

April 2009

IRAQI REFUGEE ASSISTANCE

Improvements Needed
in Measuring Progress,
Assessing Needs,
Tracking Funds, and
Developing an
International Strategic
Plan



GAO

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Highlights of [GAO-09-120](#), a report to congressional committees.

Why GAO Did This Study

Iraqi refugees are one of the largest urban populations the UN has been called on to assist. The UN reports government estimates of up to 4.8 million Iraqis displaced within the last 5 years, with 2 million fleeing, primarily to Syria and Jordan.

GAO examined challenges in (1) measuring and monitoring progress in achieving U.S. goals for assisting Iraqi refugees, (2) providing humanitarian assistance to Iraqi refugees, (3) offering solutions for Iraqi refugees, and (4) developing an international strategic plan to address the Iraqi refugee situation.

GAO analyzed reports and data; met with officials from the U.S. government, the UN High Commissioner for Refugees (UNHCR), international organizations, and NGOs; and did fieldwork in Jordan and Syria.

What GAO Recommends

GAO recommends that the Secretary of State, with relevant others, (1) develop performance measures to assess and report progress in achieving overall U.S. goals and objectives for Iraqi refugees; (2) track and report funding apportioned, obligated, and expended for Iraqi refugee programs in each host country; (3) assess the number and needs of Iraqi refugees and the related needs of countries hosting them; and (4) develop a comprehensive international strategy for assistance and solutions for Iraqi refugees. The Department of State generally concurred with our recommendations.

To view the full product, including the scope and methodology, click on [GAO-09-120](#). For more information, contact Joseph A. Christoff at (202) 512-8979 or christoffj@gao.gov.

IRAQI REFUGEE ASSISTANCE

Improvements Needed in Measuring Progress, Assessing Needs, Tracking Funds, and Developing an International Strategic Plan

What GAO Found

To implement its 2008 goal and objectives for Iraqi refugees, State primarily funded and monitored the efforts of its implementing partners, which include international organizations and nongovernmental organizations (NGO). These activities provided Iraqi refugees and host country populations with education, vocational training, health care, food, and financial support. However, State did not clearly link program achievements to its stated goal and objectives for Iraqi refugees. As a result, State has limited information to assess and report its progress in reaching its goal and objectives and improve program effectiveness. Insufficient numbers of staff to monitor projects, difficulties gaining access to projects and refugees, and the lack of reliable data have challenged State's efforts to ensure that projects help the intended beneficiaries.

U.S. and international efforts to provide humanitarian assistance to Iraqi refugees in neighboring countries are impeded by the lack of reliable estimates on the needs of Iraqi refugees and data on the funding targeted at Iraqi refugee programs. Iraqi refugees live interspersed among the local urban populations and are not easily identified. Official government estimates on the number of Iraqi refugees in each country may be overstated. It is also difficult to determine the amount of funding provided for Iraqi refugee programs because the U.S. government and UNHCR, the largest bilateral and multilateral funding sources, do not report funding for Iraqi refugee programs separately from that provided for all Iraq-related humanitarian assistance.

The U.S. government and UNHCR face challenges in offering solutions for Iraqi refugees. According to UNHCR, voluntary repatriation is the preferred solution, but conditions in Iraq are not yet suitable for Iraqis to return. According to the International Organization for Migration, the Iraqi government has cited improvements in security and offered financial incentives to returning refugee families. Although another solution is integration and settlement in host countries, Syria and Jordan consider Iraqi refugees "guests" who should return to Iraq once the security situation improves. The U.S. government has made progress in resettling Iraqi refugees under its U.S. Refugee Admissions Program, with 15,431 refugees resettled in the United States in fiscal years 2007 and 2008.

According to U.S., UN, foreign government, and NGO officials, the international community lacks a comprehensive international strategy to address the Iraqi refugee situation. Although the 2009 UN Consolidated Appeal showed progress in strategic planning, the UN and international community continue to lack a longer-term approach. First, the international community lacks a comprehensive independent assessment of the needs of vulnerable Iraqi refugees and the populations that host them. Second, State, UNHCR, and NGOs do not have a strategy that addresses factors that may affect assistance efforts. Third, the international community has lacked a coordination mechanism that involves all stakeholders.

