



OIG HIGHLIGHTS

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What OIG Inspects

OIG inspected the U.S. Embassy in Dushanbe during October 29–November 15, 2014.

What OIG Recommends

The OIG team made 38 recommendations to U.S. Embassy Dushanbe intended to improve its operations and programs. More than half of these addressed resource and management weaknesses. The OIG team determined that the embassy's leadership is effective and engaged and that embassy functions have been performed despite multiple staffing gaps, curtailments, and medical evacuations. The OIG team highlighted areas of concern, such as deficiencies in basic management processes, a tight control of information flow that has undermined confidence in reporting in Washington, and inconsistent application of the worldwide visa referral policy.



U.S. Embassy Dushanbe, Tajikistan

~~SENSITIVE BUT UNCLASSIFIED~~

March 2015

OFFICE OF INSPECTIONS

South and Central Asian Affairs

Inspection of Embassy Dushanbe, Tajikistan

What OIG Found

- The Ambassador has shaped U.S. bilateral relations with Tajikistan during a sensitive time of transition as the United States shifts from military to diplomatic engagement in neighboring Afghanistan. Front office leadership has fostered good morale and enjoys the respect of the embassy community.
- Embassy Dushanbe has carried out essential functions in the face of multiple staffing gaps, curtailments, and medical evacuations. The management section is deficient in some basic processes.
- Tight front office control of information reported to Washington has undermined confidence that the embassy provides a full and reliable picture of local developments essential for assessment of Arms Export Control Act concerns.
- Public diplomacy is integrated in planning and practice. American Corners and Access English-language programs extend the embassy's reach to young audiences, despite travel difficulties in the country.
- The embassy's application of the worldwide visa referral policy does not comply with all requirements.
- The current medical reimbursement plan for the locally employed staff is not working and needs to be replaced.





OIG

Office of Inspector General

U.S. Department of State • Broadcasting Board of Governors

ISP-I-15-17A

Office of Inspections

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Inspection of Embassy Dushanbe, Tajikistan

BUREAU OF SOUTH AND CENTRAL ASIAN AFFAIRS

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KEY FINDINGS

- The Ambassador has shaped U.S. bilateral relations with Tajikistan during a sensitive time of transition as the United States shifts from military to diplomatic engagement in neighboring Afghanistan. Front office leadership has fostered good morale and enjoys the respect of the embassy community.
- Embassy Dushanbe has carried out essential functions in the face of multiple staffing gaps, curtailments, and medical evacuations. The management section is deficient in some basic processes.
- Tight front office control of information reported to Washington has undermined confidence that the embassy provides a full and reliable picture of local developments essential for assessment of Arms Export Control Act concerns.
- Public diplomacy is integrated in planning and practice. American Corners and Access English-language programs extend the embassy's reach to young audiences, despite travel difficulties in the country.
- The embassy's application of the worldwide visa referral policy does not comply with all requirements.
- The current medical reimbursement plan for the locally employed staff is not working and needs to be replaced.

CONTEXT

Two decades after independence and a civil war, Tajikistan remains the poorest country in Central Asia. Remittances from migrant workers make up nearly half of its economy. The government welcomes foreign investment, but corruption limits opportunities for U.S. businesses. Tajikistan acceded to the World Trade Organization in 2013. Two-way trade with the United States was \$51 million in 2013.

U.S. interests in Tajikistan reflect the country's strategic location. Tajikistan allows its territory to be used for overflights and logistical support to the International Security and Assistance Force in Afghanistan. U.S. policy aims at strengthening the government's ability to control its borders against the trafficking of arms, narcotics, and persons.

The United States recognized Tajikistan in 1992 and opened an embassy in Dushanbe the same year. The Ambassador is responsible for U.S. relations with Tajikistan from the vantage point of the U.S. Embassy in Dushanbe. This responsibility has taken on renewed importance as the United States shifts engagement in neighboring Afghanistan, whose new government faces serious internal challenges. The Government of Tajikistan remains wary of possible security threats along its border with Afghanistan that could affect its own internal stability and economic health as this transition in Afghanistan unfolds. It looks to the United States to play an important and reliable role. As a former Soviet republic, Tajikistan remains cautious in its engagement with the United States yet is receptive to cooperation in areas it perceives as important to its success. U.S. foreign assistance focuses on helping Tajikistan provide food security and health for its people while expanding democratic governance. Programs emphasize a regional approach aimed at linking energy and other resources in Central Asia with markets in South Asia.

Host government constraints on organizations and activities and a restricted media environment make public diplomacy a challenge. English-language programs are an exception to the government's suspicion of embassy public outreach.

The 360 mission employees include 66 U.S. direct-hire positions from 5 separate U.S. agencies, 11 local-hire U.S. staff, and 283 locally employed (LE) staff members. The agencies are the Departments of Defense, Justice, Homeland Security, Health and Human Services, and the U. S. Agency for International Development (USAID). The embassy's 2014 funding is approximately \$84 million. More than 50 percent of its funding comes from the U.S. Department of Defense (DOD). The mission suffers from persistent staffing gaps, particularly in support positions.

LEADERSHIP

Questionnaires and extensive personal interviews score both the Ambassador and the deputy chief of mission (DCM) well above average compared to more than 90 previous posts inspected in all 13 key leadership attributes, including engagement, judgment, vision, communication, and ethics. Embassy employees rated the Ambassador even higher on her leadership awareness and problem solving.

The Ambassador, who arrived in September 2012, has led embassy efforts to oversee and sharpen cooperation with border law enforcement. Complementing the embassy's working-level engagement with Tajik ministry officials, she also helped persuade the Tajik leadership to broaden and deepen security cooperation consistent with U.S. interests. When the U.S. Department of State (Department) raised questions regarding provision of U.S. security assistance compliant with the Arms Export Control Act provisions because of a local event, she sought to ensure that only accurate and verified information reached Washington agencies through embassy reporting and informal exchanges.

This tight information control contributed to a perception that Embassy Dushanbe sought to defend bilateral security programs possibly jeopardized by unverifiable reports rather than to analyze fully possible violations of the act. The Office of Inspector General (OIG) team found no examples of biased reporting. It did find that this strict control inhibits information exchange. The OIG team concluded—and the Ambassador agreed—that the embassy should take steps to dispel this perception.

Despite the travel difficulties in the country, the Ambassador has traveled out of the capital eight times in her 2 years. She twice visited a politically sensitive region to meet with local officials and nongovernmental organizations where alleged human rights abuses may have occurred. She has used representation funds consistent with Mission Resource Request (MRR) objectives for events to advance U.S. interests. Embassy work regarding women's issues, law enforcement, governance, development and food security, business promotion, and antinarcotics training have benefitted from these events. Her events are well attended by local leaders, government officials, and leading community members.

The DCM, who arrived at post in July 2013, is well regarded by agency heads and embassy officers and commands the requisite authority to lead the embassy during the Ambassador's absence. Under the Ambassador's guidance, he oversees day-to-day military and antinarcotics cooperation programs. He has had to take an active role in overseeing the embassy's management operations during much of his tenure, given the frequent unplanned turnover of senior management staff and reliance on temporary duty personnel. Surveys show the embassy has functioned adequately despite these challenges.

Mission Resource Request Process

The mission's FY 2016 MRR and the draft Integrated Country Strategy (ICS), being finalized during this inspection, have served to sharpen embassy strategic thinking and build a consensus among mission elements about the embassy's diverse objectives, including professionalization of security services, food security and public health improvement, and expansion of democracy. Interviews with the Ambassador, key agency heads, and embassy section heads indicated that the ICS, in particular, stands out for improving interagency focused thinking and forging a better missionwide approach to cross-cutting goals. Responsibility for key ICS components has been shared among Department, USAID, and DOD officers.

