complete mandatory training, in accordance with 4 FAM 455.3c(1) and the Department's Purchase Card Manual, Section 1.3.
- Accounted for armored vehicles belonging to other agencies in the Integrated Logistics Management System (ILMS),<sup>47</sup> as required in 14 FAM 436.5b.
- Began reporting to the Post Occupational Safety and Health Officer any mishaps that occurred on Department-owned or -leased properties, as required by 16 FAM 133.2.
- Implemented a standard operating procedure to ensure that disposals of controlled substances were conducted in accordance with Department standards, as required by 16 FAM 713c.
- Disposed of expired medications, as required by 16 FAM 711b.
- Published revised post health and information guides to the embassy and consulate SharePoint sites, as required by 16 FAM 133.5.

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<sup>46</sup> A blanket purchase agreement is a simplified method of filling anticipated repetitive needs for supplies or services by establishing "charge accounts" with qualified sources of supply.

<sup>47</sup> ILMS is a unified web-based information system designed to integrate the Department's supply chain by improving processing in such areas as purchasing, procurement, warehousing, transportation, receiving, property management, personal effects, and diplomatic pouch and mail. ILMS is the only Department-approved system for property management accountability and consists of several modules.

- Implemented regular ICASS<sup>48</sup> budget committee meetings that included all required agencies, in accordance with 6 FAH-5 H-012.7.
- Implemented a new process to perform Financial Management Officer reconciliations and approval of monthly consular fees, as required by 7 FAH-1 H-744.3d.
- Updated the accommodation exchange policy and published a chief of mission memorandum for the justification of accommodation exchange services, as required by 4 FAM 361.5.
- Advised the American Community Association that it was not authorized to use the embassy cashier to perform accommodation exchange, in accordance with 4 FAM 362.1-1b(9)(d).
- Reassessed petty cash use and eliminated the cash held by subcashiers where it was not needed, as required by the Cashier User Guide, Chapter 13.2.5.

Overall, OIG found the mission's Management Section generally implemented required processes and procedures in accordance with applicable laws and Department standards, with the exceptions noted below. Mission staff attributed most deficiencies to an increased workload due to Russia's full-scale invasion of neighboring Ukraine, competing work priorities, the COVID-19 pandemic, and insufficient training.

## **Facility Management**

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

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

- Consulate General Krakow had two fall hazards, contrary to Occupational Safety and Health Standard 1910.28(b)(13)(ii).<sup>49</sup> First, the consulate's roof, which contained building system equipment and antennas, was not equipped with a fall protection system. Second, the mission's emergency and evacuation radio system antenna, which was on the edge of the roof of a local hotel, did not have fall protection around the worksite and a ladder to the roof. Consulate general staff needed access to both areas to maintain and repair equipment. In its November 2022 safety, health, and environmental management inspection, OBO identified the issue with the consulate roof as a high-risk hazard. At the time of OIG's inspection, the issue had yet to be resolved, in part because the consulate was within a UN Educational, Scientific and Cultural Organization, or UNESCO, World Heritage Site and it was a protected historical

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<sup>48</sup> ICASS is the principal means by which U.S. government agencies share the cost of common administrative support services at most diplomatic and consular posts overseas. Through the ICASS working capital fund, service providers recover the cost of delivering administrative support services to other agencies at overseas missions.

<sup>49</sup> Occupational Safety and Health Standard 1910.28 (b)(13)(ii) states that personnel working within 15 feet of an unguarded roof edge must be provided with a fall control system.

structure on the Polish Register of Monuments, making any modifications to the consulate's buildings complicated.

- Mission Poland did not conduct routine inspections and tests of its emergency lights. According to 15 FAM 844, emergency lights must be tested monthly, and dates must be recorded either in a manual or electronic log. In addition, the emergency exit lights in Embassy Warsaw were not correctly functioning and were not capable of providing uninterrupted lighting during a power outage as required by 15 FAM 845a(1).
- Consulate General Krakow did not have a program to perform annual and semi-annual workplace hazard identification inspections as required in 15 FAM 962a. Inspections of workplaces must be conducted by personnel with the training and competence to recognize and evaluate hazards and make recommendations for corrective actions.

Facility management staff told OIG these deficiencies occurred because they had multiple competing priorities, such as numerous maintenance and repair projects at both Warsaw and Krakow. In addition, Consulate General Krakow did not have a fully trained Post Occupational Safety and Health Officer at the time of the inspection. Failure to comply with safety, health, and environmental management program standards diminishes the protection of mission personnel and increases the risk of injury and loss of life.

**Recommendation 5:** Embassy Warsaw should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Warsaw)

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

OIG found Mission Poland's fire protection program did not fully comply with Department standards. Specifically, OIG found:

- Neither Embassy Warsaw nor Consulate General Krakow had an annual contract to inspect, maintain, and test the fire alarms. Department standards in 15 FAM 841e require that a certified subject matter expert conduct the annual inspection. The mission's facility management staff were not able to provide OIG with documentation showing when the last annual inspection, testing, and maintenance of the fire alarms had been performed.
- Neither Embassy Warsaw nor Consulate General Krakow recorded regular monthly inspections of fire extinguishers, as required by 15 FAM 843c. OIG found gaps in the inspection schedule of the mission's fire extinguishers. For example, OIG found fire extinguishers at Consulate General Krakow that had only been inspected six times since 2016.
- Embassy Warsaw did not ensure occupants of embassy-owned or -leased residences conducted monthly fire extinguisher checks. According to 15 FAM 843d, residents must conduct a visual inspection of their fire extinguishers monthly for operable condition and report any deficiencies to the facilities manager or general services officer.

OBO's Office of Fire Protection told OIG that they were in the process of awarding a contract to provide fire alarm inspections, maintenance, and testing worldwide, and that it did not provide funding or authorize local contractors in Warsaw to maintain fire systems. However, due to COVID-19 travel restrictions, the entire contract was behind schedule. In addition, facility management staff told OIG that the deficiencies in the fire extinguisher program occurred because Embassy Warsaw's facility staff were working on other maintenance and repair projects. Consulate General Krakow did not have the experienced staff required to perform the necessary fire extinguisher inspections and monitoring. Failure to comply with the Department's fire protection standards increases the risk of injury, loss of life, and damage to property.

**Recommendation 6:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

***Embassy Warsaw's Chancery Lacked Adequate Emergency Egress***

The embassy's chancery did not have an adequate means of emergency egress from the building's third floor lobby. Embassy employees, contractors, and visitors used the chancery building's elevators to access all floors, including those floors with controlled access area suites. However, OIG observed that in the event of a fire, when power to the elevators would be shut down and unavailable, individuals in the lobby of the third floor would need to enter the controlled access area, which was restricted to cleared U.S. direct-hire employees, to reach an emergency exit. This would prevent non-cleared employees, contractors, or visitors from being able to exit the building safely. According to 15 FAM 846.2a, 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.

OIG found the lobby had an in-ground escape ladder to the floor below and the second floor had an emergency egress accessible to all employees and visitors. However, the use of an in-ground escape ladder was not an OBO-approved Office of Fire Protection method of egress. Embassy staff told OIG that they had overlooked this issue and assumed the escape ladder was sufficient. Without a fully operational secondary egress, embassy staff cannot evacuate the building rapidly in the event of a fire, which increases the risk of potential injury and loss of life.

**Recommendation 7:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring the emergency egress on all floors of the embassy chancery into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

***Embassy Warsaw's Warehouse Had Multiple Workplace Safety Hazards***

Embassy Warsaw's warehouse had several workplace safety hazards. Specifically, OIG found:

- Embassy staff did not inspect warehouse fire extinguishers monthly as required by 15 FAM 843c. OIG found that at least five extinguishers had not been inspected in several months.
- The stack clearance below the fire sprinkler deflectors and property on the top racks of the warehouse's metal storage racks did not meet Department standards. Department standards in 14 FAH-1 H-313.2-2c require a minimum clearance of 3 feet where stack heights are greater than 15 feet. OIG observed several instances in the warehouse where there was little clearance between items on the top racks and sprinklers. OIG found the last semi-annual workplace hazard inspection of the warehouse performed by the Assistant Post Occupational Safety and Health Officer in August 2023, had identified this issue but, at the time of the inspection, the issue had not yet been resolved.
- The electric forklift charging area was obstructed by equipment such as manual dollies and wooden pallets, making access to the two charging stations difficult. According to Department standards in 14 FAH-1 H-313.1-2g, the charging area should be in an area where traffic (workers, equipment) is minimal but accessible to equipment that needs charging.
- Flammable products in the warehouse such as paints and coolants were not secured in approved flammable liquids cabinets as required by 14 FAH-1 H 313.2-15B(b).
- Fuel had not been emptied from unused lawnmowers that were kept in a storage room and waiting for disposal. Guidance in 14 FAH-1 H-313.1-2e(3) says that flammable products such as fuel should be properly and securely stored when not in use to ensure the safety and security of property and personnel.

OIG determined that these hazards existed due to a lack of oversight by U.S. direct-hire staff who did not regularly visit and perform walk throughs of the warehouse. Failure to comply with life safety and fire program standards diminishes the protection of mission personnel and increases the risk of injury and loss of life.

**Recommendation 8:** Embassy Warsaw should eliminate the safety hazards at its warehouse in accordance with Department safety and fire standards. (Action: Embassy Warsaw)

### ***Embassy Warsaw Did Not Obtain Prior Approval or Permits for Construction and Renovation Projects***

The embassy built several structures on the grounds of U.S. government-owned housing and the chancery compound, including the annex, without requesting and obtaining the required approvals. OIG found the embassy built at least three unauthorized garages at U.S. government-owned residences and renovated an unused elevator shaft in the chancery annex to provide additional storage space. However, because the embassy did not have any records of prior approval or permits for these projects, OIG was unable to determine when these unauthorized structures were built and renovated.

According to 15 FAM 687.1, an overseas mission must obtain prior OBO approval for actions that involve U.S. government-owned or -leased real property, regardless of cost or funding

source. This includes interior structural alterations, interior alterations affecting space functions or design, and new, relocated, or substantially altered driveways, walls, parking areas, landscaping, or other exterior works. Approval includes a review to ensure that the project conforms to building codes adopted by the Department.

OIG determined the work was completed outside of the approval process due to embassy staff's misunderstanding of the requirements. Construction and subsequent use of structures without ensuring compliance with building code requirements and Department approval poses significant life safety risks to employees working in or accessing these structures.

**Recommendation 9:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Warsaw, in coordination OBO).

## General Services

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

OIG found the mission did not fully comply with the Department's Motor Vehicle Safety Management Program standards. Specifically, OIG found:

- Seven incidental (self-drive) drivers held expired medical clearances (14 FAM 433.4a and c).
- Five incidental drivers did not complete the initial driver's safety training or the refresher training (14 FAM 433.5a).
- The embassy did not track all incidental drivers' compliance with driver safety training and medical clearance requirements using the Department's Fleet Management Information System<sup>50</sup> (14 FAM 433.4e and 14 FAM 433.5e).
- Some chauffeurs regularly exceeded the 10-hour per day limit on duty shifts (14 FAM 433.8a). OIG reviewed time and attendance records for 14 weeks (from July 2 to October 7, 2023) for 8 of the mission's 14 chauffeurs and found they exceeded the limit on 65 occasions.

