



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

**Office of Inspector General**

**Office of Inspections**

**Inspection of  
the Bureau of Administration,  
Global Information Services,  
Office of Information Programs and Services**

**Report Number ISP-I-12-54, September 2012**

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

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

### **PURPOSE AND SCOPE**

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

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

### **METHODOLOGY**

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



United States Department of State  
and the Broadcasting Board of Governors

*Office of Inspector General*

## PREFACE

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

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

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

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

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

Harold W. Geisel  
Deputy Inspector General

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## Key Judgments

- Leadership and management practices contribute to problematic morale and poor communication across the Bureau of Administration, Global Information Services, Office of Information Programs and Services (IPS). Management controls in IPS are insufficient, indicating leadership and management deficiencies in many parts of the organization.
- The main responsibilities of IPS include managing the Freedom of Information Act (FOIA) and declassification programs, administering the Privacy Act, and conducting records management. Lack of cooperation from the Department of State (Department) and internal weakness hamper IPS's performance of these duties.
- IPS handles one of the largest FOIA workloads in the Federal Government. However, IPS's lack of a sound process to develop its information systems led to delayed and flawed deployment of the Freedom of Information Document Managing System 2 (FREEDOMS 2), IPS's key software for managing cases, resulting in significant backlogs.
- IPS's records management practices do not meet statutory and regulatory requirements. Although the office develops policy and issues guidance, it does not ensure proper implementation, monitor performance, or enforce compliance.
- IPS carries out its declassification duties well, due in large part to hiring experienced retirees to handle much of the work.
- Unclear lines of authority in the Privacy division hinder IPS's ability to fulfill its mandated responsibilities.
- The Bureau of Administration plans to consolidate information technology and resource management under IPS for all of Global Information Services (GIS). The consolidation needs careful review and better planning.

All findings and recommendations in this report are based on conditions observed during the on-site review and the standards and policies then in effect. The report does not comment at length on areas where OIG did not identify problems that need to be corrected.

The inspection took place in Washington, DC, between May 7 and June 15, 2012. (b) (6)



## Context

IPS is responsible for the Department's records management and related technologies, including public access to information under FOIA, the Open Government Act of 2007, the Privacy Act, Executive Order (E.O.) 13526, and other legislation. This includes the following:

- Freedom of Information Act requests;
- Privacy information and protection;
- Classification management and review, including declassification;
- Corporate records management and special document production (e.g., answering a congressional or judicial request for information);
- The Department's Ralph J. Bunche Library; and
- The Diplomatic Research Service.

The office is in Washington and has no overseas locations. A director leads a staff of 358 employees, including 152 Civil Service employees, 184 when actually employed (WAE) staff members, and 22 student interns. IPS employs a varying number of contractors for different functions. Separate divisions provide information technology and resource management support.

IPS plays a critical role in the Department's communication with the public. By providing citizens access to the Department's records, the office is instrumental in maintaining openness and transparency in the conduct of foreign affairs.

IPS has multiple vacancies in branch and division leadership positions, with one branch chief job having been vacant since 2007. The current office director assumed her job in December 2011, after several months during which two employees shared leadership responsibilities.

## Executive Direction

Persistent neglect of fundamental leadership responsibilities and management practices has had profound consequences in IPS. The OIG team's observations, discussions with IPS staff, and the responses to OIG's questionnaires indicated an office with problematic morale, perceptions of favoritism, micromanagement practices, and confused lines of authority. Inspectors found failures of communication, lack of training, questionable staffing decisions, and poor time and attendance record keeping. IPS's new director is just beginning to address the many challenges that she faces.

Many suggest that poor morale stems from frequently changing priorities and excessive workload. (b) (5)



Communication among all levels of IPS staff is poor. Division chiefs are located on the same floor in order to strengthen communication within higher-level management. This physical arrangement limits managers from seeing what their employees are doing on a daily basis, however. IPS leadership told the OIG team that they plan to change this arrangement with the building renovation, currently in process, which will colocate managers with members of their staff.

The office director and all division chiefs hold a weekly leadership meeting, but division chiefs do not hold regular staff meetings. There are also no all-hands meetings to provide interaction with upper level management and to discuss the organization's priorities. Open communication with staff would help build better morale and trust within IPS.

**Recommendation 1:** The Bureau of Administration should implement a policy requiring the Office of Information Programs and Services to schedule regular all-hands meetings and for division chiefs to hold weekly meetings with staff. (Action: A)

## Policy and Program Implementation

### Freedom of Information Act Process

The Department's FOIA process is inefficient and ineffective. IPS's backlog of 6,950 cases continues to grow. A relatively small staff is processing the heavy volume of requests and dealing with new software. Delays in responses from other bureaus, offices, and agencies contribute to the problem.

The Department receives among the highest number of FOIA requests in the U.S. Government. In FY 2011, IPS reported that it received 14,262 requests, in addition to the 21,252 requests already pending at the beginning of the year. IPS employees processed 26,802 requests during the year, leaving 8,712 pending. IPS reported that in FY 2011, the average number of days to process simple cases was 156; for complex cases, 342. Some cases have been pending for 5 or 6 years.

FOIA cases are prone to delay. The FOIA process begins with IPS's receiving and reviewing an incoming request. The request then goes to an analyst, who formulates a strategy to make the necessary searches, which can involve interacting with multiple domestic offices and overseas posts. Often, the Department's bureaus do not make the request a high priority. After the bureau responds, the analyst packages the documents and sends them to a reviewer, who may remove some documents or suggest additional searches. The package then goes to another reviewer, who determines whether exemptions in FOIA or other statutes apply and makes any necessary redactions. Finally, the package goes back to the analyst, who assesses any fees for searches and copies. The analyst then sends the document with a cover letter to the requester.

Fifty-four percent of the FOIA requests received by the Department in FY 2011 were invalid. The Department's FOIA Web site does not provide information for a requester that is clear enough to avoid mistakes. The process of assessing and responding to such requests is a drain on IPS staff time.

**Recommendation 2:** The Bureau of Administration should provide clearer instructions in the Freedom of Information section of the Department of State's Internet site to minimize the number of invalid requests. (Action: A)

Workflow problems and staffing deficiencies contribute to the FOIA backlog. The group that receives cases, the Requester Communication branch, has only one person, the branch chief, who is qualified to conduct quality checks, resulting in a bottleneck in the process.

**Recommendation 3:** The Bureau of Administration should train a second person in the Office of Information Programs and Services' Requester Communication branch to do quality checks. (Action: A)

Once a case is received and passed on to the analysts, another bottleneck occurs because analysts have trouble determining which offices or units should conduct the document searches. The Department is too large and complex for analysts to rely on their knowledge of the myriad

programs administered by so many bureaus and offices. The absence of a single systematic and reliable reference to enable analysts to identify which bureaus should receive search taskers results in misrouted taskers and processing delays.

**Recommendation 4:** The Bureau of Administration should develop a list of all bureaus and independent offices in the Department of State—complete with component offices, responsibilities, and programs administered—to serve as a reference for Freedom of Information Act case analysts in the Office of Information Programs and Services. (Action: A)

### *Introduction of Freedom of Information Document Managing System 2*

In 2011, IPS introduced FREEDOMS 2, an updated version of its online case management system. Flaws in the introduction of the system have delayed FOIA cases even further, almost paralyzing the process. Those flaws include failure to involve users in the system upgrade, introduction of the system before it was ready, and lack of adequate training. The first two are discussed in the Information Technology section of this report, and the third is addressed in the Management Controls section.

### *Helping Other Organizations*

IPS recently allowed several staffers who process FOIA requests to take excursion tours in Brazil to assist in visa processing. At a time when IPS has a large backlog of cases, it is unwise to divert staff to other duties.

**Informal Recommendation 1:** The Bureau of Administration should not assign Office of Information Programs and Services staff members to other organizations until that office has reduced its backlog of Freedom of Information Act cases.

### *Current Description of the Department of State's Organization*

FOIA requires each agency to publish in the *Federal Register* a statement of its central and field organization, showing where the public may obtain information, make requests, or obtain decisions, along with other information about agency procedures.<sup>1</sup> Despite significant organizational changes, the Department has not filed an updated statement since 1986. As a result, the Department is not in compliance with the statute.

**Recommendation 5:** The Bureau of Administration, in coordination with the Office of the Legal Adviser, should publish an updated notice of the Department of State's organization. (Action: A, in coordination with L)

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<sup>1</sup> 5 U.S.C. 552(a)(1).

### *Litigation Team*

The litigation team provides support for cases in litigation. A manager who is new to litigation and the legal field in general heads the team. [REDACTED] This (b) (5) [REDACTED] coupled with vacancies at the branch chief and division chief levels, has led the litigation team to rely upon one another and, to a lesser extent, the Office of the Legal Adviser attorneys who manage the FOIA litigation portfolio, forcing the attorneys to assume duties that are the responsibility of the branch chief. Teamwide training in court proceedings would facilitate better management of this complex portfolio.

**Recommendation 6:** The Bureau of Administration, in coordination with the Office of the Legal Adviser, should implement a training plan for the Freedom of Information Act litigation team in the Office of Information Programs and Services. (Action: A, in coordination with L)

Litigation team members work together well but lack a dedicated group of reviewers to support cases currently in litigation. To assist, IPS pulls reviewers from other divisions, which increases the backlog in those divisions and demoralizes employees removed from their regular work. This problem will only become more severe if the recent upward trend in litigation volume continues.<sup>2</sup>

**Recommendation 7:** The Bureau of Administration should assign full-time reviewers to support the Freedom of Information Act litigation team in the Office of Information Programs and Services. (Action: A)

### *Appeals Team*

The Appeals branch handles appeals concerning FOIA requests, mandatory declassification reviews, classification challenges, and the Privacy Act. The appeals analyst and a panel of retired ambassadors, who head a quarterly panel, manage FOIA appeals capably, if sometimes slowly. In addition, the Office of the Legal Adviser provides legal review as necessary. Roughly half of the appeals result in the release of additional information because of the passage of time, an error in the original case analysis within IPS, or an insufficient records search by the tasked Department bureau. Better communication from the Appeals branch could improve the FOIA process. Updates to IPS case analysts and Department FOIA liaison officers, giving examples of commonly recurring mistakes, as well as examples of best practices, could reduce the number of appeals and improve overall customer service.

