



OIG HIGHLIGHTS

View Report [AUD-ACF-15-36](#).

What OIG Audited

In August 2012, the Office of Inspector General (OIG) reported* that the Border Security Program (BSP) did not have a centralized program management structure and a detailed, comprehensive program plan that identified BSP priorities. The Department's BSP is part of a coordinated national effort to deny dangerous individuals entry into the United States and facilitate the entry of legitimate travelers and is funded by consular-related fees (\$2.9 billion for FY 2014).

The objective of this compliance follow-up audit was to determine the extent to which the Bureau of Consular Affairs (CA) had implemented the six open recommendations from Report No. AUD-FM-12-39.

What OIG Recommends

OIG modified and reissued four recommendations that focus on the following: (1) developing roles and responsibilities for parties involved in the BSP; (2) developing a plan to prioritize BSP funding requests; (3) developing and disseminating guidance on the appropriate use of BSP funds; and (4) developing and implementing a comprehensive monitoring process for the BSP. Based on CA's responses to the draft report, OIG considers the four recommendations resolved, pending further action.

* *Audit of Department of State Use of Consular Fees Collected in Support of the Border Security Program* (AUD-FM-12-39, August 2012)

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July 2015

AUDIT COMPLIANCE AND FOLLOW-UP DIVISION

Compliance Follow-up Audit of the Department of State Use of Consular Fees Collected in Support of the Border Security Program

What OIG Found

OIG found that CA had not fully implemented corrective actions to address four of six open recommendations from the August 2012 BSP audit. Specifically, OIG determined that CA had not taken sufficient action to address the intent of four open recommendations that involve the following: developing roles and responsibilities for all parties involved in the BSP; preparing a written plan to prioritize all requests for BSP funding; developing and disseminating guidance to CA offices and the partner bureaus on the appropriate use of BSP funds; and preparing a documented, comprehensive monitoring program that includes periodic reviews of expenditures.

OIG determined that CA had completed sufficient corrective actions to close recommendations 1 and 4 from Report No. AUD-FM-12-39 that addressed formalizing CA's authority over the BSP by modifying the *Foreign Affairs Manual* (FAM) and establishing BSP performance goals and indicators for all parties involved in the BSP.

According to CA officials, CA has not implemented four of the six open recommendations because CA's role as the BSP program management office was not codified in the FAM until March 2015. In addition, CA did not have an appointed BSP manager to oversee the program until August 2014, 2 years after the issuance of the original audit report. OIG concludes that, until recommendations intended to improve the management and execution of the BSP are fully implemented, CA will not be able to ensure the most effective allocation of BSP funds to meet BSP objectives, such as denying terrorists and criminals entry into the United States.

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AUD-ACF-15-36

Office of Audits

July 2015

Compliance Follow-up Audit of the Department of State Use of Consular Fees Collected in Support of the Border Security Program

COMPLIANCE AND FOLLOW-UP DIVISION

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OBJECTIVE

The purpose of the audit was to determine the extent to which the Bureau of Consular Affairs (CA) had implemented the six open recommendations from Report No. AUD-FM-12-39, *Audit of Department of State Use of Consular Fees Collected in Support of the Border Security Program*, August 2012. As part of this assessment, the Office of Inspector General (OIG) determined whether the six open recommendations should be closed, modified, or reissued. See Appendix A for the scope and methodology.

BACKGROUND

The Border Security Program (BSP), which is managed by CA, is intended to be a core element of the coordinated national effort to deny individuals such as terrorists and criminals who threaten the country entry into the United States, and to facilitate the entry of legitimate travelers. A primary purpose of CA is to strengthen the security of U.S. borders through vigilant adjudication of U.S. passports and visas and provide protection to Americans living overseas. Several other Department bureaus provide services using BSP funding, such as the Bureau of Diplomatic Security, which investigates visa and passport fraud; the Bureau of Information Resource Management, which provides systems technology and backbone support for critical visa and passport systems; and the Foreign Service Institute, which provides visa adjudication training, among other courses, to consular staff.

The BSP does not receive appropriated funds and relies on funding from certain consular-related fees and surcharges.¹ The Department of State (Department) is not authorized to retain all of the consular fee revenue it collects; the percentage retained varies from year to year depending upon the budget amount authorized by Congress and the total fees collected. For example, during FY 2014, the Department collected approximately \$3.7 billion in consular fees² and retained approximately 78 percent or \$2.9 billion in fees for its BSP. In FY 2015, the retained consular fees used for the BSP were included in the Diplomatic and Consular Program account. As part of the President's Budget for FY 2016, the Department proposed establishing a new Treasury account, Consular and Border Security Program. According to CA officials, this new standalone account will allow the Department to more easily provide budget and other financial data that supports consular and BSP activities to stakeholders outside of the Department.

