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AND THE BROADCASTING BOARD OF GOVERNORS  
*OFFICE OF INSPECTOR GENERAL*

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Office of Inspections

February 2013

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**Inspection of  
Embassy Abuja and Consulate General  
Lagos, Nigeria**

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## **PURPOSE, SCOPE, AND METHODOLOGY OF THE INSPECTION**

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2011 by the Council of Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

### **PURPOSE AND SCOPE**

The Office of Inspections provides the Secretary of State, the Chairman of the BBG, and Congress with systematic and independent evaluations of the operations of the Department and the BBG. 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; whether U.S. interests are being 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; whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

### **METHODOLOGY**

In conducting this inspection, the inspectors: reviewed pertinent records; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on-site interviews; and reviewed the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by this review.



United States Department of State  
and the Broadcasting Board of Governors

*Office of Inspector General*

## **PREFACE**

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability, and positive change in the Department of State and the Broadcasting Board of Governors.

This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG and, as appropriate, have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "H. W. Geisel". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Harold W. Geisel  
Deputy Inspector General

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## Key Judgments

- Executive leadership at this large mission is perceptive and pragmatic. The Ambassador and deputy chief of mission (DCM) are engaged in and concerned for the welfare of American and Nigerian staff in a threatening security environment.
- Security is an important factor in embassy staffing and operations. The regional security office leads a well-coordinated program to manage risk in a way that allows the embassy to maintain engagement throughout much of Nigeria. Security constraints have significantly reduced travel to the north.
- Embassy Abuja and Consulate General Lagos suffer significantly from staffing gaps and employees with inadequate experience. Recruitment is the top human resources priority of both Embassy Abuja and the Bureau of African Affairs, yet there is currently no missionwide recruitment strategy.
- Consular operations have recently improved, but the mission will need to be vigilant to ensure that unacceptable visa wait times do not return.
- Mission management helps sustain generally high morale, but lack of coordination within and between the management sections in Abuja and Lagos has diminished customer service (b) (5)
- The embassy's analytic reporting is not sufficient. Lack of experience among the political/economic staff, combined with a heavy visitor load and travel constraints, has reduced reporting quantity and quality.

The inspection took place in Washington, DC, between September 10 and 28, 2012, and in Abuja and Lagos, Nigeria, between October 2 and November 2, 2012. (b) (6)

conducted the inspection.

## Context

Nigeria is one of the two most important strategic partner countries for the United States in sub-Saharan Africa. With 170 million people, it is the most populous country in Africa and the seventh most populous in the world. Nigeria supplies the United States 11 percent of U.S. oil imports and receives more than \$5 billion annually in U.S. private investment, concentrated in petroleum and mining. U.S. foreign assistance to Nigeria in FY 2012 was approximately \$630 million, 80 percent of which was focused on HIV/AIDS prevention and treatment. An estimated 1 million Nigerians live in the United States, and at least 30,000 U.S. citizens live in Nigeria, not including several thousand visitors on any given day.

The United States and Nigeria maintain a strong relationship. Cooperation in many strategic areas, such as regional peacekeeping, has been excellent. In 2010, the two countries inaugurated the U.S.-Nigeria Binational Commission, a formalized commitment to hold bilateral talks on four key areas: good governance, transparency, and integrity; energy and investment; Niger Delta and regional security; and agriculture and food security.

Despite a number of positive political developments in recent years, Nigeria suffers from uneven governance, pervasive corruption, high crime, steep inflation, inadequate infrastructure, and weak health and education systems. Most alarming has been the steady rise in sectarian violence driven by the northern Nigerian Islamist extremist group, Boko Haram, which uses attacks on Christians and moderate Muslims to heighten religious and ethnic tensions. A deadly attack in 2011 against the United Nations headquarters in Abuja, less than 1 mile from the U.S. embassy, has had a serious negative impact on mission operations. Deteriorating security conditions have resulted in severely restricted travel by mission personnel, which has hindered the mission's ability to maintain contacts and manage foreign assistance programs.

Embassy Abuja and Consulate General Lagos have an authorized staffing level of 231 U.S. direct hires and 789 locally employed (LE) staff members. The operating budget in FY 2012 was \$264 million. Because of the security threat, travel restrictions, and the overall hardship of living in Nigeria, the mission finds it increasingly difficult to attract qualified, at-grade bidders and relies heavily on stretch and excursion assignments. A high percentage of the current staff is entry level. (b) (5)

The embassy has begun a construction project to expand office space within the chancery. Discussions are under way with the Bureau of Overseas Buildings Operations (OBO) to relocate the consulate general in Lagos.

## **Executive Direction**

### **Introduction**

The Ambassador arrived in October 2010 to assume charge of the second-largest mission in sub-Saharan Africa. He leads a large interagency country team with diverse yet interconnected objectives. The embassy also functions as a regional hub providing security and technical support to 12 countries in West and Central Africa. Embassy Abuja is a focal point for numerous high-level visits by executive and legislative delegations from Washington. The President's Emergency Plan for AIDS Relief (PEPFAR) program, focused on preventing the spread of HIV/AIDS, is implemented through the U.S. Agency for International Development (USAID), the Centers for Disease Control and Prevention (CDC), and the Department of Defense. The PEPFAR program and CDC's malaria suppression program together account for \$600 million in assistance. Of overarching concern is the growth of an indigenous terrorist movement, Boko Haram, which targets Christian and moderate Muslim institutions in northern Nigeria and directs periodic attacks on police stations, banks, and offices of international organizations in Abuja itself.

The Ambassador is well respected throughout the mission and in Washington for his decisiveness, concern for morale, and communication skills. He acted quickly to resolve a thorny Equal Employment Opportunity issue. Once he was aware of serious issues with LE staff health insurance, he solicited input from LE staff and met with Department of State (Department) officials during consultations in Washington.

The DCM assumed his responsibilities in August 2010 and enjoys the Ambassador's confidence. The DCM's empathy and in-depth contacts with Nigerian officials complement the Ambassador's effectiveness. However, there is serious need for improvement in recruitment, administrative support, and management controls within the mission, which will require the direct involvement of both the Ambassador and DCM. Washington-based consumers of mission reporting are pleased with Consulate General Lagos' contributions, but Embassy Abuja does not do enough broadly sourced, analytic reporting.

### ***Recruiting***

Mission Nigeria is a Service Needs Differential post. Most positions are filled with officers who are out of cone, or whose personal rank is one or two grades below the position. At the time of the inspection, Embassy Abuja and Consulate General Lagos combined had over 40 employees either in stretch positions or on out-of-cone excursion assignments. The lack of experienced, mid-level managers and officers reduces the quantity and quality of reporting. Although recruitment of officers with adequate experience is the top human resources priority missionwide, there is no missionwide recruitment strategy. The Ambassador and DCM must take the lead in developing this strategy.

### ***Entry-Level Officer Program***

Staffing in both Abuja and Lagos includes large communities of entry-level officers. In several cases entry-level officers occupy mid-level officer positions that require greater

experience. They are highly motivated and productive, but more training and mentoring is needed, especially where entry-level officers encumber nonconsular positions.

### ***Mission Strategic Planning Process***

The Ambassador led a missionwide deliberative process of drafting the FY 2013 Mission Strategic and Resource Plan and the related FY 2014 Mission Resource Request.<sup>1</sup> The process included meetings of working groups drawing on a wide range of sections and agencies in the mission, as well as an “off-site” preparatory to drafting the plan. The work requirements of officers in the economic and political sections reflect the above goals. Recently arrived counselors reported that the Mission Strategic and Resource Plan served as a guide to mission priorities when they arrived at post.

### ***Morale***

Morale is generally high in both Abuja and Lagos. Security restrictions limit the mission’s outreach effectiveness (especially in the Muslim north) and to some degree undermine morale.

### **Consulate General Lagos**

The consul general in Lagos assumed charge in August 2012. He enjoys the confidence of his staff and has articulated his commitment to make Lagos a desirable place to work and live for consulate staff and families. Housing upgrades and an innovative ferry boat service contribute to high morale, but recruiting for Lagos remains a problem. A concerted effort to inform Washington of the advantages of assignment to Lagos is needed.

### **Construction and Rehabilitation of Facilities in Abuja and Lagos**

Improving physical plant in Abuja and Lagos are front office priorities. A large-scale OBO extension of the chancery in Abuja is proceeding close to schedule, and by early 2015 new facilities will facilitate complete consolidation of the mission’s various agencies, now scattered across the capital. In Lagos, the consulate general must focus attention and concern on the structurally compromised physical plant. A new consular annex has met only part of the space requirements needed to address an increasing workload.

### **Terrorism and Counterterrorism Agenda**

The Ambassador is aware of challenges posed by security restrictions on in-country travel but has registered his resolve to see that security mandates are respected and implemented. The Ambassador effectively reconciles security restrictions with the requirement that Mission Nigeria meet its outreach responsibilities in all parts of the country.

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<sup>1</sup> In December 2011, the Department issued 11 STATE 124737, which discontinued the Mission Strategic and Resource Plan. The Mission Resource Request (3-year strategic plan, with shorter annual resource requests) replaced the Mission Strategic and Resource Plan beginning with the FY 2014 budget cycle.

The rise of Boko Haram as a major challenge to the Government of Nigeria's authority in the north, and by extension to American interests in Nigeria, has moved center stage during the past 4 years. The most recent session of the U.S.-Nigeria Binational Commission took place in Port Harcourt, near the Niger River Delta, during the inspection. The Ambassador expressed U.S. concern over the Government of Nigeria's reluctance to see the Boko Haram insurgency as a threat to the stability of Nigeria as a whole rather than a matter of concern only in the north.

### **Mission Management**

The proactive engagement of the United States in Nigeria is confirmed by the regional work of eight U.S. Government agencies in Lagos and an additional four in Abuja. The Ambassador exercises hands-on management of the consulate general in Lagos and non-Department agencies in country. Embassy Abuja hosts 10 long-term, rotating temporary duty employees: the Military Information Support Team – 3 positions; Special Operations Force Liaison Element – 1 position; Civil Military Support Element – 4 positions; Special Agent (Legal Attaché) – 1 position; and the Drug Enforcement Administration – 1 position. Their functions have evolved over time and have not been regularized to reflect the mission's real workload and to facilitate accurate reimbursement for administrative support costs.

**Recommendation 1:** Embassy Abuja should initiate National Security Decision Directive 38 requests with the Office of Management Policy, Rightsizing, and Innovation for the 10 U.S. direct-hire positions filled with long-term, rotating temporary duty employees. (Action: Embassy Abuja)

### **Equal Employment Opportunity**

Both the embassy and the consulate general manage active Equal Employment Opportunity programs with trained American counselors. Consulate General Lagos has a trained Foreign Service national Equal Employment Opportunity liaison, but the embassy has not named a liaison, as encouraged by 3 *Foreign Affairs Manual* (FAM) 1514.2 d. Some local staff may be uncomfortable approaching an American counselor regarding Equal Employment Opportunity issues, so a liaison would increase the program's outreach.

**Informal Recommendation 1:** Embassy Abuja should appoint a Foreign Service national Equal Employment Opportunity liaison and publicize the contact information.

The mission has designated Federal Women's Program coordinators for Abuja and Lagos and publicized their contact information as required by 3 FAM 1514.2 b.

## Policy and Program Implementation

### Reporting and Analysis

Because of Nigeria's strategic importance, a range of Washington agencies closely track developments in the country. Washington consumers of Mission Nigeria's reporting products lauded the mission's timeliness and responsiveness to requests for information, especially regarding political-military and security issues. Fast-breaking events, such as the national strike in January 2012, and the public reactions in September to an anti-Islamic movie, have been covered within hours by spot reports, with more comprehensive analysis following soon after. Department end users reported that Embassy Abuja's draft submissions for mandated reports (for example, on human rights, trafficking in persons, and religious freedom) are "well done and on time."

A number of Washington users consider the mission's in-depth analytic reports to be insufficient in quantity or breadth of coverage, particularly regarding the northern half of the country covered by Embassy Abuja. Consumers recognized that travel restrictions in the north have reduced access to local officials and civil society there, but these are precisely the regions of greatest concern. Other factors reducing analytic reporting output are the large percentage of first-tour officers in political and economic reporting positions and the mission's heavy visitor load.

End users in the Bureau of African Affairs noted the absence of reporting plans in the political and economic sections and expressed the desire to review and provide input to future reporting plans. The inspection team confirmed that Abuja's political and economic counselors, who arrived at post shortly before the inspection, had begun developing reporting plans. Lagos had a plan in place, which contributed to its high output of broadly sourced spot and analytic reports. Coordinated reporting plans provide guidance to relatively inexperienced reporting officers and help ensure coverage of issues important to Washington.

**Recommendation 2:** Embassy Abuja should develop reporting plans with a focus on increasing analytic reporting. (Action: Embassy Abuja)

### *Political and Economic Staffing*

The political and economic counselors in Abuja are both experienced officers filling positions designated at the senior officer level. The two counselors and the political/economic chief at Consulate General Lagos all face challenges supervising sections composed substantially by officers in their first assignment. Seven of 10 mid-level political and economic positions in Abuja are filled by first-tour officers. The relative lack of mid-level officers has reduced reporting output, particularly in-depth analysis; section managers are compelled to spend considerable time providing basic guidance and training to the majority of their staff.

### *Leahy Vetting*

Mission Nigeria carried out Leahy vetting for 1,377 individuals in FY 2012; training applications from 211 were rejected or suspended because of human rights concerns. An entry-

level officer in the political section coordinates vetting. Two political entry-level officers serve as backups. All three officers have been trained and use the computerized International Vetting and Security Tracking system, the Department's database for Leahy vetting. A recurring problem has been the late provision of trainees' names by the Nigerian military, which results in difficulties for the mission to complete multiple checks at post and in Washington in time for the training. The political section is working with the consular section and others to provide more time for thorough checks.

### **Interagency Cooperation**

The Ambassador and DCM receive high marks for fostering a productive team approach to issues. Interviews with senior representatives from agencies with a permanent presence, such as CDC, USAID, the Drug Enforcement Administration, Foreign Commercial Service, Foreign Agricultural Service, and Federal Bureau of Investigation, revealed unanimous agreement that the front office understands and supports their programs in foreign assistance, law enforcement, and commercial promotion.