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Abbreviations

DHS	Department of Homeland Security
IDP	internally displaced person
IOM	International Organization for Migration
NGO	nongovernmental organization
OFDA	Office of U.S. Foreign Disaster Assistance
OPE	overseas processing entity
PRM	Bureau of Population, Refugees, and Migration
SARC	Syrian Arab Red Crescent
SIV	special immigrant visa
UN	United Nations
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
USAID	United States Agency for International Development
USCIS	United States Citizenship and Immigration Services
USRAP	United States Refugee Admissions Program

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United States Government Accountability Office
Washington, DC 20548

April 21, 2009

Congressional Committees

According to the United Nations (UN), Iraqi refugees represent one of the largest urban refugee populations the organization has been called upon to assist and pose an unprecedented burden on the countries hosting them. The UN reports that regional governments estimate that over the last 5 years about 4.8 million Iraqis have been displaced from their homes in search of safety, with about 2 million fleeing to neighboring countries, primarily Syria and Jordan. According to the Department of State (State), because of its unique role in Iraq, the United States has recognized the need to take the lead in mitigating the effects of this humanitarian crisis.

GAO is assessing U.S. and international efforts to protect and assist Iraqi refugees and internally displaced persons (IDP). In this report, we examine challenges in (1) measuring and monitoring progress in achieving U.S. goals for assisting Iraqi refugees, (2) providing humanitarian assistance to Iraqi refugees, (3) offering solutions for Iraqi refugees, and (4) developing an international strategic plan to address the Iraqi refugee situation.¹ In addition, we reviewed the progress made in implementing special immigrant visa programs for Iraqis, which may also benefit some refugees but are not designed specifically for them (see app. I). We plan a subsequent review that will examine challenges faced in assisting internally displaced Iraqis. Because of broad congressional interest in the U.S. engagement in Iraq, we are completing this report under the Comptroller General's authority to conduct evaluations on his own initiative.

To address these objectives, we reviewed and analyzed reports and data from the U.S. government, the UN High Commissioner for Refugees (UNHCR), the International Organization for Migration (IOM), other UN agencies, foreign governments, nongovernmental organizations (NGO), and research institutes. During our fieldwork in Washington, D.C., we met with officials from State and the Department of Homeland Security (DHS) regarding refugee assistance, refugee admissions, and special immigrant

¹As part of our methodology, we limited our fieldwork to Syria and Jordan, which reported hosting significantly more refugees than other neighboring countries, such as Lebanon, Egypt, Turkey, Iran, and the Gulf States.

visa programs and the challenges they have encountered. We also met with research institutions and NGOs and held discussion groups with NGOs conducting work in Jordan, Syria, and Iraq to discuss strategic planning and program implementation challenges. Through our fieldwork in Geneva, Switzerland; Rome, Italy; Amman, Jordan; and Damascus, Syria, we met with officials from the U.S., Jordanian, Syrian, and Iraqi governments; UNHCR and other UN umbrella agencies, including the World Food Program and IOM; international and local NGOs; and research institutions. Also, with the help of UNHCR, we held discussion groups with Iraqi refugees in Jordan and Syria to discuss their situations, needs, assistance received, and challenges encountered. We toured and observed assistance projects and activities in resettlement processing centers. We analyzed U.S. funding, refugee admissions, and visa data, and found the data to be sufficiently reliable for the purposes of this report. Appendix II contains a more detailed description of our scope and methodology.

We conducted this performance audit from January 2008 to January 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

To implement its 2008 goal and objectives for Iraqi refugees, State primarily funded and monitored the efforts of its implementing partners, which include international organizations and NGOs.² These State-funded activities provided Iraqi refugees and the populations of the countries that host them with primary education, vocational training, health care, psychosocial services, distribution of food and household items, and financial support, among other efforts. However, based on our review of State's assessment of progress in fiscal year 2008, it was difficult to determine the extent to which State achieved its overall goal and

²According to State officials, its international organization partners include UNHCR, the World Health Organization, the World Food Program, IOM, the International Federation of the Red Cross and Red Crescent Societies, and the United Nations Children's Fund. For fiscal years 2007 and 2008, State officials said that they had 9 and 11 NGO partners implementing their program, respectively.

objectives.³ For example, State reported on a number of individual projects but did not specifically measure these accomplishments against benchmarks or report how these project-level accomplishments helped State achieve its overall goal and objectives for Iraqi refugees. As a result, State has limited information to judge progress in reaching its goal and objectives for Iraqi refugee programs and improve effectiveness. Assessing progress is complicated by difficulties State confronts in overseeing refugee projects that it funds in Jordan and Syria—the countries with the largest number of Iraqi refugees. Insufficient quantity of staff to monitor projects, difficulties gaining access to projects and refugees, and the lack of reliable data on education and health needs have hindered State’s efforts to ensure that projects are helping the intended beneficiaries. For example, in April 2008, State reported that UNHCR was able to effectively monitor approximately 40 to 59 percent of its implementing partners in Jordan. In November 2008, State officials reported that the refugee coordinator did not complete annual reviews of UNHCR programs in Syria and Lebanon because of difficulties getting into each country as a result of visa and security restrictions. In Jordan and Syria, difficulty obtaining reliable data for the education and health sectors has hindered UN efforts to monitor progress.