¹ According to the BSP manager, the consular fees and surcharges supporting the BSP can vary from one fiscal year to the next. For FY 2015, the consular-related fees and surcharges include: Machine Readable Visa fee; Western Hemisphere Travel Initiative passport surcharge; Passport Security surcharge; Immigrant Visa Security surcharge; Diversity Immigrant Visa Lottery surcharge; and H and L Visa Fraud Prevention and Detection fee.

² This amount represents the consular fees included in the Earned Revenue amount in the Department's annual financial report. It does not include revenue from the H and L Visa Fraud Prevention and Detection fee, which is part of the Funds from Dedicated Collections amount included in the Department's annual financial report.

Table 1 lists the individual consular surcharges and fees that will be included in the proposed Consular and Border Security Program account.

Table 1: Consular Fees Included in the Proposed FY 2016 Consular and Border Security Program Account

Consular Fee	Consular and Border Security Program (President's Budget)
Machine-Readable Visa Fee	Yes
Immigrant Visa Security Surcharge	Yes
Western Hemisphere Travel Initiative Surcharge	Yes
Passport Security Surcharge	Yes
Diversity Immigrant Visa Lottery Surcharge	Yes
Affidavit of Support Fee	Yes
Expedited Passport Fee	Yes*

* The President's Budget Appendix for FY 2016 includes the Expedited Passport Fee; however, CA officials informed OIG that the proposed language establishing the new account gives the Department the authority to deposit Expedited Passport Fee collections into the Diplomatic and Consular Programs account, as is the current practice, or into the new account.

Source: Prepared by OIG based on information from the Fiscal Year 2016 Appendix – Budget of the U.S. Government.

In August 2012, OIG reported³ that the BSP did not have a centralized program management structure and a detailed, comprehensive program plan that identified BSP priorities. As a result, the management of the BSP was ad hoc. To assist the Department in addressing these weaknesses, OIG made seven recommendations – six to strengthen the management structure of the program and one to account correctly for expenditures erroneously charged to the program. The six recommendations to strengthen program management were considered resolved at report issuance and one recommendation to refund erroneously charged BSP funds was closed when the Bureau of Diplomatic Security corrected the error.

OIG considers a recommendation "unresolved," "resolved," or "closed" based on the actions that the Department has taken or plans to take with respect to the recommendation.⁴ An unresolved recommendation is one for which the Department has neither taken action nor stated how it plans to implement the recommendation. A resolved recommendation is one for which the Department has agreed to implement the recommendation or one in which the Department has

³ *Audit of Department of State Use of Consular Fees Collected in Support of the Border Security Program* (AUD-FM-12-39, August 2012)

⁴ Office of Management and Budget Circular A-50, Revised, "Audit Followup," Sept. 29, 1982. The circular requires that Federal agencies "assure the prompt and proper resolution and implementation of audit recommendations" made by Inspectors General, other Executive branch audit organizations, the Government Accountability Office, and non-Federal auditors. Secs.1, 5, 8a(2), and 8a(3) of the circular further require that agencies (1) resolve recommendations within a maximum of 6 months after the issuance of a final report; (2) implement corrective actions as rapidly as possible; and (3) specify criteria for proper resolution and corrective actions that provide for written plans for corrective actions with specified action dates, where appropriate.

begun, but not yet completed, actions to fully implement the recommendation. Open recommendations include both unresolved and resolved recommendations. A closed recommendation is one for which the Department has completed actions necessary to implement the recommendation and OIG has determined that no additional action is required.

AUDIT RESULTS

OIG found that CA had not taken sufficient action to address four of the six open recommendations. However, CA had completed sufficient corrective actions to close the remaining two open recommendations. According to CA officials, the four recommendations have not been implemented because Department officials did not approve CA's proposal to codify its role as the program management office in the *Foreign Affairs Manual* (FAM) until March 2015, which limited its authority to influence actions regarding the open recommendations. In addition, CA did not have an appointed BSP manager to oversee the program until August 2014, 2 years after the issuance of the original audit report. OIG concludes that, until recommendations intended to improve the management and execution of the BSP are fully implemented, CA will not be able to ensure the most effective allocation of BSP funds to meet BSP objectives, such as denying terrorists and criminals entry into the United States.