**Informal Recommendation 2:** The Bureau of Administration should implement a process to provide periodic updates highlighting common errors and best practices to guide Freedom of Information Act case analysts and liaisons in the Office of Information Programs and Services.

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<sup>2</sup> The increase in the number of lawsuits is due, in part, to a 2007 statutory amendment, 5 U.S.C. § 552(a)(4)(E)(i) (2006), amended by the Open Government Act of 2007, Pub. L. No. 110-175, 121 Stat. 2524. This “fee-shifting” provision permits the trial court to award reasonable attorneys’ fees and litigation costs to a plaintiff who has “substantially prevailed,” which, as redefined by the 2007 amendment, is a fairly low threshold.

The retired ambassadors who make up the appeals panel review FOIA appeals quarterly. Qualified by their experience, perspective, and knowledge, they are highly regarded by observers inside and outside the Department. However, meeting only quarterly limits the efficiency of the appeals process and creates delays.

***Informal Recommendation 3:*** The Bureau of Administration should schedule additional appeals panel meetings throughout the year to expedite the Freedom of Information Act appeals process.

### ***Departmentwide Training***

IPS staff reports that most Department employees are poorly informed about FOIA principles and procedures, as well as the importance of providing information to the public. IPS staff also says that assistant secretaries, deputy assistant secretaries, and office directors sometimes fail to place sufficient emphasis on FOIA responsibilities to ensure that search taskers receive prompt responses, the lack of which is a major cause of delays.

**Recommendation 8:** The Bureau of Administration should instruct the Freedom of Information Act program manager to prepare a semiannual newsletter dealing with Freedom of Information Act issues for officers who deal with such issues at all domestic bureaus and U.S. embassies. (Action: A)

**Recommendation 9:** The Bureau of Administration, in coordination with the Foreign Service Institute, should develop a distance-learning course dealing with the fundamentals of the Freedom of Information Act and require all Freedom of Information Act officers to take the course. (Action: A, in coordination with FSI)

IPS is also responsible for administering E.O. 13526, which prescribes a “uniform system for classifying, safeguarding, and declassifying national security information.”<sup>3</sup> The Department and other executive agencies have an affirmative duty to train their employees in proper classification and declassification of documents, to declassify materials as quickly as national security will allow, and to self-inspect employees’ compliance with the E.O.’s provisions.

In-person and online E.O. 13526 training is currently offered as an optional course. Although some offices have requested and completed the in-person training option, and some individual employees have completed the online training option, Department employees remain largely unaware of their legal obligation to comply with E.O. 13526. The deadline for fulfilling the mandatory E.O. 13526 training requirement for original and derivative document classifiers was June 2010.<sup>4</sup>

**Recommendation 10:** The Bureau of Administration, in coordination with the Office of the Under Secretary for Management, should implement a policy requiring all employees to

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<sup>3</sup> E.O. 13526, 3 C.F.R. 298 (Dec. 29, 2009), 75 Fed. Reg. 707 (Jan. 5, 2010), corrected at 75 Fed. Reg. 1013 (Jan. 8, 2010). These provisions went into full effect on June 25, 2010, except for sections 1.7, 3.3, and 3.7, which were effective immediately.

<sup>4</sup> *Id.* at § 6.3.

complete the classification training mandated under Executive Order 13526. (Action: A, in coordination with M/PRI)

The job of developing training and other programs to support the FOIA process belongs to IPS's FOIA program manager. The current leadership void in the Program and Policy division chief position leaves the FOIA program manager with no direct supervisor. Although the incumbent has a strong background in FOIA and the Privacy Act, IPS has not exploited her talents. IPS has not conducted planning to address the increase in FOIA cases or the Department's large backlog. IPS has undertaken some special projects, but these have largely highlighted the need for an overhaul of the Department's FOIA efforts.

***Informal Recommendation 4:*** The Bureau of Administration should provide guidance and the necessary resources for the Office of Information Programs and Services' Freedom of Information Act program manager to improve Act-related efforts throughout the Department of State via training, updates, and systemic changes.

### ***Information Access Program***

The Information Access Program branch responds to special requests, including those from Congress, the Department of Justice (generally in connection with litigation), and other agencies. The special nature of the requests normally results in rapid responses from Department offices. The Information Access Program branch appears to be functioning well despite the leadership void affecting the rest of the Programs and Policies division. This efficiency is due largely to the efforts of the current branch chief, who emphasizes communication, training, feedback, awards, and staff development—practices that are rare in this organization.

Despite the large number of hard-copy documents IPS reproduces, the office lacks copy machines that can handle the volume required. Until IPS develops a method to process and disseminate all documents electronically—a step that may be complicated by the classification level of some documents—the office will continue to experience processing delays due to the use of slow or inoperative copy machines.

***Informal Recommendation 5:*** The Bureau of Administration should provide the Office of Information Programs and Services with high-speed copy machines to facilitate the workflow until the office can implement a greener solution.

### ***Requests via the Department of Homeland Security***

The Department receives many requests that were sent incorrectly to the U.S. Citizenship and Immigration Services. The requesters receive a form letter stating that they should request the information from the Department. However, the letter does not inform the requester that the Department does not accept Department of Homeland Security forms, so when IPS receives the package, it rejects it until the requester provides the Department forms.

**Recommendation 11:** The Bureau of Administration should negotiate a reworded refusal letter with the U.S. Citizenship and Immigration Services Freedom of Information Office that informs

requesters of Department of State requirements for Freedom of Information Act requests.  
(Action: A)

***Measures to Fix Responsibility throughout the Department***

Personnel in Department bureaus who serve as liaisons to IPS are normally staff assistants or others for whom FOIA responsibilities are a small part of their job. Their lack of responsiveness indicates that performance in handling FOIA requests is not a significant factor in their evaluations. Even if it were, the Department has not developed performance standards for responding to IPS's requests for documents. IPS does not report to the upper levels of the Department about the responsiveness of bureaus and embassies on FOIA. To improve the Department's FOIA performance, the Department must fix responsibility at all stages of the process.

**Recommendation 12:** The Bureau of Administration, in coordination with the Executive Secretariat, should develop performance standards for responding to Freedom of Information Act search requests and provide semiannual reports on compliance for the Secretary, Deputy Secretaries, and Assistant Secretaries. (Action: A, in coordination with S/ES)

**Recommendation 13:** The Bureau of Human Resources, in coordination with the Bureau of Administration, should review and update all position descriptions and work requirements for the bureaus' contacts for Freedom of Information Act responsibilities. (Action: DGHR, in coordination with A)

**Recommendation 14:** The Bureau of Administration should develop a list of officers with Freedom of Information Act responsibilities at all U.S. embassies. (Action: A)

***More Effective Allocation of Attorneys' Fees***

The Open Government Act of 2007 makes it easier for plaintiffs to recover attorney's fees and other litigation costs under FOIA, including those imposed for an agency's failure to meet statutory deadlines. The amendments also prohibit the use of funds from the U.S. Government's Claims and Judgment Fund to pay those fees. IPS now pays those fees out of its budget. Sometimes when the courts assess attorney fees, it is because a bureau tasked by IPS has been dilatory in providing IPS the documents requested by the plaintiff. In those cases, it is only fair that the bureau be responsible for paying its share of attorneys' fees.

The number of cases in which the Department is a defendant has tripled in the past 3 years, from 25 to 81. The Department's liability for fees is likely to increase. Establishing a system of assessing a fair share of attorneys' fees to the bureaus at fault would instill more responsibility in the Department's bureaus and better fulfill the intent of the Open Government Act of 2007. To this end, IPS has asked for a special fund to pay attorneys' fees and other litigation expenses in its current budget request.

**Recommendation 15:** The Bureau of Administration should implement a system for billing Department of State bureaus for any attorneys' fees assessed in court cases related to the

Freedom of Information Act if delays by the bureau contributed to the court's assessment of the attorneys' fees. (Action: A)

***Support for the Litigation Team***

The FOIA-related litigation workload has increased dramatically. The Office of the Legal Adviser formerly provided one attorney to serve as the litigation team's liaison with the Department of Justice, which manages the Department's FOIA litigation. However, the FOIA litigation portfolio represented only 40 percent of the attorney's overall Office of Legal Adviser workload. The attorney selected for this role is invariably new to the Department and, generally, new to FOIA, resulting in a steep subject-matter learning curve. This combination of factors recently led the Office of the Legal Adviser to assign a second part-time attorney to help with FOIA litigation matters, placing the litigation team in the difficult position of working with two attorneys who juggle additional litigation deadlines in their respective portfolios. Furthermore, given the Office of the Legal Adviser's normal rotation cycle, an attorney who is new to the Department and to FOIA will fill this part-time portfolio every 2 years. At a minimum, the litigation team needs sufficient support for the heavy FOIA litigation portfolio.

**Recommendation 16:** The Office of the Legal Adviser, in coordination with the Bureau of Administration, should review the staffing needs of the Office of Information Programs and Services' Freedom of Information Act litigation team and assign staff as necessary to provide adequate coverage. (Action: L, in coordination with A)

**Declassification/Executive Order 13526 – Systematic Review Program Division**

IPS is responsible for declassifying the Department's foreign policy records, as well as for conducting manuscript reviews for former Department employees. WAE reviewers conduct foreign policy record declassification. One prerequisite for employment is that the WAE be a retired FS-01 or GS-15 or higher from the Department, the U.S. Agency for International Development, or the former U.S. Information Agency. This qualification helps ensure that reviewers have subject matter expertise and reviewer competence in their areas of declassification. Hiring senior-ranked retirees and paying high wages reflects in the quality of reviews. The Information Security Oversight office (ISOO), National Archives and Records Administration, noted the Department as one of the best Federal agencies in declassification accuracy.<sup>5</sup>

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<sup>5</sup> Report to the President, National Archives and Records Administration, 2010 and 2011.