Mission staff told OIG the issues related to medical clearances, driver safety training, and excessive duty shifts occurred because of workload issues and competing priorities. The lack of complete records in the Fleet Management Information System resulted from staff's unfamiliarity with Department standards. Failure to enforce Department motor vehicle safety standards increases the risk of injury to drivers and the public, as well as damage to U.S. government property.

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<sup>50</sup> The Fleet Management Information System is the Department's enterprise system for the management of all fleet operations.

**Recommendation 10:** Embassy Warsaw should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Warsaw)

***Embassy's Motor Vehicle Inventory Exceeded Authorized Fleet Size***

The embassy had excess official vehicles above the number authorized by the Department. OIG's review of motor vehicle inventory data in ILMS showed the embassy had an inventory of 45 vehicles,<sup>51</sup> which was 6 above the 39-vehicle fleet target. The Department uses the vehicle allocation methodology<sup>52</sup> survey to set the target fleet size based on industry fleet standards and mission necessity, as stated in 14 FAM 436.2a. According to 14 FAM 431.6-2b(5) and (8), the mission vehicle accountable officer<sup>53</sup> oversees overall fleet composition and size, and coordinates and oversees vehicle disposals. Management Section staff told OIG they were aware of the issue and were taking steps to address it. However, Management Section staff were unable to provide a timeline for the disposal of the remaining excess vehicles. Retaining excess vehicles increases maintenance and management costs.

**Recommendation 11:** Embassy Warsaw should dispose of excess motor vehicle inventory in accordance with Department standards. (Action: Embassy Warsaw)

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

The embassy's contracting officer's representative (COR) program did not comply with Department standards. The embassy's 13 CORs oversaw 31 contracts worth approximately \$3.9 million. OIG reviewed the files for 21 contracts (total value of approximately \$2.2 million) handled by 5 CORs and found that:

- Two CORs did not have current certifications issued by the Department's Office of the Procurement Executive (14 FAH-2 H-143a).
- The five CORs maintained files electronically but did not use the required ILMS eFiling module to do so (14 FAH-2 H-142b(16)(b)).
- Neither the CORs nor the contracting officer completed a mandatory contractor's performance review in the Contractor Performance Assessment Reporting System<sup>54</sup> for

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<sup>51</sup> According to Management Section staff, the data in ILMS was inaccurate. Specifically, staff told OIG the embassy ordered two vehicles in 2021 but the order was never fulfilled. Although the embassy never received the vehicles, the Department added them to the embassy's inventory. Without the two vehicles, the embassy's actual fleet size would be 43 vehicles, or 4 vehicles above the fleet target set by the Department. At the time of the inspection, this data quality issue had not been resolved.

<sup>52</sup> The vehicle allocation methodology is a federally mandated process to determine appropriate size and composition of U.S. government fleets based on utilization.

<sup>53</sup> The mission vehicle accountable officer is a U.S. direct-hire employee designated in writing by the chief of mission as responsible for oversight of all motor vehicle operations at a mission.

<sup>54</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 CFR § 42.1502(b) and 48 CFR § 2.101.

one of the embassy's contracts (14 FAH-2 H-572a, c, d,<sup>55</sup> and 48 Code of Federal Regulations 42.1502a).

Despite these issues, OIG's interviews with embassy staff and reviews of other documentation showed the embassy monitored contracts, received goods and services for which it had contracted, and addressed contractor performance when issues arose. Embassy staff told OIG the issues in the COR program occurred because of heavy workload, unfamiliarity with standards, and a lack of sufficient training on ILMS. A non-compliant COR program increases the risk of contract mismanagement.

**Recommendation 12:** Embassy Warsaw should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Warsaw)

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

The embassy did not close out procurement files in ILMS within the required timeframes. Specifically, the mission did not close out 209 procurement files from FY 2016 to FY 2023. In addition, 3,686 files from FY 2014 to FY 2022 could not be closed out until procurement staff completed all required steps. Guidance in 14 FAH-2 H-573.2b<sup>56</sup> states that contracts under simplified acquisitions procedures should be closed out immediately after the contracting officer receives evidence of receipt of property and final payment. Embassy staff told OIG this issue occurred because workload issues limited the amount of time available to perform contract closeout processes. Failure to close out procurement files within the required timeframe increases the risk of inaccuracies in procurement records and of internal control issues in procurement operations.

**Recommendation 13:** Embassy Warsaw should close out procurement files in accordance with Department standards. (Action: Embassy Warsaw)

***Embassy Maintained Excess Inventory of Nonexpendable Property in Warehouse***

The embassy maintained excess inventory of nonexpendable property<sup>57</sup> in its warehouse. For example, property records in ILMS showed that the embassy had 102 water distillers worth approximately \$65,000 that were no longer needed. According to 14 FAH-1 H-711, property that is not required, or in such a condition that economical repairs cannot be made, should not be allowed to accumulate in offices or warehouses. Guidance in 14 FAM 411.2-2 states the accountable property officer is responsible for direct oversight of property management procedures and key functions, including disposing of personal property to prevent accumulation in offices, warehouses, and other locations. Management Section staff told OIG the embassy had not been able to reduce its excess inventory because of competing priorities.

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<sup>55</sup> The contracting officer is responsible for ensuring the evaluation takes place, but the COR may be tasked with evaluating contractor performance. See 14 FAH-2 H572e, "Final Evaluation."

<sup>56</sup> Guidance in 14 FAH-2 H-573.2b also cites 48 C.F.R. § 4.804-1.

<sup>57</sup> Nonexpendable property is property such as furniture, appliances, and information technology equipment.

Primarily due to increased workload related to Russia's war against Ukraine, the embassy had decreased the frequency of excess property auctions. Furthermore, items in the warehouse had accumulated due to the inability to have auctions during the COVID-19 pandemic. Excess inventory creates an unnecessary administrative burden for the property management staff and increases the risk of waste and mismanagement. Additionally, funds from the sale of unneeded or obsolete inventory could be put to better use.

**Recommendation 14:** Embassy Warsaw should review its nonexpendable property inventory and dispose of excess inventory in accordance with Department standards. (Action: Embassy Warsaw)

### ***Some Furniture and Appliance Pool Assets Were Misclassified in the Integrated Logistics Management System***

OIG found some of the embassy's furniture and appliance pool (FAP) assets were misclassified in ILMS. According to ILMS data, approximately \$265,700 of the embassy's nearly \$7.3 million of FAP assets were flagged as potentially misclassified in the system. For example, OIG's review of the data showed the embassy incorrectly classified television sets and vacuum cleaners as FAP assets in the system, contrary to guidance in 6 FAH-5 H-514d, note 1, and 6 FAH-5 H-513.2-2c. OIG's review also showed some residential furniture assets, which should have been classified as FAP, were classified under different agency codes.<sup>58</sup> Management staff told OIG this occurred because of a lack of oversight. Failure to properly classify FAP assets in ILMS increases the risk of mismanagement of the embassy's FAP holdings and could result in unnecessary expenditures.

**Recommendation 15:** Embassy Warsaw, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System in accordance with Department standards. (Action: Embassy Warsaw, in coordination with A)

### ***Mission Did Not Manage Expendable Property as Required***

The mission did not manage its expendable property<sup>59</sup> in accordance with Department standards. Specifically, OIG found that the embassy did not track all facility management expendable property in the ILMS Expendable Management System, and Consulate General Krakow had no expendable property reported in the system. According to 14 FAM 414.2-1a(2), the ILMS Expendable Management System is the Department's approved system of record for office supplies, and materials and supplies such as those used for facility management. Management Section staff told OIG this occurred because of competing priorities and staff's unfamiliarity with requirements. Failure to account for all expendable property in the

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<sup>58</sup> Agency codes identify ownership of assets in the system. According to 6 FAH-5 H-512.3a, all residential inventory assets must be identified in ILMS with the agency code "FAP."

<sup>59</sup> Expendable property is property which, when put in use, is consumed, loses its identity, or becomes an integral part of another item of property. Examples are office supplies, automobile tires, and machine parts.

Department's approved system of record increases the risk of mismanagement and theft of mission property.

**Recommendation 16:** Embassy Warsaw should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Warsaw)

***Interagency Housing Board Did Not Review Leases for Living Quarters Allowance Residences***

OIG found the embassy's Interagency Housing Board<sup>60</sup> did not review leases for living quarters allowance<sup>61</sup> residences prior to the employee signing a lease, contrary to 15 FAM 263a.<sup>62</sup> At the time of the inspection, the embassy had 12 living quarters allowance residences occupied by staff from the Department of Defense. However, none of these leases had been reviewed prior to signing. Management Section staff told OIG the leases were not reviewed because of a lack management oversight. Absent a review of living quarters allowance leases, the embassy lacks assurance that living quarters allowance residences meet all Department standards.

**Recommendation 17:** Embassy Warsaw should require its Interagency Housing Board to review living quarters allowance residences leases in accordance with Department standards. (Action: Embassy Warsaw)

## **Human Resources**

***Local Compensation Plan Did Not Comply With Polish Labor Law***

The mission's local compensation plan<sup>63</sup> for LE staff did not comply with Polish labor law. Specifically, OIG found:

- The local compensation plan did not adhere to local law on retirement plans.<sup>64</sup>

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<sup>60</sup> The Interagency Housing Board consists of personnel representing all U.S. government agencies at post. The board implements housing policies in compliance with the regulations and standards found in 15 FAM 200, "Housing Abroad Program."

<sup>61</sup> A living quarters allowance is granted to an employee to help defray the annual cost of suitable, adequate living quarters for the employee and their family at a foreign post.

<sup>62</sup> Guidance in 15 FAM 263a further states that the Interagency Housing Board review should ensure that employees do not acquire ostentatious or otherwise inappropriate housing that could create a negative impression.

<sup>63</sup> A local compensation plan forms the legal basis for all salary, bonus, and other payments to LE staff members under guidelines in 3 FAM 7521.

<sup>64</sup> A Polish law went into effect in 2019, requiring implementation of the *Pracownicze Plany Kapitałowe* Employee Capital Plan service agreement, which is a legally required second tier occupational pension plan.

- The embassy had not considered revising the local compensation plan to include a salary advance plan as authorized<sup>65</sup> by the Bureau of Global Talent Management's Office of Overseas Employment in November 2021.

Standards in 3 FAM 7224.2-1a require that LE staff programs conform as closely as feasible to local law and prevailing practice but be based on and administered in accordance with U.S. laws and regulations. The embassy acknowledged the current local compensation plan, which was last revised in March 2023 to reflect an accident insurance rate change, was not reviewed annually as required by 3 FAH-2 H-131.3a(1). Human resources staff told OIG that the new retirement plan was not implemented, and the local compensation plan was not revised due to staffing gaps, competing priorities, the COVID-19 pandemic, and the Office of Overseas Employment's errors in the initial authorization cable in December 2019. Without an updated local compensation plan, LE staff may not receive the benefits to which they were entitled, and the mission may not be compliant with local labor law.