### ***President's Emergency Plan for AIDS Relief***

Nigeria's approximately 3.5 million HIV-positive individuals constitute the second greatest burden of HIV/AIDS care and treatment worldwide. Adding to this burden are more than 2 million children orphaned by AIDS and one of the highest tuberculosis rates in the world. In FY 2012, the United States provided Nigeria almost \$480 million in HIV/AIDS-focused health assistance through the PEPFAR program. Nigeria's is the second-largest PEPFAR program in the world, and PEPFAR accounts for the vast majority of the \$630 million in U.S. assistance to Nigeria. Three agencies implement the majority of the PEPFAR program: CDC, USAID, and the Department of Defense, which works directly with the Nigerian military.

U.S. Government HIV/AIDS experts in Washington and the mission praised the Ambassador and the DCM for fostering cooperation among implementing agencies; thoroughly understanding, though not micromanaging, funding streams and program details; and lobbying the Nigerian Government to take increased responsibility for anti-HIV/AIDS efforts.

In Nigeria, a contract employee reporting to the DCM and Ambassador coordinates the PEPFAR effort. The three implementing agencies credit the coordinator for their cooperation and ability to divide funding and coordinate programs without rancor.

The mission is grappling with three main PEPFAR challenges: First, results in Nigeria do not meet those in other African countries with similar funding. (The Office of the Global AIDS Coordinator has established a team to assess the cause.) Second, the Nigerian Government is not on track to meet the funding commitments it made in the 2010 U.S.-Nigeria Partnership Framework, which requires a 50-percent funding contribution by Nigeria by 2015. Third, travel restrictions in the north weaken U.S. Government oversight of local implementing partners. In response, the PEPFAR team is restructuring the implementation framework to maintain a transparent program with effective U.S. Government oversight.

### ***Commercial Advocacy***

Embassy Abuja and Consulate General Lagos advocate for U.S. companies despite limited economic/commercial officer resources at both posts. The Foreign Commercial Service and the Foreign Agricultural Service both have offices in Lagos, currently with one U.S. direct-hire officer each. Both report strong support from embassy leadership and good cooperation with the economic sections in Abuja and Lagos.

Agencies coordinated to bring to conclusion several important export sales, including an \$880 million purchase of U.S.-built aircraft by a Nigerian carrier. The mission, led by the economic section, also worked with the Nigerian Government to encourage flexible implementation of a new local content law, which had threatened to shut down international oil operations and subject foreign companies to large fines. The government now is implementing the law in a way that protects Nigeria's interests and the equities of U.S. petroleum companies. During the past year the mission hosted three energy-focused visits by delegations of U.S. businesses and senior officials.

### ***Law Enforcement and Antiterrorism***

In addition to the regional security officer, two other law enforcement agencies are permanently represented in Mission Nigeria: the Drug Enforcement Administration, located in Consulate General Lagos, and the Federal Bureau of Investigation with offices in both Abuja and Lagos. A Civil Service employee from the Bureau of International Narcotics and Law Enforcement Affairs is stationed in Abuja and coordinates law enforcement training programs.

The DCM chairs a monthly law enforcement working group and delegates most day-to-day coordination to the senior regional security officer. In addition, the Ambassador and DCM hold bimonthly video conferences with all law enforcement agencies.

The economic and political counselors have completed the Department's two main counterterrorism courses, but only one other political officer had taken both courses.

### ***Public Diplomacy***

As sectarian violence in Nigeria has increased in recent years, so have the challenges facing the mission's U.S. public diplomacy effort. Security constraints limit travel to large areas of Nigeria, complicating efforts to maintain contact with important audiences, especially in the predominantly Islamic north. The public affairs sections (PAS) of Abuja and Lagos have responded with a range of programs to maintain dialogue with the Nigerian public. PAS has incorporated all public diplomacy elements of the Mission Resource Request into an implementation plan that it reviews quarterly. Because of the strategic importance of northern Nigeria, PAS has developed a specific public diplomacy plan for that region.

PAS Abuja consists of 4 U.S. direct-hire positions and 24 LE staff positions. PAS Lagos has 2 U.S. direct-hire and 12 LE staff positions. The country public affairs officer in Abuja has open access to the Ambassador and DCM and participates in all country team meetings.

## ***Public Affairs Section Lagos***

### ***Personnel***

A survey of position descriptions for the 12 LE staff positions at Consulate General Lagos revealed that only 1 had been reviewed within the past year and certified as up to date, as required by 3 *Foreign Affairs Handbook* (FAH)-2 H-443. The remaining position descriptions had not been reviewed for 2 to 10 years. The survey also revealed differences between work requirements in some of the outdated position descriptions and work actually being performed by the employees.

***Informal Recommendation 2:*** Embassy Abuja should review and certify that all position descriptions for the locally employed staff in the public affairs section are up to date.

### ***Information Outreach***

To meet the challenges created by security restrictions, the public affairs team has responded with a proactive program to maintain contact with key audiences, especially in the north. Under the direction of the information resource officer resident in Abuja, PAS manages an information outreach program through two Information Resource Centers. One center is colocated with the educational advising center at Embassy Abuja, and the second is located within the consulate general in Lagos. The centers coordinate a network of 10 American Corners throughout Nigeria. An 11th American Corner is scheduled to open in late 2012. PAS produces several products targeted to specific audiences, including a bimonthly English and Hausa language print and electronic newsletter on mission strategic themes. Each American Corner also hosts an average of two program events each month. PAS has memoranda of understanding with all American Corner partner organizations and brings the American Corner directors together twice a year for planning and training. PAS has not hesitated to terminate collaboration with a host organization for nonperformance and has closed two American Corners in the past 3 years.

One Information Resource Center specialist in Abuja maintains the mission Web site and all social media platforms. The Web site is easy to navigate and regularly updated. Particularly noteworthy is the mission's Facebook page, which, at the time of the inspection, was engaging more than 38,000 Nigerian participants, and the mission's electronic blog, which conducts electronic discussions on bilateral policy issues.

Some 80 percent of Nigerians rely on radio as their principal news source; PAS works with a number of national and regional stations, particularly in the north. One effective initiative, entitled Greetings from America, draws on the talents of 10 to 15 Nigerian students attending universities in the United States. The students share their American experiences in prerecorded interviews that are broadcast several times each week throughout northern Nigeria. The students also respond to questions about Islam in America and other issues of interest. The program reaches an estimated 60 million people. Once managed by the Bureau of International Information Programs, it is now managed by a private contractor.

### ***Grants Management***

The section's grants program is aligned with the mission's strategic objectives. In FY 2012, PAS issued more than \$3 million in grants, which included the Ambassador's Self-Help Fund, PEPFAR community grants, and grants for non-Department agencies. The country public affairs officer, information officer, and cultural affairs officer are certified as grants officers in Abuja. Several of the PAS LE staff members serve as grants officer's representatives and have received grants training. The Office of Inspector General (OIG) team examined a selection of grant files and found them to conform to Department requirements.

During FY 2012, PAS Lagos also issued grants totaling approximately \$100,000, including a number from non-Department agencies. Although the two new American officers have grants officer training and had valid grant officer warrants during their most recent assignments, neither had transferred their warrants to Lagos. There are no other grants officers at the consulate general in Lagos.

***Informal Recommendation 3:*** Embassy Abuja should require the two new public affairs officers in Lagos to reapply for new grants officer certificates of appointment with the Office of the Procurement Executive.

One LE staff member at PAS Lagos maintains grants files, which are complete. Only two other members of the LE staff have received training and can serve as grants officer's representatives. To provide adequate backup, additional LE staff need training to serve as grants officer's representatives.

***Informal Recommendation 4:*** Embassy Abuja should arrange for additional grants officer's representative training for the locally employed staff in the public affairs section at Consulate General Lagos.

### ***Military Information Support Team***

PAS Abuja has developed a collaborative relationship, which spans several years, with the Department of Defense Military Information Support Team. The team consists of two American officers and one LE staff member who occupy offices in PAS Abuja and work with the PAS team to support common Mission Resource Request goals of counterterrorism, countering violent extremism, and promoting Muslim-Christian tolerance. Recent projects have included providing Hausa language educational textbooks for Islamic children, conducting public affairs training for the Nigerian military and police force, and producing thematic programs with Nigerian radio stations.

### ***Exchanges and Cultural Affairs***

PAS manages a portfolio of U.S.-funded exchange programs that in FY 2012 sent more than 100 Nigerian students, professionals, and officials to the United States. All elements of the mission are involved in the nomination of exchange program participants. The creation of an LE position to coordinate alumni activity has resulted in increased alumni outreach and an average of three alumni-specific programs each month. A new initiative involves the creation of youth alumni councils to propose community projects, which are funded by the mission.

### ***Educational Advising***

With more than 7,000 Nigerian students attending universities in the United States, educational advising is an important area of PAS operations. Education advising centers are located at the embassy and consulate general. The centers operate a fee-based membership program for Nigerians interested in studying in the United States as well as a free program for economically disadvantaged students. Both centers operate fund recycling accounts through the Bureau of Educational and Cultural Affairs and coordinate closely with their consular sections. Consular representatives serve as speakers during college fairs, visa orientations, and other outreach programs.

### ***Internal Communication***

Although PAS communicates effectively with audiences throughout Nigeria, internal communication within PAS requires attention. Employees were often not aware of recent policy, budget, and program decisions that have a direct impact on their work. They were not included in the discussion process but simply informed of the decision. The country public affairs officer maintains a regular schedule of meetings with PAS employees, including a weekly digital video conference that includes employees in Abuja and Lagos. The country public affairs officer could improve the quality of communication within the sections by bringing relevant employees of both posts into the discussion phase of the decision process.

***Informal Recommendation 5:*** Embassy Abuja should require that the country public affairs officer improve communications within the mission's public affairs sections by involving employees in the discussion of policy and program issues.

### ***Moveable American Spaces***

In early 2011, the Bureau of International Information Programs launched an initiative to equip posts with American-branded display platforms that can be transported and assembled at program events with partner institutions. Embassy Abuja and Consulate General Lagos were selected to test the new product. The Bureau of International Information Programs shipped one platform to each post. A unit occupies several large shipping cases, requires considerable storage space, and costs the Department approximately \$30,000 to produce.

The shipment to Lagos was received and the moveable space module is being used by PAS Lagos at off-site program events. In contrast, when the moveable space shipment arrived at Embassy Abuja, the general services office notified PAS that warehouse space was inadequate to store the module. The OIG inspection team surveyed embassy warehouse capacity and determined that space was available for the PAS module. Without discussing options with key members of the PAS staff or with the Bureau of International Information Programs in Washington, the country public affairs officer decided to sell the module at a public auction conducted by the general services office. The module was sold to a private Nigerian in August 2012 for approximately \$800, a loss to the U.S. Government of approximately \$29,000.

This action was in clear violation of 14 FAH-1 H-710, which states that government property should always be redistributed within an agency rather than sold if cost effective. If there had been communication with the Bureau of International Information Programs before the

sale was made, it would have instructed PAS Abuja to initiate shipment to another post in need of the material at the bureau's expense.

More seriously, the product was clearly branded with several prominent U.S. Government seals and insignia and sold at public auction in violation of 14 FAM 417.3. Given the level of corruption and fraud and the growing terrorism threat in Nigeria, the consequences of this action could be serious.

The OIG inspection team urged the country public affairs officer to take immediate action to recover the product from the purchaser, and the embassy was able to repurchase the module for \$3,000. Embassy Abuja must now either use the module as intended and store it properly or work with the Bureau of International Information Programs to transfer the module to another post.

**Recommendation 3:** Embassy Abuja, in coordination with the Bureau of International Information Programs, should determine whether to use the moveable space program module or transfer the module to another post. (Action: Embassy Abuja, in coordination with IIP)

### **Consular Operations**

U.S. consular officers operate in a challenging environment in Nigeria, with pervasive fraud, critical crime and terror threats, unreliable civil institutions, and burgeoning workloads. Historically, the challenge has not been met by consular leaders, resulting in 6-month nonimmigrant visa appointment wait times—among the Department's longest. The visa appointment backlogs complicated all mission operations as Nigerians sought to circumvent the unreasonable visa queues. Although the nonimmigrant visa backlog defines consular operations in Nigeria, the mission also has a growing American citizens services workload and a substantial immigrant processing unit.

In February 2012, a consular management assistance team visited Nigeria. Their March 2012 report contained 32 recommendations and a request that the country consular coordinator inform the Bureau of Consular Affairs "as soon as possible" on the steps being taken to implement the recommendations. More than 6 months after the request, Mission Nigeria has not reported on its progress. The Bureau of Consular Affairs invested considerable resources to study consular operations in Nigeria. That investment is wasted if Nigeria does not take the report seriously.

**Recommendation 4:** Embassy Abuja should report to the Bureau of Consular Affairs on the steps taken to implement the recommendations contained in the report of the consular management assistance team that visited Nigeria in February 2012. (Action: Embassy Abuja)

### ***Management, Coordination, and Common Consular Issues***

A country coordinator based in Lagos oversees consular operations. Although the new coordinator brings considerable diplomatic expertise and has helped obtain additional resources from the Department, coordination is a work in progress. There are few missionwide standard operating procedures and little interaction among the staff. In the past, no one coordinated nonimmigrant visa appointment scheduling between Abuja and Lagos. Appointment wait times

in the first three quarters of 2012 were widely divergent, with Abuja averaging about 5 months and Lagos only 2 months.

***Informal Recommendation 6:*** Embassy Abuja should coordinate mission nonimmigrant visa appointments through the country consular coordinator so that wait times are consistent within Nigeria.

There has never been a missionwide consular teambuilding meeting to instill a sense of mission and to develop harmonized approaches to common challenges. Consular operations in Abuja and Lagos operate independently, with little coordination of policies, procedures, or personnel, including visa procedures, antifraud efforts, warden messages, public diplomacy, and emergency preparedness.

***Informal Recommendation 7:*** Embassy Abuja should convene a consular conference to discuss better coordination of policies, procedures, and personnel.

The backbone of the consular operation in Nigeria is the cadre of entry-level officers. The new officers have been particularly effective in Abuja, where the section chief is the only mid-level officer. However, there is considerable confusion among the entry-level officers on their responsibilities, who they report to, when or if they will be able to rotate to other consular portfolios, and when they will be able to do professional development projects. The OIG team discussed with consular management the need to have clear expectations for the officers' professional development.

