

**OFFICE OF INSPECTOR GENERAL**  
U.S. Agency for International Development

# Inspection of USAID/South Sudan's ICASS Service Provision in Juba

Report E-668-23-002-M  
September 28, 2023

Inspection



Inspections and Evaluations Division



## OFFICE OF INSPECTOR GENERAL U.S. Agency for International Development

**DATE:** September 28, 2023  
**TO:** USAID/South Sudan, Mission Director, Katherine Crawford  
**FROM:** Inspections and Evaluations Division Director, Amy Burns /s/  
**SUBJECT:** Inspection of USAID/South Sudan's ICASS Service Provision in Juba

This memorandum transmits the final report on our inspection of the USAID Mission in South Sudan's (USAID/South Sudan) International Cooperative Administrative Support Services (ICASS) Service Provision in Juba. Our objective was to determine whether USAID/South Sudan has met the requirements of applicable laws and regulations for its role as an Alternate Service Provider (ASP). To answer the objective, we identified three overall issue areas through the course of our work that address (1) the relationship and division of roles and responsibilities between USAID as ASP and the State Department at post, (2) management, and (3) human resource challenges faced by USAID as ASP. In finalizing the report, we considered your comments on the draft and included them in their entirety, excluding attachments, in Appendix D.

The report contains 11 recommendations to improve USAID/South Sudan's management of ICASS services in its role as ASP in Juba, South Sudan. After reviewing information you provided in response to the draft report, we consider 2 recommendations closed (Recommendations 1 and 8), and 9 recommendations resolved but open pending completion of planned activities (Recommendations 2, 3, 4, 5, 6, 7, 9, 10, and 11).

For Recommendations 2, 3, 4, 5, 6, 7, 9, 10, and 11, please provide evidence of final action to the Audit Performance and Compliance Division.

We appreciate the assistance you and your staff provided to us during this engagement.

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## Inspection of USAID/South Sudan's ICASS Service Provision in Juba

### Why We Did This Inspection

In Juba, South Sudan, USAID serves as an Alternate Service Provider of the International Cooperative Administrative Support Services (ICASS) system. An Alternate Service Provider delivers services to customer agencies on behalf of another U.S. government agency. The ICASS system allows the U.S. government to provide and share the cost of common administrative support services, such as motor pool operations and building maintenance, among its overseas posts.

USAID's Mission in South Sudan (USAID/South Sudan) and the State Department share ICASS service responsibilities in Juba. USAID/South Sudan provides about half of the ICASS services in Juba while the State Department typically serves as the primary ICASS service provider at all other posts worldwide.

In 2021, Embassy Juba and USAID/South Sudan expressed concerns about the division of roles between USAID and the State Department in how ICASS services were provided at post. Both entities asked the USAID and State Department OIGs to conduct a joint inspection.

We conducted this inspection to determine whether USAID/South Sudan has met requirements of applicable laws and regulations for its role as an Alternate Service Provider that administers ICASS services.

### What We Recommend

We made 11 recommendations to improve USAID/South Sudan's management of ICASS services in its role as an Alternate Service Provider in Juba, South Sudan. Our recommendations included providing appropriate training and orientation for staff.

### What We Found

**ICASS service provision in Juba lacked a clear division of roles and responsibilities between USAID and the State Department.** As a result, coordination and communication about the duties shared by USAID and the State Department frequently depended on personal relationships. This also affected the working interactions between USAID and State Department personnel at post and contributed to the Agency's challenges as an Alternate Service Provider.

**USAID/South Sudan encountered a broad range of management challenges at the strategic, operational, and functional levels.**

While the Agency generally fulfilled its responsibilities as an Alternate Service Provider, it encountered management challenges, including a lack of institutionalized processes and standard operating procedures, administrative funds control violations, and out-of-date policies.

**USAID/South Sudan faced human resource challenges related to understaffing, ineffective transition/orientation processes, and training provided to Foreign Service Nationals.** In addition, USAID/South Sudan's Executive Office managed USAID's ICASS platform despite having multiple vacancies, which contributed to inventory management and storage problems.

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## Acronyms and Abbreviations

<b>ADS</b>	Automated Directives System
<b>AFR/SSSP</b>	Bureau for Africa, Office of Sudan and South Sudan Programs
<b>ASP</b>	Alternate Service Provider
<b>ATST</b>	Anti-Terrorism Security Driver Training
<b>COM</b>	Chief of Mission
<b>EC</b>	Embassy Compound
<b>EXO</b>	Executive Officer
<b>FAH</b>	Foreign Affairs Handbook
<b>FAM</b>	Foreign Affairs Manual
<b>FSN</b>	Foreign Service National
<b>FY</b>	Fiscal Year
<b>GSO</b>	General Services Officer
<b>ICASS</b>	International Cooperative Administrative Support Services
<b>ILMS</b>	Integrated Logistics Management System
<b>NEC</b>	New Embassy Compound
<b>OIG</b>	Office of Inspector General
<b>OMD</b>	Bureau for Management, Overseas Management Division
<b>RC</b>	Residential Compound
<b>SOP</b>	Standard Operating Procedure
<b>TDY</b>	Temporary Duty Assignment
<b>USAID</b>	U.S. Agency for International Development
<b>USAID/South Sudan</b>	USAID Mission in South Sudan
<b>USDH</b>	U.S. Direct Hire

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## Introduction

In Juba, South Sudan, USAID serves as ASP—a U.S. government agency with the ability to deliver services to customer agencies and service recipients on behalf of another U.S. government agency<sup>1</sup>—of the ICASS system. The ICASS system is the principal means by which the U.S. government provides and shares the cost of common administrative support services, such as motor pool operations and building maintenance, among the U.S. government agencies at its more than 250 diplomatic and consular posts overseas. USAID/South Sudan provides about half of the ICASS services in Juba because the compounds were originally USAID field offices. At all other posts worldwide, the State Department typically serves as the primary ICASS service provider.<sup>2</sup>

In 2021, the Embassy and USAID Mission in Juba, South Sudan expressed concerns about the close integration of management functions in the provision of ICASS services at post and requested a joint inspection to be conducted by USAID and State Department OIGs.

Our objective was to determine whether USAID/South Sudan has met the requirements of applicable laws and regulations for its role as an ASP. To answer the objective, we identified three issue areas that address:

1. The relationship and division of roles and responsibilities between USAID as ASP and the State Department at post;
2. Management challenges faced by USAID as ASP; and
3. Human resource challenges faced by USAID as ASP.

Although we gathered information related to the cost centers for which USAID provides ICASS services, the scope of our reporting prioritized areas that exhibited concrete challenges with immediate impacts on health, safety, and effective operations at USAID/South Sudan.

In coordination with the State Department OIG, we conducted an on-site inspection from October 28 to November 11, 2022, to observe the daily operations of USAID/South Sudan in its role as ASP. As a part of our work, we reviewed relevant standards, documentation provided by the mission, and written responses provided by the mission and USAID offices based in Washington, DC. We also conducted interviews with staff from the Bureau for Management's Overseas Management Division (OMD)<sup>3</sup> and the Bureau for Africa's Office of Sudan and South Sudan Programs (AFR/SSSP), agencies receiving ICASS services from USAID/South Sudan, and mission staff. We conducted this work in accordance with the Council

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<sup>1</sup> USAID, Automated Directives System, Chapter 635, Section 6, "Definitions," November 2, 2018.

<sup>2</sup> USAID serves as ASP for a limited number of ICASS services at five other posts in Egypt, Kosovo, Malawi, South African Republic, and Honduras.

<sup>3</sup> OMD is responsible for the oversight and management of ASP operations as described in ADS 635 and ADS 520. Those activities include ASP Budget Formulation, Annual Working Capital Fund Budget Cycle, ASP representation at the ICASS Interagency Working Group and Interagency ICASS Executive Board, carryover funding process, Working Capital Fund Distribution, and the Reimbursement Process.

of the Inspectors General on Integrity and Efficiency’s Quality Standards for Inspection and Evaluation.

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## **Background: Complex Operating Environment**

### **South Sudan is a Critical Priority Country with High Levels of Crime and Political Violence**

In February 2023, USAID reported that an estimated 9.1 million South Sudanese citizens required basic humanitarian assistance.<sup>4</sup> According to the mission, multiple factors—including cycles of severe flooding, violent conflict, lack of infrastructure, unregulated political competition, mismanagement of public resources, and high levels of corruption—make South Sudan one of the most dangerous places in the world to deliver assistance.

After gaining its independence from Sudan in 2011, South Sudan experienced another civil war between the Sudan People’s Liberation Movement-in government (led by President Salva Kiir) and the Sudan People’s Liberation Movement-in opposition (led by Riek Machar) that spanned from 2013-2018. According to the mission, localized violence, difficult humanitarian access, and significant human rights violations have continued in the years following the 2018 peace agreement that ended the civil war. Given the challenging operating environment, South Sudan is a critical priority country with critical ratings for crime and political violence. As a critical priority country post, staff serve for 12 months rather than a typical 24-month tour and receive two rest and recuperation breaks. Juba is also a Special Incentive Post<sup>5</sup>—U.S. Direct Hires (USDH) receive 35 percent danger pay<sup>6</sup> and 30 percent hardship differential.<sup>7</sup>

### **Expatriate Staff Work and Live on Two Aging Compounds**

Embassy Juba is located on what were USAID field office compounds and became a consulate in 2006. Following South Sudan’s independence in 2011, the consulate transitioned into an embassy. According to the mission, the Embassy Compound (EC) and Residential Compound (RC) facilities are aged and in need of maintenance, renovation, and replacement. To address facilities issues, construction of a \$784 million new embassy compound (NEC) is scheduled to begin in FY 2023 with a 54-month construction timeline.