**Recommendation 18:** Embassy Warsaw, in coordination with the Bureau of Global Talent Management, should update the mission's local compensation plan in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)

#### ***Embassy Warsaw Did Not Authorize Overtime in Advance***

Embassy Warsaw did not comply with requirements for authorizing overtime in advance. In FY 2023, Mission Poland incurred approximately \$600,000 of LE staff overtime. OIG reviewed Embassy Warsaw's overtime records for three pay periods<sup>66</sup> for the four sub-posts<sup>67</sup> that incurred the highest overtime in FY 2023, totaling \$317,307, and found that approximately 46 of 399 overtime forms submitted were approved in advance. OIG also found that prior to September 2023, Mission Poland was not using the Department's standard forms to report overtime hours worked. Additionally, timekeepers were not submitting supporting time and attendance documentation to the main timekeeper. In addition, OIG found no supporting documentation related to approximately \$84,000 of ICASS staff overtime that was charged to Ukraine supplemental funding in June 2023 (other issues related to the embassy's management of Ukraine supplemental funding are described below in the Financial Management section of this report). According to 4 FAH-3 H-523.2 and 3 FAM 2332.4(5), supervisors must approve overtime in writing and in advance. Additionally, 4 FAH-3 H-525.2-1 states that supervisors are responsible for ensuring that timekeepers are adequately trained and are observing the prescribed procedures for recording and reporting attendance, overtime, and duty for which premium or differential rates are applicable.

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<sup>65</sup> Cable 21 STATE 110976, "Locally Employed (LE) Staff: Blanket Authorization to Implement Salary Advance Plans," November 2, 2021.

<sup>66</sup> Pay periods 18, 19, and 20 in 2023.

<sup>67</sup> Time and attendance at Embassy Warsaw were reported by approximately 40 sub-posts, each with its own respective timekeeper.

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

**Recommendation 19:** Embassy Warsaw should require authorizing officials to approve staff requests for overtime in advance in accordance with Department guidance. (Action: Embassy Warsaw)

### ***Locally Employed Staff Handbook Was Outdated***

Mission Poland had not updated its LE staff handbook since February 2015. OIG found the handbook contained inaccurate information. For example, the handbook stated that LE staff received annual within-grade salary increases. This was inaccurate because the mission changed to a merit-based compensation system in 2017. The handbook also described an outdated process on how LE staff positions were classified. Department standards in 3 FAM 7155a require each overseas post to develop and maintain an LE staff handbook that documents the mission's LE staff employment policies and procedures, as well as LE staff responsibilities and expected conduct. According to human resources staff, other work commitments prevented them from updating the handbook. Absent an updated handbook with accurate policies and procedures, LE staff may not receive the benefits to which they were entitled, and the risk of litigation may increase for the Department.

**Recommendation 20:** Embassy Warsaw, in coordination with the Bureau of Global Talent Management, should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)

## **Financial Management**

### ***Only One of Five Information Management Positions Providing Support to Other Agencies Programmed to International Cooperative Administrative Support Services***

OIG found that ICASS funded only one of the embassy's five IM U.S. direct hire positions even though the section provided support to other agencies. The Department paid for the remaining four positions with its funding, even though the embassy estimated that at least one of the four positions allocated more than 50 percent of their time to ICASS services. According to 6 FAH-5 H-013.2, an operating principle of the ICASS system is that agencies pay their share of mission administrative costs based on usage. Additionally, 6 FAH-5 H-341.9<sup>68</sup> states that ICASS should include salaries and benefits of all U.S. direct-hire and LE staff who allocate time to the respective cost centers, overhead costs associated with those staff members, and equipment required to provide services. According to 6 FAH-5 H-341.4-3, Note 2, at overseas missions with multiple U.S. direct-hire IM officers and specialists, the Department pays for the first position,

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<sup>68</sup> See 6 FAH-5 H-341.9-1(B), 6 FAH-5 H-341.9-2(B), and 6 FAH-5 H-341.9-3(B).

while the second one is always paid through ICASS. Where there are more than two such employees, the embassy should determine an appropriate mix of Department-funded and ICASS-funded positions. The embassy's failure to determine whether additional positions should be reprogrammed to ICASS means the Department will continue to subsidize most of the costs for IM services to other agencies. OIG estimated the Department could recover funds of up to \$243,993 over 3 years per position by converting additional positions to ICASS.<sup>69</sup>

**Recommendation 21:** Embassy Warsaw, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, and European and Eurasian Affairs, should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Warsaw, in coordination with BP, CGFS, and EUR)

### ***Bureau Provided Insufficient Guidance and Monitoring of Ukraine Supplemental Funds Spending***

EUR did not always provide clear and sufficient guidance to Embassy Warsaw on the use and purpose of Ukraine supplemental funds.<sup>70,71</sup> Embassy Warsaw received—through advices of allotment<sup>72</sup> from EUR—approximately \$2.7 million in Ukraine supplemental funds to spend in fiscal years 2022 and 2023. OIG determined that some advices of allotment contained specific instructions to the embassy on use of the funds. (See Figure 4, below, for a description of the budget execution process.) For example, one allotment in FY 2022<sup>73</sup> for \$583,800 specified the funds were to pay for increased utility bills and specified the amounts to be paid for diplomatic and ICASS programs. However, OIG found other advices of allotment provided only general guidance, stating, “allotment provides funding for Ukraine supplemental activities,” without

<sup>69</sup> Relying on Department-provided figures, OIG estimated the Department could annually recover \$81,331 per position, using the worldwide average cost of an ICASS U.S. direct-hire position of \$268,419 and the worldwide average percentage of time U.S. direct-hire IM staff support other agencies of 30.3 percent ( $\$268,419 \times .303 = \$81,331$ ). Because Warsaw is a 3-year tour, the total funds put to better use is calculated as  $3 \times \$81,331$  for a total of \$243,993 per position reprogrammed to ICASS.

<sup>70</sup> Consolidated Appropriations Act, 2022, Public Law 117-103, Division N – Ukraine Supplemental Appropriations Act, 2022, March 15, 2022, appropriated \$13.6 billion in emergency funding to support the Ukrainian people and defend global democracy in the wake of Russia's full-scale invasion of Ukraine. The Department of State's portion of this was \$3.9 billion. The Additional Ukraine Supplemental Appropriations Act, 2022, Public Law 117-128, May 21, 2022, appropriated an additional \$13.9 billion to the Department.

<sup>71</sup> From the Ukraine supplemental funding, the Department provided an allotment authority of approximately \$166 million to EUR for diplomatic programs (excluding public diplomacy).

<sup>72</sup> An allotment is one way that a bureau can provide funds to a mission or post. An advice of allotment authorizes an allottee to establish obligations and their subsequent liquidations within stated amounts and periods. Allotment authorities are issued at the highest aggregate funding level to major bureaus (e.g., regional bureaus), with the expectation that the resources will be divided further among overseas posts or multiple activities or programs. The subdivision of funds is accomplished by a bureau issuing advices of allotment to overseas posts and activities or programs. See also Figure 4.

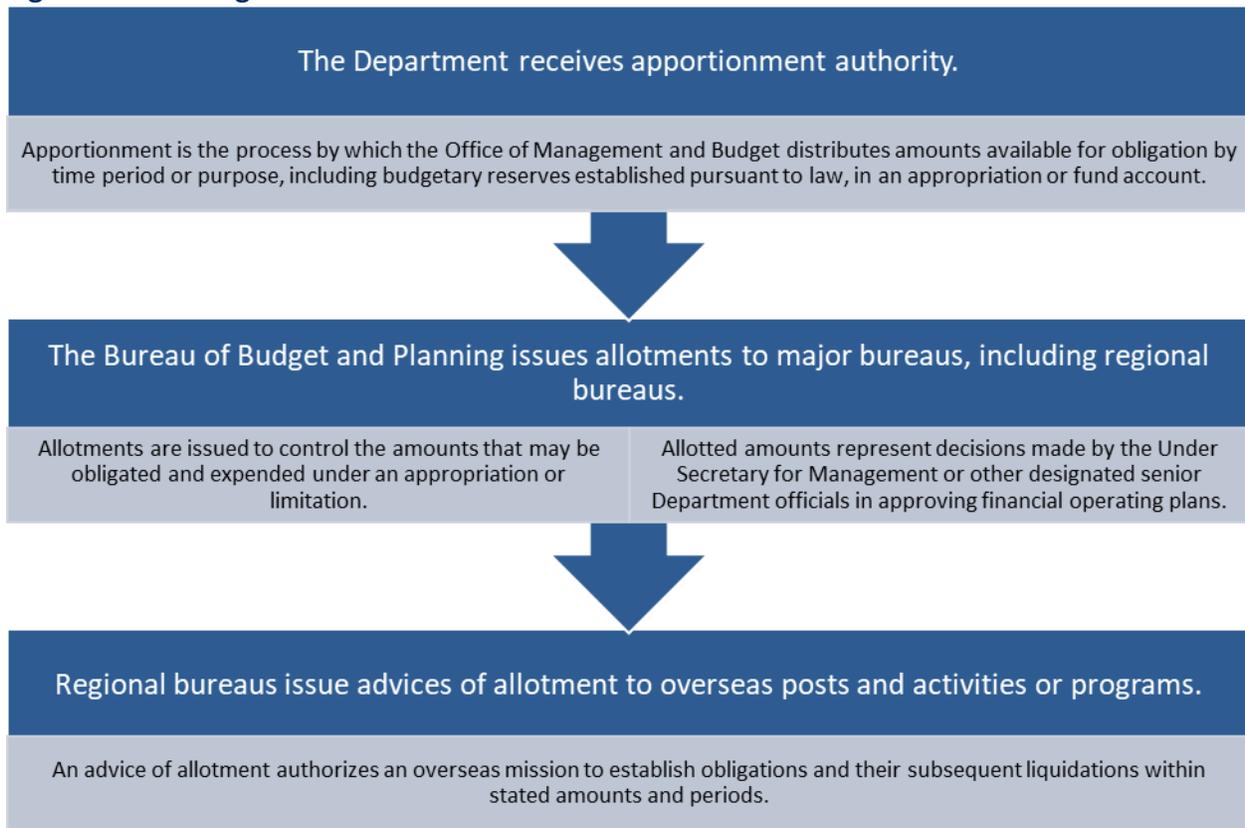
<sup>73</sup> Advice of allotment tracking number 2022-0021-0000000565-EUR-00244479, August 4, 2022.

any additional details. Of the \$2.7 million provided by EUR to the embassy, \$718,000 came without any specific instructions or guidance.

Although OIG found email communication between Embassy Warsaw and EUR regarding appropriate use of the funds, OIG determined that these communications were typically initiated when the embassy submitted projected spending figures that were questioned by EUR. In many cases, OIG found the communication confusing, and it was unclear what was being approved and what was being questioned. For example, the embassy proposed using funds on vehicles and printers. In this instance, EUR rejected the proposal because vehicles and printers were not “approved expenses.” However, when OIG requested the list of “approved expenses” for Ukraine supplemental funds neither EUR nor the embassy could provide it.

Additionally, EUR asked Embassy Warsaw for monthly spending data to monitor Ukraine-related spending. However, OIG found the embassy did not provide this information on a regular basis despite EUR repeatedly requesting the information. In those instances when EUR did receive spending reports from the embassy, OIG could not determine whether EUR was reviewing the reports and acting on the information.

Department standards in 4 FAM 082 require prudent financial management and full control over appropriations, apportionments, statutory limitations, and allotments. Additionally, 4 FAM 046 states that all funds, cash, collections, financial information, property, and other resources of which the Department is responsible will be appropriately safeguarded to prevent misuse, misappropriation, unwarranted waste, deterioration, or destruction. According to 4 FAH-3 H-122.2-2c, sound fund control practice must be instituted so that respective purposes are specified in writing on fund control documents at every subsequent level including advices of allotment. Although the Ukraine Supplemental Appropriations Act and the Additional Ukraine Supplemental Appropriations Act provided some guidance as to what the funds were to be used for, the exact details of how to use the funding was left to agencies and bureaus.