In times of crisis, such as during times of unacceptable appointment backlogs, professional development activities should not detract from the goal of reducing the backlog. These activities can include projects to enhance visa operations, exchanges within Nigeria, and after-hours representational events. Once the backlog is within the worldwide guideline of 30 days, activities that take resources away from the section, such as working as a visit control officer, traveling in country, performing temporary duty at another post, or working on a project in another section, are possible. Ideally, the entry-level officers would participate in the creation and implementation of such a professional development plan.

***Informal Recommendation 8:*** Embassy Abuja should implement a professional development program for entry-level consular officers.

### **Nonimmigrant Visa Processing**

The OIG team arrived after a summer of gaps in consular staffing caused by reassignments and medical leaves. By early October 2012, however, visa interviewing officers in Abuja routinely finished interviewing well before noon, and only a fraction of the consular officers in Lagos were dedicated to full-time visa interviewing. During the inspection, Abuja took bold steps to focus resources on the backlog, and the Department allocated additional, temporary, visa adjudication resources, including four officers in Lagos. These actions were helpful, but challenges remain.

If the consular sections continue the aggressive nonimmigrant visa appointment scheduling needed for success, they will require mission support. If an unforeseen circumstance

threatens visa production, they will need to focus all consular resources and receive assistance from the entire mission. Only a whole-of-mission effort will overcome the backlog.

***Informal Recommendation 9:*** Embassy Abuja should establish a plan that allocates nonconsular resources, as required, to eliminate the nonimmigrant visa appointment backlog.

In the 2 months of the inspection, the mission fundamentally changed its appointment policies, and both sections increased their adjudicating capacity through temporary staff. This change coincided with the arrival of permanent staff and ended the summer staffing gaps. Mission Nigeria still needs to make its visa processing more efficient. The OIG team discussed possible improvements with consular managers, including expansion of the business visa program to identify and segregate likely well-qualified applicants, taking advantage of waivers of personal appearance when warranted, and increasing reciprocal visa validities.

***Informal Recommendation 10:*** Embassy Abuja should revise visa processing procedures with the goal of increasing the efficiency of operations.

### ***Referrals***

The nonimmigrant visa referral program in Nigeria runs well; however, LE staff members were confused about their eligibility for referrals. The OIG team counseled mission management to reach out to the LE committee to explain how LE staff may apply for U.S. visas.

### ***Wilberforce Counseling***

The William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 requires that consular officers inform applicants for certain domestic visas of the legal rights and resources available to aliens applying for employment- or education-based nonimmigrant visas. Telegram 09 State 67921 requires that the interviewing officer make a notation of the Wilberforce counseling in the nonimmigrant case file. A review of a sample of cases from Abuja and Lagos found that only a small percentage of required notifications were completed. In addition, the pamphlets officers were distributing were crudely photocopied versions.

**Recommendation 5:** Embassy Abuja should distribute a professionally produced pamphlet outlining the rights of workers in the United States to all applicants for nonimmigrant worker or education visas. (Action: Embassy Abuja)

### ***Visas Viper***

During the 12 months prior to the inspection, Visas Viper monthly submissions in Abuja were timely and correct. In addition to the monthly reports, the embassy submitted scores of names, reflective of a robust and effective program. In Lagos, however, 3 (October 2011, November 2011, and February 2012) of the 12 reports required by 9 FAM 40.37 N5 were missing.

**Recommendation 6:** Embassy Abuja should implement controls so that the two consular sections submit monthly Visas Viper activity reports promptly. (Action: Embassy Abuja)

## **Fraud**

Fraud in Nigeria is pervasive. False documentation of any kind is available, and even genuine civil documents are suspect. Security threats constrain consular officials from investigating fraud in most of the country. Identity fraud is a direct risk to U.S. security, as the true identity of the applicant is not certain. Most nonimmigrant visa applicants suspected of fraud are simply refused under Section 214(b) of the Immigration and Nationality Act—at a rate of about 45 percent. For immigrant visa and U.S. citizenship services applicants, countering fraud is more complicated.

Each consular section has a fraud prevention unit bolstered by two assistant regional security officer-investigators (ARSO-I) offices. There are two ARSO-Is in Lagos and one in Abuja. They have had significant successes identifying organized criminal activities related to border security. But consular fraud prevention is hindered because the ARSO-Is are not as integrated into the consular section as they should be. The ARSO-Is work less than 80 percent of their time on border security. Pursuant to the memorandum of understanding between the Bureaus of Consular Affairs and Diplomatic Security, an ARSO-I should spend 80 percent of his/her time performing border security functions and should be tasked with regional security office programmatic duties only during threat situations or in support of high-level visits. This lack of integration is especially a concern in Lagos because the ARSO-Is do not have offices in the consular section.

**Recommendation 7:** Embassy Abuja should require that assistant regional security officer-investigators spend 80 percent of their time on border security. (Action: Embassy Abuja)

*Informal Recommendation 11:* Embassy Abuja should allocate a workspace in the consular section for the assistant regional security officer-investigators.

## **Abuja Consular Operations**

The Abuja consular section provides nonimmigrant visa and American citizens services. It is understaffed. The pressure caused by the numerous staffing gaps, 6-month visa appointment wait times, and endemic fraud have affected the management of the section and diverted focus from important tasks, such as adjudication review. This situation is exacerbated by the fact that there is only one mid-level consular position in Abuja.

### *Facilities*

The embassy in Abuja has a well-designed area for consular intake and waiting. The process is well organized and professional except for signage. Security guards must direct confused clients to the proper window. A well-thought-out signage program would enhance the customer's experience. The first priority would be a movable sign inside the consular waiting area to direct clients to the intake windows, which are in the American citizens services unit.

*Informal Recommendation 12:* Embassy Abuja should review consular signage, beginning with directional signs inside the consular waiting room.

With the 20 percent increase in visa workload, the number of interview windows is inadequate. Because the windows are larger than required, there is space to create additional windows along the present hardline. The embassy has begun a process to add windows.

### *Nonimmigrant Visas*

In the 12 months before the OIG inspection, Abuja adjudicated 43,000 visas with a refusal rate of about 45 percent. During the inspection, Abuja increased nonimmigrant visa appointments by about 25 percent and implemented a plan to increase appointments by 100 percent over the baseline in the following 3 weeks. This move reduced the visa appointment backlog in Abuja by more than 100 days in a 3-week period.

### *American Citizens Services*

The American citizens services unit in Abuja provides excellent services in a difficult environment. During the inspection, the unit held a warden's lunch at the Ambassador's residence to enhance relations with the wardens, who can be the eyes and ears of the embassy when security concerns limit travel.

### **Lagos Consular Operations**

Consular operations in Lagos dwarf those in the capital. With 15 U.S. direct-hire positions, Lagos has three times the adjudicating staff of Abuja. In the year prior to the OIG inspection, Lagos adjudicated more than 84,000 nonimmigrant visas with a refusal rate of 39 percent. In the same period, Abuja processed 43,000. Lagos also processes immigrant visas; Abuja does not. Despite the hardships of life in Lagos, morale in the consular section is very good. Much of the credit goes to the talented mid-level manager, who has recently been elevated to deputy section chief.

### *Facilities*

The consulate general is an old and deteriorating building, but the consular section is newly renovated. Work areas are sufficient. Intake procedures outside the building, however, are poor. Applicants are subjected to confusing directions, inadequate signage, multiple security screenings, and an illogical flow. The situation works contrary to the consulate general's public diplomacy efforts.

***Informal Recommendation 13:*** Embassy Abuja should improve the visa intake procedures at Consulate General Lagos.

### *American Citizens Services*

The American citizens services unit in Lagos also provides services in a difficult environment. During the inspection team's visit, the unit held a town hall meeting to build relations with the American community. The main concern of the Americans was the nonimmigrant visa appointment backlog, but unfortunately consular staffers at the meeting were not prepared to interact with the guests on this important matter.

***Immigrant Visas***

Although the Lagos nonimmigrant visa demand is growing at a double-digit rate, immigrant visa workload has declined slightly since FY 2008. The workload is complicated by fraud for two reasons: immigrant visas cannot simply be refused under Section 214(b) of the Immigration and Nationality Act, and immigrant visas are often based on relationships demonstrated by civil documents, which are unreliable in Nigeria. As a result, the immigrant visa unit relies on DNA testing to confirm biological relationships. The procedure is secure and closely managed by an American officer. Approximately 40 percent of the DNA testing caseload comes from the Department of Homeland Security, U. S. Citizenship and Immigration Service. The proportion of remaining Mission Nigeria-origin DNA cases that are confirmed through the testing is over 80 percent. Because DNA testing consumes large numbers of resources, reducing the number of confirmations might be in the interests of the mission.

***Informal Recommendation 14:*** Embassy Abuja should study DNA testing results to see whether there are other ways to reliably confirm biological relationships.

**Resource Management**

| <b>Agency</b>   | <b>U.S. Direct-Hire Staff</b> | <b>U.S. Local-Hire Staff</b> | <b>Foreign National Staff</b> | <b>Total Staff</b> | <b>Total Funding FY 2012</b> |
|---|-------------------------------|------------------------------|-------------------------------|--------------------|------------------------------|
| <b>Department of State</b>                            |                               |                              |                               |                    |                              |
| Diplomatic and Consular Programs                      | 74                            | 8                            | 14                            | 96                 | \$7,289,490                  |
| Africa Contingency Operations Training and Assistance | 0                             | 0                            | 0                             | 0                  | \$88,487                     |
| ICASS   | 17                            | 23                           | 398                           | 438                | \$26,991,000                 |
| Public Diplomacy                                      | 6                             | 1                            | 33                            | 40                 | \$3,815,900                  |
| Diplomatic Security                                   | 7                             | 1                            | 36                            | 44                 | \$6,216,778                  |
| Marine Security                                       | 16                            | 0                            | 8                             | 24                 | \$502,119                    |
| Representation  | 0                             | 0                            | 0                             | 0                  | \$99,900                     |
| MRV   | 19                            | 4                            | 10                            | 33                 | \$1,235,660                  |
| DV  | 0                             | 0                            | 4                             | 4                  | \$147,004                    |
| CA PROGRAM  | 0                             | 0                            | 30                            | 30                 | \$641,045                    |
| PAS - EAC   | 0                             | 0                            | 0                             | 0                  | \$45,181                     |
| OBO Program   | 0                             | 0                            | 0                             | 0                  | \$7,878,560                  |
| OBO Project   | 6                             | 0                            | 3                             | 9                  | \$3,411,959                  |
| Gift Fund   | 0                             | 0                            | 0                             | 0                  | \$43,983                     |
| International Narcotics and Law Enforcement Affairs   | 2                             | 0                            | 2                             | 4                  | \$106,090                    |
| State PEPFAR  | 0                             | 1                            | 3                             | 4                  | \$1,223,461                  |
| <b>Department of Agriculture</b>                      |                               |                              |                               |                    |                              |
| Foreign Agriculture Service                           | 2                             | 0                            | 4                             | 6                  | \$1,060,111                  |
| <b>Department of Defense</b>                          |                               |                              |                               |                    |                              |
| Defense Attaché Office                                | 8                             | 0                            | 2                             | 10                 | \$715,440                    |
| DOD-HIV (Walter Reed)                                 | 3                             | 0                            | 12                            | 15                 | \$1,940,383                  |
| Office of Defense Cooperation                         | 3                             | 0                            | 2                             | 5                  | \$490,031                    |
| <b>Department of Justice</b>                          |                               |                              |                               |                    |                              |
| Drug Enforcement Administration                       | 4                             | 0                            | 2                             | 6                  | \$128,408                    |
| Federal Bureau of Investigation                       | 3                             | 0                            | 4                             | 7                  | \$128,408                    |
| <b>Foreign Commercial Service</b>                     | 2                             | 0                            | 11                            | 13                 | \$915,299                    |
| <b>USAID</b>  |                               |                              |                               |                    |                              |
| Operating Expenses                                    | 16                            | 0                            | 47                            | 63                 | \$9,991,638                  |
| Development Assistance                                | 19                            | 0                            | 74                            | 93                 | \$183,791,000                |
| <b>CDC</b>  | 11                            | 1                            | 49                            | 61                 | \$4,712,765                  |

|   |            |           |            |             |                      |
|---|------------|-----------|------------|-------------|----------------------|
| <b>Treasury</b>                             | 1          | 0         | 0          | 1           | \$0                  |
| <b>Army AFRICOM, SOFLE,<br/>Navy NAVEUR</b> | 12         | 0         | 2          | 14          | \$465,000            |
| <b>Totals</b>                               | <b>231</b> | <b>39</b> | <b>750</b> | <b>1020</b> | <b>\$264,075,100</b> |

## Management Overview

### *Coordination*

Management in Lagos and Abuja communicate regularly on operational issues but do not coordinate effectively when formulating policy and procedures. Management policies and notices are not numbered or titled consistently, which makes them difficult to locate. Policies differ between the embassy and the consulate general, resulting in inequitable treatment of employees.

**Recommendation 8:** Embassy Abuja should draft, coordinate, and publish management policies applicable to the entire mission in an easily retrievable format on the embassy Web site. (Action: Embassy Abuja)

Many employees expressed frustration with unclear management and security directives and duplicative paperwork requirements. More effective coordination among management service providers, between the regional security office and management sections, and between the embassy and the consulate general would enhance productivity and customer service.

**Informal Recommendation 15:** Embassy Abuja should require that all communications to the embassy community from management subsections are cleared by other affected subsections and approved by the management officer or counselor.

**Informal Recommendation 16:** Embassy Abuja should require that all management communications to the embassy community are cleared by the regional security officer, the embassy management counselor, and the consulate management officer, and that all regional security office communications to the community are cleared by the management officer and management counselor.

**Informal Recommendation 17:** Embassy Abuja should require the management counselors and regional security officers in Abuja and Lagos to meet weekly.

**Informal Recommendation 18:** Embassy Abuja should establish weekly digital videoconference or teleconference meetings between the management counselor in Abuja and the management officer in Lagos.

