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United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General

Report of Inspection

Compliance Follow-Up Review of Embassy Antananarivo, Madagascar

Report Number ISP-C-10-30A, February 2010

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PURPOSE, SCOPE AND METHODOLOGY OF THE INSPECTION

This inspection was conducted in accordance with the Quality Standards for Inspections, as issued by the President's Council on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General, U.S. Department of State.

PURPOSE

The Office of Inspections provides the Secretary of State and Congress with systematic and independent evaluations of the operations of the Department of State, its posts abroad, and related activities. 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 being accurately and effectively represented; 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 in the Department and elsewhere; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on site interviews with personnel at the overseas missions, in the Department, and elsewhere; and reviewed the substance of the report and its findings and recommendations with office, 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".

Harold W. Geisel
Deputy Inspector General

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INTRODUCTION

Compliance follow-up reviews (CFR) by the Office of the Inspector General (OIG) provide senior managers of the Department of State (Department) with progress reports on the status of recommendations that resulted from inspections, and provide OIG with a quality assurance of its work.

The CFR of Embassy Antananarivo took place in Washington, DC from August 17-21, 2009, and in Antananarivo, Madagascar from August 31 to September 4, 2009.
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This CFR closes the 2008 inspection report and contains two reissued and one new recommendation. Other management issues listed in the work plan were reviewed and found to be completed.

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CONTEXT

Embassy Antananarivo is a medium-sized post with 42 U.S. direct-hires from six agencies, 305 locally employed staff, and 275 contract guards. Its total budget for FY 2009 from the Department is \$25 million.

Madagascar broke with the socialist orientation it had followed in its earlier years after independence when, in 2002, a new president committed to a market economy and encouraging foreign investment was elected. Relations with the United States developed steadily. By 2008, Madagascar was the first beneficiary of a Millennium Challenge Corporation (MCC) compact for a four-year program of nearly \$110 million. Overall levels of U.S. development assistance through the MCC, the U.S. Agency for International Development (USAID), and the Department of Agriculture totaled over \$217 from multiyear funding streams.

In March 2009, President Ravalomanana was overthrown in a coup d'état by the former mayor of Antananarivo, Rajoelina. The United States, the African Union, the European Union, and others have refused to recognize the new regime as the legitimate government. In response to the coup, the United States has terminated the MCC compact and suspended all but humanitarian aid programs. Negotiations between the two factions to form a transitional government leading to new elections have thus far been unsuccessful and the political outlook for Madagascar was uncertain at the time of the compliance follow-up review.

The public affairs office is working in coordination with post management, including the Embassy's human resources office, to terminate the personal service agreements of the current group of ETP teachers and to determine the benefits to which the teachers may be entitled. The current ETP teachers will be offered the opportunity to apply for positions with the privatized ETP.

The Embassy needs to take major steps to complete ETP privatization by April 1, 2010, including the resolution of questions regarding personnel, funding, and location of the ETP. The present premises at the American Cultural Center are inadequate and outmoded. The Embassy will need to pursue ETP privatization diligently over the next months in order to achieve ETP privatization by the target date. CFR Recommendation 1 is a reissue of Recommendation 2 from the 2008 inspection of Embassy Antananarivo.

CFR Recommendation 1: Embassy Antananarivo, in coordination with the Bureau of African Affairs, should privatize the English Teaching Program. (Action: Embassy Antananarivo, in coordination with AF)

DISPOSAL OF EXCESS FURNITURE

There has been no resolution to complete action on informal recommendation 14 from the 2008 inspection to dispose of excess furniture held in the warehouse for the chief of mission residence. According to post records, the total purchase value of the furniture is about \$14,000. Some of the furniture is more than 15 years old, shows wear and tear, and is not suitable for a chief of mission residence. The new embassy building has a much smaller warehouse, without space to retain aging, unused furnishings.

When the Embassy initiated action with the Bureau of Overseas Buildings Operations (OBO) to obtain authorization for disposal of the furniture, OBO stated that there was a 19-year life cycle, and that all the unused furniture should be placed in the chief of mission residence when the present Ambassador departed post. The OBO operations and maintenance/area manager contacted the Embassy prior to the CFR, and listed the steps it needed to take to determine what furniture can be disposed of or retained. The Embassy is in the process of complying with these steps, which includes taking digital photographs of the inventory to be sent to OBO for verification that disposal is justified.