## Innovative Practice: Declassification Assessments

### Innovative Practice: Declassification Assessments

**Issue:** E.O. 13526 directs all executive branch agencies to establish and maintain an ongoing self-inspection program. Its purpose is to assess the effectiveness of the classified national security information program within individual agency activities and the agency as a whole in order to comply with section 5.4 (d) (4) of the order.

**Response:** ISOO conducts a declassification assessment of 16 executive agencies by reviewing a sample size proportionate to the number of documents reviewed in a 6-month period. Assessments focus on missed equities, inappropriate referrals to other agencies, and improper exemptions.

**Result:** For 2010 and 2011, ISOO evaluated a sample of the Department's declassified holdings. The result was an accuracy rating of 100 percent for both years. The Department's perfect score is due to the hiring of experienced and highly qualified senior-level WAE personnel.

In addition, WAEs conduct manuscript reviews in the Lifecycle Management office, which falls under the E.O. 13526 program manager's supervision. This office supports authors' efforts to publish their diverse work, which ranges from articles and op-ed pieces to book-length projects, by sifting through manuscripts for classified information.<sup>6</sup>

### *Declassification Backlog*

Approximately 85 percent of all material reviewed is declassified. IPS refers another 13 percent to other agencies for review. Two percent is exempt under one of nine categories in E.O. 13526, Section 3.3 (b).

The Electronic Review and Foreign Relations of the United States/Mandatory Review branches in IPS have an adequate workforce to maintain a steady declassification rate; however, the Paper Review branch, with about half the total Systemic Review Program division staff, will eventually become backlogged at current rates of declassification. The Paper Review branch declassifies in 5-year cycles. The division is currently reviewing material for years 1986 to 1990. The goal of the Paper Review branch is to review 4 million pages annually, a rate of productivity that will prevent a backlog. The current rate is 2.5 million to 3 million pages per year. The Paper Review branch will not complete the current cycle as scheduled and will not be prepared to review files for the next period, 1991–1996. Further compounding this problem was the enactment of the Kyl-Lott Amendment to the 1999–2000 Defense Authorization Act, which requires another review of material previously declassified prior to 2001.

**Recommendation 17:** The Bureau of Administration should review staffing resources in the Office of Information Programs and Services' Paper Review branch with a view toward reducing the declassification backlog. (Action: A)

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<sup>6</sup> E.O. 13526, 3 C.F.R. 298 (Dec. 29, 2009), 75 Fed. Reg. 707 (Jan 5, 2010), corrected at 75 Fed. Reg. 1013 (Jan. 8, 2010).

***Archives Technician – Paper Review Branch***

The Paper Review branch has one GS-08, Series 1421, archives technician in its staffing pattern. According to the Office of Personnel Management's position description for this series, the archives technician is supposed to be assembling, correlating, and analyzing data and information for specific record-keeping programs, rather than retrieving, preparing, and returning storage boxes of document material for branch declassification reviewers. The OIG team notes that one of the branch manager's goals is to assign data entry duties to direct hires, therefore reserving more time for WAE reviewers to conduct their primary duty of declassification.

**Recommendation 18:** The Bureau of Administration should assign appropriate duties to the Series 1421 archives technician in the Office of Information Programs and Services' Paper Review branch so that this employee conducts data entry duties in accordance with the Office of Personnel Management's position description for this series. (Action: A)

***Foreign Affairs Officer – Foreign Relations of the United States/Mandatory Review Branch***

A GS-13 foreign affairs officer is one of two direct-hire employees in the Foreign Relations of the United States/Mandatory Review branch of the Systematic Review Program division. According to his position description, the occupant should be the key decisionmaker in the public release of declassified information, act as interagency liaison officer, represent IPS in contacts with other Federal agencies, and make recommendations for improvement of the declassification program. Instead, the branch chief carries out these duties, and the GS-13 officer spends most of his time on routine data entry and other administrative requirements that reflect neither his qualifications nor grade level.

**Recommendation 19:** The Bureau of Administration, in coordination with the Bureau of Human Resources, should review the description for foreign affairs officer position GS-130-13 in the Office of Information Programs and Services' Foreign Relations of the United States/Mandatory Review branch and reclassify the position, if appropriate. (Action: A, in coordination with DGHR)

***Declassification Guides***

IPS does not have a formal means of providing interim declassification guidance to WAE declassification reviewers. The Department updates formal declassification guides every 5 years; however, because of the lack of both horizontal and vertical communication, coupled with little interaction between the branches of the Systematic Review Program division, new declassification guidance is not distributed regularly among the WAEs, thus increasing the chance of error.

***Informal Recommendation 6:*** The Bureau of Administration should develop an interim read file of the most recent declassification guidance for distribution to all declassification reviewers in the Office of Information Programs and Services' Systematic Review Program division.

## Records Management

IPS provides records management policy and guidance to domestic bureaus and overseas posts but has no means of enforcement. The Department therefore does not comply with pertinent legal requirements, such as those in the Federal Records Act or *Foreign Affairs Manual* (FAM). The high scores that the National Archives and Records Administration give the Department on its records management program disguise the extent to which the Department fails to capture records for proper disposition.

The Department's records management infrastructure is inefficient and ineffective. It relies largely on a print-to-file system that requires domestic offices and overseas posts to print hard copies of documents and send them by the boxful to a records service center for laborious processing and storage. Existing tools that can capture records, such as the State Messaging and Archive Retrieval Toolset (SMART), are used only intermittently, resulting in significant loss of permanent records. Failure to develop and implement electronic systems has resulted in poor performance.

Attendance at the latest semiannual bureau records coordinator meetings reflects the lack of IPS influence and bureau interest: 11 of 31 coordinators attended the winter 2011 session, and 19 of 31 attended the spring 2012 session. IPS formerly offered a weekly briefing for overseas information management officers in Washington for consultations but cancelled it due to lack of participation after the Bureau of Information Resource Management made the briefing optional. IPS now offers an elective briefing that is seldom, if ever, requested.

**Recommendation 20:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should implement a plan—including adequate management, monitoring, and compliance followup controls—to facilitate domestic bureau and overseas post compliance with Federal statutory requirements for and Department of State guidance on records management. (Action: A, in coordination with IRM)

### *Records Management Program Management*

The Department's records management deficiencies begin at the first stage of the records life cycle creation. IPS cannot identify how many records the Department creates. Although it can reasonably account for the telegraphic records now captured in SMART, IPS cannot account for hard-copy records that domestic bureaus and overseas posts should be sending on a regular basis to the records service center. In the realm of print-to-file records, IPS tracks the number of boxes that it receives but has no way of knowing whether offices and posts are partially or fully compliant. Neither can IPS account for millions of record emails that SMART should capture. In 2011, for example, SMART captured 61,156 of an estimated 15 million record emails in the system that should be captured. The OIG team noted that confusion among Department employees and, in some cases, inadequate performance have resulted in an underuse of SMART's record email function.

**Recommendation 21:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should implement a plan to identify and capture all record

email in the State Messaging and Archive Retrieval Toolset. (Action: A, in coordination with IRM)

At the time of the inspection, IPS was conducting an analysis to determine the level of overseas post compliance with records management requirements. However, the methodology of this analysis is flawed and the results unverifiable. Without a verifiable gap analysis to gauge the scope of the information shortfall, IPS is unable to prepare for downstream effects, such as increased workload for declassification and FOIA activities, and risks potential loss of historical documents.

**Recommendation 22:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should conduct a verifiable analysis to determine the level of compliance of domestic bureaus and overseas posts to records management statutes and regulations. (Action: A, in coordination with IRM)

### *Electronic Records*

The November 2011 Presidential Memorandum, *Managing Government Records*, seeks to reform records management policies and practices. It requires agencies to include “plans for improving or maintaining its records management program, particularly with respect to managing electronic records...” The Department has much room for improvement in this area.

IPS, realizing the need for an electronic records system, commissioned an August 2011 study, *A Long Term Enterprise-Wide Records Management Strategy for Electronic Records*. The report envisions a solution to managing and preserving records that now are stored in network shared drives, workstation drives, and SharePoint sites. The increasing reliance on shared drives and SharePoint sites and the impracticality of the print-to-file method justify an enterprisewide electronic solution that also would minimize, if not eliminate, the print-to-file method. IPS has yet to fund an electronic records system, thereby relegating the Department to languish in inefficiency and fall short of goals highlighted in the November 2011 Presidential memorandum. Full implementation of an electronic records system would minimize, if not eliminate, the print-to-file method.

**Recommendation 23:** The Bureau of Administration should implement an enterprisewide plan to manage and preserve electronic records in accordance with Federal statutes, regulatory requirements, and the November 2011 Presidential memorandum on electronic records management. (Action: A)

Permanent records figure prominently in IPS’s priorities, but the office could take advantage of improvements in the management of temporary records to produce electronic records, dispose of paper copies, avoid the need for storage, and avoid warehousing costs. A July 2007 Department notice promulgated guidance on digital imaging for records management. The recently published *Foreign Affairs Handbook* (FAH) regulation 5 FAH-4 H-612 b. amplifies the notice and states that “temporary paper records may be destroyed after the records have been converted to an electronic format and verified for 100 percent accuracy and completeness.” Domestic offices and overseas posts would benefit greatly if the Department issued standard guidance and processes for digitizing temporary records, particularly those required in general

services and financial management operations. Such action also would fulfill the intent of the November 2011 Presidential memorandum.