Mission Morale

Embassy morale is good, according to OIG questionnaire scores and personal interviews. Several mission members cited past management staffing gaps as having affected morale negatively. Questionnaire results also underscored that the embassy community feels secure at home and at work. The embassy has tested its emergency action plan, including earthquake preparedness. The Ambassador and DCM both encourage and participate in embassy social events that include the locally employed staff. During the inspection, 100 American and LE staff members and dependents attended a family event.

First- and Second-Tour Officers Program

Approximately 12 first- and second-tour (FAST) professionals work at Embassy Dushanbe, down from 15 a year ago. The FAST program has largely been left to the entry-level professionals themselves to organize. Their events have focused on outside speakers rather than development of employee skills related to working and representing the United States overseas. The Ambassador suggested having two co-coordinators, a generalist and a specialist; the FAST professionals have followed this guideline. However, interviews with the FAST community members revealed confusion about how best to improve the program. The DCM has provided mentoring on an individual basis but has not played an active role in shaping a more structured program. The Department's leadership and management principles in 3 *Foreign Affairs Manual* (FAM) 1214 b. (8) requires managers to empower others by encouraging personal and professional development through mentoring, coaching and other opportunities. His engagement in recent months has increased, but structure and direction are lacking.

Recommendation 1: Embassy Dushanbe should revise and implement its professional development program for first- and second-tour personnel to develop employee skills related to working and representing the United States overseas. (Action: Embassy Dushanbe)

POLICY AND PROGRAM IMPLEMENTATION

Advocacy and Analysis

The embassy has a combined political/economic section. In the absence of a Department of Commerce representative, the section also carries out commercial work. At the time of the inspection, the section consisted of a single political officer on her first reporting tour, an economic officer, and a mid-level section chief, supported by trained LE staff.

Promoting U.S. Policies and Interests

In 2014, Tajikistan tightened limits on the embassy's engagement with host government officials. U.S. diplomats must receive advance permission from the Ministry of Foreign Affairs before approaching any government agency. Requests for meetings require a diplomatic note and often entail long delays.

The embassy is actively seeking relaxation of these guidelines. In the meantime, it uses a combination of demarches, more informal meetings, and personal contacts to expand bilateral relations and promote U.S. interests. The embassy uses its contacts to advocate for U.S. companies, resolving individual business disputes where possible while also pressing for systemic policy reforms.

To save time, the embassy sometimes combines demarches on a number of different issues. It reduced the cost of translating demarches into Russian by initiating an innovative system under which Dushanbe and other U.S. embassies in Central Asia take turns producing a single translation that all five missions use.

Reporting Political and Economic Developments

The embassy uses cables and official/informal email to report developments. A reporting plan that links them to expenditures for representation and travel determine topics. In 2014, the embassy submitted nearly 100 spot reports on meetings or short-term developments and 8–10 cables analyzing its agricultural and mining sectors and larger trends, including Tajikistan's relations with Russia and China.

Washington consumers canvassed in the survey noted concern that embassy reporting lacked credibility. Officials in three bureaus questioned whether information critical of the government and military was appropriately included in reports. The OIG team compared the notes of meetings and initial drafts of cables with the versions the Ambassador approved and found no pattern of distorting information, only a reluctance to report unsubstantiated or unprovable allegations of human rights abuse. In at least one case, the Department directed the embassy to issue a corrected cable.

The Leahy Amendment¹ to foreign assistance legislation bars assistance to security forces that have been involved in human rights abuse. The legislation requires missions to facilitate the flow to Washington of information from nongovernment sources relevant to this determination. The OIG team counseled the mission to report the information it receives and include its own assessment of the information's credibility, as it does with equally sensitive issues of corruption through reporting and its 2014 investment climate statement.

Law Enforcement and Narcotics

The embassy uses a separate section to manage programs the Bureau of International Narcotics and Law Enforcement Affairs funds. Funding will drop to \$4 million in FY 2015. One of the section's two U.S. direct-hire positions will revert to the political/economic section at the end of 2014 in accordance with a temporary arrangement intended to ensure sufficient oversight.

The section is responsible for four grants. A review of files established that it closely monitors performance, with evaluations based on both site visits and grantee reports. In the case of two large projects on the Afghan border, the embassy relies on a Government Technical Monitor in Washington instead of paying to establish a monitoring capability in-house. In 2014, it hired a private firm to conduct an outside evaluation of two programs in more depth. Seven grants were closed in FY 2014 but not recorded in the grants database management system, making it difficult for Washington to track their progress. Locally employed staff members updated the database during the inspection.

Several agencies in the mission manage counternarcotic programs. They meet in a biweekly border and law enforcement working group. In 2012, at the Ambassador's suggestion, the group began using a written agenda to strengthen effectiveness. The OIG team encouraged the mission to keep written minutes of decisions made by this coordinating group, a practice it adopted shortly after the inspection.

The section provides \$700,000 annually in salary supplements to Tajikistan's drug control agency and funds a narcotics interdiction unit vetted by that agency. The fee paid to a separate implementing agency to carry out this program is scheduled to increase in 2015 from 13 percent to 21 percent. To reduce the portion of funds expended on outside implementation, the embassy is seeking ways to administer expenses itself in order to devote more funds to real program work.

Recommendation 2: Embassy Dushanbe, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should determine the cost effectiveness of self-implementing its program of salary assistance to Tajikistan's Drug Control Agency rather than paying fees to implementing agencies. (Action: Embassy Dushanbe, in coordination with INL)

¹ The Leahy Amendment to the Foreign Assistance Act of 1961 forbids assistance to foreign security forces that commit gross violations of human rights. The Department and U.S. embassies vet all candidates for training and assistance for compliance with this law. Section 620M of the act requires the Department to facilitate the receipt in Washington of information from individuals and organizations outside the government to help it make this determination.

Foreign Assistance

According to the Office of the Coordinator for U.S. Assistance to Europe and Eurasia, the United States provided \$36 million in foreign operations assistance to Tajikistan in FY 2014. This included \$16 million in Economic Support Funds, \$2 million in military aid and training, \$7 million in health programs, and \$7 million in narcotics and law enforcement programs. Requests for FY 2015 total \$30 million, with reductions in narcotics programs but an increase in the areas of nonproliferation, antiterrorism, and demining.

U.S. assistance is designed to strengthen Tajikistan's capacity to control its borders, improve the country's food security, stem the decline of its education system, expand democratic governance, and improve delivery of health services.

USAID carries out the largest part of this assistance. It takes its guidance from a regional USAID mission and a regional coordinator for the President's Emergency Plan for AIDS Relief in Almaty, Kazakhstan. Most USAID projects in the region are bilateral but are tied together through a strategy that seeks to link energy and other resources in Central Asia with markets in South Asia.

The embassy coordinates assistance through a biweekly development assistance working group. A meeting of the group attended by the OIG team focused on the preparation of required annual reports on planning and performance rather than on coordination issues. The embassy coordinates with other donors through meetings chaired by the European Union and the Organization for Security and Cooperation in Europe.

Security Assistance Oversight

In 2014, the Department undertook a review of security assistance policy to ensure that U.S. training and assistance to the Tajik military met the guidelines of the Arms Export Control Act, which forbids assistance to military units used for internal security operations. The mission replied to questions for review in cables drafted by its Office of Military Cooperation rather than its political section and approved by the front office. The wording was coordinated in advance with DOD but not with the Bureau of Political Military Affairs. Department officials from four bureaus and staffs expressed frustration that the replies stressed policy considerations rather than factual information.

This approach creates a risk that assessments of compliance could be made by implementing agencies instead of the Department. Foreign Military Financing and International Military Education and Training programs are implemented by DOD, but the Department is responsible for funding, policy oversight, and guidance.