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<sup>4</sup> USAID, [South Sudan Complex Emergency Fact Sheet #2 Fiscal Year 2023](#), February 17, 2023.

<sup>5</sup> Special incentive posts encompass all overseas posts that have 1-year tours of duty. As of March 2023, these include Burma, Iraq, Pakistan, Somalia, and South Sudan. USDHs serving in these locations receive additional compensation ranging from 20 to 35 percent.

<sup>6</sup> Danger pay is additional compensation above basic compensation for service at designated danger pay posts where civil insurrection, terrorism, or war conditions threaten physical harm or imminent danger to all U.S. government civilian employees.

<sup>7</sup> Post hardship differential compensates employees for service in foreign areas where environmental conditions differ substantially from those in the continental United States and warrant additional compensation as a recruitment and retention incentive. The differential is paid as a percentage of basic compensation and can range from 5 to 35 percent.

At the time of the inspection, Embassy Juba reported it had 48 USDH staff members, 31 contractors, 13 Department of Defense military personnel, 2 third-country nationals,<sup>8</sup> and 1 eligible family member employee.<sup>9</sup> Of the 48 USDH employees, 28 worked for the State Department, 18 worked for USAID, and 2 worked for the Centers for Disease Control and Prevention. The embassy also had 396 Foreign Service National (FSN) staff members, which included 180 local guards and 148 USAID personnel. U.S. government personnel were restricted in their movements and worked on the EC and lived on the RC. In addition, a 7:00 pm curfew was in place, restricting the movements of personnel and government-owned vehicles after dark.

## **USAID is the ICASS Alternate Service Provider for Post**

USAID's Automated Directives System (ADS) describes ASP operations in Chapters 635 and 520. At the time of the inspection, USAID/South Sudan provided about half of ICASS services—including building operations, housing and leasing, and motor pool operations—at post in its role as ASP. Appendix C outlines the division of the ICASS services provided by USAID/South Sudan and the State Department. This legacy structure dates to the years when USAID operated the compounds as a field office. USAID/South Sudan's Executive Office provided most of the ICASS services through 11 business units<sup>10</sup> and used an \$18.7 million life support services contract to provide hospitality and housekeeping services, food services, and maintenance.

As ASP, USAID/South Sudan primarily received support from OMD, which provided the mission with advice on ASP operational questions. According to AFR/SSSP, the office provided general support to USAID/South Sudan for recruitment.

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## **Inspection Results**

### **Without Clear Roles and Responsibilities for ICASS Service Provision Between USAID as ASP and the State Department, Effective Interagency Coordination and Communication Have Depended on Personal Relationships**

Confusion about how ICASS-related roles and responsibilities were divided between USAID and the State Department contributed to challenges in ASP operations and impacted the working relationship between USAID and State Department staff at post. We found that roles and responsibilities of USAID and the State Department were not clearly documented or understood at the working level, which increased the importance of effective interagency

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<sup>8</sup> The ADS Glossary defines third country national as a legal resident, but not a citizen, of a non-U.S. country in which a USAID sponsoring unit is operating.

<sup>9</sup> 14 FAM 51.1.3 defines eligible family members as (1) children who are unmarried and under 21 years of age or, regardless of age, are unmarried and due to mental and/or physical limitations are incapable of self-support; (2) parents of the employee or employee's spouse; (3) sisters and brothers of the employee, or of the spouse when such sisters and brothers are at least 51 percent dependent on the employee for support, unmarried and under 21 years of age, or regardless of age, are physically and/or mentally incapable of self-support; and (4) spouse.

<sup>10</sup> The Executive Office includes Human Resources & Travel, Information & Technology, Warehouse, Shipping & Customs, Motor Pool, Housing, Procurement, Life Support Contract, Construction, and Facilities Maintenance.



communication. Without clear roles and responsibilities for ICASS service provision, the quality of interagency coordination and communication have depended on the personal relationships between USAID and State Department staff.

## **Roles and Responsibilities for ICASS Service Provision by USAID Were Defined at a High Level but Lacked Clarity in Specific Areas**

Although the services provided by USAID as ASP were documented in memorandums of understanding between USAID and the receiving agencies, USAID staff said the roles and responsibilities of USAID and the State Department in the ICASS management system at post were not clear. A USAID official characterized post as having a “non-traditional management structure,” citing challenges such as unclear or overlapping roles between the State Department Management Officer, USAID supervisory executive officer (EXO), USAID general services officer (GSO), the State Department regional security officer, and Embassy front office. The lack of clarity for roles and responsibilities at post across functional areas such as vehicle management, facilities, procurement, human resources, and information technology has created confusion for staff. Federal internal control standards state the following:

“[m]anagement considers the overall responsibilities assigned to each unit, determines what key roles are needed to fulfill the assigned responsibilities, and establishes the key roles. Those in key roles can further assign responsibility for internal control to roles below them in the organizational structure but retain ownership for fulfilling the overall responsibilities assigned to the unit.”<sup>11</sup>

Facilities management illustrated these unclear roles and responsibilities. For example, as ASP, USAID has full responsibility over managing the facilities at post. However, in some cases, when the facilities projects are funded by the State Department’s Bureau of Overseas Buildings Operations, the State Department will be responsible for managing the facilities until construction activities are complete. When construction of the facility is finalized, the management of the facilities will be transferred back to USAID.

Federal internal controls state that “[m]anagement determines what level of authority each key role needs to fulfill a responsibility.”<sup>12</sup> However, in interviews, three USAID staff also stated that there is confusion about the authority between USAID as ASP and the State Department’s authority as Chief of Mission (COM),<sup>13</sup> specifically in cases when USAID has authority over certain ICASS-related decisions because of its role as ASP. For example, USAID provided written documentation demonstrating that in 2022, after USAID had fully awarded and obligated funds for the electrical upgrade contract, the State Department’s acting charge

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<sup>11</sup> U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G), “Establish Structure, Responsibility, and Authority,” Principle 3.07, “Assignment of Responsibility and Delegation of Authority,” September 2014.

<sup>12</sup> GAO, *Standards for Internal Control in the Federal Government*, Principle 3.08, “Assignment of Responsibility and Delegation of Authority,” September 2014.

<sup>13</sup> 2 FAH-2 H-112 defines Chief of Mission as the principal officer in charge of a diplomatic mission of the United States or of a United States office abroad which is designated by the Secretary of State as diplomatic in nature. The Chief of Mission is usually the U.S. Ambassador to a foreign country or the chargé d’affaires.

d'affaires<sup>14</sup> at post sought to prevent the project from moving forward during a meeting because they thought it may not be required. Following that discussion, one USAID staff member said they expressed concern that lines of contracting authority were unclear.

## **Interagency Coordination and Communication are Necessary to Navigate Effective ICASS Service Provision, but Were Personality-Driven**

A USAID/South Sudan official noted the importance of communication and coordination between USAID and the State Department in the delivery of ICASS services at post. One USAID official and multiple USAID staff acknowledged communication and coordination efforts were a challenge that stemmed from multiple factors including disagreements between USAID and State Department staff, the number of stakeholders involved, competition for space and services, staff turnover due to the shorter tour of duty, lack of standard operating procedures (SOPs), and unclear and overlapping roles and responsibilities between USAID and the State Department. Federal internal control standards state the following:

“[m]anagement communicates quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system. In these communications, management assigns the internal control responsibilities for key roles.”<sup>15</sup>

At post, the quality of communication at the working level has depended on personality. At the time of the inspection, one USAID staff member noted that coordinating on ICASS management represented the hardest car they have ever driven and built at the same time. As a result, mission staff said poor and/or inconsistent interagency communication and disagreements about roles and responsibilities had hurt morale and the efficiency of ASP operations.

One USAID official said that regular and good communications, even overcommunicating, between agencies and agency leadership is critical due to the complicated nature of the operating environment and management systems at post. At the time of the inspection, USAID officials and multiple staff stated that the previous relationship between USAID and the State Department was not positive and made worse by personality clashes, poor communication, and professional disagreements. As a result, communication and coordination efforts between USAID and the State Department have ranged from contentious and toxic among personnel in previous tours to positive and productive at the time of the inspection, according to USAID officials and staff. One USAID staff member said that while the previous group of personnel did the best they could with acting leadership, it was a difficult and ambiguous environment to work in and effectively focus on ensuring a high quality of life for personnel at post.

At the time of the inspection, USAID officials and staff said that the current relationship between USAID and the State Department was characterized by good collaboration and

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<sup>14</sup> Generally, in the absence of an ambassador, a senior foreign service officer takes on the role of charge d'affaires and acts as COM.

<sup>15</sup> GAO, *Standards for Internal Control in the Federal Government*, “Communicate Internally,” Principle 14.03, “Communication throughout the Entity,” September 2014.

communication after the summer transition and arrival of the Ambassador. For example, a USAID official at post noted that they have worked closely with their State Department counterpart to repair past damage and build more transparent systems between current staff. Despite this progress, OIG did not identify any systematic attempt to institutionalize best practices to maintain positive collaboration and communication.