**Recommendation 24:** The Bureau of Administration, in coordination with the Bureau of the Comptroller and Global Financial Services, should issue joint guidance on digitizing temporary records and subsequent destruction of paper records after conversion and verification of accuracy and completeness. (Action: A, in coordination with CGFS)

### **Ralph J. Bunche Library**

Founded by Thomas Jefferson in 1789, the Ralph J. Bunche Library is the oldest library in the Federal Government. With a print collection of more than 300,000 items, the library handled visits by almost 17,000 patrons and circulated approximately 42,000 items in 2011.

Like most libraries, the Ralph J. Bunche Library is increasing the services it provides online. Last year, the library had almost 16,500 online user sessions, a 31 percent increase over 2005. The move to more online resources means that the library is now able to serve patrons around the clock, not just in Washington, but also at all Foreign Service posts. The increasing reliance on online resources requires paying for access for specialized databases the Department needs.

In 2001, the library became responsible for handling acquisition of online resources for much of the Department and received an increase to its budget base. In the intervening years, the cost of online resources has gone up without a matching increase in funding. Database access costs absorb a larger portion of the library's budget every year. Budget pressure sometimes requires staff to drop useful but costly services, such as the Global Trade Atlas, a source of trade data used by Department economists. In addition, acquisition of books and other traditional print materials has declined, with new items usually purchased only when a patron requests them. These changes are occurring at most libraries and require the Department to rethink the way it funds information services. Library management has not been silent about the need for budget increases but has not presented a strong case for increased funding.

***Informal Recommendation 7:*** The Bureau of Administration should analyze the effect of the increased cost of electronic acquisitions in the Ralph J. Bunche Library so that Department of State leadership can make an informed decision about appropriate funding levels for the library.

The library provides valuable research and reference material to Department employees, both in Washington and overseas. To inform potential patrons about their services, library staff members make presentations during the Civil Service Orientation and Office Management Specialist Training. They also sometimes see the Orientation for Foreign Service Officers (A-100 classes) during tours of the Department. The library has also instituted a speaker series to enhance outreach, but many other opportunities exist to promote library services. For example, there has been no effort to provide information about library services in senior training courses or in courses aimed at locally employed staff, other than those who work in Information Resource Centers overseas.

**Recommendation 25:** The Bureau of Administration, in coordination with the Foreign Service Institute, should expand the number of presentations the Ralph J. Bunche Library makes to Foreign Service Institute students. (Action: A, in coordination with FSI)

### **Privacy Division**

The Privacy division (PRV), staffed by nine full-time employees and two contractors, handles the Department's privacy awareness and training, as well as compliance with privacy and personally identifiable information (PII) statutes.

The lack of clarity on the management of PRV has hindered the division's ability to perform its responsibilities and adversely affected staff morale. Currently, PRV receives direction and assignments from the senior advisor for privacy policy (SAPP), an individual reporting to the deputy assistant secretary. The SAPP is heavily involved in day-to-day PRV activities, including tasking PRV staff members to develop presentations, participating in subcommittees, and responding to queries from other Department offices. The SAPP also holds one-on-one meetings with PRV staff to discuss personnel matters. Additional complications occur during the clearance process, because the SAPP and the director of IPS are reviewing and clearing correspondence—on several occasions each expressing a different view on the direction or message represented or both.

The OIG team heard discussions repeatedly about moving PRV out of IPS to report directly to the deputy assistant secretary, possibly with PRV staff reporting to the SAPP, whose position would become permanent. The OIG team, however, questions this strategy, especially given that senior management provided no examples to show that the division is not able to achieve requirements, including interagency coordination and interaction. The OIG team would encourage Department senior management to evaluate further the potential move of PRV and determine whether such action would be disruptive rather than productive for the bureau.

**Recommendation 26:** The Bureau of Administration should define a clear division of roles, responsibilities, and management reporting between the senior advisor for privacy policy and the Privacy division in the Office of Information Programs and Services. (Action: A)

### ***Privacy/Personally Identifiable Information Training***

Department employees receive privacy/PII training via a distance-learning course, PA 459, offered by the Foreign Service Institute. PRV develops the course content, and the Foreign Service Institute assists with graphics and course placement on the training site. The Federal Information Security Management Act (FISMA) and Office of Management and Budget guidance<sup>7</sup> require annual security and privacy training for all Department employees, including contractors. PA 459 is required only for Department full-time employees, and only once, not annually. Contractors, who account for a large portion of the Department's workforce, are not required to take this training.

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<sup>7</sup> Office of Management and Budget Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, May 2007, and Office of Management and Budget Memorandum 11-33, *FY 2011 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management*, September 2011.

PRV discussed with the Bureau of Diplomatic Security about combining the privacy/PII training requirements and the annual cyber security training course required for all Department employees. Combining the courses would enable the Department to comply with annual security and privacy training requirements. Without regular privacy training, the Department is at greater risk for accidental disclosure of sensitive information.

**Recommendation 27:** The Bureau of Administration, in coordination with the Bureau of Diplomatic Security and the Foreign Service Institute, should combine the Department of State's cyber security training course and the privacy and personally identifiable information training course into a single mandated course that all Department of State employees, including contractors, take annually. (Action: A, in coordination with DS and FSI)

### *Privacy Impact Assessments and System of Record Notices*

PRV has been unable to comply with privacy impact assessment and system of record notice requirements under the Privacy Act because of the considerable amount of time it spends interacting with and waiting for necessary information from bureau personnel. The Privacy Act requires completion of a privacy impact assessment for each information system to determine the risks and effects of collecting, maintaining, and disseminating data in identifiable form in an electronic information system. The Privacy Act requires publication of system of record notices in the Federal Register to inform the public what types of records the Department maintains, whom the records are about, and what uses are made of them. PRV coordinates with personnel from Department bureaus to complete system of record notices and privacy impact assessments.

The Department currently has 78 published system of record notices and more than 150 privacy impact assessments. PRV reviews the notices and assessments for accuracy by contacting bureaus for assistance in gathering needed information. However, PRV has been unable to comply with requirements regarding privacy impact assessments and system of record notices due to lack of responsiveness from bureau personnel. As a result, PRV staff spends a considerable amount of time either editing these documents or waiting for the correct information.

The level of interest shown by bureaus in completing privacy impact assessments and system of record notices depends heavily on whether completion is tied to the Department's annual FISMA reporting to the Office of Management and Budget. For FISMA reportable systems, Department bureau personnel have been responsive to information requests because they are accountable for incomplete records. However, bureau personnel do not give nonreportable systems the same level of importance or urgency for completion. In the absence of Department senior management emphasis on the importance of complying with Privacy Act requirements for all systems, the Department is vulnerable to improper collection or release of privacy-related information.

**Recommendation 28:** The Bureau of Administration should implement a policy requiring all bureau executive offices to designate individual(s) to be the point of contact for their bureau's privacy impact assessments and system of record notices and to provide this point of contact information to the Office of Information Programs and Services' Privacy division. (Action: A)

**Recommendation 29:** The Bureau of Administration should implement a policy requiring all bureaus to complete necessary updates and revisions for their respective privacy impact assessments and system of record notices as required by the Privacy Act of 1974. (Action: A)

*Department Data Loss Prevention Pilot*

PRV participates in the Department's Data Loss Prevention pilot, along with the Bureaus of Information Resource Management and Diplomatic Security. The pilot committee, formed in September 2009, works to determine possible solutions to the inappropriate use of sensitive information on email, mobile devices, and Web sites. PRV staff members assist with the development of policies and procedures for the Data Loss Prevention effort as it relates to privacy and participate in the analysis of identified incidents.

The Data Loss Prevention pilot is ready to move forward as an established program within the Department; however, the Department has yet to determine where the program will reside and which bureau will have ownership of the tool. The pilot committee has discussed the possibility of PRV having ownership of the program. However, the OIG team does not agree with this plan. Although the Data Loss Prevention tool currently reviews data from a privacy perspective, its scope could easily be increased to include other information security elements, including law enforcement, financial, and consular functions—a fact confirmed by the pilot committee. The Chief Information Officer in the Bureau of Information Resource Management would be the appropriate owner of the program and tool, as that office is responsible for the information security program for the Department and administers many of the Department's current information security programs.

**Recommendation 30:** The Bureau of Information Resource Management should take ownership of the Data Loss Prevention program and tool for the Department of State. (Action: IRM)

## Resource Management

### *Administrative Functions*

OIG questionnaires described the resource management team as professional and helpful. Currently, the resource management staff consists of a division chief, three program analysts, one program assistant, and an administrative officer. Contract staff provides support for the mailroom, security, and other administrative responsibilities, including time and attendance. Plans are underway with the Bureau of Administration to consolidate all resource management functions within GIS. The OIG inspectors found problems with the performance appraisal process, position descriptions, awards program, contracts, and management controls.

### *Performance Evaluations*

For the FY 2011 rating period, IPS had 37 incomplete evaluations as of March 15. According to 3 FAH-1 H-2823.1 e. and 3 FAM 2827.7, delinquent raters should be reported to the Bureau of Human Resources' Office of Civil Service Human Resources Management. The Office of the Executive Director in the Bureau of Administration has issued at least four reminders to senior management regarding the urgency to complete evaluations. IPS employees said that staff mentoring and training need improvement. IPS management has not made staff development a priority because of the heavy workload. Some employees noted that the only training they have received during their tenure in IPS is on-the-job training and that they receive minimal constructive feedback regarding performance. OIG team members counseled a number of management staff members, including managers, throughout the inspection.

**Recommendation 31:** The Bureau of Administration should train supervisors and staff on the performance appraisal process and individual development plans and develop a mentoring program for employees. (Action: A)

**Recommendation 32:** The Bureau of Administration should include the timely preparation of employee appraisals in supervisors' work requirements. (Action: A)

### *Position Descriptions*

Many position descriptions have not been updated recently, with some dating from 1990. For example, two positions in the organization are at the GS-08 level and require immediate reclassification, as these positions (numbers S9017500 and S97068) are not at an appropriate grade level. One position (see the section on declassification in this report) is conducting duties appropriate for a lower grade level. The other position is in the wrong division, based on the individual's actual duties and responsibilities.