CFR Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Antananarivo, should review the inventory and dispose locally of unused, stored chief of mission furnishings. (Action: OBO, in coordination with Embassy Antananarivo)

MILLENNIUM CHALLENGE CORPORATION CLOSEOUT ASSISTANCE

In August 2005, the MCC set up operations in Madagascar as the first country to meet requirements for funding a Millennium Challenge Compact. The Millennium Challenge Account (MCA-Madagascar) is the private nongovernmental entity set up by MCC to manage its programs. Due to the coup d'état in March 2009, Madagascar is no longer eligible for MCC funds. The country is now in the unique position of being the first to set up and implement a Millennium Challenge Compact and the first of some 18 compact countries to close the program. As a result, MCC/MCA-Madagascar has assets in nonexpendable property and vehicles that need to be disposed. A minimum number of payments must be made to the MCA-Madagascar's vendors after the closure of the MCA office.

MCC is a member of the International Cooperative Administrative Support Services, and as such, is provided normal financial and procurement services. Disposing of over \$1 million worth of property is an excessive workload for the mission. The OIG CFR team understands the need to assist MCC with the closeout; however, they question whether the embassy in Antananarivo has the legal authority to dispose of the MCC property and to pay vendors for the MCA, which is a nongovernmental entity.

CFR Recommendation 3: The Office of the Legal Adviser should review and determine the legality of Embassy Antananarivo providing property disposal for the Millennium Challenge Corporation and paying vendors for the Millennium Challenge Account. (Action: L)

COMPLIANCE FOLLOW-UP REVIEW RECOMMENDATIONS

CFR Recommendation 1: Embassy Antananarivo, in coordination with the Bureau of African Affairs, should privatize the English Teaching Program. (Action: Embassy Antananarivo, in coordination with AF)

CFR Recommendation 2: The Bureau of Overseas Buildings Operations, in coordination with Embassy Antananarivo, should review the inventory and dispose locally of unused, stored chief of mission furnishings. (Action: OBO, in coordination with Embassy Antananarivo)

CFR Recommendation 3: The Office of the Legal Adviser should review and determine the legality of Embassy Antananarivo providing property disposal for the Millennium Challenge Corporation and paying vendors for the Millennium Challenge Account. (Action: L)

APPENDIX - STATUS OF 2008 INSPECTION RECOMMENDATIONS

Recommendation 1: Embassy Antananarivo, in coordination with the Bureau of African Affairs, Bureau of Overseas Buildings Operations, and Bureau of Diplomatic Security, should develop and submit to the Department a comprehensive budget projection for establishment of a resident diplomatic presence in the Comoros to include realistic estimates for a residence, office space, furnishings, staff, transportation (including inter-island travel), security requirements, and communications. (Action: Embassy Antananarivo, in coordination with AF, OBO, and DS)

Status: Closed

Comment: The Embassy prepared a comprehensive budget projection and submitted it to the Executive Office of AF, but Washington has not made a decision regarding whether to establish a resident diplomatic presence in the Comoros. A Comoros reporting officer remains based at Embassy Antananarivo and travels periodically to the islands.

Recommendation 2: Embassy Antananarivo, in coordination with the Bureau of African Affairs, should privatize the English Teaching Program. (Action: Embassy Antananarivo, in coordination with AF)

Status: Closed

Comment: The mission has developed and begun to implement a plan to privatize the English Teaching Program (ETP), by creating a private, non-profit entity which will operate under a Board of Directors, on which the public affairs officer would have a seat. The target date for ETP privatization is April 1, 2010. The Embassy has taken several steps such as registering the privatized ETP to be called the English Language Center, as a language school with the Ministry of Education. To comply, the OIG team is reissuing this recommendation as a formal recommendation.