### **Recommendations**

Recommendation 1: We recommend the Executive Office, in coordination with Embassy Juba, develop and implement a plan for the communication and coordination of responsibilities on International Cooperative Administrative Support Services provision.

Recommendation 2: We recommend USAID/South Sudan, in coordination with the Bureau for Africa's Office of Sudan and South Sudan Programs and the Bureau for Management's Overseas Management Division, develop and implement a plan to institutionalize activities to improve coordination and communication between USAID and the State Department at post.

## **As ASP, USAID/South Sudan Has Encountered a Broad Range of Management Challenges at the Strategic, Operational, and Functional Levels**

USAID/South Sudan has generally fulfilled its responsibilities as ASP but has encountered a broad range of management challenges at the strategic, operational, and functional levels. At the strategic level, USAID used a master planning process to prioritize capital investments in the infrastructure on the EC and RC, but processes for updating the plan had not been institutionalized. At the operational level, USAID did not have established SOPs, and documents were not maintained consistently. USAID/South Sudan also incurred administrative funds control violations in fiscal years (FY) 2021 and 2022. At the functional level, USAID policies did not reflect the current state of USAID/South Sudan ASP operations.

### **USAID/South Sudan's Strategic Master Plan Report Does Not Lay Out a Dynamic Process to Address Evolving Operational Challenges**

As the service provider for the Embassy, USAID agreed to undertake a master planning process to guide investments in infrastructure over the anticipated life of the EC and RC, which resulted in a Master Plan Report.<sup>16</sup> The Master Plan Report was completed between January 2021 and April 2022 in coordination with the State Department and other stakeholders at post to ensure that critical systems can support the mission until the NEC comes online.

The Master Plan Report recognized the facilities on the EC and RC were meant to be temporary until Embassy operations moved into a NEC. In interviews, three USAID staff noted that the facilities were either not purposefully built or poorly designed. For example, at the time of the inspection, USAID staff stated that the facilities have inadequate space, limited accessibility for individuals with disabilities, insufficient vehicle maintenance facilities to meet

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<sup>16</sup> The Master Plan Report was developed to provide "a structured, thorough process for establishing baseline and projected conditions, identifying necessary investments, and soliciting input on the actions necessary to extend the life of the capital facilities."

maintenance demands, and other minor health and safety issues such as drainage problems. The Master Plan Report provided a prioritized list of investments, such as the electrical systems upgrade, the renovation of the residential compound kitchen, the construction of new wastewater treatment plants, and the construction of additional apartment units to accommodate new staff arriving at the mission and provide housing for permanent residents.

At the time of the inspection, 19 acres<sup>17</sup> had been turned into a construction site for the NEC and despite the 54-month construction timeline, USAID and State Department officials did not expect the NEC to come online for at least 5-7 years. In the Master Plan Report, USAID and State Department officials acknowledged that the RC and EC must be capable of supporting the needs of the embassy for the foreseeable future. USAID/South Sudan will continue to provide services as ASP and maintain current facilities until the NEC comes online.

Although USAID has conducted a strategic planning process to upgrade the facilities on the EC and RC as demonstrated in the Master Plan Report, it has not ensured that this exercise will continue until the NEC comes online. Federal internal control standards state that management evaluates and, if necessary, revises defined objectives so that they are consistent with applicable laws, regulations, and standards as well as internal expectations established by management.<sup>18</sup> According to USAID, the Master Plan Report had been updated twice since its completion in 2022, and the process for updating the plan was shared and approved jointly by the COM and USAID Mission Director. At the time of the inspection, a USAID official acknowledged that the Master Plan Report should be iterative and revisited more frequently by the management team. In reviewing the report, OIG did not find language within the Master Plan Report that ensured this process would continue. Based on OIG's review, the Master Plan Report only represented the strategy for a point in time as there was no explicit indication that the master planning process was undertaken as an iterative exercise. Without a consistent process for updating the Master Plan Report, emergent issues and changing needs of the mission may not be documented or fully addressed.

### **Recommendation**

Recommendation 3: We recommend USAID/South Sudan institutionalize a plan for updating the Master Plan Report to ensure that planned activities are realized and that emergent needs are incorporated into the overall strategic plan.

## **USAID/South Sudan Lacked Standard Operating Procedures Across Its Operations and Did Not Have Consistent Document Management**

A USAID official and multiple USAID staff said that USAID/South Sudan either lacked SOPs for their position or that these resources were difficult to find when they arrived. Federal internal control standards state the following:

“[e]ffective documentation assists in management’s design of internal control by establishing and communicating the who, what, when, where, and why of internal

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<sup>17</sup> 19 acres is the site for the NEC. The State Department’s Bureau of Overseas Building Operations purchased a U.S. government-owned restricted 19-acre site to construct the compound.

<sup>18</sup> GAO, *Standards for Internal Control in the Federal Government*, “Define Objectives and Risk Tolerances,” Principle 6.06, “Definitions of Objectives,” September 2014.

control execution to personnel. Documentation also provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel.”<sup>19</sup>

USAID staff emphasized how the lack of SOPs negatively impacted internal ICASS management, contributing to miscommunications as personnel moved in and out of roles. One USAID staff member noted that FSN staff capacity has suffered because they lack consistent guidance and performance standards for their roles. Another USAID staff member said that without SOPs or transparency in ASP operations, FSN staff have needed to adjust to the different personalities, understandings, and interpretations of USDHs who change regularly.

The absence of SOPs made it difficult for USAID staff to understand their roles and responsibilities at the working level. USAID staff provided procurement as an example of an area lacking SOPs. According to a USAID staff, USAID and State Department staff could procure up to certain dollar amounts, but there was no policy or procedure differentiating when and who performs certain procurements.

Further, USAID staff at post raised knowledge management as another concern. Three USAID staff said that institutional knowledge is lost due to staff turnover. USAID/South Sudan recognized the need for SOPs and had made efforts to develop them despite the staff’s limited bandwidth. For example, at the time of the inspection, the Executive Office was providing input for post’s TDY policy and working with the life support services contractor to improve housing accommodations preparations. One USAID staff member in the Executive Office stated that establishing SOPs was a shared goal of mission leadership.

Limited SOPs also led to poor document management practices, which impacted USAID ASP operations because information was difficult to find. For example, the process for tracking maintenance records and service requests was inadequate, which one USAID staff member said led to an inefficient system for work orders and requests. Federal internal control standards state the following:

“[m]anagement processes relevant data from reliable sources into quality information within the entity’s information system. An information system is the people, processes, data, and technology that management organizes to obtain, communicate, or dispose of information.”<sup>20</sup>

At the time of the inspection, USAID and the State Department used different systems for document management for some functions, which staff said created confusion and duplicative actions. For example, one USAID staff member said maintenance requests and work orders relied on multiple systems—USAID maintenance requests were received through MyServices and State Department requests were managed through the Global Maintenance Management System. In interviews, the USAID staff member said that requests were reviewed on both systems, which doubled the workload because the systems were not compatible. In some cases,

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<sup>19</sup> GAO, *Standards for Internal Control in the Federal Government*, Principle 3.10, “Documentation of the Internal Control System,” September 2014.

<sup>20</sup> GAO, *Standards for Internal Control in the Federal Government*, “Use Quality Information,” Principle 13.06, “Data Processed into Quality Information,” September 2014.

work orders would be the same. In other cases, State Department customer requests would need to be copied and pasted into the USAID system for tracking purposes. USAID staff also said that USAID/South Sudan has used multiple document management systems—Google Drive and a local network drive—but organization on the drives had been inconsistent, making it difficult for staff to locate information.

However, two USAID staff said post made efforts to improve document management. For example, one USAID staff member noted that they had developed checklists to clarify what information should be maintained as an official Agency record.

### **Recommendations**

Recommendation 4: We recommend USAID/South Sudan identify gaps in standard operating procedures across functional areas and develop and implement standard operating procedures to fill identified gaps.

Recommendation 5: We recommend USAID/South Sudan, in coordination with the Bureau for Management’s Overseas Management Division and other relevant offices, as appropriate, issue clear guidance on procedures for storing documents.

## **USAID/South Sudan Incurred Administrative Funds Control Violations**

USAID/South Sudan provided information on nine potential funds control violations in FY 2021 and FY 2022. ADS Chapter 634 defines funds control violations as either statutory or administrative in nature. According to the ADS, a violation of the Antideficiency Act, which prohibits an agency from obligating or expending funds in advance of or in excess of an appropriation unless specifically authorized by law, constitutes a statutory violation.<sup>21</sup> Violations of the Antideficiency Act may result in disciplinary and/or criminal penalties and must be reported to Congress and the President. Administrative violations occur below the allotment level<sup>22</sup> and result from actions that violate USAID funds control policy directives and required procedures. Penalties for administrative funds control violations are handled by USAID on a case-by-case basis and may range from a verbal warning or reprimand to dismissal.