### *Communication*

Despite several big and disruptive projects, such as leasing of housing compounds of up to 66 residences, there was very little communication to the embassy community on the progress of these projects and how it would affect their lives. As reflected in questionnaires and interviews, poor dissemination of information has a disruptive effect (b) (5)

**Recommendation 9:** Embassy Abuja should implement a consistent means of communication with the mission community on administrative support issues. (Action: Embassy Abuja)

***Emergency Preparedness***

Emergency preparations are not sufficiently publicized. The duty officer handbook and roster are not readily available. (b) (5)

**Recommendation 10:** Embassy Abuja should update the duty officer handbook and post it on the embassy Web site. (Action: Embassy Abuja)

**Recommendation 11:** Embassy Abuja should implement periodic orientation briefings for duty officers on their responsibilities and required actions in case of a crisis. (Action: Embassy Abuja)

(b) (5)

***Informal Recommendation 19:*** Embassy Abuja should facilitate the receipt of cell phones for all eligible family members.

***Travel and Visitors Unit***

Heavy workload brought on by the steady flow of official visitors and senior delegations was cited by the Ambassador and many employees as a serious issue for the embassy that draws heavily on the time of embassy officers, particularly in the political and economic sections. The current system makes the assigned control officer responsible for coordinating the visitor's program as well as all logistic arrangements. During FY 2012, Mission Nigeria supported the travel of 1,467 official visitors, including 69 delegations. A more systematic approach to logistical preparations would reduce the workload associated with official visitors.

**Recommendation 12:** Embassy Abuja should establish a travel and visitors unit. (Action: Embassy Abuja)

**Real Property**

***Office Facilities***

In Abuja, construction of an annex project continues on schedule at the government-owned embassy compound, with an expected completion in January 2015. The project includes offices, Marine security guard quarters, maintenance workshops, and a parking structure. The annex space will consolidate all agencies onto one compound. The mission expects final consolidation of the USAID and Department management platforms when USAID moves from commercial space off compound to the new annex. The annex will double the square footage of

government-owned facilities in Abuja. The OIG team supports Abuja's FY 2014 Mission Resource Request for a direct-hire deputy facility manager position to meet the maintenance requirements of the expanded facilities.

Construction of a new consulate compound in Lagos is scheduled to begin in 2017. Traffic congestion had led the consulate general to use its dock and boats to transport personnel. Because congestion is not likely to improve, water access for boat transportation is a high priority for the new site. Besides saving time, boat transportation decreases the security risk to personnel stuck in traffic and provides an alternate route of egress. The OIG team supports the consulate general's assessment that water access should be an important consideration in selecting the new consulate compound site.

In Lagos, construction of a consular and public affairs annex and renovation of the consulate office building, originally built in 1979, was completed in March 2012. Since completion, the chiller and air handling units have malfunctioned. The problem remains unresolved despite numerous repairs. After the building acceptance phase, if the construction contractor refuses to honor warranty obligations, 15 FAH-1 H-121.3 requires OBO to pursue further enforcement actions. High temperatures create uncomfortable offices and public spaces and put computer servers and other equipment at risk.

**Recommendation 13:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should settle the unresolved warranty claims for the chiller and air handling units at Consulate General Lagos. (Action: OBO, in coordination with Embassy Abuja)

The Lagos renovation project did not include new generators. Because of weak infrastructure, the consulate general often depends on generator power 24 hours a day. The current generators exceed the number of hours recommended for replacement and experience chronic maintenance problems. The facilities section wastes valuable time and resources to keep the generators running. As specified in 15 FAM 636.1-1, OBO is responsible for supporting and funding mission-critical generators for all Department facilities abroad. Without immediate replacement, generator failure may interrupt consulate operations.

**Recommendation 14:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should fund replacement generators for the consulate compound. (Action: OBO, in coordination with Embassy Abuja)

### *Warehouses*

In March 2013, the embassy plans to move from its current leased warehouse to a new build-to-lease warehouse. The Lagos logistics center, which originally serviced many West African posts, occupies a dilapidated, underutilized government-owned compound located 1 to 3 hours away from the consulate general, depending on traffic. The isolated location of the logistics center hampers U.S. direct-hire oversight of property management operations. Planned construction of a new consulate compound in Lagos provides an opportunity to relocate the warehouse operations.

**Recommendation 15:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should plan to replace the current logistics center with warehouse facilities

colocated with or near the new consulate compound project in Lagos. (Action: OBO, in coordination with Embassy Abuja)

### ***Staff Residences***

Housing ranks as the most important morale factor for the mission. Because of security restrictions and limited recreational opportunities, employees and family members spend much of their free time at home. For security, efficiency, cost savings, and enhanced quality of life, both Embassy Abuja and Consulate General Lagos seek to consolidate housing on fewer compounds. Abuja is working with a developer on a 66-unit residential mega-compound, which includes recreational facilities and a new warehouse. (b)(5)(b)(6) the build-with-option-to-lease project replaces almost half the embassy housing pool. The embassy expects to complete the compound in 2013. Many employees and family members express anxiety about the lack of information available about the project and the possibility of moving midtour to the new compound.

***Informal Recommendation 20:*** Embassy Abuja should develop a comprehensive transition plan for moving to the new residential mega-compound and communicate the information widely through the embassy community.

### ***Chief of Mission Residence***

After drawn-out negotiations, the embassy recently renewed the agreement on the short-term leased chief of mission residence. The lease required a substantial rent increase from \$160,000 to \$250,000 per year and a 3-year advance payment. The landlord refuses to make repairs required by terms of the lease and has indicated he will not renew the lease. The embassy suggests that a build-to-lease project for a new residence could be an appropriate solution given that suitable leased properties are not readily available in Abuja.

***Recommendation 16:*** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should evaluate the feasibility of a build-to-lease project to replace the chief of mission residence. (Action: OBO, in coordination with Embassy Abuja)

### ***General Services Office***

Dangerous traffic conditions, poor infrastructure, high-fraud risks, and the unstable security situation in Nigeria present a challenging environment for managing general services operations, complicating staff's ability to provide services in a timely manner.

### ***Procurement***

Procurement services received low scores on OIG surveys, with customers complaining about delays, poor communication, incorrect items ordered, and lack of competitive pricing. The mission is not using the government purchase card program to the extent required by the Federal Acquisition Regulation (FAR) 13.201(b), even for off-shore procurements. Expansion of the purchase card program for overseas purchases by other sections, such as public diplomacy and the medical unit, could streamline the process for special purchases. Adhering to prescribed

purchase card procedures and restricting use to off-shore procurements will lessen the opportunity for fraud.

**Recommendation 17:** Embassy Abuja should expand use of the government purchase card program for simplified acquisition purchases. (Action: Embassy Abuja)

Since 2009, the mission has improperly procured more than \$20,000 of Armed Forces Network satellite television equipment for employee residences in Abuja and Lagos. Department policy states that residential television services are a personal expense for all employees except the principal officer, DCM, and public diplomacy officers, who may be authorized satellite television equipment for job-related functions under 5 FAM 571 a. and 15 FAM 723 b. Employee recreation associations or private vendors often manage missionwide satellite television programs for residences.

**Recommendation 18:** Embassy Abuja should cease the use of appropriated funds to procure or support personal satellite television services. (Action: Embassy Abuja)

Mission contracts contain the required FAR 52.222-50 clause, Combating Trafficking in Persons. However, because of insufficient training, contracting officers and contracting officer's representatives lack awareness of their responsibilities outlined in the Office of the Procurement Executive Procurement Information Bulletin No. 2011-09. Without a structured trafficking-in-persons monitoring program, mission contractors may be engaging in illegal trafficking-in-persons activities, contrary to the Department's zero tolerance policy for recipients of Federal funds.

**Recommendation 19:** Embassy Abuja, in coordination with the Bureau of Administration, should implement a trafficking-in-persons monitoring program. (Action: Embassy Abuja, in coordination with A)

**Recommendation 20:** Embassy Abuja, in coordination with the Bureau of Administration and the Foreign Service Institute, should schedule training for contracting officers and contracting officer's representatives on how to monitor contractors compliance with the FAR 52.222.50 clause.(Action: Embassy Abuja, in coordination with A and FSI)

An OIG review of procurement documents in Lagos found three instances of unauthorized commitments, each exceeding \$1,000. The unauthorized commitments require ratification as outlined in Department of State Acquisition Regulation 601.602-3 and in 14 FAH-2 H-132. A consulate employee incorrectly assigned work to a local moving company without a valid procurement document in place. When the vendor completed the jobs and submitted invoices, the unauthorized commitments were discovered. Unauthorized commitments may result in personal liability for the person making the commitment, and vendors who act on unauthorized requests may not be paid unless the case is ratified. The Office of the Procurement Executive must also approve unauthorized commitments exceeding \$1,000.

**Recommendation 21:** Embassy Abuja, in coordination with the Bureau of Administration, should ratify all unauthorized commitments. (Action: Embassy Abuja, in coordination with the A)

### ***Warehouse and Supply Chain Management***

In Lagos, the boats and motors used for official transportation are not tracked as nonexpendable, accountable personal property or included in capitalized property reports as required by 14 FAM 418.3-1. Property personnel expressed uncertainty about the requirements. If the boats and motors are not inventoried and reported in the capitalized property reports, control over the property may be weak and the Department's financial statements will be inaccurate.

**Recommendation 22:** Embassy Abuja should enter complete property records for boats and motors used in Lagos into the Integrated Logistics Management System as capitalized property. (Action: Embassy Abuja)

In Abuja, the International Cooperative Administrative Support Services (ICASS) warehouse LE staff continues to increase with the size of the mission and consolidation of management services. Most recently, ICASS assumed responsibility for the warehouse operations and some related employees of USAID and CDC. The organizational structure at the warehouse has not adjusted with the growth. Currently, more than 20 employees report directly to the LE staff warehouse supervisor. According to 3 FAH-2 H-441.3, new or revised position descriptions are needed whenever there is a material change in the duties, responsibilities, or organization of existing positions. Without proper chains of command, employees do not receive adequate supervision.

**Recommendation 23:** Embassy Abuja should review and revise position descriptions for locally employed staff members assigned to the warehouse. (Action: Embassy Abuja)

### ***Fuel Controls***

Mission Nigeria spent approximately \$5.18 million in FY 2011 and \$4.29 million in FY 2012 on gasoline and diesel fuel—one of its largest expenses. Unreliable electric service forces the mission to rely almost full time on generators for power at office facilities and residences. Extra controls have been implemented over the past 3 years after an internal inspection conducted by the embassy in 2009.

The mission is not maintaining accurate records of monthly fuel consumption for each vehicle in the fleet by using form DS-1775 as required by 14 FAH-1 H-814.2. These records establish the average monthly kilometer per liter for each vehicle to help detect mechanical problems or theft of fuel. The general services officer should review the records monthly, investigate any problems, and sign and date the form DS-1775. Without accurate records and oversight of monthly fuel consumption, theft of fuel from vehicles can go undetected.

**Recommendation 24:** Embassy Abuja should prepare the DS-1775 monthly fuel consumption report, including calculations for average kilometers per liter mileage rates, for each vehicle and investigate any irregularities immediately. (Action: Embassy Abuja)

The underground diesel storage tanks on the embassy compound are cracked and require repair or replacement according to Department and Federal standards in the Overseas Buildings Operations Safety, Health, and Environmental Resource Guide referenced in 15 FAM 957.1.

**Recommendation 25:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should repair or replace the diesel storage tanks on the embassy compound as soon as possible to prevent environmental damage from leaks. (Action: OBO, in coordination with Embassy Abuja)

### *Customs and Shipping*

Many employees complain about not receiving unaccompanied baggage, household effects, consumables, and vehicles in a reasonable time after arrival in Abuja or Lagos. In addition, they do not receive adequate information to allow them to plan accordingly. As a result, employees waste time trying to obtain information about their shipments. The customs bureaucracy in Nigeria often delays clearances, and sea shipments are often held in the congested port of Lagos. The mission's Welcome to Post cables do not provide detailed information to manage expectations about how long shipments may take to be delivered. The guidance in 3 FAH-1 H-3763.3-2 allows posts to include location-specific information in the Welcome to Post cables. The ICASS uniform service standards for shipping and customs require weekly updates to the customer until the shipment is delivered.

**Recommendation 26:** Embassy Abuja should update its TMTHREE-Welcome to Post cables with realistic time estimates for receipt of employee shipments. (Action: Embassy Abuja)

**Recommendation 27:** Embassy Abuja should implement a system to provide customers with weekly status updates on shipments. (Action: Embassy Abuja)

The shipping section in Abuja terminated three out of four LE staff members (b) (6) in 2012. Currently, only one vendor handles export packing for outgoing embassy shipments. The embassy recently reweighed some shipments prepared by the contractor and found discrepancies in the weight certificates provided, which resulted in overcharges. The embassy has not prepared a competitive solicitation to choose additional vendors for packing, crating, and shipping services as outlined in 14 FAM 614.5-3 a. With only one contractor, the embassy risks continued problems with overcharges.

**Recommendation 28:** Embassy Abuja should prepare a competitive solicitation for local packing, crating, and shipping services. (Action: Embassy Abuja)

### *Motor Pool*

Mission Nigeria published its latest motor vehicle policy in February 2012 in accordance with 14 FAM 432.5, but it does not contain adequate information. Many employees express confusion over inconsistent charges for other authorized use, mobile police escort services, and home-to-office shuttles. Some newly arrived employees receive free home-to-office transportation until their vehicles arrive, whereas other newcomers are required to pay for the service. Some employees question paying for motor pool transportation and a mobile police escort for trips to the airport for personal travel as mandated by the regional security office. Nigeria was designated for a danger pay allowance in March 2012, and the motor vehicle policy has not been reviewed for possible exceptions for danger pay posts in 14 FAM 433.4 a.(2). Without a clear up-to-date motor vehicle policy, mission personnel may not be treated uniformly, fairly, and equitably.

**Recommendation 29:** Embassy Abuja should update and republish a comprehensive countrywide motor vehicle policy. (Action: Embassy Abuja)

An OIG team review of time and attendance records found many drivers working more than 10 hours per day in violation of 14 FAM 432.4 c.(3). Duty hours for drivers should not exceed 10 hours per day as prescribed by the Department's Motor Vehicle Safety Management Program. This violation may indicate poor scheduling or an insufficient number of drivers. Driver fatigue from excessive duty hours could result in injuries or fatalities from motor vehicle accidents.