**Recommendation 33:** The Bureau of Administration should update the position descriptions for position numbers S9017500 and S97068. (Action: A)

### *Awards Program*

IPS has an active awards program, but many employees noted that its implementation appears unfair. A few upper-level management employees appeared to receive consistent high-dollar cash awards in the past 3 years, but division staff at lower grade levels did not receive corresponding amounts. According to staff members, many believe that only a select group of individuals in IPS receives awards each year. A review of the awards file from 2007 to 2011 showed that IPS approved awards in widely varying and inconsistent amounts. Lack of an equitable awards program has a negative effect on staff morale.

**Recommendation 34:** The Bureau of Administration should implement a plan to clarify standards for the Office of Information Programs and Services' awards program and to set appropriate amounts for cash awards. (Action: A)

### *Contracts*

IPS executes approximately \$20.3 million in contracts for non-information technology services and \$7.9 million for information technology services. Most responsibilities for contracting officer's representatives fall on the IPS Resource Management branch chief, who monitors 10 contracts but has little daily involvement with the contractors and their scope of work. Having contracting officer's representatives and government technical monitors with constant interaction with their contractor staff will improve evaluation of performance and help achieve proper management oversight. If not corrected, this issue could lead to overpayment of contractors or failure to meet project milestones.

**Recommendation 35:** The Bureau of Administration should realign contracting officer's representative and government technical monitor responsibilities in the Office of Information Programs and Services to improve contract oversight management. (Action: A)

### *Financial Management*

Each year, IPS receives single-year funding that is divided into three categories: information programs and services, systems, and library services. The bulk of the budget pays for direct-hire staff, WAEs, and contractor personnel. IPS has no budget plan that identifies program objectives and funding priorities for each office. IPS would benefit from discussions with division heads on critical budget needs.

Although budget responsibilities are centralized in the Bureau of Administration's Office of the Executive Director, IPS has a designated program analyst who has coordinating responsibility for the budget and personnel support. However, this person is relatively new to the Department and is unfamiliar with its financial regulations.

**Informal Recommendation 8:** The Bureau of Administration should enroll the Office of Information Programs and Services' resource management program analyst in financial management training.

***Telework Policy***

Under 3 FAM 2362.1, the employee and supervisor must establish a telework agreement outlining the specific work arrangement before the employee begins teleworking. Both parties must review these agreements annually and upon any material change in work circumstances (i.e., promotion or new supervisor). IPS has a list of teleworkers for the office but has not reviewed some of their agreements in the past year.

***Informal Recommendation 9:*** The Bureau of Administration should implement a policy that requires the Office of Information Programs and Services to review its telework agreements annually.

## Information Technology

The Archiving and Access Systems Management division (AAS), staffed by 21 full-time employees and 25 contractors, handles the development and implementation of the Department's State Archiving System (SAS) and FREEDOMS, in addition to providing technical support to IPS employees.

The arrival of the division chief has received mixed reactions from staff members, [REDACTED]

### *Systems Development and Project Management*

AAS lacks a sound and defined systems development life cycle methodology<sup>8</sup> and appropriate implementation of project management for its systems development and enhancement projects. This resulted in a number of complaints the OIG team heard regarding the functionality and use of SAS and FREEDOMS. SAS maintains the authoritative records of official correspondence, communications, and documentation related to U.S. foreign relations. FREEDOMS is an information access, case tracking, and document management system used for processing information access requests.

The systems documentation provided for SAS and FREEDOMS was limited and in most cases did not illustrate any linkage to systems development or project management methodologies. For example, requirements-gathering documentation did not indicate a thorough analysis to identify and prioritize user requirements or engage with stakeholders. There were no benefit and cost analyses, risk assessments, or change control documentation for SAS and FREEDOMS. Also absent was documentation illustrating the use of quality assurance testing or appropriate control gates during the course of development and implementation. Control gates provide management the opportunity to review progress and challenge project teams to verify that they understand what the users want before proceeding forward.

Most IPS divisions and branches use either SAS or FREEDOMS to perform their work. IPS staff members commented that they were not part of the planning stages, nor were they consulted prior to finalizing the essential requirements for both systems. As a result, SAS users complained that the system lacks ease of use, access, and search capabilities, and FREEDOMS users indicated that the system is not intuitive and has imaging problems.

Problems experienced by SAS and FREEDOMS users could have been prevented if AAS management had enforced the use of systems development and project management methodologies. Instead, management focused on moving forward with upgrades to satisfy the requests of IPS management. Most recently, for example, the FREEDOMS project team performed data migration from FREEDOMS to FREEDOMS 2, the latest version of the system. The pressure to transition all users to the upgraded system resulted in the project team's spending

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<sup>8</sup> According to the National Institute of Standards and Technology Special Publication No. 800-64, a systems development life cycle process defines the recommended procedure by which an organization envisions, defines, builds, deploys, operates, and maintains its systems and applications.

months in a data migration cleanup effort, because a large portion of the data from FREEDOMS did not fit correctly into FREEDOMS 2. To complicate matters, one IPS branch reverted to using the previous version of FREEDOMS to perform its required core FOIA function. Although AAS staff members are unable to quantify the cost of these system efforts, their time would have been better spent working on new projects rather than on correcting mistakes.

AAS has recently drafted a systems development life cycle methodology manual for future development activities. AAS management has requested staff to adopt the methodology for current enhancements for SAS and FREEDOMS 2. As such, project teams are creating some of the required systems documentation after the fact. Although developing documentation in a piecemeal fashion may satisfy the request of management, it does not provide assurance that SAS and FREEDOMS are meeting the needs of users.

**Recommendation 36:** The Bureau of Administration should postpone all development and enhancement activities for the State Archiving System and the Freedom of Information Document Management System in the Office of Information Programs and Services until the bureau has completed all required systems documentation, including user requirements, benefit and cost analyses, risk assessments, and change control documentation, and has obtained all appropriate management and user acceptance approvals. (Action: A)

**Recommendation 37:** The Bureau of Administration should implement a plan for the Office of Information Programs and Services' Archiving and Access Systems Management division to meet with all users of the State Archiving System and the Freedom of Information Document Management System to identify all critical and core system requirements and address them in the upgrade efforts of both systems. (Action: A)

### *Single Information Technology Services Provider*

GIS plans to make AAS its single information technology services provider. However, the level of communication and planning by AAS needs significant improvement and calls into question the justification for the proposed consolidation.

AAS management says the consolidation of information technology support services will leverage expertise in this area, promote cost savings, and consolidate contracts. Once GIS completes information technology operations consolidation, AAS and the Resource Management division will merge and report directly to the deputy assistant secretary.

The OIG team questions the decision to consolidate information technology support functions under AAS for all of GIS. Currently, the Office of Global Publishing Solutions (GPS) and the Office of Directives Management (DIR) receive information technology support from the Office of Information Technology Services, which provides favorable customer support with minimal cost and resources needed. No one provided the OIG team with documentation demonstrating the benefits gained by changing the information technology support provider from the Office of Information Technology Services to AAS. Further, project documentation pertaining to the planning for the consolidation effort was insufficient. The documentation did not show an analysis of GPS's and DIR's work processes, assessment of requirements needed to support those processes, or an evaluation of information technology personnel and their skill sets

to support the required work. In addition, there was no evidence of regular communication among AAS, GPS, and DIR management to discuss the effort. In fact, during the course of the inspection, many of the regularly scheduled biweekly meetings did not take place.

AAS did not document key stakeholders supported by GPS and DIR. With GPS and DIR providing services to support the work of the Secretary of State, an understanding of their customer base is critical. Information technology contract and funding mechanisms are also unclear. Although there is no detailed timeline for the consolidation of information technology services, the OIG team was told of plans to have the information technology support functions for GPS and DIR consolidated by the end of June 2012, to coincide with the ending of one particular information technology contract. Also unresolved is the issue of how AAS will provide support services, if at all, for the international component of GPS's operations. AAS management remains undecided on this point, because it does not know how overseas posts charge information technology-related costs.

**Recommendation 38:** The Bureau of Administration should postpone the consolidation of information technology support services for the entire Office of Global Information Services until the bureau has completed an analysis of the benefits of such consolidation from cost, resources, funding, and customer service perspectives. (Action: A)

The completion of project management documentation, along with continuous communication with GPS and DIR management and staff, is key to ensuring a smooth transition of support services. The offices involved can set a transition date only once all key players complete such documentation and reach agreement. Using the end date of an information technology contract to determine when AAS will start supporting GPS and DIR is no substitute for a well-considered plan.

**Recommendation 39:** The Bureau of Administration should complete and document the Office of Global Publishing Solutions' and the Office of Directives Management's requirements, work processes, and workflows, as well as the effect of consolidation on information technology personnel and funding, before the bureau moves forward with the consolidation of information technology support services. (Action: A)

### ***Information Technology Inventory Management***

AAS lacks inventory processes and management internal controls, which has resulted in idle equipment and unapproved hardware on its networks. The OIG team identified surplus computer workstations located in one of IPS's annexes, for which AAS management was unable to provide justification. After further research, AAS management determined that staff purchased the equipment prior to the year's Department Global Information Technology Modernization program refresh. In the absence of an accurate inventory, AAS was only able to estimate the levels of idle equipment as between 70 and 125 workstations. Additionally, AAS was using unapproved scanners on its networks. Management explained such use as an oversight on its part and requested approval from the Department's Information Technology Change Control Board, which it received at the end of the OIG inspection. IPS could prevent such instances by implementing a documented inventory process as outlined in 14 FAM 426-429.