U.S. and international efforts to effectively provide humanitarian assistance to Iraqi refugees in neighboring countries are impeded by two key factors—the lack of reliable estimates on the needs of Iraqi refugees and data on the funding targeted toward Iraqi refugee programs. Iraqi refugees mostly live interspersed among the local urban populations which has made them difficult to identify. First, official government estimates on the number of Iraqi refugees in each country may be overstated. Jordan and Syria, with the largest reported numbers of Iraqi refugees, estimate 450,000 to 500,000 and 1,200,000 to 1,500,000 Iraqi refugees, respectively, in their countries. In contrast, UNHCR reported officially registering 54,411 Iraqis in Jordan and 221,506 Iraqis in Syria, as of September 30, 2008. Neither country has enabled an independent and comprehensive survey of refugees to be undertaken, asserting that

³State’s 2008 goal was to maintain basic humanitarian assistance and protection for Iraqi refugees in Jordan, Syria, and Lebanon. Its regional objectives were to meet the assistance and protection needs of refugees and other conflict victims through expanded engagement and funding of international and NGO partners; contribute to regional stability by channeling humanitarian assistance through primary international organization partners; promote UNHCR to achieve solutions for Iraqi and non-Iraqi refugees; and ensure greater burden sharing among donors, including the Iraqi government.

assistance should not be targeted toward Iraqi refugees while they have vulnerable populations that need help. As a result, both countries have based requests for international assistance primarily on the health and education needs of their citizens rather than on the numbers of Iraqi refugees residing there. Accordingly, the U.S. government and the UN have included the needs of both Iraqi refugees and host country populations in their Iraqi refugee programs. Second, it is difficult to determine the amount of funding provided for Iraqi refugee programs because the U.S. government and UNHCR, the largest bilateral and multilateral funding sources, do not report funding for Iraqi refugee programs separately from that provided for all Iraq-related humanitarian assistance.⁴ For fiscal years 2003 through 2008, the U.S. government made available about \$1.6 billion and spent about \$1.2 billion for all Iraq-related humanitarian assistance. UNHCR funding appeals for calendar years 2003 through 2008 totaled about \$730 million and resulted in about \$542 million in contributions for its Iraq Operation, which, in addition to Iraqi refugees, also included internally displaced Iraqis and other vulnerable populations in Iraq and host countries. The United States contributed about \$316 million, or about 58 percent, of these UNHCR contributions. According to State, all multilateral and bilateral donations from other countries met only a fraction of the needs inside and out of Iraq. Representatives of donor countries raised concerns regarding the uncertain number of Iraqi refugees and the extent of their needs and noted that the lack of objective and complete information made it difficult to garner support for funding. Some also stated that the United States, given its role in the Iraqi humanitarian crisis, and Iraq, given its budget surplus and that the refugees are its citizens, should bear most of the costs. Although in 2007 the Iraqi government pledged and later transferred \$25 million to support the assistance of Iraqi refugees in neighboring host countries, it is unclear whether Iraq plans to provide additional funds to support Iraqi refugees. Iraqi officials stated that the government is reluctant to fund programs for Iraqi refugees because improving refugee conditions in neighboring countries may discourage refugees from returning to Iraq.