**Figure 4: The Budget Execution Process**

**Source:** OIG generated from 4 FAH-3 H-120.

EUR told OIG that it believed financial management officers at overseas posts were trained in appropriations law and, therefore, additional guidance was not needed. Although the embassy sought clarification from the bureau in some instances, without clear guidance and oversight of Ukraine supplemental funds, EUR cannot ensure that the funds were used only for Ukraine-related activities. This could result in misuse, waste, and mismanagement of funds.

**Recommendation 22:** The Bureau of European and Eurasian Affairs should provide clear guidance on what is authorized to be expended using Ukraine supplemental funds in accordance with Department standards. (Action: EUR)

***Embassy Did Not Sufficiently Document and Justify Spending of Ukraine Supplemental Funds***

In addition to the problem with guidance from EUR described above, OIG also found that Embassy Warsaw had insufficient controls related to its spending of Ukraine supplemental funds. Specifically, OIG found the embassy's Financial Management Office did not keep sufficient and accurate supporting documentation and justifications on its use of these funds. For example, OIG found insufficient supporting documentation for approximately \$23,000 in overtime for Financial Management Office staff that was charged to Ukraine supplemental

funding through a journal voucher<sup>74</sup> in January 2023. This transaction did not describe how the amount was calculated, and it did not contain supporting documentation showing how the overtime work was for Ukraine-related activities. OIG also found the overtime forms were not signed in advance, no dates were entered in the date work to be performed fields, and the same overtime approval document was photocopied and used over several pay periods.

Furthermore, OIG found no supporting documentation related to other overtime charges of approximately \$136,000 that were charged to Ukraine supplemental funding. Financial Management Office staff told OIG that EUR provided approval for the embassy to charge 25 percent of all embassy overtime costs to Ukraine supplemental funds to simplify the process because the embassy was having difficulties calculating what was Ukraine related. However, the embassy was unable to provide sufficient documentation that EUR approved the process for calculating overtime costs at 25 percent. Additionally, when OIG attempted to reconcile these charges with overtime records and examine the embassy's overtime calculations, OIG was unable to verify the accuracy of the overtime charges and did not find sufficient documentation showing how the calculations were made. This was due to the embassy's documentation being incomplete and the embassy's time and attendance reporting and overtime processes not complying with Department requirements, as described earlier in this report.

OIG also found the Financial Management Office's descriptions of its expenditures in the spending reports to EUR were unclear. For example, the embassy spent approximately \$40,000 on a space renovation project for additional staff supporting Ukraine-related activities, but the office recorded it as a financial management office reallocation. The embassy also charged other furniture and equipment expenditures to Ukraine supplemental funding, but the embassy's documentation to EUR did not contain clear explanations as to how the expenditures related to Ukraine activities.

According to 31 United States Code § 1501, obligations can only be recorded when supported by documentary evidence. In addition, according to 4 FAM 217, financial management personnel at the bureau level in the Department and at locations abroad must accurately record all financial transactions. Additionally, 4 FAM 044d requires accounting controls through audit trails for all transactions including the retention of supporting documentation and calculations.

This issue occurred because the Financial Management Office did not follow requirements to sufficiently document and retain all financial transactions, resulting in a lack of transparency. By not providing a transparent audit trail for the expenditure of funds, the Department risks the misuse, mismanagement, and waste of appropriated funds.

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<sup>74</sup> According to 4 FAH-2 H-732a, the journal voucher is an accountable document adjusting the accounts of the [U.S. disbursing officer].

**Recommendation 23:** Embassy Warsaw should establish administrative and financial controls over the use of Ukraine supplemental funds and retain all relevant documentation according to Department standards. (Action: Embassy Warsaw)

***Embassy Had Unreconciled Balances in the Suspense Deposits Abroad Account***

Embassy Warsaw had unreconciled balances in its suspense deposits abroad<sup>75</sup> account. OIG found approximately \$266,000 in the account as of October 2023 related to official tax reimbursements from the Polish government, which dated back to December 2022. According to 4 FAM 326.2-7b, suspense deposits abroad accounts may only be used to hold funds temporarily and the financial management officer should clear all amounts owed to the U.S. government and private individuals within 30 business days.

OIG determined that there was one voucher examiner in the Financial Management Office who processed both official tax reimbursements<sup>76</sup> for the embassy and personal reimbursements for embassy employees, which added greatly to the employee's workload and the reimbursement timelines. The tax reimbursement process was cumbersome, requiring the submission of specific receipts and detailed spreadsheets. Financial management staff also told OIG that the voucher examiner spent 60 percent of their time processing employees' personal tax reimbursements, which delayed official reimbursements. In addition, because the Polish government refunded tax as one lump sum, financial management staff had additional and time-consuming work to determine who the refunds belonged to, especially when the reimbursement totals did not match the original submission. Delays in the reconciliation and reimbursement of official taxes prevented the embassy from using the funds for other purposes.

**Recommendation 24:** Embassy Warsaw should reconcile transactions in the suspense deposits abroad account in accordance with Department guidelines. (Action: Embassy Warsaw)

***Cashier Operations Lacked Internal Controls and Management Oversight***

OIG found that two internal controls in Embassy Warsaw's cashier operations did not meet Department standards. Specifically, OIG found:

- Embassy Warsaw had no alternate cashier to take over accountability of the principal cashier on a regular basis. The Cashier User Guide, Chapter 3, 3.6.5 states that alternate cashiers should routinely assume all cashiering duties. At the time of the inspection, Embassy Warsaw was relying on the principal and alternate cashiers at Consulate General Krakow to cover for the principal at the embassy when the need arose.

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<sup>75</sup> According to 4 FAM 326.1a, suspense deposits abroad transactions are official collection amounts for payments on behalf of and as directed by the depositors. The U.S. government is responsible to each such depositor for ensuring that amounts received are appropriately disbursed or returned.

<sup>76</sup> These included reimbursements for value added tax, excise tax, and fuel tax.

- Embassy Warsaw was not monitoring or tracking the embassy's subcashiers on a quarterly basis. The Cashier User Guide, Chapter 13.7.4.1.5 states that the verifying officer<sup>77</sup> should confirm that all unannounced subcashier verifications have been completed in a timely manner. In addition, Chapter 13.3.2 states that the cashier supervisor's monthly unannounced cashier verification requires a complete physical review of the funds and supporting documents making up the cashier's operating accountability, which includes reviewing all advances.

These internal control issues occurred because of insufficient management oversight of the Financial Management Office. Failure to address these internal control issues in cashiering increases the risk of errors, loss of funds, fraud, and misuse of embassy cashier services.

**Recommendation 25:** Embassy Warsaw should bring its cashier operations into compliance with Department standards. (Action: Embassy Warsaw)

## INFORMATION MANAGEMENT

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OIG reviewed Mission Poland's IM operations, including classified, unclassified, and non-enterprise network (NEN)<sup>78</sup> computer operations; physical and environmental protection of IT resources; classified communications security; emergency communications preparedness; telephone programs; and mail services in Warsaw and Krakow. OIG found the increased workload due to Ukraine support compounded by staffing gaps and vacancies in both the Warsaw and Krakow IM units, adversely affected the mission's IM operations, internal controls, and information security stances. Despite these challenges, the staff supported the mission's computer and communications needs, including Embassy Kyiv with computer and pouch support as noted in the Operating Environment section of this report.

OIG determined the embassy's IM operations generally complied with Department standards. However, OIG identified issues requiring attention, as discussed below and in the companion classified report.

### ***Embassy Warsaw Information Management Unit Did Not Periodically Visit and Assess IT Operations at Consulate General Krakow***

Embassy Warsaw IM managers did not make periodic visits to Consulate General Krakow to assess the conditions of the classified and unclassified IT infrastructure, operations, and equipment as required in 5 FAM 121.1b(6)(b), 5 FAM 121.2c(6)(c), and 5 FAM 121.3c(6)(c).<sup>79</sup>

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<sup>77</sup> A financial management officer, management officer, U.S. citizen cashier supervisor, or a LE staff member who has been officially designated as a cash verification officer.

<sup>78</sup> A non-enterprise network is a Department-procured and locally managed computing environment. NENs are used by a specific entity to meet their mission requirements that cannot be achieved using an enterprise managed solution.

<sup>79</sup> These sections of the FAM were updated in December 2023, after fieldwork for this inspection. These requirements are still incorporated within 5 FAM 120, though the numbering may differ slightly.

Instead, visits occurred to address an operational issue or support a VIP visit. For example, the Information Programs Officer visited Consulate General Krakow five times from August 2021 through October 2023. Of the five trips, one was for VIP visit support, one for classified equipment inventory, and three were to address issues with the classified computing operation. In the case of the three trips, the officer spent approximately 6 hours on site, which did not allow time for any sort of operational assessment beyond just addressing the issues with the classified computing operation.

Periodic visits by Embassy Warsaw IM managers were important because Consulate General Krakow did not have a designated U.S. direct-hire IM Specialist position. Therefore, Krakow's IM unit—staffed with six LE staff: two LE systems administrators, two mailroom clerks, a telephone operator, and a supervisor for the mailroom clerks and telephone operator—relied on Embassy Warsaw for technical and operational guidance. OIG found two significant issues in Consulate General Krakow, with mail screening and mobile device management and determined these issues were caused by insufficient guidance to the LE staff by Embassy Warsaw that could have been prevented if the periodic visits had occurred.<sup>80</sup> In FY 2023, the IM unit did not have a budget for periodic visits to Consulate General Krakow, but IM managers were in the process of developing a budget for FY 2024 at the time of the inspection. Without structured, periodic visits to assess the IM operations and infrastructure, embassy IM managers cannot ensure the Department's information resource management standards were being properly implemented at Consulate General Krakow.

**Recommendation 26:** Embassy Warsaw should implement a plan to conduct periodic visits to Consulate General Krakow to assess information management operations in accordance with Department guidance. (Action: Embassy Warsaw)

### ***Locally Employed Information Management Staff Lacked Training***

OIG found the IM LE staff responsible for management of the OpenNet<sup>81</sup> and NEN computer operations lacked mandatory role-based training as required in 12 FAM 623.5a(2). Only 3 of the 10 IM LE staff members identified as having significant information systems security roles and responsibilities took the mandatory role-based training required in 12 FAH-10 H-212.2-1 within the last 3 years. Of the 10 staff, 3 had joined the mission since 2020 and lacked the basic systems administration course, which covers OpenNet and NEN configuration and security requirements. Although IM managers started to register LE staff for the mandatory role-based training after OIG brought the deficiency to their attention, OIG determined that the IM managers had not adequately planned to train the IM LE staff consistent with Department standards.<sup>82</sup> Untrained staff may unknowingly misconfigure systems or provide solutions that violate policy, which risk systems' availability, confidentiality, and integrity.

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<sup>80</sup> The mobile devices management issue is addressed later in this report, and the mail screening issue is discussed in the companion classified report.

<sup>81</sup> OpenNet is the Department's Sensitive But Unclassified network.

<sup>82</sup> According to 13 FAM 101.2-2(E)(1), managers and supervisors are responsible for "[d]etermining the specific needs of their employees and ensuring that employees receive training for effective job performance."