The embassy does not have a security assistance working group to ensure Department oversight of these important programs. Although the issues are discussed in its border and law enforcement working group, the OIG team sees merit in separating military and law enforcement issues.

Recommendation 3: Embassy Dushanbe should establish a security assistance working group and use it to coordinate security assistance programs. (Action: Embassy Dushanbe)

The embassy also does not have a designated security cooperation officer to carry out instructions for this oversight, as required in 14 State 119096, IMET Policy Cable Explaining Authority, Purpose, and Policy.

Recommendation 4: Embassy Dushanbe should designate a civilian official as security cooperation officer with oversight responsibility for the International Military Education and Training program and for Foreign Military Financing programs. (Action: Embassy Dushanbe)

Public Diplomacy

Staffing gaps between American officers and LE staff in the public affairs section (PAS) have diminished the section's efficiency. LE staff members with full portfolios have taken on the duties of absent employees. American supervisors have had to direct the work of employees who do not report to them. At the time of the inspection, two of the three American officers had been at post for less than a month. The public affairs officer position had been vacant for 3 months, and the information officer position for 2. In 2014, gaps of up to 6 months in LE staff positions occurred. Despite this challenge, all employees reported high morale, and the OIG team observed notable collaboration among members of a small staff frequently called on to backstop one another.

The OIG team reviewed the educational and cultural exchange programs and found no issues that would warrant a recommendation. The programs are linked to the MRR goals of improving youth outreach, increasing opportunities for youth to contribute to society, and encouraging the expansion of democracy. They enjoy broad support in the embassy, including the International Visitor Leadership Program, which draws nominees from numerous sections. The programs successfully target the priority embassy audience of young people. Alumni outreach work sustains embassy contact with younger people who traveled to the United States under the auspices of the U.S. Government.

Grants

Interviews and a review of 23 grants files showed that monitoring and recordkeeping is not consistent with the Department's Grants Policy Directive Number 23 for keeping Federal assistance files. PAS uses grants to carry out more than half of its public diplomacy programs and activities. In FY 2014, the section administered approximately \$1,311,799 in grants, including \$535,720 in "democracy commission" grants derived from economic support funds.

Six of 10 members of the LE staff spend all or much of their time managing grants. They maintain their own files. Not all files contain all the documentation the Bureau of Administration stipulates in its grants policy directives. Incomplete monitoring and recordkeeping of grant activity can complicate PAS's ability to evaluate effectiveness. It also limits grant recipients' accountability and could lead to misuse of grant funds.

Recommendation 5: Embassy Dushanbe should standardize public diplomacy grants oversight, including monitoring and file maintenance. (Action: Embassy Dushanbe)

American Corners Offer Platform for Public Diplomacy

American Corners are partnerships between an embassy and a host country institution. The partner provides space and staff; the embassy provides training, technical support, and equipment. PAS supports seven Corners in Tajikistan with money from the Bureau of International Information Programs. That bureau generally prohibits salary support to staff, and paying rent for a facility. Through FY 2014, the bureau made an exception for Embassy Dushanbe because local partners are unreliable. PAS pays salary support for Corner directors, and also pays rent for two Corners.

PAS reported that in FY 2015, the Bureau of South and Central Asian Affairs will provide that money. The Corners are popular with the mission's target audience of young people. In FY 2014, American Corners had 392,541 visitors nationwide. PAS liaison with the coordinators is strong. One LE staff member spends all his time on Corners work. PAS officers visit regularly, and other embassy officers make presentations at Corners when they travel. The Corners host an average of four programs daily, including things like book club discussions, speakers, and digital video conferences. The exception whereby PAS offers salary support is warranted, given the Corners' central role in public diplomacy.

Access Programs Target Disadvantaged Young People

Access programs offer English-language instruction and exposure to American values to young people from disadvantaged backgrounds. The Bureau of Educational and Cultural Affairs funds Access through 2-year grants that PAS administers. In FY 2014, PAS had eight new grants totaling approximately \$155,500. The LE staff member who deals with Access also handles all other English-teaching programs, including English-language fellows, specialists, and mentors, as well as a "teaching excellence and achievement" program. The Bureau of Educational and Cultural Affairs has funded a new position for an LE staff member to manage the Access program, which is labor intensive because of the grants involved. The embassy was developing a position description for that new slot.

Reviewing Duties in the Press and Information Unit

Despite limited media freedom in Tajikistan, PAS engages journalists productively with traditional outreach such as press conferences and a "TV co-op" program that sends television journalists to the United States to produce reports that are aired on national channels. PAS also monitors the Russian- and Tajik-language media.

The position descriptions for the two LE staff members doing press work require revision. They do not reflect the incumbents' duties accurately, nor do they take into adequate account the growing importance of the Internet and social media outreach. One position description was classified in 2009 and the other in 2010. The *Foreign Affairs Handbook* (FAH) stipulates that position descriptions should be "revised as changes occur." The lack of accurate position descriptions causes some overlap in the work being performed and leads to inefficiencies. The Resource Management section of this report addresses this issue.

Consular Management

The OIG team found no significant deficiencies in the daily provision of visa and American citizens services. Staffing and space are adequate. The overall visa workload is low; fraud is high but unsophisticated. American citizens services are in little demand. The DCM meets with the consular officer weekly to review visa adjudications and as part of his supervisory responsibility. Given the low consular workload, the OIG team counseled, and the DCM agreed, to continue to engage the consular officer and her successor in other activities for professional development.

The Offices of Visa Services and Fraud Prevention Programs, the Consular Integrity Division, and the front office of the Bureau of Consular Affairs all expressed concern about the embassy's contravention of the worldwide visa referral policy. In the latter half of 2013, the Ambassador in seven cases and the DCM in two cases contravened the worldwide nonimmigrant visa referral policy by submitting noncompliant referrals and improperly advocating for issuance.

Complications arising from noncompliance with the policy led to deteriorating relations between the consular officer and other embassy offices, perceptions of intimidation and isolation, and increased involvement of and intervention by various offices in the Bureau of Consular Affairs. In response to revised guidance from the Bureau of Consular Affairs on referral policy, dated January 13, 2014, Embassy Dushanbe issued a management notice on January 17, 2014. On October 15 and 17, 2014, the embassy conducted briefings for referring officers and obtained current compliance agreements reflecting the revised policy guidance. The OIG team met with the front office and the consular officer, and they confirm that they understand and are committed to continuing to comply with the policy going forward.

Visa Services

The embassy adjudicated 2,433 nonimmigrant visa cases in FY 2014, a 20-percent decrease from the previous fiscal year and a daily average of 11 cases. Endemic poverty, high unemployment, and a tradition of migrant labor are reflected in the adjusted refusal rate of 44 percent. Since Global Support Strategy² was suspended in 2012 because of low demand for consular services, operational cost, and fraud concerns, nonimmigrant visa applicants make appointments through a Consular Affairs-hosted online appointment system and pay visa fees to the consular cashier at intake. Immigrant visa services for Tajik citizens are provided by Consulate General Almaty in Kazakhstan. The Almaty consular chief visits Dushanbe annually to review immigrant visa procedures, discuss fraud trends, and consult with the local panel physician. The embassy also assists Consulate General Almaty with document verification.

Although the embassy issues full-validity visas to Tajik applicants, Tajik consular officials do not offer full validity to U. S. citizens in reciprocity. The embassy is forming a working group with the Consular Department, Ministry of Foreign Affairs to address this issue. The OIG team fully supports these efforts.

² Global Support Strategy is a worldwide, 10-year contract with a maximum value of \$2.8 billion designed to change the way third parties provide information, appointments, fee collection, document delivery, and greeters for visa services.