Recommendation 3: Embassy Antananarivo should relocate the press center, press center manager, and the educational advisor from the American Cultural Center to the chancery or to an existing embassy annex. (Action: Embassy Antananarivo)

Status: Closed

Comment: Relocation will take place with the move to a new embassy compound in the spring of 2010. While the construction of the new embassy compound was underway, the PAO viewed the office space for public affairs, including the press center and the educational adviser, and confirmed that it is adequate.

Recommendation 4: Embassy Antananarivo should determine what outcomes it seeks from its relations with the press and other public diplomacy activities, develop indicators to measure those outcomes, and design and implement a process to track them. (Action: Embassy Antananarivo)

Status: Closed

Comment: The Public Affairs Office has set up an Excel spreadsheet-based process to track the tenor of media commentary on U.S.-related issues and activities.

Recommendation 5: The Bureau of Consular Affairs should approve the proposal to allow the use of credit or debit cards for the payment of consular fees at Embassy Antananarivo. (Action: CA)

Status: Closed

Comment: Credit cards are used primarily by American Citizens and there have been no issues.

Recommendation 6: The Bureau of Consular Affairs should approve an additional full-time consular assistant position for the consular section in Antananarivo. (Action: CA)

Status: Closed

Comment: A part-time consular assistant position opening is being announced. The ordered departure delayed hiring. At this time, the Embassy believes that a part-time position is sufficient for the workload. If it is insufficient, they will request additional funds from the Bureau of Consular Affairs for a full-time position.

Recommendation 7: The Office of the Legal Adviser, in coordination with the Bureau of Consular Affairs, should approve an off-site, machine readable visa collection memorandum of understanding for Embassy Antananarivo. (Action: L, in coordination with CA)

Status: Closed

Comment: In February of 2009, the Department approved an off-site, machine readable visa collection memorandum of understanding for Embassy Antananarivo and the local host country bank and it is in use with no issues.

Recommendation 8: Embassy Antananarivo should designate the Villa Liberty property (S98550, AID-678-LE 96-001) as the deputy chief of mission residence and dedicate Villa Hortensia (L98539, L-554-FBO-78) as the U.S. Agency for International Development residence and move the new occupants of those positions into those residences when they arrive at Embassy Antananarivo. (Action: Embassy Antananarivo)

Status: Closed

Comment: The Embassy made the recommended moves, updated property records, and advised OBO's Office of Planning and Real Estate, Office of Area Management of the exchange.

Recommendation 9: Embassy Antananarivo should forward to the Department all appropriate documents relating to the gift of land from the government of Madagascar and the acquisition contract, to the Office of the Legal Adviser and to the Bureau of Overseas Buildings Operations to verify that the requirements for accepting gifts and acquiring land have been met and official approval granted. (Action: Embassy Antananarivo, in coordination with L and OBO)

Status: Closed

Comment: The Embassy provided all documents pertaining to the proposed acceptance of land to L and OBO in August 2008. The post received guidance with regard to obtaining approval for acceptance of the property. However in view of a question that developed over title to the land, as well as the political uncertainty in the country at present, the Embassy has decided not to pursue acquisition of the gift of land. (See Recommendation 10).

Recommendation 10: Embassy Antananarivo should request the Bureau of Overseas Buildings Operations to conduct a technical survey of the land intended for a school to determine its viability for that purpose. (Action: Embassy Antananarivo)

Status: Closed

Comment: OBO advised that the _____ the beneficiary of the proposed property exchange, was responsible for funding the necessary technical survey. The school contracted for the survey, and then provided the results to OBO and L. However in view of a question over title to the land that developed, as well as the political uncertainty in the country at present, the Embassy has decided not to pursue acquisition of the gift of land for use as a new school location.

Recommendation 11: Embassy Antananarivo should inform the Bureau of Overseas Buildings Operations that it wishes to delay funding for a security wall at the future site for the (b) (6)(b) (6)(b) (6)(b) (6) and withdraw its request for FY 2008 funding. (Action: Embassy Antananarivo)

Status: Closed

Comment: The Embassy informed OBO and the Bureau of Diplomatic Security that the security wall project would be delayed and that funds had been withdrawn. The project is not being pursued at the present time (see Recommendations 10 and 11).