**Recommendation 27:** Embassy Warsaw should train the locally employed information management staff in accordance with Department standards. (Action: Embassy Warsaw)

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

Mission Poland's designated primary and alternate ISSOs did not perform ISSO duties for classified, OpenNet, and NENs in either Warsaw or Krakow. Specifically, OIG found the ISSOs did not:

- Review user access annually to verify if access was still needed or had been updated (12 FAH-10 H-112.1-3b and c).
- Brief users on cybersecurity responsibilities prior to granting access to the information system (12 FAH-10 H-212.1-3(1)).
- Enforce principles of least privilege<sup>83</sup> when granting access to the mission's shared folders (12 FAH-10 H-112.5-3.1).
- Review audit logs for security violations or unusual activities (5 FAM 724c(1)).

Additionally, the designated ISSOs did not have the required ISSO accounts to perform their duties.<sup>84</sup> During the inspection, IM staff created the required ISSO accounts. OIG found these deficiencies occurred because of staffing gaps and a lack of management oversight. OIG issued management assistance reports in May 2017 and December 2020 that highlighted widespread Department failures to perform ISSO duties.<sup>85</sup> Failure to perform required ISSO responsibilities leaves Department networks vulnerable to potential unauthorized access and malicious activity.

**Recommendation 28:** Embassy Warsaw should require all Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Warsaw)

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<sup>83</sup> The National Institute of Standards and Technology (NIST) defines the principle of least privilege as "allowing only authorized accesses for users (or processes acting on behalf of users) that are necessary to accomplish assigned organizational tasks." See NIST Special Publication 800-53, Revision 5, "Security and Privacy Controls for Information Systems and Organizations," page 36 (September 2020).

<sup>84</sup> ISSOs are required to use ISSO accounts to maintain separation of ISSO functions from systems management duties. According to NIST, separation of duties includes "ensuring that security personnel who administer access control functions do not also administer audit functions." See NIST Special Publication 800-53, Revision 5, page 36.

<sup>85</sup> OIG, *Management Assistance Report: Non-Performance of Information Systems Security Officer Duties by Overseas Personnel* (ISP-17-24, May 2017) and *Management Assistance Report: Continued Deficiencies in Performance of Information Systems Security Officer Responsibilities at Overseas Posts* (ISP-21-07, December 2020).

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

Embassy Warsaw did not have a functioning Local IT Configuration Control Board. According to 5 FAM 862.1, a Local IT Configuration Control Board is required to ensure that locally procured hardware and software do not adversely affect the Department's and mission's information security. IM managers told OIG that they did not want a Local IT Configuration Control Board because they planned to limit embassy and consulate general users to the hardware and software approved by the enterprise configuration control board. However, OIG found locally procured, unapproved network devices operating on the embassy's NENs and spare devices being stored in storage rooms. Moreover, OIG found the IM staff was unaware that the General Services Office had procured and implemented digital copiers with computer hard drives and automated key control systems with a biometric feature. Because the embassy did not have a functioning Local IT Configuration Control Board, the IM staff had not conducted a risk assessment to secure the biometric data stored on the key control systems and obtain approval for the systems from the Bureau of Information Resource Management as required in 12 FAH-10 H-332 and 5 FAM 862.1d. Additionally, the IM staff did not implement procedures for the vendor maintenance of digital copiers as required in 12 FAH-10 H-182.3. Without a Local IT Configuration Control Board, IM managers cannot inform users of configuration control requirements and manage risks to the Department's information.

**Recommendation 29:** Embassy Warsaw should establish a Local Information Technology Configuration Control Board in compliance with Department standards. (Action: Embassy Warsaw)

**Recommendation 30:** Embassy Warsaw should conduct a risk assessment for all locally procured hardware and software according to Department standards. (Action: Embassy Warsaw)

***Embassy Warsaw Did Not Secure or Monitor Its Non-Enterprise Networks***

Embassy Warsaw did not secure, monitor, or register all its NENs as required by 5 FAM 872.1 and 5 FAM 872.3.<sup>86</sup> OIG found unauthorized devices connected to two of the NENs operating at Embassy Warsaw. In addition, the networks did not have access control management required in 12 FAM 623.1 and did not have configuration management as required by 5 FAM 861.1. Staff told OIG that the embassy had only two NEN connections. However, OIG identified over 55 NEN connections. IM staff told OIG that they had not had the time to document and monitor the NENs due to past staffing shortages, but during the inspection, they started to register the NENs with the Bureau of Information Resource Management. Not securing and monitoring the NENs increases the embassy's vulnerability to cyberattacks.

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<sup>86</sup> Department guidance in 5 FAM 870 refers to dedicated internet networks, a term previously used for non-enterprise networks.

**Recommendation 31:** Embassy Warsaw should secure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Warsaw)

***Mission Poland Did Not Manage Mobile Devices in Accordance With Department Standards***

OIG found Mission Poland did not manage its inventory of mobile devices, such as cell phones, laptops, and radios, in accordance with 14 FAM 414.3a. At Embassy Warsaw, although IM staff used the ILMS loanable property module, they did not require recipients to sign the property transaction form when they were issued a mobile device. At Consulate General Krakow, IM staff did not use the ILMS loanable property module as required in 14 FAM 412.4-2b, and instead relied on a spreadsheet for tracking and issuing mobile devices. IM staff in Krakow also issued the devices without using the property transaction form and did not obtain recipients' signatures. OIG determined that IM managers did not provide guidance and training to the LE staff responsible for managing mobile devices in Warsaw and Krakow. The mission also did not have a current mobile devices policy, and it lacked standard operating procedures for inventory control of mobile devices. OIG reviewed the mission's 2019 mobile devices policy and found the policy did not list the current devices being issued and did not reflect the cellular service contract procured in July 2023. At the time of the inspection, the IM Officer started to revise the mission's mobile devices policy. Inadequate inventory controls of mobile devices could result in increased costs to the U.S. government and mismanagement of U.S. government property.

**Recommendation 32:** Embassy Warsaw should manage mobile devices in accordance with Department standards. (Action: Embassy Warsaw)

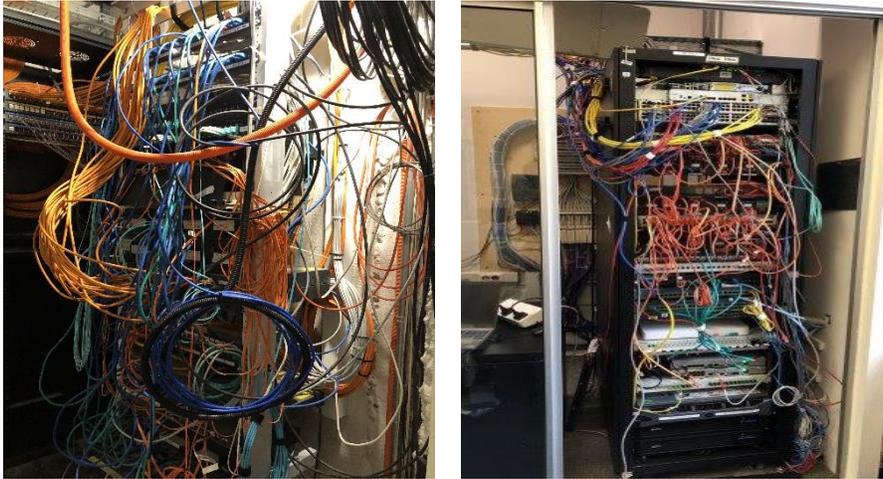
***Consulate General Krakow Did Not Test Its Information Technology Contingency Plan***

Consulate General Krakow did not test its unclassified IT contingency plan, as required by 12 FAH-10 H-232.3-1b(1) through (3). Department standards require IM staff to test IT contingency plans annually for effectiveness and to determine readiness to execute them during unplanned system outages or disruptions. Although Consulate General Krakow IM staff updated the contingency plan in August 2023, staff focused on day-to-day operations, such as computer, radio, telephone, and general customer support duties, and did not have time to test the plan. Inadequate contingency planning and testing prevents IM managers from mitigating the risk of system and service disruptions.

**Recommendation 33:** Embassy Warsaw should test Consulate General Krakow's information technology contingency plan in accordance with Department standards. (Action: Embassy Warsaw)

***Network Cabling Did Not Meet Department Standards***

Mission Poland's network cabling infrastructure did not comply with Department standards. OIG observed disorganized cabling in the server rooms at the embassy and consulate general, as shown in Figures 5 and 6, which could hinder the staff's ability to troubleshoot network outages in timely manner.



**Figures 5 and 6:** On the left, the cabling in the Embassy Warsaw server room, and on the right, the cabling in the Consulate General Krakow server room (Source: OIG).

The embassy and IRM started IT infrastructure remediation projects in 2021 to address the issues, including upgrading and organizing the data cable infrastructure in Warsaw and Krakow. However, OIG determined that the projects were delayed due to lack of planning, communication, and coordination. For example, in Warsaw, the embassy, OBO, and IRM did not communicate to identify solutions for a server room grounding deficiency found after IRM completed the site survey for the project. Instead, embassy management and OBO paused the project until OIG started to inquire about the status of the remediation project during the inspection. For IRM to complete the network cabling work, the embassy had to confirm proper grounding and electrical outlet wiring conditions before the cabling work could start.

As described in 5 FAH-9 H-221 and 5 FAH-9 H-353, Department cabling standards are intended to enable a uniform identification process for cabling to prevent unauthorized access and facilitate installation or removal of cabling. In addition to creating a network security vulnerability, non-standard cabling makes it difficult for staff to address connectivity problems quickly and could create a risk to employee safety.

**Recommendation 34:** Embassy Warsaw, in coordination with the Bureau of Information Resource Management and the Bureau of Overseas Buildings Operations, should correct the network cabling infrastructure issues at Embassy Warsaw and Consulate General Krakow to comply with Department standards. (Action: Embassy Warsaw, in coordination with IRM and OBO)

### ***Embassy Warsaw Did Not Maintain Telephone System Operational Readiness***

Embassy Warsaw did not maintain operational readiness<sup>87</sup> of its telephone system as required in 5 FAH-2 H-812.1a(3). The telephone system and battery back-up were installed in 2003 and manufacturer support ended in 2019. On September 10, 2023, Embassy Warsaw's facilities team conducted a planned power outage where the private branch exchange<sup>88</sup> failed to maintain availability because the battery back-up was old and not functioning. As a result, when the facilities team restored power, the telephone system did not fully recover, disabling the call threat recorder and other key features of the system. Embassy IM staff did not swap out defective components immediately with operable spare parts and send the defective components for repair and return as required in 5 FAH-2 H-621(2). OIG located a battery back-up for the telephone system in a storage room that was in the inventory for over a year that should have been installed when it was received. Had it been installed ahead of the planned power outage; the telephone system would have recovered fully. This issue occurred because Embassy Warsaw IM staff did not plan and prioritize the telephone systems' operational readiness. The lack of availability of critical communications systems jeopardizes daily and emergency operations.