**Recommendation 30:** Embassy Abuja should limit work hours for drivers to a maximum of 10 hours per day. (Action: Embassy Abuja)

*Travel*

(b) (5) [REDACTED]  
[REDACTED] Embassy Abuja pays for tickets via electronic funds transfers to airlines and travel agents. (b) (5) [REDACTED]  
[REDACTED]

**Recommendation 31:** (b) (5) [REDACTED]  
[REDACTED]

*Housing*

Because of a lack of strategic planning and unanticipated delays in the completion of new housing, many employees occupy temporary quarters for up to several months after arrival before moving into their permanent quarters. Some employees experience multiple moves. ICASS uniform service standards state that housing will be ready for occupancy upon the arrival of a new employee provided at least 120 days advance notice is received. In addition to the inconvenience to the employee of living in a partially furnished apartment or hotel without personal effects, the current process is costly and wasteful.

**Recommendation 32:** Embassy Abuja should improve the efficiency of housing assignments by meeting the International Cooperative Administrative Support Services uniform service standard for make ready and occupancy of housing by new arrivals during the summer and winter transfer cycles. (Action: Embassy Abuja)

Some employees and family members complain that their residences were dirty and in need of repair when they arrived, because of inadequate make-ready preparation by the landlord, contractors, or the facilities management staff. In addition, some new housing lacked required safety equipment, such as fire extinguishers, upon occupancy. According to ICASS uniform service standards, customers should move into housing that is clean, safe, and in good repair. Besides having a negative impact on morale, poor make-ready work exposes residents to risk of injury.

**Recommendation 33:** Embassy Abuja should implement a rigorous program to oversee make-ready work so that embassy housing is clean, safe, and in good repair upon occupancy. (Action: Embassy Abuja)

USAID joined the embassy's furniture and housing pools in October 2012. The mission failed to update the housing handbook for use by employees and family members to reflect new information for USAID customers. In addition, the guidelines omit post-specific housing information for customers at Consulate General Lagos. Department guidance in 15 FAM 212.5 and 15 FAM Exhibit 212.5 requires posts to keep current housing guidelines. Without up-to-date information, employees and family members experience confusion about policies and procedures for housing assignments, furniture and furnishings, and maintenance.

**Recommendation 34:** Embassy Abuja should update the mission's housing handbook to include information for all customers. (Action: Embassy Abuja)

In Lagos, the housing board has not met for more than 3 months. According to 15 FAM 212.2-2(B) f., a board should meet at least monthly. The board chairperson resigned in August without replacement as required in 15 FAM 212.2-2(B) e. Because of summer transfers, regular meetings ceased and the board failed to nominate replacements for the departing board members and chairperson. Without an active housing board to promote fair and equitable treatment, employee and family member morale suffers.

**Recommendation 35:** Embassy Abuja should facilitate at least monthly meetings of the interagency housing board in Lagos. (Action: Embassy Abuja)

**Recommendation 36:** Embassy Abuja should require the interagency housing board in Lagos to name a new chairperson. (Action: Embassy Abuja)

An OIG review of residential lease files in Lagos found incomplete records. The files lack post occupational safety and health officer certifications, which are required by 15 FAM 352(4). No system exists for the housing office to verify that all records are included. Without written records to document that properties are free of critical safety or health hazards before occupancy, employees and family members face risk of injury. In addition, the Department requires complete documentation when a property is the subject of litigation.

**Recommendation 37:** Embassy Abuja should include all required documentation in the lease files in Lagos. (Action: Embassy Abuja)

## **Facilities Management and Safety, Health, and Environmental Management**

### ***Facilities Management***

Residential maintenance received low scores on the 2012 ICASS customer satisfaction survey (3.62 out of 5 in Abuja and 3.29 in Lagos) and on OIG surveys. Many occupants of leased and government-owned housing experience improperly completed work orders, unexplained delays in service, and poor communication about scheduling of maintenance visits. Poor infrastructure, uncooperative landlords, unresponsive contractors, and sporadic oversight contribute to the problem. As required by the uniform service standards, ICASS service

providers should work with landlords, contractors, or in-house staff to ensure necessary repairs are made properly and on time, with routine repairs completed in 7 business days and emergency repairs completed in 4 hours. Lack of timely response hurts morale and exposes residents to unsafe conditions.

**Recommendation 38:** Embassy Abuja should implement a comprehensive routine maintenance and repair plan with adequate landlord liaison and contractor oversight so that residential repairs are completed properly and on time. (Action: Embassy Abuja)

### ***Safety, Health, and Environmental Management***

The facility managers at the embassy and consulate general act as post occupational safety and health officers. The safety and health standing committee in Lagos last met in 2009. Regulations in 15 FAM 933 require at least semiannual meetings. Without regular oversight of the safety program, employees risk injury.

**Recommendation 39:** Embassy Abuja should establish a formal safety and health standing committee with regular meetings in Lagos. (Action: Embassy Abuja)

Regulations in 15 FAM 312.6 and 15 FAM 252.5 require the post occupational safety and health officer to formally certify that residential properties meet Department safety, health, and environmental requirements prior to occupancy. In Lagos, because of poor recordkeeping, no documentation exists to confirm the final inspection and signed certification for residential units. Without proper certification that all hazards have been effectively controlled or eliminated before occupancy, dangerous conditions could cause serious injuries or fatalities.

**Recommendation 40:** Embassy Abuja should implement a formal certification process to document that all residential properties in Lagos meet Department safety, health, and environmental requirements before occupancy. (Action: Embassy Abuja)

### **Human Resources**

#### ***U.S. Direct-Hire Recruitment***

Recruitment of officers with appropriate skills and experience is the top human resources priority of both the embassy and the Department. But recruitment materials are out of date, and the process of monitoring and following up with bidders is haphazard. The Department maintains a centralized Web site of those who bid on positions, then sends the list of names for each position to the embassy for consideration. References for some bidders are missing from the list, which leaves the embassy scrambling to gather enough information to meet the short turnaround time to the Department.

**Recommendation 41:** Embassy Abuja, in coordination with the Bureau of African Affairs, should develop a comprehensive recruitment strategy for U.S. direct-hire officers. (Action: Embassy Abuja, in coordination with AF)

**Recommendation 42:** Embassy Abuja should update recruitment materials at the Overseas Briefing Center. (Action: Embassy Abuja)

### *Use of Resources*

Embassy Abuja has responsibility for Embassy Malabo in the areas of human resources and financial management. Since October 2010, the financial management office in Abuja has spent 119 working days in Malabo, and the human resources office has spent 59 days. Of that time, the U.S. direct-hire financial management officer spent 31 days in Malabo, and the U.S. direct-hire human resources officer spent 59 days.

***Informal Recommendation 21:*** Embassy Abuja should use more locally employed staff and fewer U.S. direct-hire human resources staff to support Embassy Malabo.

Consulate General Lagos has over two-thirds as many employees as Embassy Abuja, but only 2 of the 12 LE human resources staff members are based in Lagos. The consulate general is the size of a medium-sized embassy with a disproportionate number of entry-level officers. When the embassy moved from Lagos to Abuja in 2005, the human resources section was the only section to be centralized in Embassy Abuja. Coordination and customer service have suffered as a result.

**Recommendation 43:** Embassy Abuja, in coordination with the Bureau of Human Resources, should move the deputy human resources officer (position number 51-120003) to Consulate General Lagos. (Action: Embassy Abuja, in coordination with DGHR)

### *Locally Employed Staff Committee*

Lack of effective communication with the LE staff committee resulted in much time and energy spent on investigating individual cases of medical insurance fraud rather than addressing the root cause of the issue.

It is standard operating practice in Nigeria for hospitals to demand payment up front and to refuse to treat patients with inadequate funds. One LE staff member died after the LE staff committee was unable to deliver funds on short notice for his emergency condition. The committee raised the funds in a matter of hours while their colleague's family took him from one hospital to another seeking treatment. The funds reached him at the third hospital, but by that time the doctor said it was too late, and he died very shortly thereafter.

Locally employed staff had been lobbying for years to change the method of medical payments, which required staff to pay for medical services and then request reimbursement.

(b) (5)

A dozen LE staff members were fired over the past 2 years for medical insurance fraud.

The Department authorized Embassy Abuja to issue a request for proposal for a new health insurance plan in April of 2009. The new plan, unsatisfactory to LE staff and vulnerable to the same weaknesses as the old plan, took effect in September 2012. The delay in implementation of the plan and lack of communication during the formation of the plan are sources of frustration and bitterness for LE staff.

The LE staff committee's position is that the new plan is better than the reimbursement method; it provides for more coverage and even with the new premium payment it is better than the old plan. But the co-pay required up front makes the patient vulnerable to being refused treatment. The co-pay is defined as a percentage of the treatment even though the payment is required prior to diagnosis and treatment. The new plan shares a serious shortcoming with the old plan: patients do not know how much cash will be required before going to the hospital, (b) (5)

**Recommendation 44:** Embassy Abuja should designate one U.S. direct-hire employee to be its expert on local medical insurance, who will be the interlocutor with the locally employed staff committee, the Department of State, and the Ambassador. (Action: Embassy Abuja)

**Recommendation 45:** The Bureau of Human Resources, in coordination with Embassy Abuja, should eliminate the requirement for locally employed staff to make co-payments up front under the medical insurance plan. (Action: DGHR, in coordination with Embassy Abuja)

**Recommendation 46:** Embassy Abuja, in coordination with the Bureau of Human Resources, should examine all components of the new medical insurance plan to ensure it is in the best interest of the U.S. Government. (Action: Embassy Abuja, in coordination with DGHR)

The LE staff committee is concerned about several other issues: salary, benefits, allowances, special immigrant visa requirements, retirement plan, lack of a robust grievance process, lack of access to basic employment documents, the process by which the local compensation plan is revised, and lack of effective communication with management.

Department guidance, per 06 State 149813, encourages embassies to communicate as freely as practicable with LE staff to anticipate problems and formulate plans to resolve them effectively. Lack of communication and attention to LE staff issues diminishes mission cohesiveness.

**Recommendation 47:** Embassy Abuja should meet monthly with the locally employed staff committee for input on work life and employment issues. (Action: Embassy Abuja)

Many LE staff members expressed confusion about the local compensation plan, in particular how it was established and its benefits. As outlined in 3 FAH-2 H-215 C., selected LE staff members from various mission elements may assist in the salary survey process. Where LE staff participation is minimal because of local circumstances, the mission could substantially increase its briefings of LE staff on survey procedures and findings. When a mission does not provide information to its LE staff, and does not seek information from them on local practices, it risks deficiencies in its local compensation plan.

**Recommendation 48:** Embassy Abuja should brief the locally employed staff committee on how salary and benefits are determined in the local compensation plan. (Action: Embassy Abuja)

Neither the current local compensation plan nor the Foreign Service National Handbook is readily available. Department guidance requires the embassy to publish these documents for all locally employed staff and to include salary schedules at the embassy's discretion. Even drafts should be clearly explained and readily available to every embassy employee.

**Recommendation 49:** Embassy Abuja should post current versions of the local compensation plan and the Foreign Service National Handbook on its Web site. (Action: Embassy Abuja)

***Informal Recommendation 22:*** Embassy Abuja should post current locally employed staff salary schedules on its Web site.

The high inflation rate in Nigeria may make the embassy eligible for a waiver to the worldwide LE staff salary freeze.

**Recommendation 50:** Embassy Abuja, in coordination with the Bureau of Human Resources, should determine whether the embassy is eligible for a waiver to the locally employed staff salary freeze. (Action: Embassy Abuja, in coordination with DGHR)

### ***Locally Employed Staff Concerns***

Inspectors observed that the LE staff is not consulted on issues of concern and there is an atmosphere of fear among LE staff members following the recent termination for cause of a large number of local employees. The LE staff members feel that they risk their jobs if they ask too many questions or push too hard on issues having an impact on their employment.

Four years ago the local compensation plan was revised to change the calculation of the gratuity at the time of separation from 1 month's pay for every year of service to 3 weeks' pay for every year of service. Prevailing practice may reflect the older calculation.

***Informal Recommendation 23:*** Embassy Abuja should determine whether separation payments are in accordance with local law and practice.

LE staff members are at risk because of their service to the U.S. Government. The LE staff asked if it is eligible for danger pay, particularly as danger pay was recently instituted for U.S. direct-hire employees.

***Informal Recommendation 24:*** Embassy Abuja should determine whether the locally employed staff is eligible for special conditions of work compensation.

The Ambassador recently presented the Department with information on the rising cost of living in Nigeria to make a case for raising some of the allowances in the local compensation plan. There is no education allowance in the plan, but several LE staff members claim that the prevailing practice is to provide such an allowance.

***Informal Recommendation 25:*** Embassy Abuja should conduct surveys for housing, education, leave, meals, and transportation allowances.

The LE staff perceives that prevailing practice may involve a different retirement calculation than that stipulated in their current retirement plan.

***Informal Recommendation 26:*** Embassy Abuja should determine whether the locally employed staff retirement plan is in accordance with local law and practice.

In the past, LE staff members with less than 20 years of service had obtained special immigrant visas. Embassy policy has changed to require a minimum of 20 years of service. There is confusion on the interpretation of the embassy policy.

***Informal Recommendation 27:*** Embassy Abuja should publish a clear and comprehensive special immigrant visa policy on its Web site.

Inspectors observed that the grievance policy in place for the LE staff is unclear and there is no provision for a grievance board.

***Informal Recommendation 28:*** Embassy Abuja should revise and republish its locally employed staff grievance procedure.

### ***Eligible Family Member Employment***

Eligible family member (EFM) recruitment and hiring processes are not clear. The embassy Web site contains the process map from the Bureau of Human Resources, but there is no document that details the process and includes a timeline. The current EFM program is marked by lack of a clear explanation of the mission's policy and process for the creation, recruitment, and hiring of EFM positions.

**Recommendation 51:** Embassy Abuja should publish a clear and comprehensive eligible family member recruitment and hiring policy on its Web site that describes the hiring process and timelines. (Action: Embassy Abuja)

The long lead time for obtaining security clearances has prevented EFMs from working for much of their time in Nigeria. EFMs are not informed in advance of the need for security clearances, and the embassy does not effectively follow up on the bureaucratic process of obtaining security clearances. As a result, the embassy has not maximized its use of EFM resources.