**Recommendation 40:** The Bureau of Administration should document the Office of Information Programs and Services' information technology inventory process, including roles and responsibilities of personnel and steps for equipment acquisition and reconciliation. (Action: A)

## Security

IPS is located in two General Services Administration-leased buildings (State Annexes 2 and 13) and in the Harry S Truman Building. The leased buildings are lock-and-leave facilities. The Bureau of Diplomatic Security certified the buildings for open storage of information classified at Secret and below. Uniformed protection officers from the Bureau of Diplomatic Security conduct roving patrols and respond to alarms if activated. Two unit security officers administer the IPS security program. A full-time contractor oversees operations at one building, and a GS-09 Civil Service program analyst is responsible for security at the other. The security programs are administered separately, with little communication between the unit security officers.

IPS conforms largely to Department procedural, physical, and technical security policies with the exceptions discussed below. The OIG team found the security incident program exceptionally well managed. The Department has not recorded any security incidents or violations since 2005.

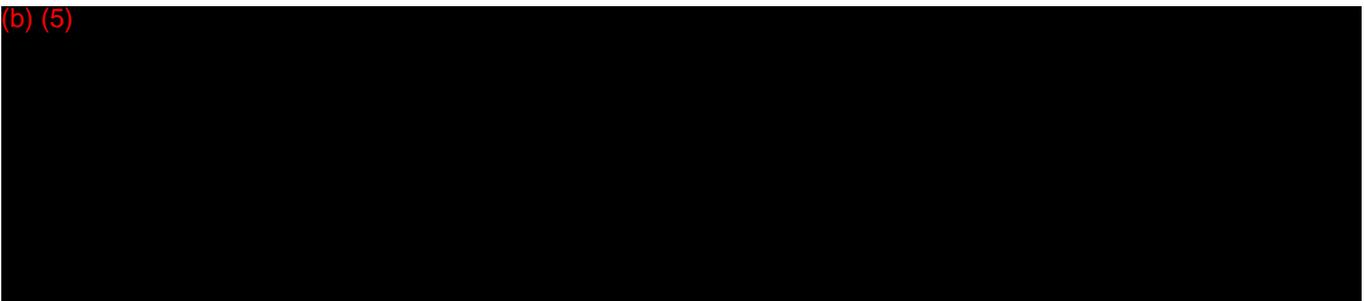
(b) (5)



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



(b) (5)



*Informal Recommendation 10:* (b) (5)



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(b) (5)



*Top Secret Control Officer*

IPS has not assigned a unit Top Secret control officer for State Annex 13. One primary Top Secret control officer is on orders to oversee Top Secret document control for State Annex 2 only. These control officers are responsible for properly safeguarding collateral Top Secret material, including its accountability, storage, and transfer, per 12 FAM 512.1-4. State Annex 13 receives Top Secret documents directly from non-Department entities and should have a Top Secret control officer to account for in- and out-bound shipments in accordance with 12 FAM 535.1-2 b.

**Recommendation 42:** The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should designate a unit Top Secret control officer for operations at State Annex 13 and provide the designated employee with the required Bureau of Diplomatic Security training. (Action: A, in coordination with DS)

*Office of Information Programs and Services Employee Badges*

IPS issues office-specific security badges to its own employees. (b) (5)

IPS directs employees to wear the badge in conjunction with Department-issued Personal Identity Verification and Facility Access Cards. (b) (5)

Issuance of the IPS-specific badges is excessive and a waste of resources. The OIG team consulted with the Bureau of Diplomatic Security on the matter and received confirmation that only official Personal Identity Verification media that are compliant with Homeland Security Presidential Directive 12 can allow access into any Department facility or suite. Although the Department does issue badges for identification of visitors, for subject matter expertise such as official Department photographer and security systems technicians, or for specific events, these badges neither grant access nor serve as substitutes for Department-issued badges.

Although neither Homeland Security Presidential Directive 12 nor Department regulation 12 FAM 371.5 provides specific guidance on issuance of other than Personal Identity Verification identification, the OIG team believes that the intent of the directive is to provide uniformity among Federal agencies in security badge identification. For this and other reasons, the Department converted from the former "blue" badge to the current Personal Identity Verification identification, which has a uniform photo, security clearance, escort status, and personal identification number. These features should be sufficient to allow a Department-affiliated employee justification for access to any particular building within the Department. In addition, the inspection team believes that the Bureau of Diplomatic Security's uniformed protection officer controlling access to a building might concentrate on an employee's activity badge (in this case, the IPS badge) rather than on the Department Personal Identity Verification identification.

**Recommendation 43:** The Bureau of Administration should eliminate the use of Office of Information Programs and Services employee identification badges and modify the Personal Identity Verification identification media to identify office employee status. (Action: A)

***Facility Emergency Action Plan***

State Annexes 2 and 13 each have their own domestic emergency action and emergency evacuation plans. The plans are sound, describing actions taken to ensure the safety of IPS employees and protection of property in IPS-occupied space. IPS properly conducts emergency action drills biannually.

## Management Controls

Department managers are tasked with establishing cost-effective systems of management controls so that U.S. Government activities are managed effectively and with integrity, according to 2 FAM 021.1. Each manager has a responsibility to design management controls that provide reasonable assurance of the prevention or prompt detection of errors, irregularities, and mismanagement. IPS lacks management oversight and controls in basic procedures and processes, such as time and attendance processing, personnel actions, award nominations, and contract oversight. The lack of such oversight has resulted in widespread problems that require immediate attention.

### *Time and Attendance*

The OIG team reviewed time and attendance records and discovered that IPS was not recording overtime appropriately. According to 4 FAH-3 H-523.2, an appropriate official must authorize premium pay, such as overtime, night, holiday, and Sunday work, in advance and in writing. The assessment showed that employees worked overtime hours but submitted only a few written requests and that immediate supervisors, rather than a certifying official, approved and certified these same requests. For example, one division did not have appropriate approvals before the employees worked overtime, and the supervisor signed overtime request forms as both the authorizing and certifying officer. Employees made no correction to the original submittal for overtime and included no justification in the request to indicate what specific work they would accomplish during the extra time. (b) (5)

IPS employees said they understood that only specific offices were permitted to request overtime hours and that a senior-level manager granted one division a “blanket overtime authorization” that permitted as much as 15 hours a pay period per employee. Employees also indicated that if they worked more than 15 hours, the claim would not be approved. The absence of a clear overtime policy and inadequate management controls for overtime and leave documentation have led to confusion and lack of accountability among staff.

**Recommendation 44:** The Bureau of Administration should implement and enforce an overtime policy for the Office of Information Programs and Services staff that requires appropriate documentation and advance approval of overtime. (Action: A)

The OIG team’s review of records from 2007 to 2012 showed inconsistencies in approval of the time and attendance reports. Some supervisors did not sign reports in a timely manner, thus requiring subsequent corrections.

Time and attendance records for direct-hire, contractor, and WAE employees are exclusively in paper format and date back to 2005. Maintaining these records in paper is wasteful. It would be more effective for supervisors to validate time and attendance hours in an online system. The Bureau of Administration implemented a successful electronic virtual timecard system, but GIS advised the bureau that the system did not meet its requirements and

therefore opted out. The office could not provide documentation to justify nonparticipation and remains the only office in the Bureau of Administration that does not use the application.

**Recommendation 45:** The Bureau of Administration should implement a policy requiring the Office of Global Information Services to participate in the bureauwide electronic virtual timecard system program. (Action: A)

***Personnel Management: Inadequate Human Capital Planning***

IPS does not have a plan to manage retirements and fill vacancies promptly. Since 2009, 69 employees have retired or resigned. Three division head positions and one branch chief position were vacant at the time of the inspection, one since 2007. The deputy director, in addition to his other duties, serves as acting head for all of those offices. This situation is unacceptable. These offices handle a significant part of the workload for IPS and require consistent, full-time leadership. However, IPS used funding for these positions to hire new full-time equivalents at lower grades.

**Recommendation 46:** The Bureau of Administration should fill the three vacant division positions and the vacant branch chief position in the Office of Information Programs and Services. (Action: A)

IPS employs an unusually large percentage of WAEs and contractors. The presence of these experienced employees, who work under a flexible system, is a source of strength to the organization. However, the OIG team identified multiple occasions when WAEs reached their hour or salary caps, and IPS rehired them under a contract so that they could continue performing the same work. It is not permissible for an employee on a temporary appointment who reaches his or her hourly or salary cap to continue work as a contractor performing the same duties.<sup>10</sup> This practice can result in violations of Federal employee ethical standards and related criminal laws.

**Recommendation 47:** The Bureau of Administration should cease rehiring when actually employed staff members on contracts after they reach their hour or salary caps. (Action: A)

On average, a WAE employee costs the U.S. Government \$65 per hour. As a contract hire, the same person costs the U.S. Government \$87.65 per hour. IPS could use the difference in labor costs to build a better staffing model that maximizes use of WAEs at the standard pay rate and applies the savings toward full-time equivalent Civil Service positions. Such a plan would allow IPS to continue to employ highly qualified WAEs and to fill key vacant positions in a cost-effective manner.

**Recommendation 48:** The Bureau of Administration should implement a human capital plan that optimizes use of when actually employed and direct-hire Civil Service employees to provide a sufficient workforce. (Action: A)

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<sup>10</sup> See Office of Civil Service Human Resources Management Memorandum, *Employees on Temporary Appointments Working for Contractors*, dated October 27, 2010.

There are imbalances and inconsistencies in IPS's reassigning and hiring of personnel, handling of the student employment program, and performance of other administrative functions, all of which contribute to an appearance of impropriety. Although the OIG team did not obtain clear evidence of the violation of any human resources rules or regulations, several processes require improvement.