Need for Current Visa Validation Studies

Visa validation studies are a useful tool in fraud management to determine whether officers at post are correctly adjudicating individual applications or whether additional training is needed. The embassy recently completed two validation studies using 2012 data: one for student visa applicants indicating a nonreturn rate of 12 percent, and a second for tourist/business applicants indicating a nonreturn rate of 25 percent. The last validation study of third-country nationals covered applications from June 2006 through September 2011. Embassies are required to conduct at least one validation study per year in addition to an annual validation of referral cases as noted in 7 FAH-1 H-943.6-2 b.

Recommendation 6: Embassy Dushanbe should conduct visa validation studies with issuance data from FYs 2013 and 2014. (Action: Embassy Dushanbe)

American Citizens Services

In FY 2014 the embassy issued 72 passports and 3 Consular Reports of Birth Abroad. Of the 303 American citizens registered with the embassy, 190 reside in Dushanbe. Although emergency services are in little demand, the few cases that do occur can be complex, such as the rescue of American kayakers in a politically sensitive area of the country. Because the Government of Tajikistan does not recognize dual nationality, Tajik parents of American-born children must obtain visas for their children semi-annually. The embassy will address this issue as well in the upcoming working group.

Inactive Warden System and Lack of Town Hall Meetings

Only two wardens cover the eight warden³ zones as of November 2014. A third warden recently departed when the Government of Tajikistan declined to renew his visa. Consular outreach to U.S. citizens is generally handled on an ad hoc basis. No town hall meeting has been held since January 2013, shortly before the arrival of the current consular officer. In the event of a serious crisis, 92, or approximately one-third of the Americans registered, live in areas not covered by a warden.

Recommendation 7: Embassy Dushanbe should conduct town hall meetings annually for resident American citizens to recruit additional wardens and better inform current wardens of their responsibilities and their role in protecting U.S. citizens. (Action: Embassy Dushanbe)

Per 7 FAM 071 a., a well-organized and efficient warden system is essential for an embassy to carry out its primary function of U.S. citizen protection in times of crisis. The consular section is responsible for management of the warden system, including periodic testing, updating contact information and recruiting wardens to ensure adequate coverage of the consular district, and

³ Wardens assist consular sections in disaster preparedness by alerting U.S. citizens to emergency situations and passing on information from the post or Department. Wardens are also a valuable asset that can provide post with key information, both about specific individuals and for situational awareness, from the local community or area.

holding periodic meetings and/or conferences with wardens. The warden system has not been tested periodically, as required by 7 FAM 073 a.

Recommendation 8: Embassy Dushanbe should conduct periodic tests of its warden system.
(Action: Embassy Dushanbe)

Request for Assistant Regional Security Officer-Investigator Position

In the FY 2016 MRR, the embassy requests one assistant regional security officer-investigator position to assist local law enforcement in arresting individuals responsible for committing crimes related to document fraud, human trafficking, and counterfeiting as well as investigations related to crimes against U.S. citizens. A person in that position is required to work 80 percent of the time in the consular section combatting visa and passport fraud. The nonimmigrant visa workload in FY 2014 was only 2,433 cases, with an adjusted refusal rate of 44 percent. The methods applicants use to commit fraud are easy to detect. Fraud management resources in the consular section are sufficient to address this level and complexity of fraud. Per 1 FAM 014.1, the embassy should ensure the most effective use of government resources.

Recommendation 9: Embassy Dushanbe should amend the FY 2016 Mission Resource Request to delete the request for an assistant regional security officer-investigator position.
(Action: Embassy Dushanbe)

RESOURCE MANAGEMENT

Table 1: FY 2014 Staffing and Funding, by Agency

Agency	U.S. Direct-hire Staff	U.S. Locally Employed Staff	Foreign National Staff	Total Staff	Funding (\$)
Department of State					
Diplomatic & Consular Programs	20	0	13	33	\$1,350,910
ICASS	7	9	210	226	\$8,287,900
Public Diplomacy	3	0	11	14	\$983,359
Diplomatic Security	3	0	17	18	\$722,148
Marine Security	6	0	4	12	\$104,293
Representation	0	0	0	0	\$16,999
Overseas Buildings Operations	1	0	0	1	\$1,602,323
International Narcotics and Law Enforcement	1	0	5	6	\$598,478
Machine Readable Visa	0	1	3	4	\$111,895
Subtotal	41	10	253	314	\$13,778,305
USAID	5	1	12	18	\$24,325,000
Department of Defense					
Defense Attaché Office	5	0	1	6	\$186,445
Office of Military Cooperation	4	0	5	9	\$34,505,000
Special Operations Command Central	7	0	0	7	\$10,000,000
Subtotal	16	0	6	22	\$44,691,445
Department of Justice					
Drug Enforcement Administration	4	0	1	6	\$40,000
Subtotal	4	0	1	6	\$40,000
Department of Homeland Security					
Customs and Border Protection	1	0	1	2	\$810,122
Subtotal	1	0	1	2	\$810,122
Health and Human Services					
Centers for Disease Control	1	0	3	4	\$273,144
Subtotal	1	0	3	4	\$273,144
Total	66	11	283	360	\$83,918,016

OIG questionnaires and International Cooperative Administrative Support Services (ICASS) surveys rate the management section high for customer service. However, staffing gaps resulting from early curtailments and medical evacuations have hampered management operations and controls at Embassy Dushanbe. Thirty-one direct-hire, while actually employed, and personal services contractor American employees have filled the six U.S. direct-hire management positions since 2011. This has created additional costs for the Bureau of South and Central Asian Affairs, which identified more than \$90,000 of travel and per diem costs attributed to the temporary staffing of Embassy Dushanbe. The bureau was unable to identify additional temporary duty salary costs.

Management Policies

A review of post management policies on Dushanbe's SharePoint site uncovered several anomalies. For example, the embassy issues management notices, instructions, and policies, but no clear delineation exists among the three. In fact, mission policies are located under the list of notices and instructions. Many policies are in need of review and update. Per 2 FAM 022.7(2), appropriate management controls must be maintained to prevent internal controls weaknesses.

Recommendation 10: Embassy Dushanbe should update all management policies and file accordingly. (Action: Embassy Dushanbe)

International Cooperative Administrative Support Services

Embassy Dushanbe is an ICASS Lite post: all ICASS services are lumped together and charged by head count. Some ICASS agencies are dissatisfied with this approach because they may be subsidizing others, but it is impossible to know for sure without more detailed knowledge of overall distribution. Per 6 FAH-5 H-321.1-1 a., the ICASS Standard approach provides additional detail by distributing costs on the basis of workload counts for each specific service. The costs charged under ICASS Standard are more closely matched to serviced agencies' consumption of services. For example, after 2 days of research, embassy ICASS staff determined that one agency submits 10 percent of requests under one cost center but pays only 6 percent of costs overall. As the embassy grows and other-agency presence expands, the standard ICASS model would more equitably distribute costs.

Recommendation 11: Embassy Dushanbe should transition from International Cooperative Administrative Support Services Lite to Standard. (Action: Embassy Dushanbe)

Missing Annual Staffing Assessment

Since the last inspection in 2008, the client base has grown from 46 to 66 direct-hire personnel. ICASS spending, a good indicator of growing demand for services, has increased from \$4.4 million in FY 2008 to \$6.4 million in FY 2014, and overall mission spending has more than doubled. New ICASS position additions have not kept pace with mission growth.

Though Embassy Dushanbe has a functioning ICASS budget committee, the council has not revalidated new position requirements on an annual basis as required by 6 FAH-5 H-222.3-3 a.

(6). Without a holistic view of ICASS services at Embassy Dushanbe, the ICASS council is unable to make fully informed decisions on ICASS staffing.