OIG reviewed supporting documentation for the nine potential funds control violations: six in FY 2021 and three in FY 2022. OIG found that USAID/South Sudan did not incur any statutory funds control violations in FY 2021 or FY 2022. Of the nine potential funds control violations, USAID/South Sudan confirmed seven administrative violations, six in FY 2021 and one in FY 2022, totaling approximately \$271,203. Examples of administrative funds control violations included purchasing refreshments for mission-hosted events, procuring office supplies, and paying tuition for employee training without funds being committed or obligated for the purchases. Of the remaining two potential funds control violations, in FY 2022, USAID/South Sudan determined that one reported potential funds control violation did not result in an actual funds control violation and a determination had not been made the other. Overall, USAID/South Sudan said it had taken corrective actions to prevent recurrence of administrative

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<sup>21</sup> 31 U.S.C. § 1341(a)(1).

<sup>22</sup> ADS 634.6 defines allotment as “the authority delegated by the head or other authorized employee of an agency to agency employees to incur obligations within a specified amount, pursuant to Office of Management and Budget apportionment or reappportionment action or other statutory authority making funds available for obligation.”

funds control violations, including informing staff about the importance of ensuring that funds are available before processing authorizations or obligations and providing staff with training on how to prevent administrative funds control violations.

OIG's annual financial statement audits encompass funds control violations and make recommendations to USAID's Chief Financial Officer related to internal controls. We coordinated with the financial auditors responsible for this reporting to ensure their awareness. As such, this inspection did not examine these violations further to potentially recommend corrective action.

## **USAID/South Sudan Experienced Challenges with Motor Pool and Property Disposal and Had Not Fully Adhered to its Temporary Duty Assignment Policy**

### **Some Motor Pool Unit Staff Did Not Have Valid Training Certifications**

According to USAID/South Sudan, Juba is a critical threat post for crime and political violence. As such, expatriate staff are restricted in their movements and rely on USAID motor pool<sup>23</sup> operations to provide transportation in armored vehicles for official purposes.

According to the Foreign Affairs Manual (FAM), operators of armored vehicles must complete State Department-certified safe-driver training and State Department-approved armored vehicle training. USAID uses Smith System safe-driver training and Anti-Terrorism Security Driver Training (ATST) to meet the safe-driver and armored vehicle training requirements. In addition, requirements under 14 FAM 433.5(b) state incidental drivers—employees other than chauffeurs who have been assigned to operate an official vehicle incidental to their primary job—in “elevated risk” countries must receive the same training as chauffeurs—employees hired as full-time drivers. USAID/South Sudan's motor vehicle policy reflects this requirement, stating incidental drivers must complete State Department-certified safe-driver training and State Department-approved armored vehicle training. However, at the time of the inspection, two staff within the motor pool unit said that they had not received required trainings.

As of March 2023, the USAID motor pool unit included a total of 36 staff, including 29 chauffeurs and 7 incidental drivers. OIG reviewed USAID/South Sudan's training records and found that USAID/South Sudan had maintained training records, but nine motor pool staff did not have valid safe-driver or armored vehicle training certifications. In one case, a chauffeur's Smith System safe-driver and ATST certifications were both not valid. Table I provides the number of valid and invalid certifications for motor pool chauffeurs and incidental drivers.

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<sup>23</sup> Motor pool is a group of motor vehicles centrally controlled (as by a governmental agency) and dispatched for use as needed.

**Table I: Motor Pool Chauffeurs and Incidental Drivers Training Records (as of March 2023)**

<b>Smith System Safe-Driver Training Certification</b>		
	<b>Chauffeurs</b>	<b>Incidental Drivers</b>
Valid	27	7
Not valid	2	0

<b>Anti-Terrorism Security Driver Training Certification</b>		
	<b>Chauffeurs</b>	<b>Incidental Drivers</b>
Valid	27	1
Not valid	2	6

Source: Generated by USAID OIG based on USAID data.

One motor pool staff member said COVID-19 had delayed in-person trainings, causing some training requirements to lapse. In a written response, USAID/South Sudan said that three motor pool staff (two chauffeurs and one incidental driver) were accepted and scheduled to attend ATST training within the calendar year.

**Recommendation**

Recommendation 6: We recommend USAID/South Sudan develop a routine schedule for reviewing training records and ensure all chauffeurs and incidental drivers maintain valid certifications for State Department-certified safe-driver training and State Department-approved armored vehicle training.

**USAID Took Steps to Ensure Transportation Was Available for Personnel at Night, but Efforts Were Inconsistent With Post’s Motor Vehicle Policy**

USAID/South Sudan’s motor vehicle policy states that the operation of the motor pool is based on the security situation in Juba. At the time of the inspection, motor pool staff said that USAID’s motor pool operations were divided into three shifts—morning, afternoon, and overnight—to provide transportation for embassy personnel.

According to 14 FAM 433.8(a), operators of official vehicles may not spend more than 10 hours on duty and must spend a minimum of 8 hours off duty between shifts. OIG reviewed USAID/South Sudan’s motor vehicle policy and found that it complied with requirements under 14 FAM 433.8(a). In an interview and in a written response to OIG, USAID staff said motor pool shifts were scheduled in 8-hour increments to ensure compliance with the FAM requirement.

At the time of the inspection, USAID had added one 12-hour overnight shift so that a driver was available to transport embassy personnel at night. One motor pool staff member said that the decision was made after USAID and the State Department had discussed the need to have transportation available at night. OIG found that USAID had not updated its motor vehicle policy to reflect exceptions to the 10-hour duty limit. 14 FAM 433.8(d) states that when exceptional circumstances require an on-duty shift greater than 10 hours, an operator must



spend 14 hours off duty before returning to driving duties. Motor pool staff said that the 12-hour shift was created out of concern for driver safety. Specifically, motor pool staff said USAID and the State Department agreed to extend the night shift to 12 hours so that drivers could avoid safety concerns when traveling home, such as military presence along the roads after dark. While the FAM allows shifts to be greater than 10 hours, USAID's motor vehicle policy does not reflect the 12-hour overnight shift or enforce the subsequent 14 hours off duty in accordance with 14 FAM 433.8(d).

### **Recommendation**

Recommendation 7: We recommend USAID/South Sudan update its motor vehicle policy with the 12-hour overnight shift in alignment with 14 FAM 433.8 requirements for shifts greater than 10 hours.

### **USAID/South Sudan Faced Challenges with Disposing of Property by Auction**

At the time of the inspection, USAID/South Sudan had not disposed of property by auction<sup>24</sup> since October 2020, which contributed to challenges with storage space as excess property had to be stored until it could be disposed of properly. 14 FAM 411.2-1(b) provides the Property Management Officer<sup>25</sup> with broad accountability in creating an effective system of internal property management controls, primarily designating responsible individuals or offices for day-to-day activities to include property disposals. At the time of the inspection, one USAID staff member said property marked for disposal was stored at USAID's container storage facility.<sup>26</sup> According to USAID staff, the space limitations were making new procurements challenging because there would not be room to store new inventory.

Following the last auction in October 2020, USAID staff said that post was trying to identify a site to hold an auction to dispose of property. Previously, auctions had taken place at 19 acres, the site for the NEC. However, according to USAID, COVID-19 prevented USAID/South Sudan from conducting auctions through early 2022. One USAID staff member said that in August 2022, post asked USAID to move inventory from 19 acres because the site was being handed over to the State Department's Bureau of Overseas Buildings Operations to prepare for NEC construction activities. The USAID staff member said the decision was made quickly, so inventory that was meant to be disposed of was removed from the site and moved into storage. USAID staff said that post was trying to identify an alternative site to hold the auction, but safety concerns made it challenging to find a location. At the time of the inspection, one USAID staff member said that USAID/South Sudan was working to identify an alternative space and was planning to hold one auction in January 2023 and another auction in February 2023.

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<sup>24</sup> 14 FAM 417.2-3 states "if foreign excess personal property is not disposed of by transfer or return to the United States, it may be sold if in the best interest of the U.S. Government." According to the FAM, proceeds of sale from personal property, originally purchased by the State Department's Bureau of Overseas Buildings Operation are deposited to the Embassy, Security, Construction, and Maintenance Appropriation; when USAID property is involved, proceeds of sale are returned to USAID's Budget and Clearing Account.

<sup>25</sup> 14 FAM 411.2-1(f) states that "the USAID executive officer or director at post always retains PMO responsibility for all USAID property.

<sup>26</sup> USAID's container storage facility holds property and inventory in about 66 containers near the EC.

As of March 2023, USAID/South Sudan has been unable to conduct the planned auctions because the vendor serving as auctioneer had difficulty registering in SAM.gov.<sup>27</sup> USAID/South Sudan said that post had obtained clearance to conduct the next auction at the RC helicopter landing zone, which was scheduled to take place in April 2023.

### **USAID Had Not Consistently Invoiced Temporary Duty Assignment Personnel According to Its Temporary Duty Assignment Policy**

All executive branch temporary duty assignment (TDY) travelers to post fall under COM authority and are required to stay on the RC, unless otherwise granted permission by the COM. TDY visitors not under COM authority, including third-party contractors, who may seek or are required to have access to COM facilities and/or ICASS services may be granted access as determined by the COM on a case-by-case basis. Given the environment at post and security restriction in Juba, administrative costs are higher compared to other posts worldwide. Some of these costs include TDY housing and armored vehicle transportation, which COM employees are required to take for all travel except between the EC and RC. According to USAID/South Sudan's TDY policy, all TDY employees who require ICASS support services are invoiced once the total cost of services exceeds \$500.

Prior to our inspection, a stakeholder expressed concern about whether USAID/South Sudan issued TDY invoices to recover ICASS costs for service provision. Although post has a TDY policy, USAID staff acknowledged that billing processes were not in place or were not clear in the policy. In an interview, one USAID staff member said they were not sure whether post was charging TDY employees for the provision of ICASS services in accordance with post's policy.