At the time of the inspection, three former deputy directors and one former senior advisor of IPS were working as contractors. The common perception among IPS staff is that only certain employees are provided this opportunity. The OIG team found several cases of immediate family members of IPS employees working in the office. Several employees raised the issue of nepotism in questionnaires or interviews with inspectors, and staff thought that family members have an advantage in the office. Some of these same family members were interns in the IPS student program before they received a full-time position with the Department. Under the U.S. Code,<sup>11</sup> an employee may not appoint, employ, promote, advance, or advocate for appointment to a Department position any relative of that employee. The U.S. Code also imposes an absolute bar on Federal pay for any relative hired in violation of this prohibition.<sup>12</sup>

**Recommendation 49:** The Bureau of Administration should examine hiring practices in the Office of Information Programs and Services, deal with any violations appropriately, and issue a notice reminding all office managers that Federal law prohibits nepotism in the workplace. (Action: A)

IPS frequently reassigns staff to respond to surges in workload. On several occasions, IPS detailed employees to another division and later permanently assigned them there without filling the vacant positions they left behind. IPS usually makes these temporary detail assignments or reassignments without providing employees with a statement of their new duties beforehand, as required by 3 FAM 2412.3. Furthermore, IPS's process for notifying employees about reassignments is not consistent; some employees receive notification via a memorandum, whereas others receive verbal or email notification. Frequent and inconsistent reassignment of employees can have a negative affect on performance, career enhancement, and morale.

**Recommendation 50:** The Bureau of Administration should reconcile the staffing pattern in the Office of Information Programs and Services to verify that each employee fills a current full-time equivalent position and that there is justification for any position that is on hold. (Action: A)

**Recommendation 51:** The Bureau of Administration should implement a procedure for conducting employee reassignments and details in the Office of Information Programs and Services. (Action: A)

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<sup>11</sup> 5 U.S.C. § 3110.

<sup>12</sup> 5 U.S.C. § 3110 (c). The language of 3 FAM 8312 a. incorrectly suggests this prohibition applies only to members of an employee's household, but 5 U.S.C. § 3110 (a) (3) defines relatives to include "an individual who is related to the public official as father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, or half sister."

A review of ethics training of top-level management in IPS showed that many managers have not yet completed required training as outlined in Code of Federal Regulations 5 CFR 2638, Subpart G, E.O. 12674, and E.O. 12731. Without such training, managers may lack the skills to deal effectively and appropriately with a variety of issues, including those pertaining to human resources and contracts.

**Recommendation 52:** The Bureau of Administration should implement a policy requiring all managers in the Office of Information Programs and Services to take the Department of State's required ethics training. (Action: A)

### *Student Internship Programs*

In 2000, the Bureau of Human Resources created the program entitled Success, Today and Tomorrow, Through Training and Recruiting Students. This program is an innovative effort to capture the next generation of talent from universities in the Washington, DC, area. Other programs that create opportunities for students at the Department include the student clerical program and the student career experience program.

In IPS, student employees provide program assistance in many areas, including administering FOIA, reviewing historical records for declassification and release, and responding to public requests. A majority of the students who work in IPS receive full-time Civil Service or Foreign Service jobs directly after completing their internships. The screening process for this program relies on a student coordinator and a group of WAEs to review applications and provide recommendations. After the review panel selects the candidates, the director or deputy assistant secretary for IPS gives final approval. This screening process will change with the implementation of the new Pathway Programs in July 2012, which will allow for a more structured, centralized recruitment and selection process.

### *Training*

IPS does not have an effective training plan. Most training is on the job, and there is little cross-training, even among offices that share staff. Many employees did not receive a general orientation or attend the Civil Service Orientation at the Foreign Service Institute upon entry into service. A review of training records also demonstrated that only a few IPS employees at the GS-13 level and above attended Equal Employment Opportunity training, and many did not have the required leadership training. Without appropriate training for all levels of staff, the organization suffers in terms of employee performance and product quality.

**Recommendation 53:** The Bureau of Administration should implement a training plan for the Office of Information Programs and Services that clearly identifies training requirements for both supervisors and other employees and includes Equal Employment Opportunity and diversity training as well as leadership courses for each grade level. (Action: A)

### *Delegation of Authorities*

The deputy director and the Resource Management branch chief each monitor 4 of the 13 programs listed in IPS's 2011 Federal Managers' Financial Integrity Act Internal Management

Control review. Key areas, such as the FOIA program, case processing of FOIA and Privacy Act requests, and time and attendance, however, have no backup. This arrangement strains the span of control that two people are capable of exercising, thereby reducing the effectiveness of these programs.

**Recommendation 54:** The Bureau of Administration should realign internal controls in the Office of Information Programs and Services and designate key personnel for Federal Managers' Financial Integrity Act categories in 2012. (Action: A)

IPS lacks adequate controls for handling the retired records that await destruction at the Washington National Records Center and the Department's Records Center. An estimated 13,000 cubic feet of retired records are past due for destruction. When IPS receives disposal notices for records destruction, it forwards these notices to the respective Department records owners for approval. However, Department offices and bureaus do not always respond in a timely manner, which causes a backlog of records pending destruction.

**Recommendation 55:** The Bureau of Administration should implement a cost control mechanism for the Office of Information Programs and Services to charge individual Department of State bureaus and offices directly for records stored beyond their life span. (Action: A)

## List of Recommendations

**Recommendation 1:** The Bureau of Administration should implement a policy requiring the Office of Information Programs and Services to schedule regular all-hands meetings and for division chiefs to hold weekly meetings with staff. (Action: A)

**Recommendation 2:** The Bureau of Administration should provide clearer instructions in the Freedom of Information section of the Department of State's Internet site to minimize the number of invalid requests. (Action: A)

**Recommendation 3:** The Bureau of Administration should train a second person in the Office of Information Programs and Services' Requester Communication branch to do quality checks. (Action: A)

**Recommendation 4:** The Bureau of Administration should develop a list of all bureaus and independent offices in the Department of State—complete with component offices, responsibilities, and programs administered—to serve as a reference for Freedom of Information Act case analysts in the Office of Information Programs and Services. (Action: A)

**Recommendation 5:** The Bureau of Administration, in coordination with the Office of the Legal Adviser, should publish an updated notice of the Department of State's organization. (Action: A, in coordination with L)

**Recommendation 6:** The Bureau of Administration, in coordination with the Office of the Legal Adviser, should implement a training plan for the Freedom of Information Act litigation team in the Office of Information Programs and Services. (Action: A, in coordination with L)

**Recommendation 7:** The Bureau of Administration should assign full-time reviewers to support the Freedom of Information Act litigation team in the Office of Information Programs and Services. (Action: A)

**Recommendation 8:** The Bureau of Administration should instruct the Freedom of Information Act program manager to prepare a semiannual newsletter dealing with Freedom of Information Act issues for officers who deal with such issues at all domestic bureaus and U.S. embassies. (Action: A)

**Recommendation 9:** The Bureau of Administration, in coordination with the Foreign Service Institute, should develop a distance-learning course dealing with the fundamentals of the Freedom of Information Act and require all Freedom of Information Act officers to take the course. (Action: A, in coordination with FSI)

**Recommendation 10:** The Bureau of Administration, in coordination with the Office of the Under Secretary for Management, should implement a policy requiring all employees to complete the classification training mandated under Executive Order 13526. (Action: A, in coordination with M/PRI)

**Recommendation 11:** The Bureau of Administration should negotiate a reworded refusal letter with the U.S. Citizenship and Immigration Services Freedom of Information Office that informs

requesters of Department of State requirements for Freedom of Information Act requests.  
(Action: A)

**Recommendation 12:** The Bureau of Administration, in coordination with the Executive Secretariat, should develop performance standards for responding to Freedom of Information Act search requests and provide semiannual reports on compliance for the Secretary, Deputy Secretaries, and Assistant Secretaries. (Action: A, in coordination with S/ES)

**Recommendation 13:** The Bureau of Human Resources, in coordination with the Bureau of Administration, should review and update all position descriptions and work requirements for the bureaus' contacts for Freedom of Information Act responsibilities. (Action: DGHR, in coordination with A)

**Recommendation 14:** The Bureau of Administration should develop a list of officers with Freedom of Information Act responsibilities at all U.S. embassies. (Action: A)

**Recommendation 15:** The Bureau of Administration should implement a system for billing Department of State bureaus for any attorneys' fees assessed in court cases related to the Freedom of Information Act if delays by the bureau contributed to the court's assessment of the attorneys' fees. (Action: A)

**Recommendation 16:** The Office of the Legal Adviser, in coordination with the Bureau of Administration, should review the staffing needs of the Office of Information Programs and Services' Freedom of Information Act litigation team and assign staff as necessary to provide adequate coverage. (Action: L, in coordination with A)

**Recommendation 17:** The Bureau of Administration should review staffing resources in the Office of Information Programs and Services' Paper Review branch with a view toward reducing the declassification backlog. (Action: A)

**Recommendation 18:** The Bureau of Administration should assign appropriate duties to the Series 1421 archives technician in the Office of Information Programs and Services' Paper Review branch so that this employee conducts data entry duties in accordance with the Office of Personnel Management's position description for this series. (Action: A)

**Recommendation 19:** The Bureau of Administration, in coordination with the Bureau of Human Resources, should review the description for foreign affairs officer position GS-130-13 in the Office of Information Programs and Services' Foreign Relations of the United States/Mandatory Review branch and reclassify the position, if appropriate. (Action: A, in coordination with DGHR)

**Recommendation 20:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should implement a plan—including adequate management, monitoring, and compliance followup controls—to facilitate domestic bureau and overseas post compliance with Federal statutory requirements for and Department of State guidance on records management. (Action: A, in coordination with IRM)

**Recommendation 21:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should implement a plan to identify and capture all record email in the State Messaging and Archive Retrieval Toolset. (Action: A, in coordination with IRM)

**Recommendation 22:** The Bureau of Administration, in coordination with the Bureau of Information Resource Management, should conduct a verifiable analysis to determine the level of compliance of domestic bureaus and overseas posts to records management statutes and regulations. (Action: A, in coordination with IRM)

**Recommendation 23:** The Bureau of Administration should implement an enterprisewide plan to manage and preserve electronic records in accordance with Federal statutes, regulatory requirements, and the November 2011 Presidential memorandum on electronic records management. (Action: A)