**Recommendation 35:** Embassy Warsaw should maintain telephone system operational readiness in accordance with Department standards. (Action: Embassy Warsaw)

### ***Telecommunications Demarcation Point Was Improperly Located***

OIG found the demarcation point<sup>89</sup> connecting the internet service provider connections to the embassy were located in the Sensitive But Unclassified server room, which was a limited access area. This placement is contrary to 12 FAH-6 H-651.5.2, which requires the demarcation points to be in a separate, locked building within the facility grounds or in a separate locked room. OIG determined that IM staff did not look for alternate locations due to the general space issues at the embassy, as described in the Operating Environment section of this report. Locating the public telecommunications equipment in the Sensitive But Unclassified server room creates security vulnerabilities when non-cleared internet service provider employees access the room to work on the public telecommunications system.

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<sup>87</sup> Operational readiness of telecommunications systems is defined as the optimum availability of systems, applications, equipment, and personnel to meet the requirement. Operational readiness is achieved through preventive maintenance, including testing at least annually as determined by the mission IM officer or Emergency Action Committee, training, and redundancy. See 5 FAH-2 H-811.

<sup>88</sup> According to 5 FAH-2 H-114, a private branch exchange is a private telephone exchange that provides on-premises dial service and may provide connections to local and trunked communication networks. It is based on centralized stored program computer technology that provides switched telephone networking features and services.

<sup>89</sup> A demarcation point marks the point where communications facilities owned by one organization interface with that of another organization. In telecommunications terminology, this is the interface between customer-premises equipment and network service provider equipment.

**Recommendation 36:** Embassy Warsaw should relocate the telecommunications demarcation point outside limited access area communications rooms in accordance with Department standards. (Action: Embassy Warsaw)

***Mission Poland Did Not Dispose Excess Information Technology Assets***

Mission Poland did not dispose of excess IT equipment, such as computers, printers, and monitors in accordance with 5 FAH-2 H-852. OIG observed boxes of old cables, mice, keyboards, computers, and monitors accumulated in storage rooms and IM staff offices in Warsaw and Krakow. In Warsaw, OIG also noted the accumulation of excess equipment obscured the battery back-up for the telephone system, which had been in the storage room for over a year, as described previously. OIG determined the accumulation of excess inventory was the result of a lack of planning, inventory control, and shifting priorities due to staffing shortages. Excess inventory adds security risks and occupies limited storage space and staff offices.

**Recommendation 37:** Embassy Warsaw should dispose of excess information technology assets as required by Department standards. (Action: Embassy Warsaw)

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

OIG found Mission Poland's records management program did not comply with Department standards in 5 FAH-4 H-312.1b and 5 FAH-4 H-312.2 for records oversight and retirement. Consulate General Krakow did not archive any program and principal officers' electronic records. Krakow's paper records were last archived in 2014. Additionally, the mission had not developed policies and procedures for Embassy Warsaw and Consulate General Krakow that governed the location and organization of electronic records to ensure records were available when needed to conduct Department business, in accordance with 5 FAM 441c. As a result, staff in both Warsaw and Krakow did not organize records for efficient access and collaboration after the mission migrated to Office 365 cloud storage in March 2021. OIG determined this occurred because the designated records coordinator did not provide sufficient guidance and oversight. The coordinator also was unclear about their responsibilities for Consulate General Krakow's records even though the mission's designation of officers to perform specific mission responsibilities<sup>90</sup> confirmed the coordinator had responsibility for both Warsaw and Krakow.

OIG issued management assistance reports in September 2020 and June 2022<sup>91</sup> that highlighted deficiencies in records management, including records retirement, across the Department. Without a records management program that follows Department requirements for organization, records retirement disposition, and oversight, the mission is vulnerable to inefficient information retrieval and loss of critical documentation.

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<sup>90</sup> Embassy Warsaw, "Management Notice: Designation of Officers to Perform Specific Post Responsibilities," November 2, 2023.

<sup>91</sup> OIG, *Management Assistance Report: Deficiencies in Overseas Records Management* (ISP-20-25, September 2020); and OIG, *Management Assistance Report: The Department of State's Records Retirement Process* (ISP-22-20, June 2022).

**Recommendation 38:** Embassy Warsaw should implement a records management program for the mission that complies with Department standards. (Action: Embassy Warsaw)

## 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 Warsaw, the Bureau of European and Eurasian Affairs, and the Bureau of International Narcotics and Law Enforcement Affairs. 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 Warsaw should update and implement planning guidance and processes for official visits. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw updated and implemented planning guidance and processes for official visits.

**Recommendation 2:** Embassy Warsaw should bring its public diplomacy award files into compliance with Department standards for federal assistance award monitoring and evaluation. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the public diplomacy award files complied with Department standards for federal assistance award monitoring and evaluation.

**Recommendation 3:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that all consular spaces complied with Department standards.

**Recommendation 4:** The Bureau of International Narcotics and Law Enforcement Affairs, in coordination with Embassy Warsaw, should review the letter of agreement guiding the bureau's activities in Poland, as well as the bureau's current and planned foreign assistance to

Poland, and implement any changes to the letter of agreement as required. (Action: INL, in coordination with Embassy Warsaw)

**Management Response:** In its May 6, 2024, response,<sup>1</sup> the Bureau of International Narcotics and Law Enforcement Affairs 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 International Narcotics and Law Enforcement Affairs reviewed the letter of agreement guiding the bureau's activities in Poland, as well as the bureau's current and planned foreign assistance to Poland and implemented any changes to the letter of agreement as required.

**Recommendation 5:** Embassy Warsaw should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 6:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 7:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring the emergency egress on all floors of the embassy chancery into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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<sup>1</sup> In an email to OIG dated May 8, 2024, the Bureau of International Narcotics and Law Enforcement Affairs agreed with Embassy Warsaw's response.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the emergency egress on all floors of the embassy chancery complied with Department standards.

**Recommendation 8:** Embassy Warsaw should eliminate the safety hazards at its warehouse in accordance with Department safety and fire standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw eliminated the safety hazards at its warehouse in accordance with Department safety and fire standards.

**Recommendation 9:** Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Warsaw, in coordination OBO).

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 10:** Embassy Warsaw should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw complied with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority.

**Recommendation 11:** Embassy Warsaw should dispose of excess motor vehicle inventory in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw disposed of excess motor vehicle inventory in accordance with Department standards.

**Recommendation 12:** Embassy Warsaw should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 13:** Embassy Warsaw should close out procurement files in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 14:** Embassy Warsaw should review its nonexpendable property inventory and dispose of excess inventory in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw reviewed its nonexpendable property inventory and disposed of excess inventory in accordance with Department standards.

**Recommendation 15:** Embassy Warsaw, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System in accordance with Department standards. (Action: Embassy Warsaw, in coordination with A)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw reviewed and updated furniture and appliance pool assets records in the Integrated Logistics Management System in accordance with Department standards.

**Recommendation 16:** Embassy Warsaw should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw disagreed with the wording of the recommendation. The embassy noted that it corrected the workflow that allowed a very limited number of facilities management expendable property to be delivered directly to the embassy without Integrated Logistics Management System accounting.

**OIG Reply:** OIG considers the recommendation resolved. At the time of the inspection, as noted in the report, the embassy did not track all expendable property in the Integrated Logistics Management System. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw used the Integrated Logistics Management System to account for all expendable property in accordance with Department standards.

**Recommendation 17:** Embassy Warsaw should require its Interagency Housing Board to review living quarters allowance residences leases in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw required its Interagency Housing Board to review leases for its living quarters allowance residences in accordance with Department standards.

**Recommendation 18:** Embassy Warsaw, in coordination with the Bureau of Global Talent Management, should update the mission's local compensation plan in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 19:** Embassy Warsaw should require authorizing officials to approve staff requests for overtime in advance in accordance with Department guidance. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw required authorizing officials to approve staff requests for overtime in advance in accordance with Department guidance.

**Recommendation 20:** Embassy Warsaw, in coordination with the Bureau of Global Talent Management, should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 21:** Embassy Warsaw, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, and European and Eurasian Affairs, should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use. (Action: Embassy Warsaw, in coordination with BP, CGFS, and EUR)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation. The embassy noted that it proposed, and the International Cooperative Administrative Support Services Council (ICASS) approved, the reprogramming of two Department funded information management positions to ICASS-funded positions.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw reprogrammed additional Department-funded information management positions to ICASS-funded positions in accordance with Department standards, so funds of up to \$243,993 over 3 years per position can be put to better use.

**Recommendation 22:** The Bureau of European and Eurasian Affairs should provide clear guidance on what is authorized to be expended using Ukraine supplemental funds in accordance with Department standards. (Action: EUR)

**Management Response:** In its May 6, 2024, response, the Bureau of European and Eurasian Affairs neither agreed nor disagreed with this recommendation. The bureau noted that it did provide guidance in both allotments and via email exchanges with the embassy from the initial availability of Ukraine supplemental funds for Poland. In addition, the bureau sent temporary duty staff to Warsaw to provide guidance and support on using these funds. Additionally, the bureau noted it now requires Embassy Warsaw to request its written approval for each individual expenditure it wishes to make using Ukraine supplemental funding. Furthermore, the bureau provides more detail on all Ukraine supplemental allotment cables bureau-wide to explain exactly how the allotment of funding is in support of Ukraine related activities, rather than relying on both allotments and email exchanges.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that the Bureau of European and Eurasian Affairs provided clear guidance on what is authorized to be expended using Ukraine supplemental funds in accordance with Department standards.

**Recommendation 23:** Embassy Warsaw should establish administrative and financial controls over the use of Ukraine supplemental funds and retain all relevant documentation according to Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw established administrative and financial controls over the use of Ukraine supplemental funds and retained all relevant documentation according to Department standards.

**Recommendation 24:** Embassy Warsaw should reconcile transactions in the suspense deposits abroad account in accordance with Department guidelines. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw reconciled transactions in the suspense deposits abroad account in accordance with Department guidelines.

**Recommendation 25:** Embassy Warsaw should bring its cashier operations into compliance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 26:** Embassy Warsaw should implement a plan to conduct periodic visits to Consulate General Krakow to assess information management operations in accordance with Department guidance. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw implemented a plan to conduct periodic visits to Consulate General Krakow to assess information management operations in accordance with Department guidance.

**Recommendation 27:** Embassy Warsaw should train the locally employed information management staff in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 28:** Embassy Warsaw should require all Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw required all Information Systems Security Officers to perform their duties in accordance with Department standards.

**Recommendation 29:** Embassy Warsaw should establish a Local Information Technology Configuration Control Board in compliance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 30:** Embassy Warsaw should conduct a risk assessment for all locally procured hardware and software according to Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw conducted a risk assessment for all locally procured hardware and software according to Department standards.

**Recommendation 31:** Embassy Warsaw should secure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

**Recommendation 32:** Embassy Warsaw should manage mobile devices in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw managed mobile devices in accordance with Department standards.

**Recommendation 33:** Embassy Warsaw should test Consulate General Krakow's information technology contingency plan in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw tested Consulate General Krakow's information technology contingency plan in accordance with Department standards.

**Recommendation 34:** Embassy Warsaw, in coordination with the Bureau of Information Resource Management and the Bureau of Overseas Buildings Operations, should correct the network cabling infrastructure issues at Embassy Warsaw and Consulate General Krakow to comply with Department standards. (Action: Embassy Warsaw, in coordination with IRM and OBO)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw corrected the network cabling infrastructure issues at Embassy Warsaw and Consulate General Krakow to comply with Department standards.

**Recommendation 35:** Embassy Warsaw should maintain telephone system operational readiness in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw maintained telephone system operational readiness in accordance with Department standards.