One USAID staff member noted that TDY billing is an issue but at the time of the inspection, three USAID staff said post was developing a process for TDY invoicing. After the site visit, USAID/South Sudan provided additional documentation showing in January 2023, Embassy Juba implemented an updated TDY Policy, confirming that TDY visitors would be invoiced for services used. In accordance with the update, USAID/South Sudan issued a Mission Notice in March 2023 instructing TDY visitors to include funds to cover charges for ICASS/ASP accommodations in their travel orders.

### **Recommendation**

Recommendation 8: We recommend USAID/South Sudan and the Bureau for Management's Overseas Management Division develop and implement invoicing procedures to ensure TDY personnel are invoiced consistent with the TDY policy.

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<sup>27</sup> The System for Award Management (SAM.gov) is an official website of the U.S. government. Entities register in SAM.gov to do business with the U.S. government.

## **As ASP, USAID/South Sudan Faced Human Resource Challenges Related to Understaffing, Ineffective Transition and Orientation Processes, and Foreign Service National Training**

USAID/South Sudan’s Executive Office managed USAID’s ICASS platform with multiple vacancies and ineffective orientation and transition processes. In recognition of the human resource challenges USAID/South Sudan faced, we found two areas for improvement—ensuring that personnel, including FSNs, receive appropriate training for their positions and that personnel receive a formal orientation and sufficient handover materials.

### **USAID/South Sudan is Understaffed in the Executive Office and Warehouse Operations**

As of March 2023, the USAID/South Sudan’s Executive Office had 19 vacancies. According to the Foreign Affairs Handbook (FAH), service providers are responsible for developing budget and staffing requirements and presenting them to the ICASS Council<sup>28</sup> and ICASS Budget Committee for review and possible negotiation.<sup>29</sup> The ICASS Council at the mission is responsible for reviewing and approving new ICASS positions.<sup>30</sup> At the time of the inspection, two USAID staff said that many positions were in the process of being filled or had been proposed to the ICASS Council<sup>31</sup> for approval.

Throughout the inspection, multiple USAID staff and officials said that the Executive Office was understaffed. The Executive Office is composed of 11 business units that provide about half of ICASS services at post. Figure 1 provides an overview of the organization structure of USAID/South Sudan’s Executive Office. The EXO directly oversees procurement, information technology, and the human resources and travel units within the Executive Office. Key roles such as the Deputy EXO and General Services Specialist have delegated responsibility over the other units within the Executive Office, but primary responsibilities reside with the EXO.

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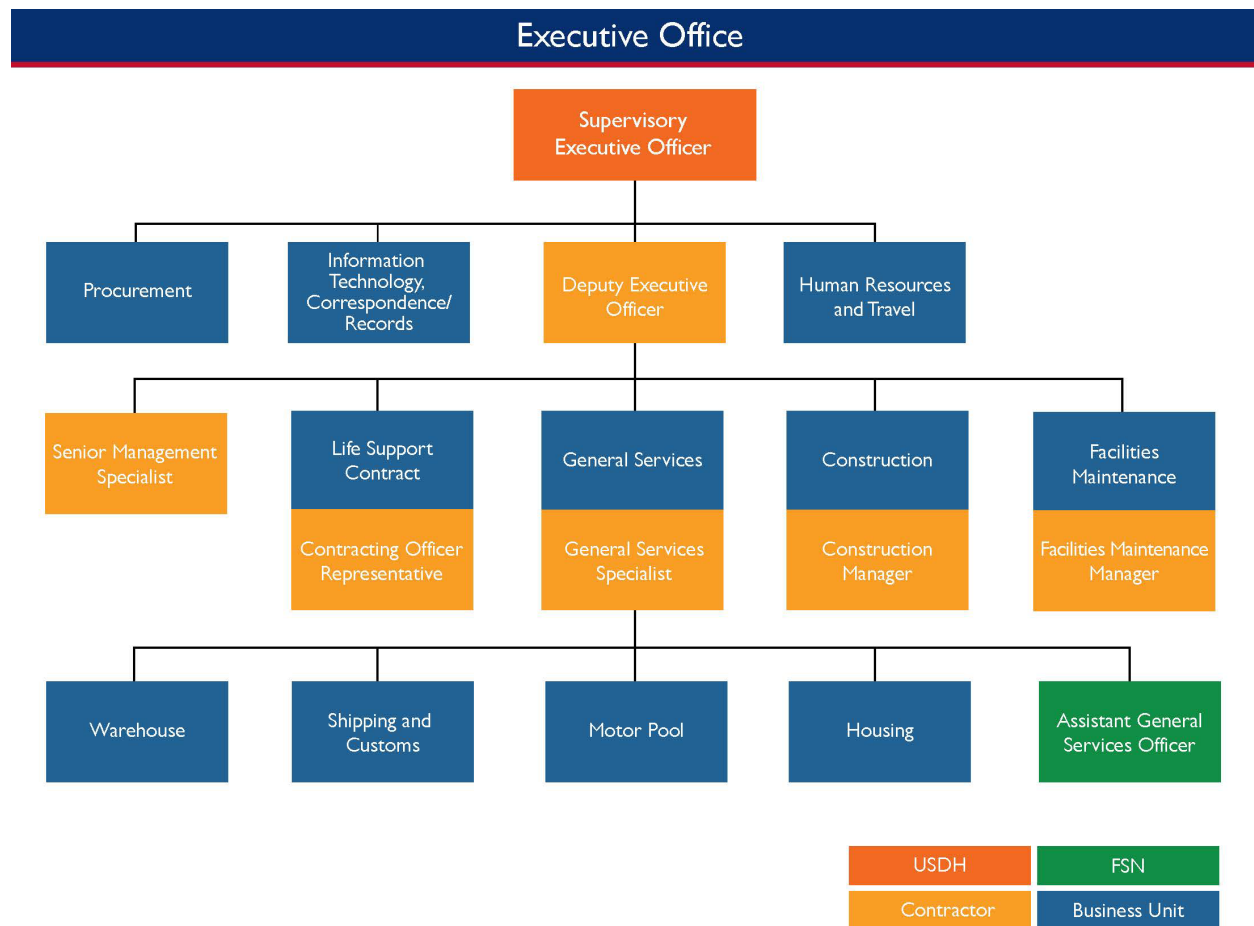
<sup>28</sup> Volume 6 of the Foreign Affairs Handbook, Section 5 H-222.3-3 states that “[t]he post ICASS Council is key to making ICASS work at post. The Council exercises oversight and leadership in its installation of the ICASS infrastructure and the administration of the ICASS system. As with all mission operations, the activities of the ICASS Council fall under the authority of the COM.”

<sup>29</sup> Volume 6 of the Foreign Affairs Handbook, Section 5 H-032.

<sup>30</sup> 6 FAH-5 H-222.3.

<sup>31</sup> The ICASS Council at post includes members from USAID, the Department of State, the Department of Defense, and the Centers for Disease Control and Prevention.

**Figure I: Organization Chart of USAID/South Sudan’s Executive Office (as of September 2022)**



Source: Generated by USAID OIG based on USAID information.

At the time of the inspection, the EXO was the only USDH within the Executive Office. USAID officials and staff said that a strong Executive Office is needed to support USAID-run ICASS services. To provide the necessary support to the EXO and Executive Office, USAID relied on a combination of contractors<sup>32</sup> and FSNs to serve as the first line of management in all of the units in the Executive Office. For example, USAID provided information showing that post has not been able to fill a USDH Deputy EXO position. One USAID staff member said that the position has been vacant for almost 2 years. As a stopgap measure, USAID hired a U.S. personal service contractor<sup>33</sup> to serve as Deputy EXO.

The warehouse unit was also understaffed. Warehouse and Property Management Services include receiving and properly documenting all incoming official shipments, ensuring they are appropriately stored and/or delivered, and ensuring appropriate warehousing and storage of

<sup>32</sup> Contractors include third-country nationals and U.S. personal services contractors.

<sup>33</sup> ADS 309.6 defines a U.S. personal service contractor as a U.S. national hired under a contract for personal services in accordance with FAR, Part 37 and AIDAR, Appendix D.

property.<sup>34</sup> As of October 2022, post had multiple vacancies within the warehouse unit. At the time of the inspection, the warehouse unit had one supply clerk, one receiving clerk, and six custodians. Warehouse staff said that they often served in multiple roles and needed to serve as back up for positions that should be segregated. The Government Accountability Office's *Standards for Internal Control in the Federal Government* state under Principle 10.13 that management should consider "the need to separate control activities related to authority, custody, and accounting of operations to achieve adequate segregation of duties."<sup>35</sup>

OIG found that USAID had taken actions to correct the staffing deficiencies in the warehouse unit. Specifically, in March 2022, USAID/South Sudan requested additional staff in recognition of the need for a separation of duties. In April 2022, the ICASS Budget Committee approved new warehouse positions. However, at the time of the inspection, positions had not been filled.