Recommendation 12: Embassy Dushanbe should conduct its annual International Cooperative Administrative Support Services review, including staffing needs. (Action: Embassy Dushanbe)

National Security Decision Directive 38

The National Security Decision Directive 38 process does not include an assessment of the adequacy of ICASS staff, or the approval of the ICASS council for the change in ICASS costs. Per 6 FAH-5 H-351.2 d. and 6 FAH-5 H-351.2 d. (2), newly established positions may create additional support requirements for the embassy's management staff and may result in higher ICASS costs for the embassy. The ICASS service provider, working with the ICASS budget committee, must identify the additional ICASS resources required to support the new position(s) administratively.

Recommendation 13: Embassy Dushanbe should determine the impact of new positions on International Cooperative Administrative Support Services staffing prior to making a final decision on National Security Decision Directive 38 requests. (Action: Embassy Dushanbe)

Human Resources

The only ICASS score that did not exceed worldwide standards was in the category of American human resources support. A human resources officer arrived in late September following a 10-week gap in the position. The office has a dearth of experienced LE staff members, and those employees lack training. The longest serving person has 4 years, interrupted by 18 months of maternity leave. A senior specialist has been in the section for 13 months and has no training in her area. A previous senior LE employee received a special immigrant visa and departed the embassy. With the growth in staffing, Embassy Dushanbe may want to consider developing an eligible family member position in the section.

Locally Employed Staff

The OIG team met with the LE committee, and they praised the Ambassador for taking an active interest in their issues.

Salaries

The LE staff has not received a salary increase since 2010. In early October, the LE committee sent a memorandum to the management officer, with copies to the Ambassador, requesting a 47-percent increase on the basis of inflation and information they gleaned from some comparator firms. They are also requesting more active participation in the selection of comparator firms and information gathering from these firms.

Medical Reimbursements

The medical plan established to reimburse LE staff for medical expenses has failed both the U.S. Government and the staff members themselves. Employees can be reimbursed for up to \$1,458 of medical expenses each year for themselves and their families. Reimbursements can only be obtained with legitimate receipts provided by the doctors who treat them. Corruption in the medical system makes the system inoperable. Doctors will not provide bona fide invoices. This has led to LE staff falsifying receipts in order to be compensated for their payments. The embassy has explored several alternatives to the current system, including a medical allowance similar to the transportation allowance, or a contract with one or more private clinics that could provide the services and appropriate receipts. The Bureau of Human Resources and the embassy can use the options discussed in 3 FAH-2 H-226 to provide a workable health care program.

Recommendation 14: Embassy Dushanbe, in coordination with the Bureau of Human Resources, should develop a credible medical reimbursement plan for the locally employed staff. (Action: Embassy Dushanbe, in coordination with DGHR)

Local Social Security Payment System

On January 1, 2013, a tax law took effect in Tajikistan that required Tajik employees of diplomatic missions to pay 26 percent in social security taxes. In response, the embassy has coordinated with the Department on an agreement, approved by the Under Secretary for Management, per 3 FAM 7371, to pay these taxes for the LE staff despite the fact that a defined contribution plan is in place. No local social security system exists, with no expectation that LE staff members would ever benefit from contributions to this plan. The embassy has been negotiating with the Tajik Government to conclude an agreement, and according to embassy officials, the agreement is near completion. The LE committee expressed some reservations that their personal information would be provided to the Government of Tajikistan and hoped the embassy would share the final agreement with them prior to signing it.

Recommendation 15: Embassy Dushanbe should conclude the agreement to pay income and social security taxes for locally employed staff members. (Action: Embassy Dushanbe)

Locally Employed Staff Position Descriptions

The embassy is not reviewing position descriptions to update them and to validate the classification and modify it, as needed. This creates an inaccurate or incomplete understanding of the roles and functions of the LE staff. No management policy requires that position descriptions be reviewed on a periodic basis, as required by 3 FAH-2 H-443.1. The human resources officer noted in the OIG functional questionnaire that an annual review was not being conducted.

Recommendation 16: Embassy Dushanbe should conduct an annual review of position descriptions to validate the classification and modify it, as necessary. (Action: Embassy Dushanbe)

Equal Employment Opportunity

Two American Equal Employment Opportunity counselors are on site. One received training in December 2013 and the other in March 2014. One LE staff liaison works with the counselors. The inspectors suggested that a second liaison be appointed. Information is posted in several locations throughout the embassy. No training for LE staff has taken place for at least 2 years. The OIG team left information with the counselors regarding this training.

Financial Management

A retired temporary duty officer supervises the financial management office. He is the third temporary employee staffing the office since the departure of the section supervisor in July 2014. A full-time replacement is scheduled to arrive in January 2015. The office is also staffed with an LE financial specialist, an accounting technician, a budget analyst, two voucher examiners and one cashier. Section staffing has not kept pace with an increased workload over the past 7 years. ICASS service satisfaction scores exceed bureau and worldwide averages, as do OIG work and quality of life questionnaire scores compared to previously inspected posts.

Reducing the Cashier Advance

Each mission is authorized a cash advance by the U.S. disbursing office. Embassy Dushanbe carries an authorized cash advance of \$300,000 without a detailed plan or justification of how this money would be used. Of this amount, \$150,000 was established as an earthquake contingency fund and the remaining \$150,000 is an operating advance. In October 2014, the U.S. disbursing office in Bangkok asked that the cashier advance be reduced, eliminating the earthquake contingency fund and reducing the operating advance to \$55,000.

In response, the embassy sent telegram 14 DUSHANBE 1640 requesting that Bangkok leave the advance at \$300,000, indicating that because of the extreme earthquake risk in the region and Tajikistan, it required the additional contingent funds in cash. It did not include, however, details to justify this additional advance. In telegram 14 GLOBAL FINANCIAL SERVICES 6580, Bangkok concurred with the request. According to 4 FAH-3 H-393.4-2, an operating cash advance "may not exceed the needs of the cashier" to limit the vulnerabilities inherent with an advance that is larger than necessary.

Recommendation 17: The Bureau of the Comptroller and Global Financial Services should reduce Embassy Dushanbe's \$300,000 cash advance to \$55,000. (Action: CGFS)

Cash Reconciliation

The OIG team identified multiple deficiencies in the cash-reconciliation process. In telegram 14 DUSHANBE 1640, the embassy stated that the \$150,000 contingency fund is kept in a secure location outside the cashier's office. The inspection revealed that not to be the case. The cash was in the cashier's safe and was being used as operating funds. During a cash reconciliation, it was also revealed that only \$130,000 remained of the \$150,000 and that \$20,000 had been comingled with the operating funds. The Dushanbe telegram noted that cash is required to support DOD temporary duty teams. The cash is used to pay vendors who do not have bank

accounts. However, an advance notice system is in place for cash disbursements between \$2,000 and \$25,000. Management officials noted that with this advance notice, a local bank can provide this currency in dollars.

The cash reconciliation also revealed more than \$100,000 worth of electronic documents in transit between Dushanbe and Bangkok, some going back as far as June 2014. A computer systems glitch in the recently installed Department's cashiering system may be the culprit, and the embassy was attempting to correct it during the inspection. Other anomalies, such as a large subcashier advance and the fact that the alternate cashier has no separate advance, require a review from the cashier monitor at the U.S. disbursing office in Bangkok, per 4 FAH-2 H-816.4.

Recommendation 18: Embassy Dushanbe, in coordination with the Bureau of the Comptroller and Global Financial Services, should procure an assessment of overall cashier operations. (Action: Embassy Dushanbe, in coordination with CGFS)

Real Property

Embassy Dushanbe owns four properties: the embassy compound; the Michurina warehouse; and two residences, one of which was the first chancery. The warehouse is a compound that includes a former Soviet kindergarten unsuited for use as a warehouse, a prefabricated building, and covered parking spaces. It is in a busy and valuable part of downtown Dushanbe. Although the warehouse compound is large enough to build residential units, it is unclear whether the Government of Tajikistan would permit the U.S. Government to develop the site.

