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

# Report of Audit

## **Review of Procurement and Property Operations at Embassy Bamako**

**Report Number AUD/PPA-05-03, November 2004**

**~~IMPORTANT NOTICE~~**

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## **SUMMARY**

At the request of post management, the Office of Inspector General (OIG) reviewed the integrity of the management of procurement and property activities at Embassy Bamako. OIG determined that inadequate oversight of procurement and property processes contributed to management control weaknesses.

OIG found that about one-third of the post's procurement files lacked required documentation, which raised questions about compliance with applicable procurement regulations. The post used a blanket purchase agreement (BPA) to inappropriately obtain casual labor. The local guard contractor worked without authorized modifications, which increased the potential for contract ceiling overruns and unauthorized commitments. In addition, recordkeeping was inadequate for monitoring the local guard contractor, and contractor services were inappropriately obtained with petty cash payments. The post did not cancel its purchase card account after the cardholder relinquished card duties, leaving the account vulnerable to misuse. Fuel discounts of about \$1,000 were lost because the post did not comply with contract provisions. Lease agreement duties relevant to negotiation, translation, and monthly payment lacked adequate segregation, subjecting the post to potential malfeasance. Personal property irregularities included inventory shortages, a recent theft, and questionable annual reconciliation practices.

These weaknesses were indicative of a control environment vulnerable to waste, fraud, abuse, and mismanagement. The post had identified prior control weaknesses, but they were not corrected. In one instance, weak controls contributed to a \$140,000 theft of property in FY 2003. Post officials agreed with our findings and, in most cases, proposed corrective actions.

OIG recommended that the post comply with federal and Department procurement and property regulations and contract provisions. OIG also recommended that the Department update its property management regulations relevant to conducting inventory to strengthen management controls Department-wide.

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## **OBJECTIVES, SCOPE, AND METHODOLOGY**

The primary objective of this review, as requested by a senior post official in April 2004, was to determine if the post's procurement and property management processes followed applicable federal and Department regulations. OIG also evaluated procurement and property operations for potential fraud or illegal acts.

OIG examined a total of 633 post procurement actions between October 2002 and March 2004, valued at \$4.6 million. These procurement actions included 211 purchase card transactions totaling \$126,000; 393 small purchases totaling \$1.7 million; and contracts, including those for local guard services and fuel because they were the post's largest annual procurement expenditures at more than \$900,000 and \$300,000, respectively. In addition, OIG assessed the post's 18 residential and two nonresidential FY 2004 lease agreements with an estimated annual cost of \$410,000.

OIG reviewed the post's personal property system, including FYs 2002 and 2003 annual certifications of inventory reconciliation and expendable inventory of more than \$511,000 and nonexpendable inventory of about \$7.6 million and judgmentally selected a sample of 9 expendable and 16 nonexpendable property items that were at risk for pilferage to test the accuracy of the post's property records. OIG also reviewed the post's FYs 2002 and 2003 annual management control certifications, which reported an FY 2003 property shortage caused by theft, and evaluated corrective actions proposed by the post based on the FY 2003 certification.

To accomplish the objectives, OIG obtained and reviewed criteria related to procurement actions and property inventory. OIG discussed management controls over these functions with post officials. The relevant criteria for OIG's work are found in the Federal Acquisition Regulation (FAR); Department guidelines and regulations, such as Department of State Acquisition Regulations (DOSAR); Foreign Affairs Manual (FAM); Foreign Affairs Handbook (FAH); and *The Overseas Contracting and Simplified Acquisition Guidebook*. The control weaknesses identified are discussed in the Results of Review section of this report.

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The Office of Audits, Procurement, Property and Administrative Support Division conducted this review in accordance with government auditing standards. Accordingly, the review included such tests of records and other auditing procedures as were considered necessary under the circumstances. OIG performed its work between May and July 2004 and included discussions with current and prior officials from Embassy Bamako and the Bureaus of African Affairs, Human Resources, and Administration.