Based on the results of this audit compliance follow-up, OIG has modified and reissued three recommendations, reissued one recommendation in its original form, and closed two of the six open recommendations.

Finding A: CA Needs To Take Further Corrective Action to Address Four Open Recommendations

AUD-FM-12-39 Recommendation 2

OIG recommended that the Bureau of Consular Affairs develop clear roles and responsibilities for all parties involved in the Border Security Program and codify this information in the *Foreign Affairs Manual*.

Compliance Follow-up Audit Results

OIG determined that CA has not developed clear roles and responsibilities for all parties involved in the BSP, nor has CA codified this information in the FAM. Specifically, CA delayed developing the roles and responsibilities for all parties involved in BSP because its authority over the BSP was not formally recognized until March 12, 2015. Developing clear roles and responsibilities for all parties involved in a program helps define the organizational structure of the program so it can be managed effectively.

CA officials proposed incorporating the roles and responsibilities of all parties involved with the BSP in a BSP Program Plan that would be published on an appropriate platform such as CA's

website. CA officials anticipated that this would be accomplished by June 30, 2015. OIG acknowledges that CA's proposed corrective action would meet the intent of the original audit and has modified the recommendation accordingly.

Status:

Modified and Reissued.

Recommendation 1: OIG recommends that the Bureau of Consular Affairs (CA) develop clear roles and responsibilities for all parties involved in the Border Security Program (BSP), document those roles and responsibilities within the BSP Program Plan, and publish the plan on an appropriate platform such as CA's website.

Management Response: CA agreed with the recommendation.

OIG Reply: Based on CA's agreement with the recommendation, OIG considers the recommendation resolved. This recommendation will be closed when OIG receives and accepts documentation that CA has developed roles and responsibilities for all parties involved in the BSP and has published the BSP Program Plan on an appropriate platform.

AUD-FM-12-39 Recommendation 3

OIG recommended that the Bureau of Consular Affairs develop processes to prioritize Border Security Program funding requests and oversee the allocation of funding for prioritized projects of the Border Security Program.

Compliance Follow-up Audit Results

CA officials stated that, starting with the FY 2017 budget formulation process, they will be requesting all BSP parties to prioritize their BSP resource requests; however, CA has not developed a written plan or process for funding high-priority BSP projects or developed a methodology for overseeing the allocation of funding based on the prioritization. However, developing a methodology for CA to prioritize the funding requests for the BSP as a whole, including its operations and the allocation of BSP funds, will assist CA in using BSP funds in the most efficient and effective manner, as well as focus resources on the program's key priorities.

In January 2015, CA officials briefed the partner bureaus' staff on prioritization criteria for BSP resource requests to include support for CA's strategic goals, past performance in utilizing BSP funds, and "negative" prioritization.⁵ CA officials plan to incorporate the prioritization criteria into its FY 2017 BSP resource request guidance. Although developing prioritization criteria is a

⁵ According to CA officials, negative prioritization requires partner bureaus to identify the programs or expenses that would be cut in the event of a 5, 20, or 40 percent decrease in BSP funds. This same prioritization will be required of CA offices and consular operations.

first step, CA continues to need a formalized plan for prioritizing funding requests and overseeing the allocation of BSP funds for high-priority projects. Therefore, OIG has modified and reissued the recommendation to promote the implementation of a formal process to prioritize and allocate BSP funds.

Status:

Modified and Reissued.

Recommendation 2: OIG recommends that the Bureau of Consular Affairs (CA) develop and implement formal processes and procedures for CA to comprehensively prioritize Border Security Program (BSP) funding requests and oversee the allocation of funding for BSP projects it has prioritized.

Management Response: CA agreed with the recommendation.

OIG Reply: Based on CA's agreement with the recommendation, OIG considers the recommendation resolved. This recommendation will be closed when OIG receives and accepts documentation that demonstrates CA has developed and implemented formal processes and procedures to comprehensively prioritize BSP funding requests and oversee the allocation of the BSP projects it has prioritized.

AUD-FM-12-39 Recommendation 6

OIG recommended that the Bureau of Consular Affairs develop Department-wide guidance on the use of border security-related funds and disseminate the guidance to all bureaus and posts that receive border security funds.