The Bureau of Overseas Buildings Operations (OBO) has not authorized the former chancery to be used as temporary duty quarters, and the embassy has not assigned it to a permanent embassy employee. The other government-owned residence is part of the embassy housing pool.

The 2008 OIG inspection report⁴ recommended a real estate market survey to determine the market value of the Michurina facility and former chancery. Because of delays in construction of a new warehouse, the embassy did not conduct the survey. Construction of a new warehouse on the embassy compound will begin in 2015. The embassy can now explore development or sale of the Michurina site and the former chancery.

Per 1 FAM 283.1, OBO is responsible for directing and preparing master plans, including optimum use of existing sites and assets, and construction of new facilities. By not planning holistically, Embassy Dushanbe risks underusing its real property.

Recommendation 19: Embassy Dushanbe, in coordination with the Bureau of Overseas Buildings Operations, should produce an action plan on disposition and/or use of the Michurina warehouse site and the former chancery. (Action: Embassy Dushanbe, in coordination with OBO)

⁴ *Embassy Dushanbe, Tajikistan*, Report No. ISP-I-08-17A, February 2008.

Per 15 FAM 252.6 d., posts in high seismic areas must evaluate the seismic safety of residential buildings and request the services of OBO seismic consultants. Without a cost-benefit analysis of leasing versus building housing, the U.S. Government risks foregoing long-term savings and putting its employees at risk in housing that does not meet seismic standards.

Recommendation 20: The Bureau of Overseas Buildings Operations should conduct a cost-benefit analysis of building seismically sound housing versus leasing embassy housing in Dushanbe. (Action: OBO)

General Services Operations

The general services operation staff functions as a cohesive team but lacks some basic operational knowledge because of lack of continuity in and experience of U.S. direct-hire personnel.

Leased Housing Safety Inspection

The realty LE staff assistant posts background information, meeting minutes and agendas, the housing policy, and housing assignment recommendations on a SharePoint site for housing board members ahead of the monthly meeting, enabling the board to make informed decisions on assignments. Though the post occupational safety and health officer participates in leasing decisions, his input is not documented. As noted in the 2008 OIG inspection report, residential lease files do not contain safety inspection checklists. Guidance in 15 FAM 252.5 a. requires that safety, health, and environmental hazards be identified in the selection of housing, that missions verify that the mission occupational safety and health officer has inspected residences under consideration for purchase or lease, and that those hazards have been effectively controlled or eliminated. All relevant factors, with proper documentation, must be taken into account before a lease is signed.

Recommendation 21: Embassy Dushanbe should document consideration of safety, health, and environmental factors before signing leases in embassy lease files. (Action: Embassy Dushanbe)

Make-Ready Costs

The embassy is improving its housing pool by leasing newer properties and is keeping costs down by more effectively negotiating with landlords to make ready properties according to U.S. standards. However, as noted in the 2008 OIG inspection report, make-ready costs routinely exceed the \$5,000 ceiling because of a fire and safety requirement to change aluminum wiring to copper. The mission has not prepared a justification for release from this limitation, nor does the mission track the amount spent on each residence. Per 15 FAM 162.2 d. (1), embassies may expend up to \$5,000 to prepare residential properties for occupancy. Justification and accounting documentation should be maintained in the lease file. Per 15 FAM 162.2 d. (2), each regional bureau may establish guidelines and procedures under which its posts may apply for release from the limitation. By not following guidelines, the embassy undermines the regional bureau's budget planning authority.

Recommendation 22: Embassy Dushanbe should prepare a justification to the Bureau of South and Central Asian Affairs to waive the \$5,000 limitation on program and International Cooperative Administrative Support Services funds used for make-ready costs. (Action: Embassy Dushanbe)

Recommendation 23: Embassy Dushanbe should track make-ready costs for each residence in the housing pool and maintain make-ready documentation in the lease files. (Action: Embassy Dushanbe)

Property Management

Property recordkeeping is in order, and inventories are accomplished on time despite the severe handicap of inappropriate warehouse facilities. However, stock levels are not monitored or assessed satisfactorily.

Furniture and Appliance Pool

Embassy Dushanbe's furniture and appliance pool is not administered correctly. Though all agencies participate in Embassy Dushanbe's furniture and appliance pool, the housing policy states that employees of other agencies may be required to bring their own furnishings, in contradiction of the shared pool structure. A replacement schedule or annual assessment, as required by 6 FAH-5 H-512.2-2 b., is also absent. Without assessing use and scheduling replacement of furniture and appliances, Embassy Dushanbe risks wasting money and warehouse space on excess stock.

Recommendation 24: Embassy Dushanbe should bring its furniture and appliance pool into compliance with the *Foreign Affairs Handbook* requirement. (Action: Embassy Dushanbe)

Embassy Dushanbe stores but does not use or dispose of used welcome kit stock. It has not conducted a cost-benefit analysis of purchase versus reuse of welcome kit items. Per 6 FAH-5 H-512.2-2 f., welcome kits must be handled like all other U.S. Government property with regard to issuance and disposal.

Recommendation 25: Embassy Dushanbe should bring its welcome kit program into compliance with *Foreign Affairs Handbook* requirements. (Action: Embassy Dushanbe)

Motor Pool

Though all drivers regularly drive armored vehicles, less than half have received training according to embassy-provided records. One inspector witnessed a near accident due to a driver driving too fast and not allowing sufficient braking distance for an armored vehicle. According to 12 FAM 389 b., supervisors of armored vehicle drivers must ensure that any driver assigned regularly to drive an armored vehicle has the opportunity to attend the Diplomatic Service Training Center armored vehicles driver training program. By not providing armored vehicle training to drivers, Embassy Dushanbe puts the safety of its employees, other drivers, and pedestrians at risk.

Recommendation 26: Embassy Dushanbe should provide armored vehicle driver training to all its drivers. (Action: Embassy Dushanbe)

Facilities

The Embassy Dushanbe compound has adequate space for offices and provides storage space with the addition of a warehouse. The DCM leads a robust safety, health, and environmental management program. In addition to regular meetings and safety assessments, the embassy prioritizes safety by including a full-time post occupational safety and health assistant on its facilities staff.

Because the contracting company that built the embassy went bankrupt before completing the project, some key items remain unfinished. The OBO project director for the on-compound warehouse will arrive in early 2015, and construction will commence shortly thereafter. Three priority corrections to the contractor's work remain.

The chancery and compound access control roof systems are not adequate. Numerous leaks in the chancery and the compound access control facility have occurred since occupancy. An OBO expert inspected the roofs of the chancery and the compound access control canopies in September 2014 and reported that replacement of the roofs should be planned for in the next 3–5 years. An inspector confirmed the roof issues and observed large black cobwebs between the double panes of several windows that are visible to visitors on their way to the executive office suite. In addition, on one window the rubber insulation strip is hanging between the double panes and has left a wide strip of melted rubber on the inside of the interior pane.

Per 15 FAM 641 a. and b. (4), posts must obtain a building permit from OBO to replace or alter roof structures. Per 15 FAM 1012.4, window repair and replacement projects may be managed by an OBO assigned project director. By not maintaining the chancery, the U.S. Government risks incurring larger costs as a result of damage to the physical plant.