In late May 2004, OIG briefed the Deputy Chief of Mission and other senior Foreign Service officers at post on the preliminary results of the review. They agreed with OIG's findings and, in most cases, proposed corrective actions. In addition, OIG contacted the Bureau of Administration, Office of Logistics Management's Property Management Branch concerning property accountability issues and its worldwide purchase card operations management office concerning purchase card issues. These offices agreed with the report findings and recommendations. OIG received written comments on the draft version of this report from the post and the Bureau of Administration and incorporated the comments as Appendices A and B, respectively.

## RESULTS OF REVIEW

Responsible post personnel did not exercise adequate oversight of procurement and property operations, contributing to management control weaknesses. OIG found incomplete procurement files, BPAs not in compliance with federal and Department procurement regulations, inadequate administration of the local guard contract, lack of purchase card documentation, nonuse of fuel discounts, inadequate leasing practices, and control weaknesses relating to expendable and nonexpendable personal property.

### **Incomplete Procurement Files**

OIG's review of the post's procurement files for the period October 2002 through March 2004 found that about one-third of the DS-1920s, *Blanket Purchase Agreement*; DS-1919s, *Delivery Order*; and DS-1918s, *Purchase Order*, did not contain complete information because post management officials were not monitoring the files. For example, the files lacked such required documentation as purchase requests and receiving reports. These files contain checklists to help ensure adherence to procedures and regulations. During this review, post management officials agreed to comply with DOSAR 613.307-70, requiring that these files be used to record relevant data and document acquisitions.

**Recommendation 1:** OIG recommends that Embassy Bamako comply with procurement regulations by completing checklists contained in the Department's files for blanket purchase agreements, delivery orders, and purchase orders in accordance with Department of State Acquisition Regulation 613.307-70.

### **Inadequate Blanket Purchase Agreements**

OIG's review of October 2002 through March 2004 procurement records indicated that the post did not use BPAs in accordance with federal and Department regulations and guidelines. The contracting officer (CO) did not conduct annual reviews, agreements were incomplete, logs were not used for tracking purchases, purchase requests were missing, and casual labor was inappropriately

acquired. Post management acknowledged that a lack of oversight contributed to these conditions.

Although the post's CO established all BPAs annually, there was no indication that the CO, or a designated representative of the CO, complied with FAR 13.303-6, which requires the review of a random sample of BPA files annually to ensure adherence to authorized procedures. The BPAs often did not include the FAR and Department regulation clauses required by DOSAR 613.302, so that in the event of an inconsistency between the provisions of the BPA and an invoice, the provisions of the BPA would take precedence. Contrary to *The Overseas Contracting and Simplified Acquisition Guidebook*, vendors often did not sign and date BPAs to confirm that there was an agreement between post and vendor, and the post did not use Department form DS-1920, *Blanket Purchase Agreement*, as a log for tracking purchases. In addition, purchase requests to validate the requirement for goods and services were missing.

**Recommendation 2:** OIG recommends that Embassy Bamako's contracting officer review the post's blanket purchase agreement files and ensure compliance with Federal Acquisition Regulation 13.303-6, Department of State Acquisition Regulation 613.302, and *The Overseas Contracting and Simplified Acquisition Guidebook*.

The post did not comply with Department policy by directly hiring casual laborers and placing them under an existing BPA. The post's FY 2003 records indicated that one BPA was "a bit artificial." OIG found that post hired individuals as necessary and then had the BPA vendor complete paperwork to indicate that the vendor had provided the labor. The post's management officials were aware of this, but did not take corrective action. The Department's August 2001 cable 140917, *Obtaining Personal Services Versus Nonpersonal Services - A Review*, states:

Casual labor may not, repeat may not, be obtained through a procurement mechanism [such as a BPA]. Aside from violating the FAR and host government law, it is patently unfair to obtain services using a mechanism that will provide no benefits to the individual or his/her survivors if injured or killed in the performance of assigned work.

The cable also offers guidance on the use of personal versus nonpersonal service hiring instruments, which are discussed in FAR 37.101 and 37.104.

**Recommendation 3:** OIG recommends that Embassy Bamako refrain from hiring casual laborers under blanket purchase agreements as stated in the Department's August 2001 cable 140917.