Compliance Follow-up Audit Results

OIG found that CA updated and disseminated guidance to posts on the appropriate use of BSP funding. The Post Allotment Funding Matrix lists activities and the corresponding BSP funds that posts can use to pay appropriate expenses. CA first provided this updated funding matrix to posts as part of its FY 2013 funding requests cable⁶ and posted it on CA's website.

Although CA updated its guidance to posts on the appropriate use of BSP funds, CA has not developed similar guidance for CA offices and partner bureaus. CA officials stated that they had provided guidance on the appropriate uses for BSP funds in their budget formulation guidance provided to CA offices and partner bureaus. However, OIG reviewed this guidance and found that it did not meet the intent of the recommendation because it did not provide sufficient detail regarding activities and funding sources. Further, in its compliance correspondence to

⁶ MRV, CA-D&CP, H/L, and DV Related Funding for FY 2013: Data Call for Post Requests (13 STATE 7284, Jan. 24, 2013).

OIG, CA stated that it was developing a matrix for BSP partner bureaus that would be similar to the one used by posts and would attach the matrix to each Bureau's Service Level Agreement.⁷ CA's Comptroller further stated that, although a funding matrix for domestic partners had not been drafted, CA planned to prepare a domestic funding matrix this fiscal year.

OIG acknowledges that a funding matrix for CA offices and partner bureaus would be beneficial. However, because CA does not have Service Level Agreements with all partner bureaus, the matrix should be disseminated as part of CA's budget formulation guidance and posted on CA's website along with the Post Allotment Funding Matrix. OIG modified and reissued the recommendation to recognize that CA has prepared and provided guidance on the appropriate use of BSP funds to posts, while underscoring the need for similar guidance for CA offices and the partner bureaus.

Status

Modified and Reissued.

Recommendation 3: OIG recommends that the Bureau of Consular Affairs (CA) develop and post guidance on the use of Border Security Program funds for CA offices and partner bureaus to its website, and disseminate this guidance as part of CA's budget formulation guidance.

Management Response: CA agreed with the recommendation.

OIG Reply: Based on CA's agreement with the recommendation, OIG considers the recommendation resolved. This recommendation will be closed when OIG receives and accepts documentation that demonstrates CA has published and disseminated guidance on the appropriate use of BSP funds for CA offices and partner bureaus as part of CA's budget formulation guidance.

AUD-FM-12-39 Recommendation 7

OIG recommended that the Bureau of Consular Affairs develop and implement a comprehensive monitoring process, to include periodic reviews of expenditures, for the Border Security Program that will ensure that border security funds are used in accordance with guidelines.

Compliance Follow-up Audit Results

In July 2014, the Bureau of the Comptroller and Global Financial Services began providing reports on the partner bureaus' financial data to CA, which are used to prepare CA's Scorekeeper report. In December 2014, CA started utilizing its Scorekeeper report for tracking

⁷ A Service Level Agreement is an agreement between the partner bureau and CA that establishes the parameters of services to be expected.

the allotments and obligations of BSP funds for CA offices, posts, and partner bureaus. The Scorekeeper report highlights high-level financial information and summarizes the spending of BSP funds by the various parties. However, CA has not developed or documented a comprehensive monitoring process that includes periodic reviews of expenditures.

CA officials explained that, due to security considerations, they have not been granted access to the Department's accounting system to review detailed transaction data that included a description of the expenditures for partner bureaus. However, after discussions with OIG, CA officials recognized they could use the information contained in the bi-weekly reports from the Bureau of the Comptroller and Global Financial Services to review and monitor expenditures.

Although OIG acknowledges that CA is monitoring posts' and bureaus' BSP spending rates, CA's monitoring process continues to be deficient and does not include periodic reviews of expenditures to determine their validity under the BSP. OIG is reissuing the recommendation to promote the implementation of a comprehensive monitoring process for BSP expenditures to ensure that border security funds are used in accordance with guidelines developed in response to new Recommendation 3.

Status

Reissued.

Recommendation 4: OIG recommends that the Bureau of Consular Affairs develop and implement a comprehensive monitoring process, to include periodic reviews of expenditures, for the Border Security Program that will ensure that border security funds are used in accordance with guidelines.

Management Response: CA agreed with the recommendation.

OIG Reply: Based on CA's agreement with the recommendation, OIG considers the recommendation resolved. This recommendation will be closed when OIG receives and accepts documentation showing that CA has established and implemented a comprehensive monitoring process that includes periodic reviews of expenditures.