Recommendation 27: The Bureau of Overseas Buildings Operations should replace the chancery roof. (Action: OBO)

Recommendation 28: The Bureau of Overseas Buildings Operations, in coordination with Embassy Dushanbe, should replace the compound access control canopies. (Action: OBO, in coordination with Embassy Dushanbe)

Recommendation 29: The Bureau of Overseas Buildings Operations, in coordination with Embassy Dushanbe, should remove the cobwebs, glue, and stripping from the publicly visible windows of the chancery. (Action: OBO, in coordination with Embassy Dushanbe)

Information Management

Embassy Dushanbe's information management office meets most of the Department's information technology support and security standards, according to scores from the Department's network monitoring software and operational reviews by the OIG team. Below average scores on ICASS surveys and OIG questionnaires reveal that the office is not meeting

the embassy's customer support needs. The information management office received new leadership in September 2014 and is working to improve customer service. The office also needs to improve its radio network management and emergency preparedness.

Radio Program

Residents in some mission housing are unable to use the embassy's emergency and evacuation radio network to communicate with the chancery. The information management office has not identified the reason for the signal degradation but suspects it is related to the thickness of the walls of some of the residences. According to 5 FAM 542.2(1), the information management officer or the information program officer is responsible for maintaining the emergency and evacuation network, including its operational efficiency. Residences that cannot communicate with the embassy are at risk of becoming isolated if primary communication lines fail.

Recommendation 30: Embassy Dushanbe should assess the cause of the radio signal degradation and implement corrective steps. (Action: Embassy Dushanbe)

Emergency Preparedness

The bandwidth set on Embassy Dushanbe's alternate network route is not high enough to support the unclassified and classified networks communications when the primary route fails. The Bureau of Information Resource Management has identified a need to transition the alternate route from a terrestrial network path to a satellite-based network path in order to increase the bandwidth, but the bureau has not established a date to install the necessary equipment. System managers are required under 12 FAM 622.3-1 a. to implement procedures to ensure continuity of operations. Without a fully functioning alternate route, the embassy risks being unable to meet the mission's communications requirements during an emergency.

Recommendation 31: The Bureau of Information Resource Management should transition Embassy Dushanbe's alternate network route to a satellite-based path. (Action: IRM)

The information management office is not testing its broadband global area network satellite equipment, because personnel do not know how to operate the equipment. The system allows users to connect a laptop computer, network switch, and telephone to the Internet from remote locations. The lack of testing puts the embassy at risk of being unable to communicate if the terrestrial network infrastructure is damaged during a natural disaster or other emergency situation. The OIG team counseled the office to test regularly the broadband global area network satellite equipment.

Information Systems Security

The embassy's information management office is not conducting monthly reviews of randomly selected user libraries and word-processing documents, as required by 12 FAM 622.1-8 a. Office managers are aware of the requirement but have complied infrequently. Networks that are not checked on a regular basis run the risk of containing unauthorized and inappropriate applications and files.

Recommendation 32: Embassy Dushanbe should conduct monthly reviews of randomly selected user libraries and word-processing documents. (Action: Embassy Dushanbe)

BlackBerry Policy

Embassy Dushanbe does not have a clearly established BlackBerry distribution policy. Although the information management office has received verbal guidance from the front office on who should receive phones, it lacks a written policy making the decision process transparent. Language in 2 FAM 022.7 requires embassies to develop and maintain appropriate systems of management controls for their organization. Incorporating employee feedback into new policies is required by 1 FAM 014.2. Inspection interviews and meetings revealed that misinformation absent a clear policy has led to the perception among LE staff members that they are being denied BlackBerry devices for no logical operational reasons.

Recommendation 33: Embassy Dushanbe should establish and disseminate a written policy on BlackBerry distribution. (Action: Embassy Dushanbe)

Security

Several staffing gaps in the regional security office occurred in 2014. The regional security officer, an assistant regional security officer, and the office management specialist were all medically evacuated during the year. The office management specialist, who left in July, did not return to the embassy. Despite the challenge of working without a full staff, the section was productively engaged in all required security areas. The classified annex of this report contains details on mission security.

MISSION SUPPORT SERVICES

Medical Operations

The medical unit is staffed with a Foreign Service health practitioner, a local doctor, a part-time local physician, and an administrative assistant position that is currently vacant. The health practitioner would like to add a laboratory technician to his staff. Medical space is cramped and lacks a waiting room. The trauma room is very small. The addition of a laboratory technician would require a more spacious health unit.

ICASS scores decreased from 4.48 (out of a possible 5) in 2013 to 3.64 in 2014. In part, this was due to the number of temporary duty health providers or gaps when no American health provider was at post between September 2013 and April 2014. OIG work and quality of life questionnaire scores reflect an improvement in services since the arrival of the full-time Foreign Service health practitioner in April 2014.

Vaccine Shipments

Embassy Dushanbe has lost over \$14,000 of medical vaccines because of the difficulty in shipping cold storage vaccines to Dushanbe. Vaccines must remain in cold storage throughout

the shipment process. Using the Medical Store, as authorized by the Office of Medical Services, does not allow for continuous cold storage to Dushanbe because of the airport transit the vaccines must pass through. The preferred method to allow vaccines to travel to Dushanbe is to have them purchased by the U.S. Army Medical Materiel Center Europe in Frankfurt, Germany, and shipped directly to Dushanbe.

Recommendation 34: The Office of Medical Services, in coordination with the Bureau of Administration and Embassy Dushanbe, should conclude a memorandum of understanding permitting cold storage vaccines to be procured in Frankfurt and shipped directly to Embassy Dushanbe. (Action: MED, in coordination with A and Embassy Dushanbe)

Community Liaison Office

Isolation, lack of medical care, frequent illness, and a lack of services and amenities affect morale in Dushanbe. To counter the many difficulties of service here, the community liaison office engages the community in weekly events for American and LE staff and children. These efforts are reflected in the consistently high remarks in the OIG survey and from the front office.

Schools

[Redacted] (b) (6) is the Department-sponsored school. It is a small, coeducational day school with an American curriculum. Classes are organized into multigrade groupings based on age and mastery of subjects. Students originate from 23 countries.

The school is not accredited and has a sparsely populated high school. School management will apply for accreditation once the school moves to a new and larger facility in 2015.

American Community Association

A license agreement documenting the use of government property and logistical support provided by the embassy is dated December 2011. The association sells logo and souvenir items, provides personal duty free orders, and administers the Dushanbe recreation center.

Because of a shortage of board members, the association is delinquent in submitting several reports, including the 2013 audit report and management letter, the 2013 association-prepared financial statements, the 2013 statement of auditor's independence, and the January–June semi-annual financial statements. A revised compliance certification documenting noncompliant areas, corrective action, and submission dates is also pending.

Recommendation 35: Embassy Dushanbe should complete all delinquent American Community Association reports and forward them to the Office of Commissary and Recreational Affairs. (Action: Embassy Dushanbe)

The association maintains a kiosk in the embassy lobby that sells logo and souvenir items. The kiosk is staffed from 8:00 a.m. to 5:00 p.m., when a cashier accepts payments for items. However, the kiosk also maintains a cash envelope pasted to a refrigerator, where employees can pay for items and make change after hours and on the weekend on the honor system. Although the OIG

team commends the honesty and trustworthiness of embassy staff, the exposed location of the envelope presents a clear vulnerability, and the team suggested an alternative arrangement.

MANAGEMENT CONTROLS

Embassy Dushanbe maintains management controls such as a secure receiving area in the warehouse with appropriate, limited access; however, management controls have been weakened by the lack of staff experience and continuity.

The OIG team reviewed the 2014 chief of mission statement of assurance and determined that it was reviewed thoroughly and with care. The Ambassador assured herself that vulnerabilities were accurately identified, including an ongoing complicated case involving medical claims for LE staff.

Designated Billing Office

The embassy procurement office routinely receives invoices for goods and services it orders, violating the separation of duties between ordering and paying offices outlined in 4 FAH-3 H-422.2. The financial management office does not have copies of contracts, which it needs to examine payment vouchers. With the incomplete transition to automated systems, accountability for certain functions, such as contract closeout, has become ill-defined. The financial management section posts payments on a shared drive for the procurement staff to check and close out contract files. The correct voucher processing procedure is explained in detail in 4 FAH-3 H-420. Violation of separation of duties increases the risk of error, waste, and wrongful acts.