**Recommendation 52:** Embassy Abuja should inform eligible family members who are interested in employment of the need for security clearances during their preliminary outreach efforts and should follow up with the Department of State once the security clearance paperwork has been submitted. (Action: Embassy Abuja)

Newly hired EFMs are sometimes not paid on time due to lack of coordination between the consulate general and the embassy and between the embassy and the payroll center. The result is frustrated employees and loss of productivity.

***Informal Recommendation 29:*** Embassy Abuja should implement timely payment procedures for eligible family member employees.

### ***Locally Employed Staff Recruitment and Hiring***

Embassy Abuja receives between 300 and 2,000 applications per advertised LE staff position. The human resources office prints all applications received and assesses them using the

hard copies. This method requires extra storage space and staff time. The staff is pulled away from substantive work to take time to print the applications.

***Informal Recommendation 30:*** Embassy Abuja should assess and file electronic copies of applications and supporting documentation and print the documents only when there is no other alternative.

### ***Position Review***

Several positions at Embassy Abuja and Consulate General Lagos that perform the same or very similar functions with similar scope and responsibilities are graded differently. (b) (5)



**Recommendation 53:** The Bureau of Human Resources should conduct a limited review of the locally employed staff position grades at Embassy Abuja and Consulate General Lagos. (Action: DGHR)

### ***Awards***

The mission has an awards program, but there is widespread confusion about the process. Awards committee members do not have complete information on which to base their decisions and do not formally approve a final awards list.

***Informal Recommendation 31:*** Embassy Abuja should make available to members of the awards committee all nominations submitted and the awards history of at least 3 years for each nominee and require written clearance of each member of the awards committee on the final list of awards.

Lack of understanding of how awards are determined diminishes the positive impact of the awards program.

***Informal Recommendation 32:*** Embassy Abuja should publish an awards policy cleared by the International Cooperative Administrative Support Services budget committee.

### ***Overtime Compensation***

Employees who submit overtime are compensated in either salary or compensatory time, but there is no clear instruction on who is eligible for overtime or the possibility of converting compensatory time to salary payments. The result is inequitable treatment of employees.

**Recommendation 54:** Embassy Abuja should publish a comprehensive overtime policy, including an explanation of compensatory time and conversion of compensatory time to salary payments. (Action: Embassy Abuja)

## **Financial Management**

The financial management office gets high marks from clients and ICASS subscribers, but it suffers from lack of sufficient coordination with Consulate General Lagos and lack of attention to internal controls. Conflicting policies and procedures are confusing to employees. Better communication between the financial management offices in Abuja and Lagos is needed.

***Informal Recommendation 33:*** Embassy Abuja should hold joint embassy and consulate financial management staff meetings by video or teleconference.

The financial management office provides funding to ICASS service providers without sharing the comprehensive budget. Budget decisions should be negotiated by all concerned offices to maximize embassy resources and encourage advance planning.

***Informal Recommendation 34:*** Embassy Abuja should coordinate budget planning by providing funding information to all International Cooperative Administrative Support Services providers and establishing consensus on spending priorities.

## ***International Cooperative Administrative Support Services***

The ICASS process functions well with an active budget committee. It could be improved by tighter coordination between Embassy Abuja and Consulate General Lagos.

The Broadcasting Board of Governors uses motor pool resources for its temporary duty personnel but does not pay into ICASS. As mandated by ICASS operating guidance, no agency should be exempt from paying proper ICASS costs. The result of an agency not subscribing to ICASS but receiving ICASS services is other agencies inappropriately subsidizing the nonsubscriber.

**Recommendation 55:** Embassy Abuja should require that the Broadcasting Board of Governors become an International Cooperative Administrative Support Services subscriber. (Action: Embassy Abuja)

The embassy currently direct charges temporary duty personnel for administrative support. An optional method of charging temporary duty personnel, which captures indirect ICASS service costs, is described in 6 FAH-5 H-363.1-3. Direct charging may not capture all administrative support costs.

**Recommendation 56:** Embassy Abuja should determine whether using the International Cooperative Administrative Support Services temporary duty module or direct charging is more advantageous to the U.S. Government. (Action: Embassy Abuja)

## ***Voucher Processing***

Embassy Abuja's average cost to process a voucher in house is \$38.65 per strip code. Regional financial support units charge \$12 per strip code to process vouchers. Guidance from the Global Financial Services office in Charleston is that outsourcing voucher processing is

optional and should be determined locally. Not choosing the appropriate voucher processing method is costly to the U.S. Government.

**Recommendation 57:** Embassy Abuja should determine whether outsourcing voucher processing would result in cost savings. (Action: Embassy Abuja)

### **Information Management**

Embassy Abuja's information program center and information systems center meet the mission's basic requirements. At the time of the inspection both were being managed by one mid-level officer because of two staffing vacancies. Given the environment, including the need for auxiliary generator power 24/7, security concerns, and lack of continuity caused by lengthy staffing gaps, the OIG team commends the unit's ability to maintain a strong level of performance. With all positions filled, Embassy Abuja's American and LE information management (IM) staffing levels are adequate for present operations. However, upon completion of a new office annex construction project, a considerable number of USAID, CDC, and other employees will relocate to the embassy compound. As that project draws to a close, the American IM staff would benefit from the addition of an information systems officer. Embassy Abuja has been counseled to include this position in its Mission Resource Request submissions.

The new IM officer is scheduled to arrive in November 2012. He should have oversight of IM operations in Lagos delineated in his work requirement statement. As the senior IM officer in country, he is the reviewing officer for the senior IM position in Lagos, currently the information systems officer, to provide a professional assessment of the latter's managerial and technical abilities.

**Informal Recommendation 35:** Embassy Abuja should designate the information management officer as the rating officer for the information systems officer at Consulate General Lagos.

**Informal Recommendation 36:** Embassy Abuja should include oversight of the information operations at Consulate General Lagos in the information management officer's work requirements statement.

The IM section at Consulate General Lagos also meets the mission's basic requirements while facing similar environmental, power, security, and staffing concerns found in Abuja. The consulate building itself, aside from a recently built consulate and public affairs wing, is an older structure that has facilities and maintenance deficiencies, including a leak from the roof into the post communications center foyer. The IM section consists of a mid-level information systems officer, a recently tenured information program officer, and an entry-level officer information management specialist expected to arrive in January 2013. American and LE staffing levels are adequate but would be enhanced by leadership provided by the IM officer assigned to Embassy Abuja. The Lagos IM staff would also benefit from an EFM position to assist in mail and pouch operations, inventory requirements, escorting LE systems staff and radio/telephone technicians, and other general IM related duties, thus reducing overtime the American IM staff now spends performing these activities.

**Informal Recommendation 37:** Embassy Abuja should create an eligible family member position to augment the Consulate General Lagos information management staff.

(b) (5)

**Recommendation 58:** (b) (5)

The OIG team noted an excessive amount of paper files in the Lagos information programs center, much of it dated or superseded. These files must be retired or destroyed in accordance with record management procedures found in 5 FAM 400 and 5 FAH 4 and as recommended in 12 Pretoria 650 (Regional Information Management Center operational review).

**Informal Recommendation 38:** Embassy Abuja should direct Consulate General Lagos to reduce information program center paper files and holdings.

(b) (5)

**Recommendation 59:** (b) (5)

**Informal Recommendation 39:** (b) (5)

### *Mail and Pouch Operations*

Mail screening procedures and facilities at Embassy Abuja comply with procedures outlined in 14 FAH-4, but mail screening procedures at Consulate General Lagos are inadequate.

(b) (5)

The OIG team counseled IM staff to enforce mail screening procedures more rigorously. The OIG team also counseled the consulate general to cross-train with Embassy Abuja to learn from the embassy's excellent mail screening procedures.

(b) (5)

*Informal Recommendation 40:* (b) (5)

(b) (5)

*Informal Recommendation 41:* (b) (5)

(b) (5)

*Informal Recommendation 42:* (b) (5)

*Informal Recommendation 43:* (b) (5)

### *Radio Operations*

The OIG team found a 1966 Nigerian Foreign Office diplomatic note in Lagos that approved the use of three VHF frequencies in Lagos, which was then the capital of Nigeria. The files do not contain any subsequent VHF frequency approvals. However, given the frequent and overt use of VHF radios by both Embassy Abuja and Consulate General Lagos, it must be assumed that the Nigerian Government does not disapprove of their use.

(b) (5)

(b) (5)

*Informal Recommendation 44:* (b) (5)

(b) (5)

*Informal Recommendation 45:* (b) (5)

(b) (5)

*Informal Recommendation 46:* (b) (5)

*Consulate General Lagos Logistics Center (Warehouse)*

The consulate general warehouse has a room filled with old, excess radio, telephone, and computer equipment. The consulate general needs to inventory the equipment, taking note of Nonexpendable Property Application or Worldwide Property Accountability System inventory numbers for reconciliation purposes, request disposition instructions, and dispose of it accordingly.

*Informal Recommendation 47:* Embassy Abuja should direct Consulate General Lagos to dispose of excess radio, telephone, and computer equipment stored at the consulate warehouse.

There is a significant amount of new Global Information Technology Modernization refresh computer workstation and monitor equipment at the consulate warehouse that has been there for 2 or 3 months. A schedule for deploying the new equipment would be beneficial to the consulate general.

***Informal Recommendation 48:*** Embassy Abuja should direct Consulate General Lagos to implement a schedule to deploy new computer workstations and monitors currently stored at the consulate warehouse.

(b) (5)



***Informal Recommendation 49:*** (b) (5)



## Quality of Life

### Community Liaison Office

#### *Sponsor Program*

The sponsor program is not integrated into embassy operations. Some employees report that they were not assigned a sponsor, and others report that the sponsor met them at the airport but did not provide further assistance. There are no documents explaining the sponsorship program or setting benchmarks for a sponsor's performance.

**Recommendation 60:** Embassy Abuja should implement and publicize a comprehensive sponsor program for new U.S. direct-hire employees and their families. (Action: Embassy Abuja)

#### *Embassy Orientation Program*

Because so many positions are filled by officers on their first tour, an orientation to the embassy is particularly important. However, there is no template for an orientation program or a clear planning calendar to ensure that such an orientation is conducted consistently.

**Recommendation 61:** Embassy Abuja should implement an annual calendar and planning template for an embassy orientation program and conduct the orientation a minimum of once a year. (Action: Embassy Abuja)

#### *Emergency Preparedness Seminar*

The Family Liaison Office offers excellent materials to guide an emergency preparedness seminar. Department guidance encourages such a seminar at least annually to prepare U.S. direct-hire employees and their families for different types of emergencies. Without annual seminars, families are left unprepared for emergencies.

**Recommendation 62:** Embassy Abuja should establish a template for an emergency preparedness seminar and conduct the seminar at least once a year. (Action: Embassy Abuja)

### Health Unit

The embassy and consulate health units get high marks from patients and colleagues. The regional medical officer is based in Lagos. Abuja is staffed with a Foreign Service health practitioner. Because of the heavy patient load in Abuja, however, the U.S. direct-hire healthcare provider is overworked. The use of available resources is uneven; the U.S. direct-hire supervisor in Abuja would benefit from managing the staff more effectively and delegating more patient care to the local nurses.

**Recommendation 63:** Embassy Abuja should implement a plan to empower local nurses to take more responsibility. (Action: Embassy Abuja)

The health unit is well stocked with medications and emergency supplies, but those stocks are stretched unnecessarily when employees do not bring enough medicine with them from the United States for their personal needs. Employees are not well informed about shipping times and mail limitations, which results in an unreasonable demand on health unit stocks of medicine.

**Recommendation 64:** Embassy Abuja should include in the Welcome to Post cable specific information on the challenges of obtaining medicines in Nigeria and advise employees to bring at least 6 months of personal medications with them. (Action: Embassy Abuja)

### Overseas Schools

Most children of Mission Nigeria employees attend (b)(5)(b)(6)

Most families are satisfied with the educational programs and school environments; however, the schools have very limited capacities to assist students with special needs. Both schools work with the regional security office and have committees to address security. The schools receive funding from the Office of Overseas Schools and have received grants for security upgrades. Mission children receive priority for enrollment.

### Employee Association

The employee associations in Abuja and Lagos get high marks from the Department for management of their funds. The Lagos temporary duty quarters provide a substantial income stream.

Some housing compounds in both Abuja and Lagos have cable television infrastructure in place, but many employees do not have that infrastructure at their residences. Internet service is difficult to obtain. There are many different providers, many with unreliable service. Employees spend hours trying to find a reliable service, and some have waited as long 4 months to obtain home Internet service.

**Recommendation 65:** Embassy Abuja should use the employee association to facilitate Internet and cable television service to U.S. direct-hire employees. (Action: Embassy Abuja)

## Management Controls

### Chief of Mission Certification

The annual certification of internal controls is thorough and addresses several important areas. Shipping fraud was discovered shortly before the certification was sent to Washington. Over the past 2 years, the embassy has terminated nine LE staff members for fraud, mainly involving medical claims. This year, three of four LE shipping staff members were terminated, and one was prosecuted for a scheme setting up shell companies, tampering with and forging invoices, and diverting U.S. Government funds to his own bank account. The total loss to the U.S. Government is unknown. The measure outlined in the chief of mission certification to prevent such a fraudulent scheme in the future is logical (b) (5)

The statement also failed to note the lack of a functioning safety and health standing committee and a formal residential safety certification process in Lagos.

### Separation of Duties

Given its history of LE staff committing fraud, the embassy should be particularly vigilant against fraud. However, the structure of internal controls is not coordinated well within the mission and does not address the fundamental principle of separation of duties between ordering and billing offices.

Until recently, the shipping section in Abuja received shipping invoices. After discovering a problem with a fraudulent invoice that ultimately cost the embassy more than \$175,000 in unnecessary storage fees, three out of four shipping section LE staff members were terminated. However, violation of separation of duties continues.

(b) (5)

Per 4 FAH-3 H-413.5 b. (1) and (3), purchasing goods and services should be separated from examining invoices and preparing vouchers. Violation of separation of duties increases the risk of error, waste, and wrongful acts.