Recommendation 12: Embassy Antananarivo, in coordination with the Bureau of Human Resources, should gather and review required documentation and make a determination regarding the eligibility of Embassy Antananarivo to participate in the Department's defined contribution plan. (Action: Embassy Antananarivo, in coordination with DGHR)

Status: Closed

Comment: The embassy human resource staff, including the regional human resource officer, and in coordination with the local employees association, reviewed this issue and were unable to make a case for withdrawing local staff from the country's local social security system. The embassy human resource staff, including the regional human resource officer is pursuing, development of a supplemental defined retirement contribution plan. The Bureau of Human Resources, Office of Overseas Employment is considering the option that this mission serve as a pilot post for the Voluntary Retirement Savings Program, developed by the Department as a supplemental program to local social security systems.

Recommendation 13: Embassy Antananarivo should obtain Office of Medical Services approval to continue holding clinic hours at an off-site location. (Action: Embassy Antananarivo, in coordination with MED)

Status: Closed

Comment: The regional medical officer, in consultation with the Office of Medical Services, approved the use of an off-site medical clinic.

STATUS OF 2008 INSPECTION 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.

All but one informal recommendation was closed. The OIG inspectors verified corrective actions during the compliance follow-up review. They reissued the informal recommendation that was not resolved as a formal recommendation.

Informal Recommendation 1: Embassy Antananarivo should develop a plan to have greater officer Malagasy language competence and implement it.

Comment: The mission holds language classes in Malagasy and French for American staff.

Informal Recommendation 2: Embassy Antananarivo should solicit feedback on an annual basis from press center clients.

Comment: The public affairs office surveys clients monthly on the utility of press center services.

Informal Recommendation 3: Embassy Antananarivo should establish a regular interagency public diplomacy coordination meeting just before the weekly country team meeting.

Comment: The public affairs office and USAID meet regularly to coordinate their public diplomacy outreach efforts.

Informal Recommendation 4: Embassy Antananarivo should explore and experiment with ways to increase outreach to the segment of the host country population that only speaks Malagasy.

Comment: The public affairs office already provides material for the local Malagasy language radio station. In addition, the mission is holding an off-site meeting at the end of September to review how best to advance U.S. goals and objectives in the current political situation. This will include consideration of public diplomacy efforts with the Malagasy-speaking population.

Informal Recommendation 5: Embassy Antananarivo should include in the work requirements of the new Comoros position, limited consular outreach, and duties such as accepting passport and consular reports of births abroad of American citizen applications for processing in Antananarivo.

Comment: The Embassy has a budget of \$30,000 for travel to the Comoros Islands, including by the consular officer. A trip was planned the week of the ordered departure from post. A trip is planned for the end of September to handle the needs of the 12 U.S. citizens on the island and to establish contacts for future visits.

Informal Recommendation 6: Embassy Antananarivo should direct the incoming consul to try to meet with counterparts in other missions and arrange at least an informal consular corps.

Comment: The consular officer has contacted other embassies and coordinates regularly as needed.

Informal Recommendation 7: The Embassy Antananarivo class B cashier should provide the consular cashier with a dollar advance.

Comment: (b) (2)(b) (2) is provided to both the consular cashier and the alternate.

Informal Recommendation 8: Embassy Antananarivo should provide a separate cash box for the use of the back-up consular assistant/cashier.

Comment: The Embassy has provided a separate cash box for the back-up consular cashier.

Informal Recommendation 9: Embassy Antananarivo should make revisions to the website a priority for the public diplomacy section and the incoming consul.

Comment: The consular and public diplomacy sections have updated their information on the website to include a French language page.

Informal Recommendation 10: Embassy Antananarivo should monitor compliance with International Cooperative Administrative Support Services standards and use the results as a management tool to improve customer service.

Comment: ICASS Uniform Service Standards are in place and the ICASS Council reviews the service standards annually for changes.

Informal Recommendation 11: Embassy Antananarivo should include compliance with International Cooperative Administrative Support Services standards as an element in performance evaluations.