Finding B: CA Actions Were Sufficient To Meet the Intent of Two Open Recommendations

AUD-FM-12-39 Recommendation 1

OIG recommended that the Bureau of Consular Affairs (CA) formalize its authority over the Border Security Program by modifying the *Foreign Affairs Manual* (1 FAM 250) to recognize CA's role as the overall program management office for the Border Security Program. (Note: This recommendation was resolved at report issuance based on CA's response to the draft report.)

Compliance Follow-up Audit Results

On March 12, 2015, the Department published revisions to 1 FAM 250, *Bureau of Consular Affairs (CA)*. Specifically, 1 FAM 252.4-1 (a) provides that “the Financial Management Division (CA/C/FMD), formerly CA/EX/RES, is responsible for directly managing, monitoring, and coordinating all issues related to financial resources used by the Bureau of Consular Affairs and the Department’s Border Security Program.” Under 1 FAM 252.5(a), the Office of Consular Technology (CA/CT) “plans, directs and coordinates consular information technology systems, application studies and development functions for the Department’s visa, passport and overseas citizen services operations, including the Bureau’s Border Security Program... .” According to CA officials, the FAM publication was delayed because CA’s Office of Consular Systems and Technology and the Bureau of Information Resource Management objected to portions of the proposed revisions during the clearance process.⁸ This revised FAM section recognizes CA’s authority over the BSP, as well as the role of CA’s Office of the Comptroller in the overall program management of the BSP. In addition, the codified FAM outlines the responsibilities for other CA offices and CA’s Office of the Comptroller divisions as related to the BSP. Based upon the Department’s publication of the revised 1 FAM 250, OIG concludes that CA actions met the intent of the recommendation.

Status

Closed.

AUD-FM-12-39 Recommendation 4

OIG recommended that the Bureau of Consular Affairs develop comprehensive performance goals and indicators for the Border Security Program and a process to measure the program’s accomplishments. (Note: This recommendation was resolved at report issuance based on CA’s response to the draft report.)

Compliance Follow-up Audit Results

In November 2013, CA issued its Functional Bureau Strategy for FY 2015 – FY 2017, which identified CA’s mission, strategic goals, and strategic objectives under each strategic goal. According to CA officials, its Functional Bureau Strategy establishes the goals and indicators for which CA measures the accomplishments of all parties involved in the BSP. In addition, CA’s Budget Formulation Guidance for FY 2016 required CA offices and the partner bureaus to apply CA’s strategic goals identified within its Functional Bureau Strategy for FY 2015 – FY 2017. CA

⁸ CA’s Office of Consular Systems and Technology delayed the clearance because the revised 1 FAM 250 did not reflect the organizational structure under which CA’s Office of Consular Systems and Technology was operating. Similarly, the Bureau of Information Resource Management would not clear the revised 1 FAM 250 due to concerns with organizational changes within CA.

officials stated that, starting in November 2014, they also implemented quarterly business meetings during which recipients of BSP funds report on their progress towards meeting BSP strategic goals outlined in its Functional Bureau Strategy. Based upon CA's issuance of its Functional Bureau Strategy and implementation of quarterly business meetings with recipients of BSP funds, OIG concludes that CA actions met the intent of the recommendation.

Status

Closed.

RECOMMENDATIONS

Recommendation 1: OIG recommends that the Bureau of Consular Affairs (CA) develop clear roles and responsibilities for all parties involved in the Border Security Program (BSP), document those roles and responsibilities within the BSP Program Plan, and publish the plan on an appropriate platform such as CA's website.

Recommendation 2: OIG recommends that the Bureau of Consular Affairs (CA) develop and implement formal processes and procedures for CA to comprehensively prioritize Border Security Program (BSP) funding requests and oversee the allocation of funding for BSP projects it has prioritized.

Recommendation 3: OIG recommends that the Bureau of Consular Affairs (CA) develop and post guidance on the use of Border Security Program funds for CA offices and partner bureaus to its website, and disseminate this guidance as part of CA's budget formulation guidance.

Recommendation 4: OIG recommends that the Bureau of Consular Affairs develop and implement a comprehensive monitoring process, to include periodic reviews of expenditures, for the Border Security Program that will ensure that border security funds are used in accordance with guidelines.