Recommendation 36: Embassy Dushanbe should bring its procurement and payment processes into compliance with Department regulations. (Action: Embassy Dushanbe)

Purchase Card Review

Because of staffing gaps, Embassy Dushanbe did not conduct an annual review of purchase card operations for FY 2014 as required by 4 FAM 455.2 a. (4). Not conducting the annual review increases the risk of error and fraud.

Recommendation 37: Embassy Dushanbe should complete a purchase card program annual review. (Action: Embassy Dushanbe)

Overtime Monitoring

Embassy Dushanbe has correctly identified its time and attendance procedures as deficient and is beginning to take corrective action. At the time of the inspection, the embassy was unable to produce a list of overtime in FY 2014 by employee. Per 4 FAH-3 H-525.1-2, the management officer must establish controls for accurate and timely recording and reporting of time and attendance. No single person is accountable for monitoring overtime. By not monitoring

overtime, embassy Dushanbe risks perpetuating workload imbalances and paying fraudulent overtime claims.

Recommendation 38: Embassy Dushanbe should designate a single officer to oversee staff overtime compensation. (Action: Embassy Dushanbe)

RECOMMENDATIONS

Recommendation 1: Embassy Dushanbe should revise and implement its professional development program for first- and second-tour personnel to develop employee skills related to working and representing the United States overseas. (Action: Embassy Dushanbe)

Recommendation 2: Embassy Dushanbe, in coordination with the Bureau of International Narcotics and Law Enforcement Affairs, should determine the cost effectiveness of self-implementing its program of salary assistance to Tajikistan's Drug Control Agency rather than paying fees to implementing agencies. (Action: Embassy Dushanbe, in coordination with INL)

Recommendation 3: Embassy Dushanbe should establish a security assistance working group and use it to coordinate security assistance programs. (Action: Embassy Dushanbe)

Recommendation 4: Embassy Dushanbe should designate a civilian official as security cooperation officer with oversight responsibility for the International Military Education and Training program and for Foreign Military Financing programs. (Action: Embassy Dushanbe)

Recommendation 5: Embassy Dushanbe should standardize public diplomacy grants oversight, including monitoring and file maintenance. (Action: Embassy Dushanbe)

Recommendation 6: Embassy Dushanbe should conduct visa validation studies with issuance data from FYs 2013 and 2014. (Action: Embassy Dushanbe)

Recommendation 7: Embassy Dushanbe should conduct town hall meetings annually for resident American citizens to recruit additional wardens and better inform current wardens of their responsibilities and their role in protecting U.S. citizens. (Action: Embassy Dushanbe)

Recommendation 8: Embassy Dushanbe should conduct periodic tests of its warden system. (Action: Embassy Dushanbe)

Recommendation 9: Embassy Dushanbe should amend the FY 2016 Mission Resource Request to delete the request for an assistant regional security officer-investigator position. (Action: Embassy Dushanbe)

Recommendation 10: Embassy Dushanbe should update all management policies and file accordingly. (Action: Embassy Dushanbe)

Recommendation 11: Embassy Dushanbe should transition from International Cooperative Administrative Support Services Lite to Standard. (Action: Embassy Dushanbe)

Recommendation 12: Embassy Dushanbe should conduct its annual International Cooperative Administrative Support Services review, including staffing needs. (Action: Embassy Dushanbe)

Recommendation 13: Embassy Dushanbe should determine the impact of new positions on International Cooperative Administrative Support Services staffing prior to making a final decision on National Security Decision Directive 38 requests. (Action: Embassy Dushanbe)

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Recommendation 30: Embassy Dushanbe should assess the cause of the radio signal degradation and implement corrective steps. (Action: Embassy Dushanbe)

Recommendation 31: The Bureau of Information Resource Management should transition Embassy Dushanbe's alternate network route to a satellite-based path. (Action: IRM)

Recommendation 32: Embassy Dushanbe should conduct monthly reviews of randomly selected user libraries and word-processing documents. (Action: Embassy Dushanbe)

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Recommendation 36: Embassy Dushanbe should bring its procurement and payment processes into compliance with Department regulations. (Action: Embassy Dushanbe)

Recommendation 37: Embassy Dushanbe should complete a purchase card program annual review. (Action: Embassy Dushanbe)

Recommendation 38: Embassy Dushanbe should designate a single officer to oversee staff overtime compensation. (Action: Embassy Dushanbe)

PRINCIPAL OFFICIALS

Title	Name	Arrival Date
Ambassador	Susan M. Elliott	09/12
Deputy Chief of Mission	Robert G. Burgess	07/13
Chiefs of Sections:		
Management	Mark Wilson	08/14
Consular	Erica S. King	02/13
International Narcotics and Law Enforcement	Mark E. Wood	08/13
Political and Economic	Nickolas G. Katsakis	04/13
Political and Military	Timothy H. Scovin	07/12
Public Affairs	Douglas E. Johnston	10/14
Regional Security	Michael J. Mancini	06/14
Other Agencies:		
Defense Attaché	Lt. Colonel Sulev A. Suvari	06/14
Office of Military Cooperation	Lt. Colonel Scott D. Maxwell	06/12
U.S. Agency for International Development	Kathleen S. McDonald	09/12
Drug Enforcement Administration	Robert C. Masters	09/13

Source: Embassy Dushanbe, Tajikistan.

APPENDIX A: SCOPE AND METHODOLOGY

This inspection was conducted in accordance with the Quality Standards for Inspection and Evaluation, as issued in 2012 by the Council of the Inspectors General on Integrity and Efficiency, and the Inspector's Handbook, as issued by the OIG for the Department and the Broadcasting Board of Governors (BBG).

Purpose and Scope

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

- **Policy Implementation:** whether policy goals are being effectively achieved and U.S. interests are effectively represented.
- **Resource Management:** whether resources are used with maximum efficiency and effectiveness and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether operations meet the requirements of applicable laws and regulations; whether internal management controls are enforced; whether instances of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

Inspections also assess executive leadership in such areas as security, interagency cooperation, morale, Equal Employment Opportunity, and staff development.

Methodology

The inspection team's primary assessment criteria are regulations contained in the *Foreign Affairs Manual* and *Handbook*, Department instructions, applicable law and generally accepted management principles.

The Office of Inspections solicits reviews of the content of inspection reports from interested offices, individuals, organizations, and activities.

ABBREVIATIONS

BBG	Broadcasting Board of Governors
DCM	Deputy chief of mission
Department	U.S. Department of State
DOD	U.S. Department of Defense
FAH	<i>Foreign Affairs Handbook</i>
FAM	<i>Foreign Affairs Manual</i>
FAST	First- and second-tour
ICASS	International Cooperative Administrative Support Services
ICS	Integrated Country Strategy
LE	Locally employed
MRR	Mission Resource Request
OBO	Bureau of Overseas Buildings Operations
OIG	Office of Inspector General
PAS	Public affairs section
USAID	U. S. Agency for International Development

TEAM MEMBERS

The OIG team inspected the U.S. Embassy in Dushanbe during October 29–November 14, 2014. These OIG staff members conducted the inspection:

Ambassador Douglas A. Hartwick (team leader)
Martha Fikru (deputy team leader)
Alison Barkley
Calvin Carlsen
Pasquale Capriglione
David Davison
Brett Fegley
Mark Jacobs
Keith McCormick
Shawn O'Reilly
Derwood Staeben

In conducting this inspection, the inspectors reviewed relevant records and documents, observed 34 management and working-level meetings, conducted 182 interviews, and reviewed 104 questionnaires.



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