**Recommendation 66:** Embassy Abuja should designate the financial management office as the billing office for all embassy transactions. (Action: Embassy Abuja)

Local vendors often submit invoices late with erroneous and sometimes inflated prices. Per 4 FAH-3 H-422.3, the billing office shall identify and solicit late invoices. Closely tracking and pursuing invoices diminishes the risk of erroneous payments.

**Recommendation 67:** Embassy Abuja should monitor and solicit tardy invoices. (Action: Embassy Abuja)

(b) (5)



**Recommendation 68:** (b) (5)



### **U.S. Direct-Hire Oversight**

Embassy Abuja and Consulate Lagos have different management controls in place because of a lack of coordination. Inconsistency weakens management controls.

**Recommendation 69:** Embassy Abuja should conduct a comprehensive review of management controls and change procedures as necessary to tighten internal controls, using the chief of mission certification risk assessment questionnaires as a starting point. (Action: Embassy Abuja)

(b) (5)



**Recommendation 70:** (b) (5)



### ***Blanket Purchase Agreements***

Embassy Abuja uses many small vendors for cash purchases because of local practice and lack of large vendors willing to accept credit. Though blanket purchase agreements may still be paid in cash, establishing such agreements using prescribed methods of determining advantageous prices and using several competing vendors would enhance discipline in purchasing and increase oversight of local purchasing.

**Recommendation 71:** Embassy Abuja should negotiate blanket purchase agreements with local vendors. (Action: Embassy Abuja)

### *Subcashiers*

Embassy Abuja employs eight subcashiers and Consulate General Lagos employs five. Some are subject to monthly unannounced cash counts and others to quarterly counts. The OIG inspectors observed that documentation for all but three subcashiers was incomplete for FY 2012. In accordance with 4 FAH-3 H-397.1-2, unannounced verifications of a Class B cashier must be conducted monthly, regardless of the cash amount. Per 4 FAH-3 H-394.3 a., the regulations that apply to the Class B cashier's use of the operating cash advance also apply to subcashiers. Lack of oversight invites fraud.

**Recommendation 72:** Embassy Abuja should conduct monthly cash counts, require that verification officers complete exhibit 12C of the cashier user guide, and include a copy with the subcashier records. (Action: Embassy Abuja)

### *Locally Employed Staff Certifying Officer*

Abuja has one LE certifying officer and has not conducted the voucher reviews of her certifications as mandated by 4 FAH-3 H-065.2-2. Lack of oversight could result in undiscovered errors and fraud.

**Recommendation 73:** Embassy Abuja should bring oversight of the locally employed staff certifying officer into compliance with Department of State regulations. (Action: Embassy Abuja)

### *Property Disposal*

The unauthorized sale of the U.S. Government-produced Moveable American Space module was discussed with a recommendation in the Public Diplomacy section of this report. The unauthorized sale is in violation of 14 FAH-1 H-710 and reflects the need for a review of current mission property disposal practices to bring them into compliance with regulations.

**Recommendation 74:** Embassy Abuja should bring its property disposal procedures into compliance with Department of State regulations. (Action: Embassy Abuja)

### *Gifts*

Embassy Abuja does not have a standard operating procedure for disposition of gifts and no designated gifts officer to maintain gift logs and to dispose of gifts in accordance with Department regulations. Per 3 FAM 4122.1, the designated officer for receiving gifts is the embassy management officer. Because gifts are used and disposed of in accordance with Department regulations governing property management and disposal, management offices often delegate this role to the general services office. The absence of a designated gifts officer and clear standard operating procedure for gifts disposition places gift recipients at risk of ethics violations.

**Recommendation 75:** Embassy Abuja should revise its delegation of authorities memorandum to identify a gifts officer from the general services office. (Action: Embassy Abuja)

**Recommendation 76:** Embassy Abuja should implement and publish a gifts policy. (Action: Embassy Abuja)

### **Consular Management Controls**

A review of cash accountability paperwork and spot checks of physical inventory showed that both posts were following required procedures. There are only two relatively small issues relating to cash accounting that need attention. Consular cashiers in both Abuja and Lagos are not managing their cash advances properly. In Abuja, there are no cash advances. The cashier cannot make change and either gets it from the Class B cashier or asks the customer to wait until a subsequent client uses exact change. In Lagos, the consular cashier and the backup share one cash advance. Both of these situations are contrary to 7 FAH-1 H-771.2-1 (cash advance) and 7 FAH-1 H-771.1-8 (separate cash boxes for each cashier).

**Recommendation 77:** Embassy Abuja should provide consular cashiers with adequate cash advances to perform their duties. (Action: Embassy Abuja)

Because of a large number of temporary personnel in Nigeria, in the 12 months before the OIG inspection, 25 different officers adjudicated nonimmigrant visas in Abuja and 28 officers adjudicated visas in Lagos. Because many temporary assignments are only for a month or less, consular managers were challenged to quickly incorporate new officers in the adjudication process. Local orientation and training is essential for quality adjudications. To check the adjudications, consular managers are required to review a percentage of adjudications of their line officers. For officers in their first (or only) month, this requirement is especially important. Abuja and Lagos have not conducted these reviews and, in both cases, the managers cited the press of business and complexity of managing the high turnover in staff. Adjudication review is essential to maintaining the integrity of the nonimmigrant visa adjudication process.

**Recommendation 78:** Embassy Abuja should perform required nonimmigrant adjudication reviews. (Action: Embassy Abuja)

Mission Nigeria takes in some \$20 million in machine-readable visa fees each year through a commercial bank. Reconciliation of these fees is an important activity, considering the amount of fraud and other illegal currency transactions that occur in Nigeria. At present, both Abuja and Lagos compile machine-readable visa fees, but the country consular coordinator does not review the countrywide receipts, as required by 7 FAH-1 H-744.2. This review is important because the place of payment does not automatically determine the post of application.

**Recommendation 79:** Embassy Abuja should instruct the country consular coordinator to review weekly the machine-readable visa fee receipts for the entire country. (Action: Embassy Abuja)

### ***Lagos Consular Management Controls***

The cashier booths in the recently renovated consular section in Lagos do not have any windows apart from the teller window for the client. To have managerial line-of-sight control over the consular operations, there must be a window either in the wall of the cashier booth or in the door.

**Recommendation 80:** Embassy Abuja, in coordination with the Bureau of Overseas Buildings Operations, should install windows in the cashier booths in Consulate General Lagos. (Action Embassy Abuja, in coordination with OBO)

## List of Recommendations

**Recommendation 1:** Embassy Abuja should initiate National Security Decision Directive 38 requests with the Office of Management Policy, Rightsizing, and Innovation for the 10 U.S. direct-hire positions filled with long-term, rotating temporary duty employees. (Action: Embassy Abuja)

**Recommendation 2:** Embassy Abuja should develop reporting plans with a focus on increasing analytic reporting. (Action: Embassy Abuja)

**Recommendation 3:** Embassy Abuja, in coordination with the Bureau of International Information Programs, should determine whether to use the moveable space program module or transfer the module to another post. (Action: Embassy Abuja, in coordination with IIP)

**Recommendation 4:** Embassy Abuja should report to the Bureau of Consular Affairs on the steps taken to implement the recommendations contained in the report of the consular management assistance team that visited Nigeria in February 2012. (Action: Embassy Abuja)

**Recommendation 5:** Embassy Abuja should distribute a professionally produced pamphlet outlining the rights of workers in the United States to all applicants for nonimmigrant worker or education visas. (Action: Embassy Abuja)

**Recommendation 6:** Embassy Abuja should implement controls so that the two consular sections submit monthly Visas Viper activity reports promptly. (Action: Embassy Abuja)

**Recommendation 7:** Embassy Abuja should require that assistant regional security officer-investigators spend 80 percent of their time on border security. (Action: Embassy Abuja)

**Recommendation 8:** Embassy Abuja should draft, coordinate, and publish management policies applicable to the entire mission in an easily retrievable format on the embassy Web site. (Action: Embassy Abuja)

**Recommendation 9:** Embassy Abuja should implement a consistent means of communication with the mission community on administrative support issues. (Action: Embassy Abuja)

**Recommendation 10:** Embassy Abuja should update the duty officer handbook and post it on the embassy Web site. (Action: Embassy Abuja)

**Recommendation 11:** Embassy Abuja should implement periodic orientation briefings for duty officers on their responsibilities and required actions in case of a crisis. (Action: Embassy Abuja)

**Recommendation 12:** Embassy Abuja should establish a travel and visitors unit. (Action: Embassy Abuja)

**Recommendation 13:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should settle the unresolved warranty claims for the chiller and air handling units at Consulate General Lagos. (Action: OBO, in coordination with Embassy Abuja)

**Recommendation 14:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should fund replacement generators for the consulate compound. (Action: OBO, in coordination with Embassy Abuja)

**Recommendation 15:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should plan to replace the current logistics center with warehouse facilities colocated with or near the new consulate compound project in Lagos. (Action: OBO, in coordination with Embassy Abuja)

**Recommendation 16:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should evaluate the feasibility of a build-to-lease project to replace the chief of mission residence. (Action: OBO, in coordination with Embassy Abuja)

**Recommendation 17:** Embassy Abuja should expand use of the government purchase card program for simplified acquisition purchases. (Action: Embassy Abuja)

**Recommendation 18:** Embassy Abuja should cease the use of appropriated funds to procure or support personal satellite television services. (Action: Embassy Abuja)

**Recommendation 19:** Embassy Abuja, in coordination with the Bureau of Administration, should implement a trafficking-in-persons monitoring program. (Action: Embassy Abuja, in coordination with A)

**Recommendation 20:** Embassy Abuja, in coordination with the Bureau of Administration and the Foreign Service Institute, should schedule training for contracting officers and contracting officer's representatives on how to monitor contractors compliance with the FAR 52.222.50 clause. (Action: Embassy Abuja, in coordination with A and FSI)

**Recommendation 21:** Embassy Abuja, in coordination with the Bureau of Administration, should ratify all unauthorized commitments. (Action: Embassy Abuja, in coordination with the A)

**Recommendation 22:** Embassy Abuja should enter complete property records for boats and motors used in Lagos into the Integrated Logistics Management System as capitalized property. (Action: Embassy Abuja)

**Recommendation 23:** Embassy Abuja should review and revise position descriptions for locally employed staff members assigned to the warehouse. (Action: Embassy Abuja)

**Recommendation 24:** Embassy Abuja should prepare the DS-1775 monthly fuel consumption report, including calculations for average kilometers per liter mileage rates, for each vehicle and investigate any irregularities immediately. (Action: Embassy Abuja)

**Recommendation 25:** The Bureau of Overseas Buildings Operations, in coordination with Embassy Abuja, should repair or replace the diesel storage tanks on the embassy compound as soon as possible to prevent environmental damage from leaks. (Action: OBO, in coordination with Embassy Abuja)

**Recommendation 26:** Embassy Abuja should update its TMTHREE-Welcome to Post cables with realistic time estimates for receipt of employee shipments. (Action: Embassy Abuja)

**Recommendation 27:** Embassy Abuja should implement a system to provide customers with weekly status updates on shipments. (Action: Embassy Abuja)

**Recommendation 28:** Embassy Abuja should prepare a competitive solicitation for local packing, crating, and shipping services. (Action: Embassy Abuja)

**Recommendation 29:** Embassy Abuja should update and republish a comprehensive countrywide motor vehicle policy. (Action: Embassy Abuja)

**Recommendation 30:** Embassy Abuja should limit work hours for drivers to a maximum of 10 hours per day. (Action: Embassy Abuja)

**Recommendation 31:** (b) (5)

**Recommendation 32:** Embassy Abuja should improve the efficiency of housing assignments by meeting the International Cooperative Administrative Support Services uniform service standard for make ready and occupancy of housing by new arrivals during the summer and winter transfer cycles. (Action: Embassy Abuja)

**Recommendation 33:** Embassy Abuja should implement a rigorous program to oversee make-ready work so that embassy housing is clean, safe, and in good repair upon occupancy. (Action: Embassy Abuja)

**Recommendation 34:** Embassy Abuja should update the mission's housing handbook to include information for all customers. (Action: Embassy Abuja)

**Recommendation 35:** Embassy Abuja should facilitate at least monthly meetings of the interagency housing board in Lagos. (Action: Embassy Abuja)

**Recommendation 36:** Embassy Abuja should require the interagency housing board in Lagos to name a new chairperson. (Action: Embassy Abuja)

**Recommendation 37:** Embassy Abuja should include all required documentation in the lease files in Lagos. (Action: Embassy Abuja)

**Recommendation 38:** Embassy Abuja should implement a comprehensive routine maintenance and repair plan with adequate landlord liaison and contractor oversight so that residential repairs are completed properly and on time. (Action: Embassy Abuja)

**Recommendation 39:** Embassy Abuja should establish a formal safety and health standing committee with regular meetings in Lagos. (Action: Embassy Abuja)

**Recommendation 40:** Embassy Abuja should implement a formal certification process to document that all residential properties in Lagos meet Department safety, health, and environmental requirements before occupancy. (Action: Embassy Abuja)

**Recommendation 41:** Embassy Abuja, in coordination with the Bureau of African Affairs, should develop a comprehensive recruitment strategy for U.S. direct-hire officers. (Action: Embassy Abuja, in coordination with AF)

**Recommendation 42:** Embassy Abuja should update recruitment materials at the Overseas Briefing Center. (Action: Embassy Abuja)

**Recommendation 43:** Embassy Abuja, in coordination with the Bureau of Human Resources, should move the deputy human resources officer (position number 51-120003) to Consulate General Lagos. (Action: Embassy Abuja, in coordination with DGHR)

**Recommendation 44:** Embassy Abuja should designate one U.S. direct-hire employee to be its expert on local medical insurance, who will be the interlocutor with the locally employed staff committee, the Department of State, and the Ambassador. (Action: Embassy Abuja)

**Recommendation 45:** The Bureau of Human Resources, in coordination with Embassy Abuja, should eliminate the requirement for locally employed staff to make co-payments up front under the medical insurance plan. (Action: DGHR, in coordination with Embassy Abuja)

**Recommendation 46:** Embassy Abuja, in coordination with the Bureau of Human Resources, should examine all components of the new medical insurance plan to ensure it is in the best interest of the U.S. Government. (Action: Embassy Abuja, in coordination with DGHR)

**Recommendation 47:** Embassy Abuja should meet monthly with the locally employed staff committee for input on work life and employment issues. (Action: Embassy Abuja)