## **Inadequate Administration of Local Guard Contract**

OIG's examination of the post's local guard contract<sup>1</sup> identified shortcomings attributable to inadequate contract administration practices. OIG found that the contractor worked at risk, the post inappropriately used petty cash to obtain services, the CO had not officially appointed the contracting officer's representative (COR), and the COR's records were incomplete.

OIG's examination of the local guard contract indicated that the post had accepted guard services before executing contract modifications. In one instance, during January through June 2003, the post allowed the contractor to work at its own risk, which made the post vulnerable to contract ceiling overruns and unauthorized commitments. The contractor provided approximately \$1,300 in services without a contract modification. In another instance, the post inappropriately used petty cash to pay for contractor transportation costs pending issuance of a modification. FAR 43.201 states,

Generally, Government contracts contain a changes clause that permits the CO to make unilateral changes, in designated areas, within the general scope of the contract. These are accomplished by issuing written change orders.

Contrary to DOSAR 642.270(f)(2), the CO did not give the COR a memorandum of appointment stating the COR's authority, limitations, duties, and responsibilities. The COR is not authorized to direct the contractor to undertake any activity that will change the total price and deliverables. The COR did not maintain a complete working file, containing all modifications, invoices, and correspondence to and from the contractor as required by 6 FAH-2 H-517 and 12 FAH-7 H-438. Also, OIG did not find performance documentation in the local guard contract files. Maintaining contractor performance information is important because the contract allows for monetary deductions when performance is inadequate.

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<sup>1</sup>SOML200-02-C-0001.



**Recommendation 4:** OIG recommends that Embassy Bamako's contracting officer ensure that the local guard contract is modified on a timely basis in accordance with Federal Acquisition Regulation 43.201.

**Recommendation 5:** OIG recommends that Embassy Bamako's contracting officer issue a memorandum of delegation to the contracting officer's representative in accordance with Department of State Acquisition Regulation 642.270(f)(2).

### **Lack of Purchase Card Documentation**

OIG's review of October 2002 through March 2004 procurement records indicated that the post did not use the purchase card in accordance with the Department's *Worldwide Purchase Card Program Manual*. Purchase requests were typically missing, making it difficult to identify the requesting offices. The cardholder's FY 2004 files did not contain adequate documentation. For example, there was no indication that a purchase card approving official-post's general services officer (GSO)-approved the majority of FY 2004 orders or that a financial management officer certified that the funds were available. Further, the post failed to use Optional Form 127, *Receiving and Inspection Report*, to confirm order receipt and inspection. OIG could not determine whether the cardholder or approving official conducted monthly reconciliations because buying logs and bank statements were generally missing.

Post officials acknowledged there had been a lack of oversight and replaced the cardholder in March 2004. However, during this review, OIG determined that the post had not submitted the maintenance forms required to cancel the cardholder's account, which continued to be billed for a recurring newspaper subscription. A Department purchase card operations management official confirmed that the card was still active.

**Recommendation 6:** OIG recommends that Embassy Bamako's purchase card program coordinator establish proper purchase card controls and cancel the cardholder's account and the recurring newspaper subscription that continues to be billed to the account.

Finally, although the current GSO said an FY 2003 purchase card annual review was conducted, the GSO could not provide a copy of the review, and the post's procurement records did not include documentation indicating that annual reviews had been conducted in either FY 2002 or 2003. The purpose of these reviews is to continually improve program operations while ensuring that cardholders and approving officials comply with established procurement management practices, operating procedures, and purchase card controls. The purchase card program coordinator-post's management officer-is responsible for ensuring that annual reviews are conducted.

**Recommendation 7:** OIG recommends that Embassy Bamako's purchase card program coordinator conduct an annual review for FY 2004 in accordance with the Department's *Worldwide Purchase Card Program Manual*.

## **Nonuse of Fuel Discounts**

OIG found that the post did not obtain discounts allowed under its fuel contract.<sup>2</sup> The GSO had recently arrived at post and was not aware of the discounts. The contract provisions indicated that the price charged for gasoline, diesel fuel, and bottled gas was based on the official prices mandated by the government of Mali, minus an applicable discount. The post lost the discounts, totaling about \$1,000, on 20 out of 32 delivery orders that OIG examined for February 2003 to April 2004. OIG estimated that the post could potentially save at least \$4,170 over the life of the contract if all option years are renewed.