APPENDIX A: SCOPE AND METHODOLOGY

The Office of Inspector General (OIG) Audit Compliance and Follow-up Division initiated this compliance audit to determine to what extent the Bureau of Consular Affairs (CA) had implemented the six open recommendations from Report No. AUD-FM-12-39 regarding the oversight and use of Border Security Program (BSP) funds. As part of this assessment, OIG determined whether the recommendations from the audit should be closed, modified, or reissued.

OIG performed fieldwork from January to March 2015 at the CA offices in Washington, D.C. To assess actions taken to implement the recommendations, OIG interviewed officials from the CA's Office of the Executive Director and CA's Office of the Comptroller. OIG obtained and reviewed BSP budget formulation guidance, CA strategic planning documents, Service Level Agreements between CA and the partner bureaus and offices, memorandums and other documents on prioritizing BSP fund requests, cables and guidance on the appropriate use of BSP funds, and financial reports related to BSP fund monitoring.

This audit was conducted in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

Work Related to Internal Controls

OIG performed steps to assess the adequacy of internal controls related to the areas audited. For example, OIG gained an understanding of the internal controls by meeting with CA officials, including the Comptroller and BSP Manager, and reviewing BSP documents. The BSP Manager is responsible for ensuring that sufficient action is taken to close the open recommendations issued by OIG in Report No. AUD-FM-12-39. Work performed on internal controls during the audit is detailed in the Audit Results section of that report.

Use of Computer-Processed Data

OIG made limited use of computer-generated data to conduct this review. Specifically, the team used information from the Department's accounting system to verify obligations included in the Scorekeeper report. This accounting system is used to prepare the annual financial statements, which are independently audited annually. OIG determined that, based on how the data would be used in this report and the assurances provided by the annual financial statement audit, the data was sufficiently reliable to reach the conclusions presented in this report.

APPENDIX B: BUREAU OF CONSULAR AFFAIRS RESPONSE



United States Department of State

Assistant Secretary of State
for Consular Affairs

Washington, D.C. 20520

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June 17, 2015

MEMORANDUM

To: OIG/AUD – Norman P. Brown

From: CA – Michele T. Bond, Acting ^{MBond}

Subject: Draft Report on *Compliance Follow-up Audit of the Department of State's Use of Consular Fees Collected in Support of the Border Security Program (BSP)*

Thank you for the opportunity to review the captioned draft follow-up report prior to issuance. We are glad to learn that your office has decided to close Recommendations 1 and 4 based on our updates to 1 FAM 250, our Functional Bureau Strategy goals, and our periodic performance reviews (including quarterly business meetings) of activities funded through the BSP. Since Recommendation 5 was closed previously, this leaves Recommendations 2, 3, 6, and 7.

In response to OIG request for comments on the draft and information on actions taken or planned, CA believes that materials we have developed in the course of the FY 2017 budget formulation, and in support of a comprehensive plan and monitoring process for all BSP-supported activities, will enable us to resolve the four remaining open recommendations.

Accordingly, CA **agrees** with each of the four recommendations, to be reissued as follows:

1. OIG recommends that the Bureau of Consular Affairs develop clear roles and responsibilities for all parties involved in the Border Security Program, document those roles and responsibilities within the BSP Program Plan, and publish the plan on an appropriate platform such as CA's website.
2. OIG recommends that the Bureau of Consular Affairs develop a Standard Operating Procedure or other such promulgation of the policy, and implement a formal process for CA to comprehensively prioritize Border Security Program

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funding requests and oversee the allocation of funding for BSP projects it has prioritized.

3. OIG recommends that the Bureau of Consular Affairs develop and post guidance on the use of Border Security Program funds for CA offices and partner bureaus to its website, and disseminate this guidance as part of CA's budget formulation guidance.
4. OIG recommends that the Bureau of Consular Affairs develop and implement a comprehensive monitoring process, to include periodic reviews of expenditures, for the Border Security Program that will ensure that border security funds are used in accordance with guidelines.

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ABBREVIATIONS

BSP	Border Security Program
CA	Bureau of Consular Affairs
FAM	<i>Foreign Affairs Manual</i>
OIG	Office of Inspector General

OIG AUDIT TEAM

Naomi Snell, Director
Audit Compliance and Follow-up Division
Office of Audits

Bernard M. Vennemann, Audit Manager
Contracts and Grants Division
Office of Audits

Christopher Groubert, Auditor
Contracts and Grants Division
Office of Audits

Carol Hare, Auditor
Contracts and Grants Division
Office of Audits

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