**Recommendation 36:** Embassy Warsaw should relocate the telecommunications demarcation point outside limited access area communications rooms in accordance with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw relocated the telecommunications demarcation point outside limited access area communications rooms in accordance with Department standards.

**Recommendation 37:** Embassy Warsaw should dispose of excess information technology assets as required by Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

**OIG Reply:** OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that Embassy Warsaw disposed of excess information technology assets as required by Department standards.

**Recommendation 38:** Embassy Warsaw should implement a records management program for the mission that complies with Department standards. (Action: Embassy Warsaw)

**Management Response:** In its May 6, 2024, response, Embassy Warsaw concurred with this recommendation.

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

## PRINCIPAL OFFICIALS

Agency/Section/Title	Name	Arrival Date
<b>Chiefs of Mission:</b>		
Ambassador	Mark Brzezinski	1/2022
Deputy Chief of Mission	Daniel Lawton	5/2022
<b>Constituent Post:</b>		
Consulate General Krakow, Principal Officer	Erin Nickerson	8/2022
<b>Chiefs of Sections:</b>		
Consular	Hale C. VanKoughnett	9/2021
Economic	Douglas O'Neill	8/2023
Management	Ann Gabrielson	8/2021
Political	Anthony Pirnot	7/2021
Public Affairs	Brian George	7/2023
Regional Security	George Semertsidis	7/2022
<b>Other Agency Representatives:</b>		
Senior Defense Official/Defense Attaché	Col. John Zohn Jr.	7/2023
Office of Defense Cooperation	Col. Richard Bush	7/2023
Air Force Office of Special Investigations	Adam Long	2/2021
Department of Energy	Robert Rudich	9/2020
Federal Aviation Administration	Heidi Ames	8/2020
Legal Attaché	Christopher Brest	7/2022
Department of Homeland Security, Immigration and Customs Enforcement	Todd McWhorter	1/2022
Department of Homeland Security, Customs and Border Protection	Kevin Wright	2/2023
Department of Homeland Security, Transportation Security Administration	Brian Krenzien	11/2021
Foreign Agricultural Service	Levin Flake	7/2023
U.S. Commercial Service	James Lindley	8/2022
U.S. Agency for International Development	Christopher Abrams	8/2023

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

## APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

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This inspection was conducted from September 5, 2023, to January 22, 2024, in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspections Handbook, as issued by the Office of Inspector General (OIG) for the Department and the U.S. Agency for Global Media (USAGM). This report relates to Overseas Contingency Operation Atlantic Resolve and was completed in accordance with OIG's oversight responsibilities described in Section 8L of the Inspector General Act of 1978, as amended.

### Objectives and Scope

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

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

### Methodology

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

This review was conducted consistent with the FY 2024 Joint Strategic Oversight Plan for Operation Atlantic Resolve, Including U.S. Government Activities Related to Ukraine, which was released in October 2023 by the Inspectors General of the Departments of State, Defense, and the U.S. Agency for International Development.

## APPENDIX B: MANAGEMENT RESPONSES

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Embassy of the United States of America

Warsaw, Poland

May 6, 2024

UNCLASSIFIED

THRU: EUR-IO/EX Andrew Stowe

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

FROM: U.S. Embassy Warsaw – Daniel Lawton, Deputy Chief of Mission

SUBJECT: Response to Draft OIG Report – Inspection of Embassy Warsaw and Constituent post, Poland

Warsaw/EUR has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG:

**OIG Recommendation 1:** *Embassy Warsaw should update and implement planning guidance and processes for official visits. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. The Control Officer Handbook was last reviewed and updated in February 2024. It has been shared with Mission employees and can be accessed on the EXEC SharePoint site. The document will be reviewed and re-cleared annually, or sooner if substantial changes are identified in the interim. Additional guidance for control officers has been provided through instructor-led training sessions in September 2022 and February 2024. The February session was video recorded, and the recording was shared with Mission employees and is available on the EXEC SharePoint site. A training session will be held annually going forward, or more often as needed or requested. Most significantly, Post regularly received overwhelmingly positive feedback for the large number of visits cited in the OIG report. These visits were managed efficiently and successfully because VIP visits had become routine for Mission Poland.

**OIG Recommendation 2:** *Embassy Warsaw should bring its public diplomacy award files into compliance with Department standards for federal assistance award monitoring and evaluation. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation, which was self-identified. Beginning in July 2023, PDS initiated measures to bring its award files into full compliance with Department standards for monitoring and evaluation and to address shortcomings identified by A/OPE following a post-initiated review of its grant processes in June 2023. These measures include uploading to award files progress reviews, final assessments, and monitoring activities. Beginning in July 2023, PDS provided grants officer representatives with additional training in ILMS to reduce our dependence on a single LE staff for grant records management. By August 2023, several GORs were generating award documents and uploading necessary grant documents to the award files directly. Training continued through January 2023, when all GOs and GORs at post completed training on the newly deployed MyGrants software. Additionally, PDS developed between October and November 2023 updated grant SOPs to delineate responsibilities between GOs, GORs, and Resource Coordination Unit staff across the lifecycle of an award. The Resource Coordination Specialist continues to provide additional training to GORs on award management and the use of the new MyGrants system.

**OIG Recommendation 3:** *Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring all consular spaces into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)*

**Management Response:** Mission Poland concurs with the recommendation. The Warsaw and Krakow Consular Sections have been working with post's Facilities office and RSO, OBO, and CA to make changes as soon as possible. Preliminary work on some items began before the inspection and is ongoing.

**OBO Response:** OBO will work with the post Facility Manager to address the consular space items.

**OIG Recommendation 4:** *The Bureau of International Narcotics and Law Enforcement Affairs, in coordination with Embassy Warsaw, should review the letter of agreement guiding the bureau's activities in Poland, as well as the bureau's current and planned foreign assistance to Poland and implement any changes to the letter of agreement as required. (Action: INL, in coordination with Embassy Warsaw)*

**Management Response:** Mission Poland concurs with this recommendation. Embassy Warsaw is coordinating with INL HQ to conduct a review of the Amended Letter of Agreement with Latvia to determine if changes are required. INL HQ representatives are planning to visit Embassy Warsaw in June 2024 to further discuss this issue and take appropriate actions.

**OIG Recommendation 5:** *Embassy Warsaw should bring its safety, health, and environmental management program into compliance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with this recommendation. Krakow's POSHO, the Management Officer, had three years of residential and occupational POSHO experience prior to completing formal POSHO training in January 2024. Additionally, Krakow has two Assistant Post Occupational Safety and Health Officers (A/POSHO) – Agnieszka Bakowska and

Krzysztof Madej – though their primary jobs are Supervisory General Services Assistant and Maintenance Worker, respectively. Additionally, Warsaw's A/POSHO visits Krakow annually to inspect all workspaces and residences.

Mission Poland received approval from OBO to pursue negotiations with the Consulate landlord for some mitigating renovations.

Post will work with OBO to develop plans for additional projects and seek funding.

**OIG Recommendation 6:** *Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring its fire protection program into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)*

**Management Response:** Mission Poland concurs with the recommendation. In addition to OBO's response below, Embassy Warsaw is investigating other options to track compliance.

**OBO Response:** OBO/FIRE conducted fire/life safety assessments at Embassy Warsaw and Consulate General Krakow in March 2023, and is available to assist post to resolve their findings from the assessment. OBO/FIRE also can provide training and a means to track smoke alarm and monthly fire extinguisher inspections.

**OIG Recommendation 7:** *Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should bring the emergency egress on all floors of the embassy chancery into compliance with Department standards. (Action: Embassy Warsaw, in coordination with OBO)*

**Management Response:** Mission Poland concurs with the recommendation as well as OBO's response below. Mission Poland will work with OBO on project development and funding.

**OBO Response:** OBO/FIRE concurs with the recommendation and cited the lack of two egress and the non-compliant floor escape ladder in prior fire inspections.

**OIG Recommendation 8:** *Embassy Warsaw should eliminate the safety hazards at its warehouse in accordance with Department safety and fire standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation and already eliminated the safety hazards at the warehouse in accordance with Department safety and fire standards.

**OIG Recommendation 9:** *Embassy Warsaw, in coordination with the Bureau of Overseas Buildings Operations, should report all unauthorized construction projects and rectify each project in accordance with Department standards. (Action: Embassy Warsaw, in coordination OBO).*

**Management Response:** Embassy Warsaw concurs with the recommendation and with the OBO response below. Embassy Warsaw will work on statements of work and contracting, and contract execution.

**OBO Response:** In January 2024, OBO approved funding and sent it to post to contract A/E services and follow-on construction for structural, mechanical, and electrical issues involving a former elevator shaft and floors built within the space. OBO also stands ready to assist post as needed to fund demolishing and reconstructing permitted replacement garages.

**OIG Recommendation 10:** *Embassy Warsaw should comply with all Department Motor Vehicle Safety Management Program standards for chauffeurs and incidental drivers under chief of mission authority. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. Currently, all active drivers Mission-wide are current with medical clearances and SMITH training. GSO verifies SMITH training and medical clearances before checking out a motor pool vehicle to any incidental driver (although there are some incidental drivers who use non-motor pool vehicles). Post is now tracking SMITH and Medical certifications in FMIS and will continue to work with incidental drivers to stay current on their certifications with periodic notifications starting when drivers are one month away from expiration. Mission chauffeurs were all current at the time of the inspection and remain so.

**OIG Recommendation 11:** *Embassy Warsaw should dispose of excess motor vehicle inventory in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. We have a target fleet size of 39 with 40 vehicles inventoried. One vehicle is scheduled for auction later this month which will bring us to 39. Additionally, we have an armored vehicle that Overseas Fleet (OF) permitted us to keep due to the large number of VIP visits we have been receiving since Russia's full-scale invasion in 2022. OF decided not to increase our target fleet size when they allowed us to keep this vehicle since it will not be replaced once it reaches its end of life.

**OIG Recommendation 12:** *Embassy Warsaw should bring its contracting officer's representative program into compliance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. Post is working to update its COR program and will ensure that all CORs have the required certificates within a reasonable timeframe.

**OIG Recommendation 13:** *Embassy Warsaw should close out procurement files in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. Post continues to tackle the eFiles backlog and recently hired a Management EPAP who is assisting with these efforts. Post is committed to clearing this backlog.

**OIG Recommendation 14:** *Embassy Warsaw should review its nonexpendable property inventory and dispose of excess inventory in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Post is on track to hold auctions at a minimum quarterly, with a goal to hold six auctions per calendar year. These auctions, either live or online, will include both the Mission's excess inventory identified during annual and spot-check inventories and excess non-expendable inventory sent to Embassy Warsaw from other EUR posts. The number of auctions had been reduced, in part, due to a backlog from COVID and a large number of VIP visitors and increased workload caused by the war in Ukraine. (Note: there were no auctions held in 2020 and only one at the end of 2021 due to COVID)

**OIG Recommendation 15:** *Embassy Warsaw, in coordination with the Bureau of Administration, should review and update furniture and appliance pool assets records in the Integrated Logistics Management System in accordance with Department standards. (Action: Embassy Warsaw, in coordination with A)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Post completed its FY2024 Annual Inventory and identified Furniture and Appliance Pool assets that need updates. Post is working on correcting the asset information or removing FAP out of locations it does not belong. In addition, Post identified FAP assets in non-FAP locations prior to OIG's visit and had already begun correcting this issue. Items identified that were misclassified as FAP are already in the process of being corrected and moved to ICASS.