**Recommendation 8:** OIG recommends that Embassy Bamako use the discounts allowed under its fuel contract.

## **Inadequate Leasing Practices**

OIG identified management control weaknesses covering the post's real property inventory of 18 residential and two nonresidential FY 2004 lease agreements with an estimated annual cost of approximately \$410,000. OIG found that,

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<sup>2</sup>SOML200-03-C-0005.

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contrary to 6 FAM 737 Exhibit 737.1A, language was not generally standardized among the lease agreements, and 4 of the 39 agreements did not state the address of the leased premise. There were no English translations for some French documents as mandated by 6 FAM 738(b). One agreement did not state payment frequency (i.e., monthly, quarterly, semiannually, or annually) as required by 6 FAM 737 Exhibit 737.1B. Also, OIG learned that a Foreign Service national (FSN) procurement supervisor, with responsibilities for negotiating, translating, and managing leases for approximately 10 years, also issued the post's lease payments to the landlords during that period. In the latter instance, OIG found that the financial management officer resolved this matter by coordinating with the GSO to implement other payment procedures in April 2004.

**Recommendation 9:** OIG recommends that Embassy Bamako officials ensure that lease agreements are documented in accordance with Department policy found in 6 FAM 737 and 738.

### **Personal Property Control Weaknesses**

OIG's examination of the post's personal property system identified property shortages of about \$3,000. OIG questioned the veracity of the post's FY 2003 nonexpendable inventory as it was identical to that reported for FY 2002 in total costs and overage costs. Inventory shortages, a lack of accurate property records, and a \$140,000 theft in FY 2003 were indicators of a control weakness that warrants a complete accounting for all expendable and nonexpendable property.

To test the accuracy of the post's May 2004 records, OIG judgmentally selected a sample of nine expendable and 16 nonexpendable property categories at risk to pilferage. OIG found shortages valued at about \$2,200 in six of the nine expendable categories. The property records indicated that the on-hand quantity for the nine expendable categories was 76. However, OIG found only 27 of the 76 items (35 percent). Missing, for example, were all of the tires, ready-to-eat meals, and spark plugs sampled, 40 percent of the motorcycle batteries, and 17 percent of the Freon canisters used for air conditioning. Moreover, in December 2003, the post found shortages totaling \$2,915 in its comprehensive annual inventory of expendable items.

OIG was unable to locate 3 of the 16 nonexpendable items. In addition, of the items sampled, one had been sold more than 1-year earlier (a two-wheel vehicle), and another was in disrepair (a freezer). Yet the post's inventory system had not been updated accordingly. OIG found questionable results in the post's FYs 2002 and 2003 certifications of inventory reconciliation in that the post had reported identical values for both its nonexpendable property total costs and overage costs in each year.

The post's FY 2003 annual management control certification identified property shortages caused by theft as a management control weakness. The certification further indicated that the post had taken corrective actions, including "renewed emphasis on frequent spot checks." However, OIG's examination of property records indicated that the accountable property officer (APO) had delegated the duty of periodically spot-checking expendable and nonexpendable property to the supply supervisor, an FSN who had daily oversight of the post's property operations. Although both 6 FAM 221.2-2(b)(9) and 6 FAH-1 H-221.6-2(d)(8) permit delegation of this required task, OIG's findings on property management weaknesses warrant more direct APO involvement and a complete accounting for all expendable and nonexpendable property.

**Recommendation 10:** OIG recommends that Embassy Bamako's accountable property officer conduct a physical inventory of expendable and nonexpendable property and reconcile the results with the inventory balance in its property systems.

## **Other Matters**

During this review, OIG discussed the delegation of property accountability with the Department's Property Management Branch officials. OIG expressed its concern that under current policy, an APO may delegate the duty of periodically spot-checking personal property. Requiring APOs to conduct spot checks would reduce the risk of property mismanagement and help strengthen management controls Department-wide. Property Management Branch officials agreed.