One USAID staff member said that the warehouse unit faced challenges related to inventory management and storage because of the staffing shortages. For example, warehouse staff said that they needed to manually enter USAID procurements into post's inventory management system—the State Department's Integrated Logistics Management System (ILMS)—because USAID's procurement system was not fully compatible with post's inventory management system and could not be updated automatically. One USAID staff member said that not all warehouse staff knew how to enter USAID information into the inventory system because their responsibilities were only to deliver and receive goods. The staff member said that having one person perform both sets of responsibilities is a conflict of interest. In addition, the USAID staff member said that backlogs could occur because inventory could not be updated in the system when warehouse staff needed to cover for one another.

USAID/South Sudan officials acknowledged that the warehouse unit had limited resources to carry out its responsibilities related to inventory and recognized that there was not an adequate separation of duties. 14 FAM 41 I.2(c) states that when a separation of duties is not possible, the accountable property officer, property management officer, or authorized designee must conduct a management review at least twice a year.<sup>36</sup> Following our inspection, USAID/South Sudan said that management reviews had not been recorded or put on file. The last review was conducted in December 2022, but it was not recorded in accordance with 14 FAM 41 I.2(c), so OIG was unable to review any documentation. USAID expects to complete its next management review by March 31, 2023.

### **Recommendation**

**Recommendation 9:** We recommend USAID/South Sudan develop and implement a plan to fill approved warehouse positions and properly train staff to fulfill their roles.

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<sup>34</sup> Volume 6 of the Foreign Affairs Handbook, Section 5 H-341.7-7(A).

<sup>35</sup> GAO, *Standards for Internal Control in the Federal Government*, "Design Control Activities," Principle 10.13, "Segregation of Duties," September 2014.

<sup>36</sup> USAID/South Sudan provided a written response stating that the EXO served as the property management officer, and the supervisory general services specialist served as the accountable property manager.

## **USAID/South Sudan Lacked a Formal Orientation and Transition Process for U.S. Direct Hires and Contractors**

Based on multiple interviews with USAID staff at post, OIG found USAID/South Sudan did not have a formal orientation or onboarding process that enabled newly arrived USDHs and contractors to adjust to their roles. Federal internal control standards state the following:

“[m]anagement communicates quality information down and across reporting lines to enable personnel to perform key roles in achieving objectives, addressing risks, and supporting the internal control system. In these communications, management assigns the internal control responsibilities for key roles.”<sup>37</sup>

In general, USAID staff responses varied about whether they had been provided an appropriate amount of information to perform their job when they arrived. For example, a USAID official stated that all they received on arrival was a welcome packet with no handover notes for any office. One USDH said that they had received a lot of emails from post before their tour began, but once they arrived, they needed to learn a lot on their own. Another USDH said that they found job-related information in USAID’s ServiceNow platform, but the information was difficult to understand and not complete. One contractor said that they received a “3-day orientation” from their predecessor, but that they did not have time to fully understand how to operate the systems they would be using in their new role. Meanwhile, another USDH said that they had taken a TDY to post before their tour that allowed them to overlap with their predecessor and meet people they would be working with, which gave them a good idea of what was to be expected when they arrived.

USAID staff acknowledged that the continuity of ASP operations is impacted by staff turnover and the amount of time it takes for new staff to learn their roles. Juba is a 12-month tour with two rest and recuperation breaks for USDHs, which leaves limited time for staff to adjust to post, learn how to navigate post’s ASP operations, and perform their role. One USAID staff member said that it took 2-3 months for the USDHs to settle in, giving them only a couple months before they start preparing to leave post. Another contractor said it took them 3 months to understand their role, and that they would like to leave handover material for their replacement. Lack of clear orientation and handover material negatively impacts USDH’s and contractors’ ability to effectively transition into their roles during their limited time in Juba.

### **Recommendations**

Recommendation 10: We recommend USAID/South Sudan develop and implement procedures to formalize the orientation and transition process for USDHs and contractors.

## **USAID Should Ensure Full Access to Relevant Trainings for Foreign Service National Staff**

USAID FSN staff who work with State Department information systems are often waitlisted for trainings because they are not State Department employees. In interviews, multiple FSN staff

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<sup>37</sup> GAO, *Standards for Internal Control in the Federal Government*, Principle 14.03, “Communication throughout the Entity,” September 2014.

said they had encountered challenges accessing State Department trainings relevant to their positions. Federal internal control standards state the following:

“[m]anagement recruits, develops, and retains competent personnel to achieve the entity’s objectives. ... Train - Enable individuals to develop competencies appropriate for key roles, reinforce standards of conduct, and tailor training based on the needs of the role.”<sup>38</sup>

In some cases, USAID staff work on State Department systems. For example, multiple business units within the Executive Office use ILMS—a State Department system used for inventory management. Although USAID staff may work on State Department systems, Foreign Service Institute enrollment guidelines state that State Department employees with a job- or assignment-related need are prioritized for trainings. In interviews, FSN staff said that they had requested State Department trainings but had challenges enrolling in the training because they were USAID employees.

Without relevant training opportunities, one FSN staff member said that they felt underprepared to perform their job duties properly and effectively. Another FSN staff member said that they were sometimes asked to do things they did not know how to do because training was only available for certain positions and that more training opportunities would help to motivate and improve their morale. In interviews, multiple FSN staff expressed a desire for more job-specific training, including customer service training and technical on-the-job training related to maintenance. For example, FSN staff in the Executive Office often serve in customer-facing roles. One FSN staff member in the motor pool unit said that customer service-related training would help with customer relations challenges—for example, when motor pool staff handle complaints from customers. One USAID staff member stated that refresher courses for FSNs are important because ASP operations are always changing. The staff member also expressed the benefit of in-person trainings, particularly for FSNs.

### **Recommendation**

Recommendation 11: We recommend the Bureau for Management’s Overseas Management Division work directly with the State Department to identify which trainings would best serve Foreign Service National staff working with State Department systems and develop procedures to enroll Foreign Service National staff in those trainings on a regular basis.

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## **Conclusion**

Given USAID’s unique role as ASP in South Sudan, only one of six missions around the world where the Agency has this responsibility, it is important to identify and address the challenges the Agency faces in that role. In spite of the non-traditional ICASS management structure, the operating environment in Juba, and frequent staff turnover, USAID/South Sudan made efforts to improve transparency between ICASS service providers by fostering relationships and collaboration with State Department staff. USAID also made efforts to improve its internal ASP

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<sup>38</sup> GAO, *Standards for Internal Control in the Federal Government*, “Demonstrate Commitment to Competence,” Principle 4.05, “Recruitment, Development, and Retention of Individuals,” September 2014.

operations by engaging in a strategic planning exercise and drafting SOPs for a limited number of ASP operations at the working levels, including a process for TDY billing. However, institutionalization of these efforts would help to ensure these practices continue after current staff depart from post. In addition, USAID/South Sudan could improve the continuity of its ASP operations by documenting and updating SOPs, formalizing its orientation and transition processes for incoming staff, filling vacancies, and ensuring that staff receive appropriate training for their positions. As USAID/South Sudan will continue serving as the primary ICASS service provider for Embassy Juba until embassy functions transition to the NEC, the mission must ensure that its Executive Office receives sufficient support to provide these services for the foreseeable future.

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## **OIG Response to Agency Comments**

We provided our draft report to USAID on July 31, 2023. On September 12, 2023, we received the Agency's response, which is included as Appendix D of this report.

The report included 11 recommendations, and we acknowledge management decision on all 11. We consider 2 of them closed (Recommendations 1 and 8) and 9 resolved but open pending completion of planned activities (Recommendations 2, 3, 4, 5, 6, 7, 9, 10, and 11).



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## Appendix A. Scope and Methodology

We conducted our work from August 2022 through July 2023 in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. Our objective was to determine whether USAID/South Sudan has met the requirements of applicable laws and regulations for its role as an ASP. To answer the objective, we identified three issue areas that address:

1. The relationship and division of roles and responsibilities between USAID as ASP and the State Department at post;
2. Management challenges faced by USAID as ASP; and
3. Human resource challenges faced by USAID as ASP.

Although we gathered information related to the cost centers for which USAID provides ICASS services, the scope of our reporting prioritized areas that exhibited concrete challenges with immediate impacts on health, safety, and effective operations at USAID/South Sudan.

In coordination with State Department OIG, we conducted an on-site inspection from October 28 to November 11, 2022, to observe the daily operations of USAID/South Sudan in its role as ASP. As a part of our work, we reviewed relevant standards in the FAM, FAH, and chapters in USAID's ADS related to the provision of ICASS services and USAID's role as ASP. In addition, we reviewed documentation provided by the mission, including USAID's Motor Vehicle Policy, Master Plan Report, and TDY Policy. As a part of the inspection, we collected written responses from OMD and USAID/South Sudan about the ICASS services USAID provided as ASP. We also conducted interviews with the OMD, AFR/SSSP, agencies receiving ICASS services from USAID/South Sudan, and mission staff including USDHs, contractors, and FSNs.

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## Appendix B. Recommendations

We recommend that USAID/South Sudan, Bureau for Management's Overseas Management Division, and Bureau for Africa's Office of Sudan and South Sudan Programs take the following actions:

Recommendation 1: We recommend the Executive Office, in coordination with Embassy Juba, develop and implement a plan for the communication and coordination of responsibilities on International Cooperative Administrative Support Services provision.