**Recommendation 24:** The Bureau of Administration, in coordination with the Bureau of the Comptroller and Global Financial Services, should issue joint guidance on digitizing temporary records and subsequent destruction of paper records after conversion and verification of accuracy and completeness. (Action: A, in coordination with CGFS)

**Recommendation 25:** The Bureau of Administration, in coordination with the Foreign Service Institute, should expand the number of presentations the Ralph J. Bunche Library makes to Foreign Service Institute students. (Action: A, in coordination with FSI)

**Recommendation 26:** The Bureau of Administration should define a clear division of roles, responsibilities, and management reporting between the senior advisor for privacy policy and the Privacy division in the Office of Information Programs and Services. (Action: A)

**Recommendation 27:** The Bureau of Administration, in coordination with the Bureau of Diplomatic Security and the Foreign Service Institute, should combine the Department of State's cyber security training course and the privacy and personally identifiable information training course into a single mandated course that all Department of State employees, including contractors, take annually. (Action: A, in coordination with DS and FSI)

**Recommendation 28:** The Bureau of Administration should implement a policy requiring all bureau executive offices to designate individual(s) to be the point of contact for their bureau's privacy impact assessments and system of record notices and to provide this point of contact information to the Office of Information Programs and Services' Privacy division. (Action: A)

**Recommendation 29:** The Bureau of Administration should implement a policy requiring all bureaus to complete necessary updates and revisions for their respective privacy impact assessments and system of record notices as required by the Privacy Act of 1974. (Action: A)

**Recommendation 30:** The Bureau of Information Resource Management should take ownership of the Data Loss Prevention program and tool for the Department of State. (Action: IRM)

**Recommendation 31:** The Bureau of Administration should train supervisors and staff on the performance appraisal process and individual development plans and develop a mentoring program for employees. (Action: A)

**Recommendation 32:** The Bureau of Administration should include the timely preparation of employee appraisals in supervisors' work requirements. (Action: A)

**Recommendation 33:** The Bureau of Administration should update the position descriptions for position numbers S9017500 and S97068. (Action: A)

**Recommendation 34:** The Bureau of Administration should implement a plan to clarify standards for the Office of Information Programs and Services' awards program and to set appropriate amounts for cash awards. (Action: A)

**Recommendation 35:** The Bureau of Administration should realign contracting officer's representative and government technical monitor responsibilities in the Office of Information Programs and Services to improve contract oversight management. (Action: A)

**Recommendation 36:** The Bureau of Administration should postpone all development and enhancement activities for the State Archiving System and the Freedom of Information Document Management System in the Office of Information Programs and Services until the bureau has completed all required systems documentation, including user requirements, benefit and cost analyses, risk assessments, and change control documentation, and has obtained all appropriate management and user acceptance approvals. (Action: A)

**Recommendation 37:** The Bureau of Administration should implement a plan for the Office of Information Programs and Services' Archiving and Access Systems Management division to meet with all users of the State Archiving System and the Freedom of Information Document Management System to identify all critical and core system requirements and address them in the upgrade efforts of both systems. (Action: A)

**Recommendation 38:** The Bureau of Administration should postpone the consolidation of information technology support services for the entire Office of Global Information Services until the bureau has completed an analysis of the benefits of such consolidation from cost, resources, funding, and customer service perspectives. (Action: A)

**Recommendation 39:** The Bureau of Administration should complete and document the Office of Global Publishing Solutions' and the Office of Directives Management's requirements, work processes, and workflows, as well as the effect of consolidation on information technology personnel and funding, before the bureau moves forward with the consolidation of information technology support services. (Action: A)

**Recommendation 40:** The Bureau of Administration should document the Office of Information Programs and Services' information technology inventory process, including roles and responsibilities of personnel and steps for equipment acquisition and reconciliation. (Action: A)

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

**Recommendation 42:** The Bureau of Administration, in coordination with the Bureau of Diplomatic Security, should designate a unit Top Secret control officer for operations at State Annex 13 and provide the designated employee with the required Bureau of Diplomatic Security training. (Action: A, in coordination with DS)

**Recommendation 43:** The Bureau of Administration should eliminate the use of Office of Information Programs and Services employee identification badges and modify the Personal Identity Verification identification media to identify office employee status. (Action: A)

**Recommendation 44:** The Bureau of Administration should implement and enforce an overtime policy for the Office of Information Programs and Services staff that requires appropriate documentation and advance approval of overtime. (Action: A)

**Recommendation 45:** The Bureau of Administration should implement a policy requiring the Office of Global Information Services to participate in the bureauwide electronic virtual timecard system program. (Action: A)

**Recommendation 46:** The Bureau of Administration should fill the three vacant division positions and the vacant branch chief position in the Office of Information Programs and Services. (Action: A)

**Recommendation 47:** The Bureau of Administration should cease rehiring when actually employed staff members on contracts after they reach their hour or salary caps. (Action: A)

**Recommendation 48:** The Bureau of Administration should implement a human capital plan that optimizes use of when actually employed and direct-hire Civil Service employees to provide a sufficient workforce. (Action: A)

**Recommendation 49:** The Bureau of Administration should examine hiring practices in the Office of Information Programs and Services, deal with any violations appropriately, and issue a notice reminding all office managers that Federal law prohibits nepotism in the workplace. (Action: A)

**Recommendation 50:** The Bureau of Administration should reconcile the staffing pattern in the Office of Information Programs and Services to verify that each employee fills a current full-time equivalent position and that there is justification for any position that is on hold. (Action: A)

**Recommendation 51:** The Bureau of Administration should implement a procedure for conducting employee reassignments and details in the Office of Information Programs and Services. (Action: A)

**Recommendation 52:** The Bureau of Administration should implement a policy requiring all managers in the Office of Information Programs and Services to take the Department of State's required ethics training. (Action: A)

**Recommendation 53:** The Bureau of Administration should implement a training plan for the Office of Information Programs and Services that clearly identifies training requirements for both supervisors and other employees and includes Equal Employment Opportunity and diversity training as well as leadership courses for each grade level. (Action: A)

**Recommendation 54:** The Bureau of Administration should realign internal controls in the Office of Information Programs and Services and designate key personnel for Federal Managers' Financial Integrity Act categories in 2012. (Action: A)

**Recommendation 55:** The Bureau of Administration should implement a cost control mechanism for the Office of Information Programs and Services to charge individual Department of State bureaus and offices directly for records stored beyond their life span. (Action: A)

## List of Informal Recommendations

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

***Informal Recommendation 1:*** The Bureau of Administration should not assign Office of Information Programs and Services staff members to other organizations until that office has reduced its backlog of Freedom of Information Act cases.

***Informal Recommendation 2:*** The Bureau of Administration should implement a process to provide periodic updates highlighting common errors and best practices to guide Freedom of Information Act case analysts and liaisons in the Office of Information Programs and Services.

***Informal Recommendation 3:*** The Bureau of Administration should schedule additional appeals panel meetings throughout the year to expedite the Freedom of Information Act appeals process.

***Informal Recommendation 4:*** The Bureau of Administration should provide guidance and the necessary resources for the Office of Information Programs and Services' Freedom of Information Act program manager to improve Act-related efforts throughout the Department of State via training, updates, and systemic changes.

***Informal Recommendation 5:*** The Bureau of Administration should provide the Office of Information Programs and Services with high-speed copy machines to facilitate the workflow until the office can implement a greener solution.

***Informal Recommendation 6:*** The Bureau of Administration should develop an interim read file of the most recent declassification guidance for distribution to all declassification reviewers in the Office of Information Programs and Services' Systematic Review Program division.

***Informal Recommendation 7:*** The Bureau of Administration should analyze the effect of the increased cost of electronic acquisitions in the Ralph J. Bunche Library so that Department of State leadership can make an informed decision about appropriate funding levels for the library.

***Informal Recommendation 8:*** The Bureau of Administration should enroll the Office of Information Programs and Services' resource management program analyst in financial management training.

***Informal Recommendation 9:*** The Bureau of Administration should implement a policy that requires the Office of Information Programs and Services to review its telework agreements annually.

***Informal Recommendation 10:*** (b) (5)

## Principal Officials

	<b>Name</b>	<b>Arrival Date</b>
Deputy Assistant Secretary	Margaret P. Grafeld	09/10
Director, A/GIS/IPS	Sheryl L. Walter	12/11
Deputy Director, A/GIS/IPS	Alex Galovich	12/09
Division Chiefs		
Records and Archives Management Division	Tasha Thian	08/07
Resource Management Staff	Crystal Abrams	01/10
Diplomatic Research Services	Alex Galovich, Acting	12/09
Privacy Division	Christina Jones	01/11
Requester Liaison Division	Rosemary Reid	06/11
Programs and Policies Division	Alex Galovich, Acting	06/11
Statutory Compliance and Research Division	Patrick Scholl	10/10
Archiving and Access Systems Management Division	Andrew Blumenthal	06/11
Ralph J. Bunche Library	Hugh Howard	12/11
Systematic Review Program	Alex Galovich, Acting	04/12

## Abbreviations

AAS	Archiving and Access Systems Management division
Department	U.S. Department of State
DIR	Office of Directives Management
E.O.	Executive Order
FAH	<i>Foreign Affairs Handbook</i>
FAM	<i>Foreign Affairs Manual</i>
FISMA	Federal Information Security Management Act
FOIA	Freedom of Information Act
FREEDOMS	Freedom of Information Document Managing System
GIS	Global Information Services
GPS	Office of Global Publishing Solutions
IPS	Office of Information Programs and Services
ISOO	Information Security Oversight office
OIG	Office of Inspector General
PII	Personally identifiable information
PRV	Privacy division
SAPP	Senior advisor for privacy policy
SMART	State Messaging and Archival Retrieval Toolset
WAE	When actually employed

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