**Recommendation 11:** OIG recommends that the Bureau of Administration revise both the Foreign Affairs Manual and Foreign Affairs Handbook to require the accountable property officer to personally conduct periodic personal property spot checks.

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## APPENDIX A

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Cameron R. Hume  
Deputy Inspector General  
U.S. Department of State  
Washington, DC

Dear Mr. Hume:

The American Embassy in Mali was pleased to receive your draft report on the *Review of Procurement and Property Operations at Embassy Bamako*. We were sufficiently concerned about the conditions we found at the Embassy that we were glad you could accept our invitation for an inspection of these operations. We would like to thank all of the inspectors and those who participated from Washington for their efforts on our behalf.

This report has already proved useful in addressing and beginning the process correcting the deficiencies we have observed, and that you have confirmed in our GSO operations. It gives a relatively new team an excellent opportunity to start afresh and proceed from this point in a more effective manner consistent with all US government policies and procedures.

Overall, the Mission agrees with the OIG recommendations. In a few places, steps had already been taken to manage some of the needed corrections. These are noted, together with our initial comments on the draft report, on the attachment keyed to the list of ten recommendations. A full compliance response with supporting documentation will be submitted in accordance with OIG requirements upon receipt of the final report.

Bamako is anxious to be in compliance with all aspects of a properly functioning administrative section. I have made this a top priority and have asked my staff to provide their full cooperation in this endeavor.

Thank you again for your work, and I would be willing to discuss this report and our continuing efforts with you at any time.

Sincerely,

Vicki Huddleston  
American Ambassador  
Bamako, Mali

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## ***Review of Procurement and Property Operations at Embassy Bamako*** **Comments on Draft Report from American Embassy, Bamako Mali**

### **POST COMMENTS KEYED TO RECOMMENDATIONS**

#### **Recommendation 1: Incomplete Procurement Files**

Post is in the process of reviewing all Blanket Purchase Agreements (BPAs) and completing required checklists. BPAs incomplete or not in compliance with Department of State Acquisition Regulations shall be brought up to standard.

#### **Recommendation 2: Inadequate Blanket Purchase Agreements**

As above.

#### **Recommendation 3: Causal Labor**

Post will place a contract with a local firm to provide necessary services.

#### **Recommendation 4: Inadequate Administration of Local Guard Contract**

There has been a change of staff since the finding that services were provided prior to contract modifications or that petty cash was used to pay for contractor transportation costs pending issuance of a modification. The Regional Security Officer or contracting officer's representative (COR) does not authorize work to be performed until the contract has been modified and the GSO/CO has received approval from Washington. The timely submittal of contract modifications has improved significantly during the last several months and all those involved understand and recommendation and are abiding by it.

#### **Recommendation 5: Administration of Local Guard Contract**

The A/RSO will be formally designated to be the COR through a memo of delegation in accordance with the DOSAR.

#### **Recommendation 6: Lack of Purchase Card Documentation**

The account and subscription referred to have been cancelled.

#### **Recommendation 7: Purchase Card Documentation**

Post will conduct the review in accordance with the Worldwide Purchase Card Program Manual.

#### **Recommendation 8: Nonuse of Fuel Discounts**

Post will tighten controls and ensure that it takes full advantage of all discount savings available to the USG under this contract.

#### **Recommendation 9: Inadequate Leasing Practices**

GSO and Management Officer have reviewed all lease agreements and identified those that lacked proper documentation or were not in compliance with Department of State leasing standards found in 6 FAM.

**Recommendation 10: Personal Property Control Weaknesses**

Post is presently in the process of conducting inventories of expendable and nonexpendable property, and will reconcile those results with the inventory balance.

Before the inspection, post had already terminated two employees identified as derelict in their duties. The resulting vacancies in GSO are now in the process of being filled through recruitment of outside staff. When they are on board, post will bring in formal trainers to ensure the new employees are fully and properly trained.