Recommendation Status: Closed

Recommendation 2: We recommend USAID/South Sudan, in coordination with the Bureau for Africa's Office of Sudan and South Sudan Programs and the Bureau for Management's Overseas Management Division, develop and implement a plan to institutionalize activities to improve coordination and communication between USAID and the State Department at post.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 3: We recommend USAID/South Sudan institutionalize a plan for updating the Master Plan Report to ensure that planned activities are realized and that emergent needs are incorporated into the overall strategic plan.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 4: We recommend USAID/South Sudan identify gaps in standard operating procedures across functional areas and develop and implement standard operating procedures to fill identified gaps.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 5: We recommend USAID/South Sudan, in coordination with the Bureau for Management's Overseas Management Division and other relevant offices, as appropriate, issue clear guidance on procedures for storing documents.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 6: We recommend USAID/South Sudan develop a routine schedule for reviewing training records and ensure all chauffeurs and incidental drivers maintain valid certifications for State Department-certified safe-driver training and State Department-approved armored vehicle training.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 7: We recommend USAID/South Sudan update its motor vehicle policy with the 12-hour overnight shift in alignment with 14 FAM 433.8 requirements for shifts greater than 10 hours.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 8: We recommend USAID/South Sudan and the Bureau for Management's Overseas Management Division develop and implement invoicing procedures to ensure TDY personnel are invoiced consistent with the TDY policy.

Recommendation Status: Closed

Recommendation 9: We recommend USAID/South Sudan develop and implement a plan to fill approved warehouse positions and properly train staff to fulfill their roles.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 10: We recommend USAID/South Sudan develop and implement procedures to formalize the orientation and transition process for USDHs and contractors.

Recommendation Status: Resolved but open, pending completion of planned activities

Recommendation 11: We recommend the Bureau for Management's Overseas Management Division work directly with the State Department to identify which trainings would best serve Foreign Service National staff working with State Department systems and develop procedures to enroll Foreign Service National staff in those trainings on a regular basis.

Recommendation Status: Resolved but open, pending completion of planned activities

## Appendix C. ICASS Service Providers at Embassy Juba

ICASS Services	Service Provider(s)
<b>Mandatory<sup>a</sup></b>	
Basic Package	USAID and State
Community Liaison Office	State
Health Services	State
Security Services	State
<b>Building Operations</b>	
Non-Residential Operations/Maintenance	USAID
Residential Operations/Building Maintenance	USAID
<b>Financial Management</b>	
Accounts and Records <sup>b</sup>	State
Budgets and Financial Plans <sup>b</sup>	State
Cashiering	State
Non-Travel Vouchering Services <sup>b</sup>	State
Payroll <sup>b</sup>	State
Travel Vouchering <sup>b</sup>	State
<b>General Services</b>	
Administrative Supply	USAID
Customs and Shipping	USAID
Fuel	USAID
Household, Furniture and Furnishings	USAID
Housing	USAID
Leasing	USAID
Motor Pool	USAID
Non-Expendable Property Management – Non-IT Assets	USAID
Procurement Services <sup>b</sup>	USAID and State
Travel Services <sup>b</sup>	State
Vehicle Maintenance	USAID
<b>Human Resources</b>	
FSN Staff Human Resources Services <sup>b</sup>	USAID and State
FSN Staff Human Resources Services - Medical Benefits	State
U.S. Citizen Human Resources Services <sup>b</sup>	USAID and State
<b>Local Guard Programs</b>	
Non-Residential Local Guard Program	State
Residential Local Guard Program	State
<b>Information Management</b>	
IT Support – Land lines	USAID
IT Support – Open Net and Class Net	State
IT Support – USAID Net	USAID
Mail and Messaging	State
Non-Expendable Property Management – Classified Assets <sup>c</sup>	State
Non-Expendable Property Management – State IT Assets <sup>b, c</sup>	State
Non-Expendable Property Management – USAID IT Assets	USAID
Pouching	State
Telecommunications – Circuits <sup>b</sup>	USAID and State
Telecommunications – Mobile Devices <sup>b</sup>	USAID and State

<b>ICASS Services</b>	<b>Service Provider(s)</b>
Telecommunications – Radios <sup>c</sup>	State
Telecommunications – TDY Radios Programming <sup>c</sup>	State
Telecommunications – TDY Radio Issuance	USAID

<sup>a</sup> Four services (also referred to as cost centers) are mandatory for every agency at post with personnel under Chief of Mission authority. These four services include basic package services, community liaison office services, health services, and security services. See Volume 6 of the Foreign Affairs Handbook, Section 5 H-341b, “Cost Center Description—ICASS Standard.”

<sup>b</sup> USAID’s Executive Office and Office of Financial Management provide certain information technology (IT), human resources, and financial management services for USAID that are not consolidated under ICASS. For example, USAID ICASS service providers manage the USAID network, USAID IT assets, and radio issuance for USAID employees on TDY in country.

<sup>c</sup> Not applicable for USAID.

Source: State Department OIG, *Inspection of Embassy Juba, South Sudan (ISP-I-23-12)*, April 2023.

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## Appendix D. Agency Comments



### MEMORANDUM

**TO:** Amy Burns, Director, Inspections and Evaluations, USAID/OIG

**FROM:** Katherine Crawford, Mission Director, USAID/South Sudan /s/

**DATE:** August 31, 2023

**SUBJECT:** Management Comment(s) (Corrective Action Plan) to Respond to the Draft Report issued by the Office of Inspector General (OIG) titled, Inspection of USAID/South Sudan’s ICASS Service Provision in Juba. Draft Report No. E-668-23-002-M

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The U.S. Agency for International Development (USAID) would like to thank the Office of Inspector General (OIG) for the opportunity to provide comments on the subject draft report. The Agency agrees with the recommendations, herein provides plans for implementing them, and reports on significant progress already made.

As acknowledged in the draft report, USAID/South Sudan is providing well over half of the ICASS services in Juba. In 2021, both the Embassy and USAID/South Sudan raised concerns about the integration of management functions in the provision of ICASS services at post. In October 2022, both State Department OIG and USAID OIG deployed teams to observe and report on various aspects of ICASS management for their respective agencies.

Since the OIG’s October 28 – November 11, 2022, visit, substantial improvement has been made to improve communication and coordination between USAID and Department of State at post. While many of the inherent and significant challenges of operating in South Sudan will continue – such as insecurity and staffing gaps due to low capacity and space constraints -- USAID/South Sudan has made considerable progress in improving interagency coordination and collaboration, and in developing and implementing standard operating procedures, which clarify management and operational roles and responsibilities for the current team and future

teams. The one-team approach which stresses communication and dialogue has also improved overall staff morale.

Moreover, the Mission leadership's commitment to building transparency and trust among staff is reflected in the institutionalization of regular meetings; increased reporting on plans and execution; inclusion of team members in the decision-making; and instilling a sense of accountability and ownership to stakeholders for the multiple processes. USAID/Juba is confident that the recommendations herein are or will be fully addressed by the proposed completion dates.

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) ON THE DRAFT REPORT RELEASED BY THE USAID OFFICE OF THE INSPECTOR GENERAL (OIG) TITLED, INSPECTION OF USAID/SOUTH SUDAN'S ICASS SERVICE PROVISION IN JUBA (E-668-23-002-M)**

Please find below the management comments from the U.S. Agency for International Development (USAID) on the draft report produced by the Office of the USAID Inspector General (OIG), which contains 11 recommendations for USAID:

**Recommendation 1:** We recommend the Executive Office, in coordination with Embassy Juba develop and implement a plan for the communication and coordination of responsibilities on International Cooperative Administrative Support Services Provision.

- **Management Comments:** USAID/South Sudan agrees with Recommendation 1. To address this recommendation, the EXO and the Management Officer developed a plan to address issues and review current procedures through a weekly meeting with the participation of the ICASS/Alternative Service Provider (ASP), State, and Diplomatic Security leadership. These weekly meetings facilitate coordination and address Post management and ICASS/ASP concerns. At these meetings, issues are identified and, if needed, elevated to USAID and State Front Offices. These weekly meetings have been instituted to ensure that staff turnover will not affect continuity.

In addition, the Office of Financial Management developed step-by-step SOPs for ICASS/ASP coordination between stakeholders to ensure critical deadlines are met and responsibilities clarified (att. 1). These SOPs have been adopted and shared with the respective Budget Committee and ICASS Council members to improve coordination efforts and better inform decision-making for all involved.

- **Target Completion Date:** The Mission deems that the recommendation has been addressed and respectfully requests its closure upon issuance of the report.

**Recommendation 2:** We recommend USAID/South Sudan, in coordination with the Bureau for Africa's Office of Sudan and South Sudan Programs and the Bureau for Management's Overseas Management Division, develop and implement a plan to institutionalize activities to improve coordination and communication between USAID and the State Department at Post.

- **Management Comments:** USAID/South Sudan, along with the Bureau for Management's Overseas Management Division (OMD) and the Bureau for Africa's Office of Sudan and South Sudan Programs (SSSP), agree with Recommendation 2. As noted in the draft report, USAID/South Sudan has improved communication and advanced collaboration with all Embassy staff. USAID/South Sudan is committed to a collaborative one-team work environment, including instituting daily USAID/Embassy Front Office meetings and weekly management/operation meetings with the Embassy Front Office and representatives from agencies subscribed to the ICASS/ASP services. These regular meetings strengthen communication and serve as constant check-ins between USAID/South Sudan and Embassy leadership to ensure more effective ICASS/ASP operations at Post. Both State and USAID/ASP communicate with Post's ICASS Council and the ICASS Budget Committee members on a regular basis for their awareness and seek their feedback on services provided.