Comment: Work requirements and annual evaluations for ICASS service providers include a discussion and evaluation of performance in meeting standards as ICASS service providers.

Informal Recommendation 12: Embassy Antananarivo should distribute National Security Decision Directive-38 guidance and train International Cooperative Administrative Support Services Council members on developing cost impacts for National Security Decision Directive-38 requests.

Comment: The management officer advises the ICASS Council of the cost impacts of all National Security Decision Directive-38 requests.

Informal Recommendation 13: Embassy Antananarivo should ensure that mission supervisors develop and discuss work requirements with employees at the beginning of the rating period.

Comment: The use of the new e-performance software for establishing work requirements establishes the date of the performance period, as work requirements cannot be back dated.

Informal Recommendation 14: Embassy Antananarivo should request the Bureau of Overseas Buildings Operations residential interior designer to review the inventory of the Ambassador's residence furniture stored in the warehouse again, and allow the Embassy to sell it.

Comment: This recommendation is reissued as a formal recommendation, CFR Recommendation 2.

Informal Recommendation 15: Embassy Antananarivo should use the Department's OpenNet Everywhere, if additional needs for residential OpenNet are identified.

Comment: The Embassy provides access for all ICASS service providers and most U.S. direct-hires using key devices or Blackberries. This proved to be very useful during the ordered departure.

Informal Recommendation 16: Embassy Antananarivo should designate and publicize the designation of a new Equal Employment Opportunity counselor.

Comment: The mission has designated and publicized an EEO counselor, who has received training in accordance with 3 FAM 1514.2.

Informal Recommendation 17: Embassy Antananarivo should publicize the designation of a Federal Women's Program coordinator.

Comment: The mission has designated a Federal Women's Program coordinator in accordance with 3 FAM 1514.2 b.

Informal Recommendation 18: Embassy Antananarivo should select another local staff to fulfill the role of the Equal Employment Opportunity local staff liaison.

Comment: The inspectors discussed with the local staff liaison, who has attended EEO training, any difficulties or conflict of interest issues that might arise as a result of also being the human resource specialist. The specialist, the EEO counselor and the management officer do not see a conflict of interest; they realize that there is limited staff with English speaking skills to provide liaison with local staff as well as with U.S. direct-hires.

Informal Recommendation 19: Embassy Antananarivo should display Equal Employment Opportunity information at the warehouse and at other leased office buildings and on the mission Intranet site.

Comment: The latest EEO information, obtained by the EEO counselor at EEO training, is displayed at the mission, the warehouse, the American Cultural Center, and on the mission Intranet site. A picture of the EEO counselor is also featured on all sites.

Informal Recommendation 20: Embassy Antananarivo should comply with procedures that require advance approval of premium pay such as overtime, night, holiday, and Sunday work.

Comment: The Embassy has issued a policy on procedures for premium pay in accordance with 4 FAH-3 H-523.2. The management officer reviews all requests prior to work except in emergency situations.

PRINCIPAL OFFICIALS

	Name	Arrival Date
Ambassador	R. Niels Marquardt	8-2007
DCM	Eric Stromayer	8-2008
POL/ECON	Dovie Holland	7-2008
Comoros Islands Reporting Officer	John Corrao	9-2009
Public Affairs	Rodney Ford	8-2007
Regional Security Officer	Rhonda Bent	8-2008
Consular	Melanie Rubenstein	9-2008
Management	Stephen Dodson	4-2008
OBO	Eric Rumpf	1-2008
Other Agencies		
DOD – Defense Attaché	CDR John Ries	7-2008
USAID	Rudolph Thomas	2-2009
Peace Corps	Steven Wisecarver	2-2008
Millennium Challenge Corporation	Glenn Lines	1-2005

ABBREVIATIONS

AF	Bureau of African Affairs
CFR	compliance follow-up review
Department	U.S. Department of State
EEO	Equal Employment Opportunity
ETP	English Teaching Program
L	Office of the Legal Adviser
MCA	Millennium Challenge Account
MCC	Millennium Challenge Corporation
OBO	Bureau of Overseas Buildings Operations
OIG	Office of Inspector General
USAID	U.S. Agency for International Development

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