**Recommendation 48:** Embassy Abuja should brief the locally employed staff committee on how salary and benefits are determined in the local compensation plan. (Action: Embassy Abuja)

**Recommendation 49:** Embassy Abuja should post current versions of the local compensation plan and the Foreign Service National Handbook on its Web site. (Action: Embassy Abuja)

**Recommendation 50:** Embassy Abuja, in coordination with the Bureau of Human Resources, should determine whether the embassy is eligible for a waiver to the locally employed staff salary freeze. (Action: Embassy Abuja, in coordination with DGHR)

**Recommendation 51:** Embassy Abuja should publish a clear and comprehensive eligible family member recruitment and hiring policy on its Web site that describes the hiring process and timelines. (Action: Embassy Abuja)

**Recommendation 52:** Embassy Abuja should inform eligible family members who are interested in employment of the need for security clearances during their preliminary outreach efforts and should follow up with the Department of State once the security clearance paperwork has been submitted. (Action: Embassy Abuja)

**Recommendation 53:** The Bureau of Human Resources should conduct a limited review of the locally employed staff position grades at Embassy Abuja and Consulate General Lagos. (Action: DGHR)

**Recommendation 54:** Embassy Abuja should publish a comprehensive overtime policy, including an explanation of compensatory time and conversion of compensatory time to salary payments. (Action: Embassy Abuja)

**Recommendation 55:** Embassy Abuja should require that the Broadcasting Board of Governors become an International Cooperative Administrative Support Services subscriber. (Action: Embassy Abuja)

**Recommendation 56:** Embassy Abuja should determine whether using the International Cooperative Administrative Support Services temporary duty module or direct charging is more advantageous to the U.S. Government. (Action: Embassy Abuja)

**Recommendation 57:** Embassy Abuja should determine whether outsourcing voucher processing would result in cost savings. (Action: Embassy Abuja)

**Recommendation 58:** (b) (5)

**Recommendation 59:** (b) (5)

**Recommendation 60:** Embassy Abuja should implement and publicize a comprehensive sponsor program for new U.S. direct-hire employees and their families. (Action: Embassy Abuja)

**Recommendation 61:** Embassy Abuja should implement an annual calendar and planning template for an embassy orientation program and conduct the orientation a minimum of once a year. (Action: Embassy Abuja)

**Recommendation 62:** Embassy Abuja should establish a template for an emergency preparedness seminar and conduct the seminar at least once a year. (Action: Embassy Abuja)

**Recommendation 63:** Embassy Abuja should implement a plan to empower local nurses to take more responsibility. (Action: Embassy Abuja)

**Recommendation 64:** Embassy Abuja should include in the Welcome to Post cable specific information on the challenges of obtaining medicines in Nigeria and advise employees to bring at least 6 months of personal medications with them. (Action: Embassy Abuja)

**Recommendation 65:** Embassy Abuja should use the employee association to facilitate Internet and cable television service to U.S. direct-hire employees. (Action: Embassy Abuja)

**Recommendation 66:** Embassy Abuja should designate the financial management office as the billing office for all embassy transactions. (Action: Embassy Abuja)

**Recommendation 67:** Embassy Abuja should monitor and solicit tardy invoices. (Action: Embassy Abuja)

**Recommendation 68:** (b) (5)

**Recommendation 69:** Embassy Abuja should conduct a comprehensive review of management controls and change procedures as necessary to tighten internal controls, using the chief of mission certification risk assessment questionnaires as a starting point. (Action: Embassy Abuja)

**Recommendation 70:** (b) (5)

**Recommendation 71:** Embassy Abuja should negotiate blanket purchase agreements with local vendors. (Action: Embassy Abuja)

**Recommendation 72:** Embassy Abuja should conduct monthly cash counts, require that verification officers complete exhibit 12C of the cashier user guide, and include a copy with the subcashier records. (Action: Embassy Abuja)

**Recommendation 73:** Embassy Abuja should bring oversight of the locally employed staff certifying officer into compliance with Department of State regulations. (Action: Embassy Abuja)

**Recommendation 74:** Embassy Abuja should bring its property disposal procedures into compliance with Department of State regulations. (Action: Embassy Abuja)

**Recommendation 75:** Embassy Abuja should revise its delegation of authorities memorandum to identify a gifts officer from the general services office. (Action: Embassy Abuja)

**Recommendation 76:** Embassy Abuja should implement and publish a gifts policy. (Action: Embassy Abuja)

**Recommendation 77:** Embassy Abuja should provide consular cashiers with adequate cash advances to perform their duties. (Action: Embassy Abuja)

**Recommendation 78:** Embassy Abuja should perform required nonimmigrant adjudication reviews. (Action: Embassy Abuja)

**Recommendation 79:** Embassy Abuja should instruct the country consular coordinator to review weekly the machine-readable visa fee receipts for the entire country. (Action: Embassy Abuja)

**Recommendation 80:** Embassy Abuja, in coordination with the Bureau of Overseas Buildings Operations, should install windows in the cashier booths in Consulate General Lagos. (Action: Embassy Abuja, in coordination with OBO)

## List of Informal Recommendations

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent regional bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess the mission's progress in implementing the informal recommendations.

***Informal Recommendation 1:*** Embassy Abuja should appoint a Foreign Service national Equal Employment Opportunity liaison and publicize the contact information.

***Informal Recommendation 2:*** Embassy Abuja should review and certify that all position descriptions for the locally employed staff in the public affairs section are up to date.

***Informal Recommendation 3:*** Embassy Abuja should require the two new public affairs officers in Lagos to reapply for new grants officer certificates of appointment with the Office of the Procurement Executive.

***Informal Recommendation 4:*** Embassy Abuja should arrange for additional grants officer's representative training for the locally employed staff in the public affairs section at Consulate General Lagos.

***Informal Recommendation 5:*** Embassy Abuja should require that the country public affairs officer improve communications within the mission's public affairs sections by involving employees in the discussion of policy and program issues.

***Informal Recommendation 6:*** Embassy Abuja should coordinate mission nonimmigrant visa appointments through the country consular coordinator so that wait times are consistent within Nigeria.

***Informal Recommendation 7:*** Embassy Abuja should convene a consular conference to discuss better coordination of policies, procedures, and personnel.

***Informal Recommendation 8:*** Embassy Abuja should implement a professional development program for entry-level consular officers.

***Informal Recommendation 9:*** Embassy Abuja should establish a plan that allocates nonconsular resources, as required, to eliminate the nonimmigrant visa appointment backlog.

***Informal Recommendation 10:*** Embassy Abuja should revise visa processing procedures with the goal of increasing the efficiency of operations.

***Informal Recommendation 11:*** Embassy Abuja should allocate a workspace in the consular section for the assistant regional security officer-investigators.

***Informal Recommendation 12:*** Embassy Abuja should review consular signage, beginning with directional signs inside the consular waiting room.

***Informal Recommendation 13:*** Embassy Abuja should improve the visa intake procedures at Consulate General Lagos.

***Informal Recommendation 14:*** Embassy Abuja should study DNA testing results to see whether there are other ways to reliably confirm biological relationships.

***Informal Recommendation 15:*** Embassy Abuja should require that all communications to the embassy community from management subsections are cleared by other affected subsections and approved by the management officer or counselor.

***Informal Recommendation 16:*** Embassy Abuja should require that all management communications to the embassy community are cleared by the regional security officer, the embassy management counselor, and the consulate management officer, and that all regional security office communications to the community are cleared by the management officer and management counselor.

***Informal Recommendation 17:*** Embassy Abuja should require the management counselors and regional security officers in Abuja and Lagos to meet weekly.

***Informal Recommendation 18:*** Embassy Abuja should establish weekly digital videoconference or teleconference meetings between the management counselor in Abuja and the management officer in Lagos.

***Informal Recommendation 19:*** Embassy Abuja should facilitate the receipt of cell phones for all eligible family members.

***Informal Recommendation 20:*** Embassy Abuja should develop a comprehensive transition plan for moving to the new residential mega-compound and communicate the information widely through the embassy community.

***Informal Recommendation 21:*** Embassy Abuja should use more locally employed staff and fewer U.S. direct-hire human resources staff to support Embassy Malabo.

***Informal Recommendation 22:*** Embassy Abuja should post current locally employed staff salary schedules on its Web site.

***Informal Recommendation 23:*** Embassy Abuja should determine whether separation payments are in accordance with local law and practice.

***Informal Recommendation 24:*** Embassy Abuja should determine whether the locally employed staff is eligible for special conditions of work compensation.

***Informal Recommendation 25:*** Embassy Abuja should conduct surveys for housing, education, leave, meals, and transportation allowances.

***Informal Recommendation 26:*** Embassy Abuja should determine whether the locally employed staff retirement plan is in accordance with local law and practice.

***Informal Recommendation 27:*** Embassy Abuja should publish a clear and comprehensive special immigrant visa policy on its Web site.

**Informal Recommendation 28:** Embassy Abuja should revise and republish its locally employed staff grievance procedure.

**Informal Recommendation 29:** Embassy Abuja should implement timely payment procedures for eligible family member employees.

**Informal Recommendation 30:** Embassy Abuja should assess and file electronic copies of applications and supporting documentation and print the documents only when there is no other alternative.

**Informal Recommendation 31:** Embassy Abuja should make available to members of the awards committee all nominations submitted and the awards history of at least 3 years for each nominee and require written clearance of each member of the awards committee on the final list of awards.

**Informal Recommendation 32:** Embassy Abuja should publish an awards policy cleared by the International Cooperative Administrative Support Services budget committee.

**Informal Recommendation 33:** Embassy Abuja should hold joint embassy and consulate financial management staff meetings by video or teleconference.

**Informal Recommendation 34:** Embassy Abuja should coordinate budget planning by providing funding information to all International Cooperative Administrative Support Services providers and establishing consensus on spending priorities.

**Informal Recommendation 35:** Embassy Abuja should designate the information management officer as the rating officer for the information systems officer at Consulate General Lagos.

**Informal Recommendation 36:** Embassy Abuja should include oversight of the information operations at Consulate General Lagos in the information management officer's work requirements statement.

**Informal Recommendation 37:** Embassy Abuja should create an eligible family member position to augment the Consulate General Lagos information management staff.

**Informal Recommendation 38:** Embassy Abuja should direct Consulate General Lagos to reduce information program center paper files and holdings.

**Informal Recommendation 39:** (b) (5) [Redacted]

**Informal Recommendation 40:** (b) (5) [Redacted]

**Informal Recommendation 41:** (b) (5) [Redacted]

**Informal Recommendation 42:** (b) (5) [Redacted]

*Informal Recommendation 43:* (b) (5) [Redacted]

*Informal Recommendation 44:* (b) (5) [Redacted]

*Informal Recommendation 45:* (b) (5) [Redacted]

*Informal Recommendation 46:* (b) (5) [Redacted]

*Informal Recommendation 47:* Embassy Abuja should direct Consulate General Lagos to dispose of excess radio, telephone, and computer equipment stored at the consulate warehouse.

*Informal Recommendation 48:* Embassy Abuja should direct Consulate General Lagos to implement a schedule to deploy new computer workstations and monitors currently stored at the consulate warehouse.

*Informal Recommendation 49:* (b) (5) [Redacted]

## Principal Officials

|  | <b>Name</b>            | <b>Arrival Date</b> |
|--|------------------------|---------------------|
| Ambassador   | Terence P. McCulley    | 10/10               |
| Deputy Chief of Mission  | James P. McAnulty      | 1/11                |
| Constituent Post   |                        |                     |
| Consulate General Lagos  |                        |                     |
| Consul General   | Jeffrey J. Hawkins     | 8/12                |
| Country Consular Coordinator                                   | Daphne M. Titus        | 8/12                |
| Foreign Agricultural Service                                   | Russell J. Nicely      | 7/10                |
| Foreign Commercial Service                                     | Rebecca Armand         | 8/10                |
| Federal Bureau of Investigation/Office of<br>the Legal Attaché | Victor D. Lloyd        | 7/12                |
| Drug Enforcement Agency  | Peter K. Lampkins      | 11/11               |
| Chiefs of Sections:  |                        |                     |
| Management   | Tedla Y. Yitna         | 8/11                |
| Consular   | Carol A. Cox           | 8/11                |
| Political  | Gregory F. Lawless     | 8/12                |
| Economic   | Douglas P. Climan      | 6/12                |
| Overseas Buildings Operations                                  | William L. Young       |                     |
| Public Affairs   | Melissa G. Ford        | 10/11               |
| Regional Affairs   | Kevin L. Higgins       | 7/11                |
| Regional Security  | John Bray              | 10/12               |
| Other Agencies:  |                        |                     |
| Department of Treasury   | Phillip W. Morris      | 8/11                |
| Defense Attaché Office   | Co. Ryan P. McMullen   | 9/11                |
| Office of Defense Cooperation                                  | Kenneth B. Ivy         | 9/12                |
| Centers for Disease Control and Prevention                     | Okechukwu C. Nwanyanwu | 9/10                |
| U.S. Agency for International Development                      | Dana Mansuri           | 9/10                |

## Abbreviations

|            |   |
|------------|---|
| ARSO-I     | Assistant regional security officer-investigator          |
| CDC        | Centers for Disease Control and Prevention                |
| DCM        | Deputy chief of mission                                   |
| Department | U.S. Department of State                                  |
| EFM        | Eligible family member                                    |
| FAH        | <i>Foreign Affairs Handbook</i>                           |
| FAM        | <i>Foreign Affairs Manual</i>                             |
| FAR        | Federal Acquisition Regulation                            |
| HF         | High frequency  |
| ICASS      | International Cooperative Administrative Support Services |
| IM         | Information management                                    |
| LE         | Locally employed (staff)                                  |
| OBO        | Bureau of Overseas Buildings Operations                   |
| OIG        | Office of Inspector General                               |
| PAS        | Public affairs section                                    |
| PEPFAR     | President's Emergency Plan for AIDS Relief                |
| USAID      | U.S. Agency for International Development                 |
| VHF        | Very high frequency                                       |



**FRAUD, WASTE, ABUSE,  
OR MISMANAGEMENT  
OF FEDERAL PROGRAMS  
HURTS EVERYONE.**

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TO REPORT ILLEGAL  
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202-647-3320

800-409-9926

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