SSSP and OMD coordinate in-briefings for new State and USAID leadership and Management and Executive Officers to appraise them of lines of command, operations, issues, or challenges prior to their arrival at post. SSSP and OMD will continue joint in-briefs and take advantage of Ambassador, Mission Director, and State Management Officer trips to Washington to meet and update each other on the situation in South Sudan.

Lastly, to ensure that USAID/W is aware of situations in South Sudan, USAID/South Sudan, SSSP, and OMD will hold joint program and operations meetings on a quarterly basis. This will ensure everyone is aware of issues, plans, or problems. The next meeting will be scheduled for November 2023.

- **Target Completion Date:** USAID/South Sudan, OMD, and SSSP consider the recommendation is addressed and respectfully request closure upon issuance of the report.

**Recommendation 3:** We recommend USAID/South Sudan institutionalize a plan for updating the Master Plan Report to ensure that planned activities are realized and that emergent needs are incorporated into the overall strategic plan.

- **Management Comments:** USAID/South Sudan agrees with Recommendation 3 and has institutionalized quarterly Master Plan reviews. The third quarterly Master Plan Meeting was held on August 2, 2023 (att. 2). This meeting is regularly attended by the Ambassador and/or DCM, USAID's Mission Director, and Diplomatic Security leadership as well as the management team for State and USAID/ASP. During the meeting, a review of the progress made on ongoing projects, changes to the plan based on Post's needs, and proposals to approve additional projects take place.

Moreover, bi-weekly coordination meetings are held with participation of the DCM, State Management Officer, OBO, OMD, and USAID/ASP. The bi-weekly meeting provides an



opportunity for OBO to raise New Embassy Compound construction issues that may impact the Master Plan.

- **Target Completion Date:** USAID/South Sudan deems that the recommendation has been fully addressed and respectfully requests its closure upon issuance of the report.

**Recommendation 4:** We recommend USAID/South Sudan identify gaps in standard operating procedures across functional areas and develop and implement standard operating procedures to fill identified gaps.

- **Management Comments:** USAID/South Sudan agrees with recommendation 4. A Mission-wide exercise revealed that there are various functional areas that will benefit from the development and implementation of SOPs. ICASS/ASP functional areas identified requiring SOPs include staff transition for CCNs, USDHs and TDYs; records management; and the ASP management and budgetary approval process.
- **Target Completion Date:** USAID/South Sudan is currently in the process of developing and implementing the SOPs and expect to have fully addressed and seek closure of the recommendation by January 31, 2024.

**Recommendation 5:** We recommend USAID/South Sudan, in coordination with the Bureau for Management's Overseas Management Division and other relevant offices, as appropriate, issue clear guidance on procedures for storing documents.

- **Management Comments:** USAID/South Sudan and OMD agree with Recommendation 5. As noted in the draft report, USAID/South Sudan has improved document management, including developing checklists to clarify what information should be maintained as official Agency records. As records storage and document management is a post function, USAID/South Sudan will update and continue to adhere to Post SOPs on record management. OMD and the Bureau of Management's Information Records Division (IRD) will collaborate with USAID/South Sudan in developing and/or refining processes and procedures.

USAID/South Sudan has identified a Subject Matter Expert (SME) on filing structures and procedures who will liaise with IRD to develop a separate and distinct operational unit file structure for ASP management employees. The structure is envisioned to include appropriate subject areas, destruction schedules, access permissions, and files custodian assignments designated to local staff to promote continuity.

- **Target Completion Date:** USAID/South Sudan and OMD expect to implement the recommendation and request closure by January 31, 2024.

**Recommendation 6:** We recommend USAID/South Sudan develop a routine schedule for reviewing training records and ensure all chauffeurs and incidental drivers maintain valid

certifications for State Department-certified safe-driver training and State Department-approved armored vehicle training.

- **Management Comments:** USAID/South Sudan concurs with Recommendation 6. Currently, the Mission conducts ongoing reviews of chauffeurs and incidental drivers training certifications. These reviews are done by the Motor Pool Office Fleet Manager for AV training prior to the advertisement of the Agency's AV Training schedule and regularly for incidental drivers. By the end of this calendar year, 8 out of 30 chauffeurs are scheduled to attend the AV training, two for the first time and six renewals. In addition, incidental drivers are provided Smith System Drivers Training by Motor Pool staff at post on a regular basis. At this point, the Mission has put in place a routine schedule for Smith System Driver Training and is actively reviewing all training requirements. As a result, training has been scheduled for both groups and the ICASS/ASP motor pool expects to be in compliance with the training requirements by the end of the calendar year.
- **Target Completion Date:** USAID/South Sudan to comply with the recommendation by the end of the calendar year and seek closure by January 31, 2024.

**Recommendation 7:** We recommend USAID/South Sudan update its motor vehicle policy with the 12-hour overnight shift in alignment with 14 FAM 433.8 requirements for shifts greater than 10 hours.

- **Management Comments:** USAID/South Sudan concurs with Recommendation 7. In compliance with 14 FAM 433.8, all drivers, except for the designated overnight duty driver, are scheduled for 8-hour daily shifts. Due to security concerns for drivers moving throughout the city at night, official movements are limited and only one rotating driver is designated as duty driver during the overnight hours. In line with security directives, the duty driver night shift is scheduled for 12 hours. Accordingly, the updated Mission Motor Pool Policy reflecting the changes in drivers schedules due to security guidance is in circulation for clearance within the interagency.
- **Target Completion Date:** USAID/South Sudan expects to have the recommendation addressed and request closure by December 31, 2023.

**Recommendation 8:** We recommend USAID/South Sudan and the Bureau for Management's Overseas Management Division develop and implement invoicing procedures to ensure TDY personnel are invoiced consistent with the TDY policy.

- **Management Comments:** USAID/South Sudan agrees with Recommendation 8. Since the inspection took place, the Mission in collaboration with OMD developed and implemented ICASS/ASP invoicing procedures for TDY personnel. A Management TDY Policy issued on January 20, 2023, reflected this change. Moreover, based on multiple requests by subscribers, on August 3, 2023, an addendum to the Policy was issued to

further clarify the billing process and pricing (att. 3).

- **Target Completion Date:** USAID/South Sudan and OMD deems the recommendation is fully addressed and respectfully requests its closure upon issuance of the report.

**Recommendation 9:** We recommend USAID/South Sudan develop and implement a plan to fill approved warehouse positions and properly train staff to fulfill their roles.

- **Management Comments:** USAID/South Sudan agrees with Recommendation 9. At present, the Mission's Executive Office is actively recruiting for the 10 vacant warehouse positions. These actions are at different stages of the recruitment process and include revising position descriptions, advertising vacancies, and onboarding process. As these positions are filled, on the job and formal training will be provided.
- **Target Completion Date:** USAID/South Sudan expects to have addressed and seek closure for this recommendation by June 30, 2024.

**Recommendation 10:** We recommend USAID/South Sudan develop and implement procedures to formalize the orientation and transition process for USDHs and contractors.

- **Management Comments:** USAID/South Sudan agrees with Recommendation 10. The Mission recently held an orientation for incoming expat personnel and is in the process of formalizing the orientation for incoming CCN staff. Furthermore, a Mission-wide Knowledge Management and Organizational Learning exercise has been initiated which focuses on formalizing the transition process for incoming and outgoing staff to include ICASS/ASP personnel based on the Knowledge Retention and Transfer Model.
- **Target Completion Date:** USAID/South Sudan expects to formalize orientation and transition processes for USDHs and contractors and seek closure for this recommendation by January 31, 2024.

**Recommendation 11:** We recommend the Bureau for Management's Overseas Management Division work directly with the State Department to identify which trainings would best serve Foreign Service National staff working with State Department systems and develop procedures to enroll Foreign Service National staff in those trainings on a regular basis.

- **Management Comments:** OMD agrees with Recommendation 11. USAID/South Sudan and OMD recognize proper training is critical for our FSN staff to carry out their responsibilities. OMD will work with USAID/South Sudan to identify staff training needs and with the State Department's Foreign Service Institute (FSI) to ensure enrollment parity between USAID and State staff. OMD has raised this concern with contacts at the ICASS Service Center as well as the FSI. OMD informed FSI that, as USAID is the ICASS service provider for certain services, in several key posts there should be training enrollment equality with State counterparts. Once the training needs are identified for

each type of FSN position and training courses identified and approved, USAID/South Sudan will share these training requirements with OMD so that OMD and FSI can have discussions on the best approach to ensure equality in training needs.

- **Target Completion Date:** OMD and USAID/South Sudan propose to create the training criteria for Foreign Service National staff and hold discussions with FSI by January 31, 2024.

In view of the above, we request that the OIG inform USAID when it agrees or disagrees with a recommendation's management comments.

**Attachments:**

- 1- ICASS/ASP SOPs
- 2- Master Plan Presentation – August 2, 2023
- 3- TDY Management Policy and Addendum

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## Appendix E. Major Contributors

Members of the inspection team include:

- Amy Burns, Inspections and Evaluations Director
- Jessica Ernst, Acting Assistant Director
- Emily Laur, Lead Analyst
- Paul Donnelly, Program Analyst

The team would also like to acknowledge contributions from Alexandra Miller, Jennifer Herrmann, and Olalekan (Lincoln) Dada.



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