**OIG Recommendation 16:** *Embassy Warsaw should use the Integrated Logistics Management System to account for all expendable property in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland does not concur with the wording of this recommendation. Post has corrected the workflow that allowed a very limited number of FAC expendable supplies to be delivered directly to the embassy without ILMS accounting.

If OIG determines that the recommendation will remain, Post requests the wording be changed to "Embassy Warsaw should expand its use of the Integrated Logistics Management System to account for remaining expendable property in accordance with Department standards. (Action: Embassy Warsaw)."

**OIG Recommendation 17:** *Embassy Warsaw should require its interagency housing board to review living quarters allowance residences leases in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. During the OIG visit in October, GSO committed to have LQA leases approved by the IAHB moving forward.

Since October 2023, post has had only two new LQA leases (one in January and one in February 2024), both of which were approved by the IAHB. Post requests that this recommendation be removed.

**OIG Recommendation 18:** *Embassy Warsaw, in coordination with the GTM Bureau, should update the Mission's Local Compensation Plan (LCP) in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)*

**Management Response:** Mission Poland concurs with the recommendation. Two LCP items are not up to date. Post will add GTM's global-blanket-approval for salary advance plans. Post will add the Polish retirement contribution (PPK is similar to TSP).

**OIG Recommendation 19:** *Embassy Warsaw should require authorizing officials to approve staff requests for overtime in advance, in accordance with Department guidance. (Action: Embassy Warsaw)*

**Management Response:** Mission Poland concurs with the recommendation. The proper T&A forms were not being used and, in some cases, only emails or verbal approval was provided. The change of implementation the Department standard premium compensation form has largely resolved this concern.

**OIG Recommendation 20:** *Embassy Warsaw should update the locally employed staff handbook in accordance with Department standards. (Action: Embassy Warsaw, in coordination with GTM)*

**Management Response:** Embassy Warsaw concurs with the recommendation. A revised and updated version was posted on Mission Poland's SharePoint site in May 2024. The ongoing responsibility for maintaining and updating the LE Staff Handbook will be assigned to the leadership of the HR team.

**OIG Recommendation 21:** *Embassy Warsaw, in coordination with the Bureaus of Budget and Planning, the Comptroller and Global Financial Services, and the European and Eurasian Affairs Should reprogram additional Department-funded information management positions to International Cooperative Administrative Support Services-funded positions in accordance with Department standards, so funds of up to \$243,993 over three years per position can be put to better use. (Action: Embassy Warsaw, in coordination with BP, CGFS, and EUR)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy Warsaw proposed two additional positions be reprogrammed to ICASS, the IMO and one of the IPO positions, which was approved by the ICASS Council on April 8, 2024.

**OIG Recommendation 22:** *The Bureau of European and Eurasian Affairs should provide clear guidance on what is authorized to be expended using Ukraine supplemental funds in accordance with Department standards (Action: EUR)*

**Management Response:** EUR is answering this recommendation separately.

**OIG Recommendation 23:** *Embassy Warsaw should establish administrative financial controls over the use of Ukraine supplemental funds and retain all relevant documentation according to Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. During the OIG visit, the FMO that arrived in June 2023 established a process to send requests for Ukraine supplemental to the EUR Budget Office for approval and when approved the emails are saved on the EUR Budget Office Post folder. This folder also contains the Status of Funds, which remains up-to-date at all times and includes all supporting documentation.

**OIG Recommendation 24:** *Embassy Warsaw should reconcile transactions in the suspense deposits abroad account in accordance with Department guidelines. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy Warsaw is working with CGFS to create additional SDA accounts for VAT, Medcover, ZUS, and PPK has assisted in expediting the reconciliation of the SDA account.

**OIG Recommendation 25:** *Embassy Warsaw should bring its cashier operations into compliance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. After a review of the subcashiers, it was found that documentation was missing. To date all subcashiers have been reviewed and all paperwork has been completed for their designations. Subcashier supervisors are providing quarterly surprise cash counts. The Principal Cashier maintains the paperwork on file and reminds supervisors of their quarterly responsibility. An additional alternate cashier has been hired in Warsaw providing post with two alternates to support the Principal Cashier.

**OIG Recommendation 26:** *Embassy Warsaw should implement a plan to conduct periodic visits to Consulate General Krakow to assess information management operations in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Warsaw DTO-CE Officer has scheduled quarterly trips to CG Krakow while other DTO staff provide as-needed support to CG Krakow. With the recent arrival of a full-time DTO EPAP at CG Krakow, Embassy Warsaw will further evaluate the ongoing need for routinely scheduled trips.

**OIG Recommendation 27:** *Embassy Warsaw should train the locally employed information management staff in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy Warsaw DT Office continues to pursue training options and availability for local DT staff. Several

local DT staff have recently attended FSI training while additional staff have registered and are scheduled to attend training in the upcoming months.

**OIG Recommendation 28:** *Embassy Warsaw should require all Information Systems Security Officers to perform their duties in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy Warsaw DT Office continues to prioritize cybersecurity on our networks and systems. Warsaw ISSOs routinely perform their required ISSO checklist duties and document their ongoing actions and findings. The results from a recent Cybersecurity Assessment confirms that ISSO duties are being performed in accordance with Department standards.

**OIG Recommendation 29:** *Embassy Warsaw should establish a Local Information Technology Configuration Control Board in compliance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy Warsaw DT Office has formally established a local IT-CCB and it's Charter document has been uploaded to the ISSO SharePoint site.

**OIG Recommendation 30:** *Embassy Warsaw should conduct a risk assessment for all locally procured hardware and software according to Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with this recommendation. Embassy Warsaw has refreshed it's LCCB charter and re-established a LCCB which will review all post specific hardware and software according to Department standards.

**OIG Recommendation 31:** *Embassy Warsaw should secure and monitor its non-enterprise networks in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. As requested in [24 STATE 42326](#), Embassy Warsaw has registered all NENs and performed security reviews for each of them. All NENs without a sufficient justification and those which cannot be properly secured for use will be removed from operation.

**OIG Recommendation 32:** *Embassy Warsaw should manage mobile devices in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. DTO staff continue to utilize the ILMS Loanable Property module for inventory and accountability of Embassy issued mobile devices. Local staff are now requiring either a wet signature or a digitally signed receipt acknowledgement for all devices that are issued.

**OIG Recommendation 33:** *Embassy Warsaw should test Consulate General Krakow's information technology contingency plan in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation and is coordinating with Consulate IT Staff to test.

**OIG Recommendation 34:** *Embassy Warsaw, in coordination with the Bureau of Information Resource Management and the Bureau of Overseas Buildings Operations, should correct the network cabling infrastructure issues at Embassy Warsaw and Consulate General Krakow to comply with Department standards. (Action: Embassy Warsaw, in coordination with IRM and OBO)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Embassy DT Office recently coordinated with IRM/ITI for a survey team from the contractor to re-evaluate proposal to include necessary grounding of TR rooms and equipment. Mission Poland is awaiting further approval and scheduling action to be coordinated from Washington.

**OBO Response:** OBO concurs with the recommendation and stands ready to assist post as needed to correct the network cabling infrastructure at both locations.

**OIG Recommendation 35:** *Embassy Warsaw should maintain telephone system operational readiness in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Electrical grounding issues in the telephone frame room have now been rectified and sufficient UPS Backup power is available. In addition, in coordination with IRM/ITI/FPT, Embassy Warsaw is scheduled for a telephone system replacement in FY-2025.

**OIG Recommendation 36:** *Embassy Warsaw should relocate the telecommunications demarcation point outside limited access area communications rooms in accordance with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Plans are being developed to coordinate the creation of a separate demarcation room adjacent to the server room. This should occur with the upcoming Building Automation System upgrade project. Warsaw DTO and Facilities Management are working to complete this task.

**OIG Recommendation 37:** *Embassy Warsaw should dispose of excess information technology assets as required by Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Mission Poland conducted an auction in April 2024 and disposed of excess IT equipment from its warehouse. More and more excess equipment from Warsaw and Krakow continues to be prepared and sent to the warehouse for disposal/auction.

**OIG Recommendation 38:** *Embassy Warsaw should implement records management program for the mission that complies with Department standards. (Action: Embassy Warsaw)*

**Management Response:** Embassy Warsaw concurs with the recommendation. Mission Poland's Records Management Coordinator has identified Records Management Liaisons for each DOS office and has provided Records and Files Management training to our Liaisons. These Liaisons have been tasked with creating a Records File Plan for their offices. Several offices are already in compliance and File Plans are being saved and are available on SharePoint.



United States Department of State

Washington, DC 20520

**UNCLASSIFIED**

May 6, 2024

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

THRU:        EUR – James C. O’Brien, Assistant Secretary

FROM:        EUR-IO/EX – Andrew Stowe, Executive Director

SUBJECT:     Response to Draft OIG Report – Warsaw Inspection

EUR-IO/EX/FM has reviewed the draft OIG inspection report. We provide the following comments in response to the recommendations provided by OIG:

**OIG Recommendation 22:**

The Bureau of European and Eurasian Affairs should provide clear guidance on what is authorized to be expended using Ukraine supplemental funds in accordance with Department standards. (Action: EUR)

**Management Response:** EUR-IO/EX/FM did provide guidance in both allotments and via email exchanges with post from the initial availability of Ukraine supplemental funds for Poland. In addition, EUR-IO/EX/FM sent TDYers to Warsaw to provide guidance and support on using these funds. The bureau now requires Embassy Warsaw to request our written approval for each individual expenditure it wishes to make using Ukraine supplemental funding. In addition, we provide more detail on all Ukraine supplemental allotment cables bureau-wide to explain exactly how the allotment of funding is in support of Ukraine related activities, rather than relying on both allotments and email exchanges.

## ABBREVIATIONS

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COR	Contracting Officer's Representative
DCM	Deputy Chief of Mission
EEO	Equal Employment Opportunity
EUR	Bureau of European and Eurasian Affairs
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAP	Furniture and Appliance Pool
FAST	First- and Second-Tour
FMF	Foreign Military Financing
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
IDEA	Inclusion, Diversity, Equity, and Accessibility
ILMS	Integrated Logistics Management System
IM	Information Management
INL	Bureau of International Narcotics and Law Enforcement Affairs
IRM	Bureau of Information Resource Management
ISSO	Information Systems Security Officer
KTP	Kyiv Transit Platform
LE	Locally Employed
NATO	North Atlantic Treaty Organization
NEN	Non-Enterprise Network
OBO	Bureau of Overseas Buildings Operations
TDY	Temporary Duty

## OIG INSPECTION TEAM MEMBERS

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Ken Gross, U.S. Ambassador, Retired, Team Leader  
Danny Vergamini, Team Manager  
Eleanor Nagy, Team Manager, Kyiv Transit Platform  
Marlene Abshire  
Martha Fikru  
Mark Jeleniewicz  
Mark Hall  
James J. Hogan, III  
Sergio Lagares  
Rachel Martinez  
Shawn O'Reilly  
Mark Pannell  
Lynn Roche  
Derwood Staeben  
Daniel Tessler  
Sharon Umber  
Erik Winther

### **Other Contributors**

Dolores Adams  
Lexy Boudreau  
Rebecca Sawyer



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