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**APPENDIX B**



United States Department of State

Washington, D.C. 20520

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TO:           OIG - Mr. Cameron R. Hume, Deputy Inspector  
                  General

FROM:         A/LM - Frank Coulter *FC*

SUBJECT:     Draft Audit Report on the Review of Procurement  
                  and Property Operations at Embassy Bamako

RE:           Your Memorandum, dated August 24, 2004

Thank you for the opportunity to review and comment on Recommendation 11 from the OIG draft audit report (copy attached) titled *Review of Procurement and Property Operations at Embassy Bamako*.

**Recommendation 11:** The Office of the Inspector General recommends that the Bureau of Administration's Office of Logistics Management, Office of Program Management and Policy, Business Analysis Division, Property Management Branch revise both the Foreign Affairs Manual and Foreign Affairs Handbook to require the accountable property officer to personally conduct periodic personal property spot checks.

**A/LM/PMP's Response:** The A/LM/PMP/BA Property Management Branch in conjunction with the A/LM/PMP/P Logistics Policy Branch agree with OIG Recommendation 11 that the accountable property officer at post should personally conduct periodic, unannounced spot checks of expendable and nonexpendable property in warehouses to verify the accuracy of the property records. Therefore, the Policy Branch will update both the Foreign Affairs Manual (6 FAM 220) and Foreign Affairs Handbook (14 FAH-1) to reflect this requirement in the next FAM and FAH revision, and will notify your office when this action has been completed.

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If you have any questions, or would like some additional information, please contact Lisa Million, the Chief of the Logistics Policy Branch on (703) 875-6287.

Attachments:  
As stated

## **LIST OF RECOMMENDATIONS**

**Recommendation 1:** OIG recommends that Embassy Bamako comply with procurement regulations by completing checklists contained in the Department's files for blanket purchase agreements, delivery orders, and purchase orders in accordance with Department of State Acquisition Regulation 613.307-70.

**Recommendation 2:** OIG recommends that Embassy Bamako's contracting officer review the post's blanket purchase agreement files and ensure compliance with Federal Acquisition Regulation 13.303-6, Department of State Acquisition Regulation 613.302, and *The Overseas Contracting and Simplified Acquisition Guidebook*.

**Recommendation 3:** OIG recommends that Embassy Bamako refrain from hiring casual laborers under blanket purchase agreements as stated in the Department's August 2001 cable 140917.

**Recommendation 4:** OIG recommends that Embassy Bamako's contracting officer ensure that the local guard contract is modified on a timely basis in accordance with Federal Acquisition Regulation 43.201.

**Recommendation 5:** OIG recommends that Embassy Bamako's contracting officer issue a memorandum of delegation to the contracting officer's representative in accordance with Department of State Acquisition Regulation 642.270(f)(2).

**Recommendation 6:** OIG recommends that Embassy Bamako's purchase card program coordinator establish proper purchase card controls and cancel the cardholder's account and the recurring newspaper subscription that continues to be billed to the account.

**Recommendation 7:** OIG recommends that Embassy Bamako's purchase card program coordinator conduct an annual review for FY 2004 in accordance with the Department's *Worldwide Purchase Card Program Manual*.

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**Recommendation 8:** OIG recommends that Embassy Bamako use the discounts allowed under its fuel contract.

**Recommendation 9:** OIG recommends that Embassy Bamako officials ensure that lease agreements are documented in accordance with Department policy found in 6 FAM 737 and 738.

**Recommendation 10:** OIG recommends that Embassy Bamako's accountable property officer conduct a physical inventory of expendable and nonexpendable property and reconcile the results with the inventory balance in its property systems.

**Recommendation 11:** OIG recommends that the Bureau of Administration revise both the Foreign Affairs Manual and Foreign Affairs Handbook to require the accountable property officer to personally conduct periodic personal property spot checks.

## **ABBREVIATIONS**

APO	Accountable property officer
BPA	Blanket purchase agreement
CO	Contracting officer
COR	Contracting officer's representative
DOSAR	Department of State Acquisition Regulation
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
FAR	Federal Acquisition Regulation
FSN	Foreign Service National
GSO	General services officer
OIG	Office of Inspector General

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