The U.S. government and UNHCR face challenges in offering solutions for Iraqi refugees. According to UNHCR, voluntary repatriation is the preferred solution, but conditions in Iraq are not yet suitable for Iraqis to

⁴Iraq-related humanitarian assistance funding includes that for Iraqi refugees and vulnerable populations of neighboring countries hosting them; internally displaced Iraqis; vulnerable populations in Iraq; refugees in Iraq, such as Palestinians; and other conflict victims.

return. According to IOM, the Iraqi government has cited improvements in security and offered financial incentives (about 1 million Iraqi dinars) to returning refugee families. However, according to UNHCR, refugees fear leaving the safety of their host countries for the uncertain environment in Iraq, and there is no clear trend on the number of Iraqis returning to or leaving their country. According to the UN, a limited number of Iraqis may be returning, but this may be due to increasing hardship in their host countries rather than improvements in Iraq. Although another solution is integration and settlement in host countries, both Syria and Jordan consider Iraqi refugees “guests” who should return to Iraq once the security situation improves. In Syria and Jordan, difficulties in renewing visas, a lack of funds, and limited access to employment and public services affect Iraqi refugees’ decisions to stay or return to Iraq. According to Jordanian and Syrian government officials, neither government anticipated a long-term Iraqi presence. According to UNHCR, Syria and Jordan are determined not to establish arrangements that might lead to permanent residence, such as officially allowing employment of Iraqi refugees. Resettlement to a third country is another option, but a limited number of countries resettle refugees, according to UNHCR, and less than 1 percent of registered refugees worldwide are resettled in third countries, according to State. The U.S. government has made progress in resettling Iraqi refugees to the United States under its U.S. Refugee Admissions Program, established in February 2007. In 2007, the U.S. government admitted 1,608 Iraqi refugees but did not achieve State’s own expectation of resettling 2,000 to 3,000 refugees under the program. However, the U.S. government surpassed its fiscal year 2008 goal of 12,000 with the admission of 13,823 Iraqi refugees. According to UNHCR, as of September 30, 2008, other countries resettled a total of 5,852 refugees in calendar years 2007 and 2008.

According to U.S., UN, foreign government, and NGO officials, the international community lacks a comprehensive international strategy to address the Iraqi refugee situation.⁵ Although the international community has recognized the need to strategically plan for the Iraqi refugee situation, it has focused on the crisis within Iraq and annual planning efforts while deferring strategic planning for the refugee situation. Although the 2009 UN Consolidated Appeal for Iraq and the Region showed significant

⁵A strategic plan should contain strategic or long-term goals that cover a period of not less than 5 years from the year it is submitted and should be updated and revised at least every 3 years.

progress in strategic planning, the UN and the international community continue to lack a longer-term approach. According to NGOs, the lack of an international strategy has hindered efforts to effectively assist Iraqi refugees in Syria and Jordan. First, the international community lacks a comprehensive independent assessment of the needs of vulnerable Iraqi refugees and the economically vulnerable populations that host them. Host countries' unwillingness to enable these assessments impedes strategic planning efforts. Without these assessments, it is difficult to determine the scope of the problem and to appropriately prioritize and align resources to address the Iraqi refugee situation. Second, State, UNHCR, and NGOs do not have a strategy that addresses factors that may affect assistance efforts. For example, according to NGOs, the annual budget focus of UNHCR and key donor countries, including the United States, makes it difficult for them to conduct longer-term planning because they do not know whether their efforts will be funded from one year to the next. Thus, they may focus on shorter-term efforts in lieu of more effective long-term efforts. Third, the international community has lacked a coordination mechanism involving all stakeholders—including the governments hosting refugees, international organizations, NGOs, and the donor community—that would help ensure effective delivery of assistance. For example, NGOs in Jordan cited duplication of efforts and competition for beneficiaries as impeding progress in helping Iraqi refugees. NGOs cited the need for international strategic planning to use resources efficiently and address coordination difficulties.

In this report, we make several recommendations. First, we recommend that the Secretary of State develop performance measures to assess and report progress in achieving U.S. goals and objectives for Iraqi refugees. Performance goals, objectives, and measures should clearly and transparently address the extent to which programs should target Iraqi refugees and host government populations. Second, we recommend that the Secretary of State and the U.S. Agency for International Development (USAID) Administrator develop systems to separately track and report funding apportioned, obligated, and expended for Iraqi refugee programs in each host country, to the extent practicable. Third, we recommend that the Secretary of State work with UNHCR and the governments of Jordan, Syria, and other relevant host governments to expedite efforts to conduct independent comprehensive assessments of the number and needs of Iraqi refugees and the related needs of the countries hosting them. Fourth, we recommend that the Secretary of State, in conjunction with relevant U.S. agencies and in coordination with the donor community, work with UNHCR and the governments of Iraq, Jordan, Syria, and other relevant host governments, to build on the efforts in the 2009 UN Consolidated

Appeal for Iraq and the Region and develop a comprehensive international strategy for providing assistance and solutions for Iraqi refugees.

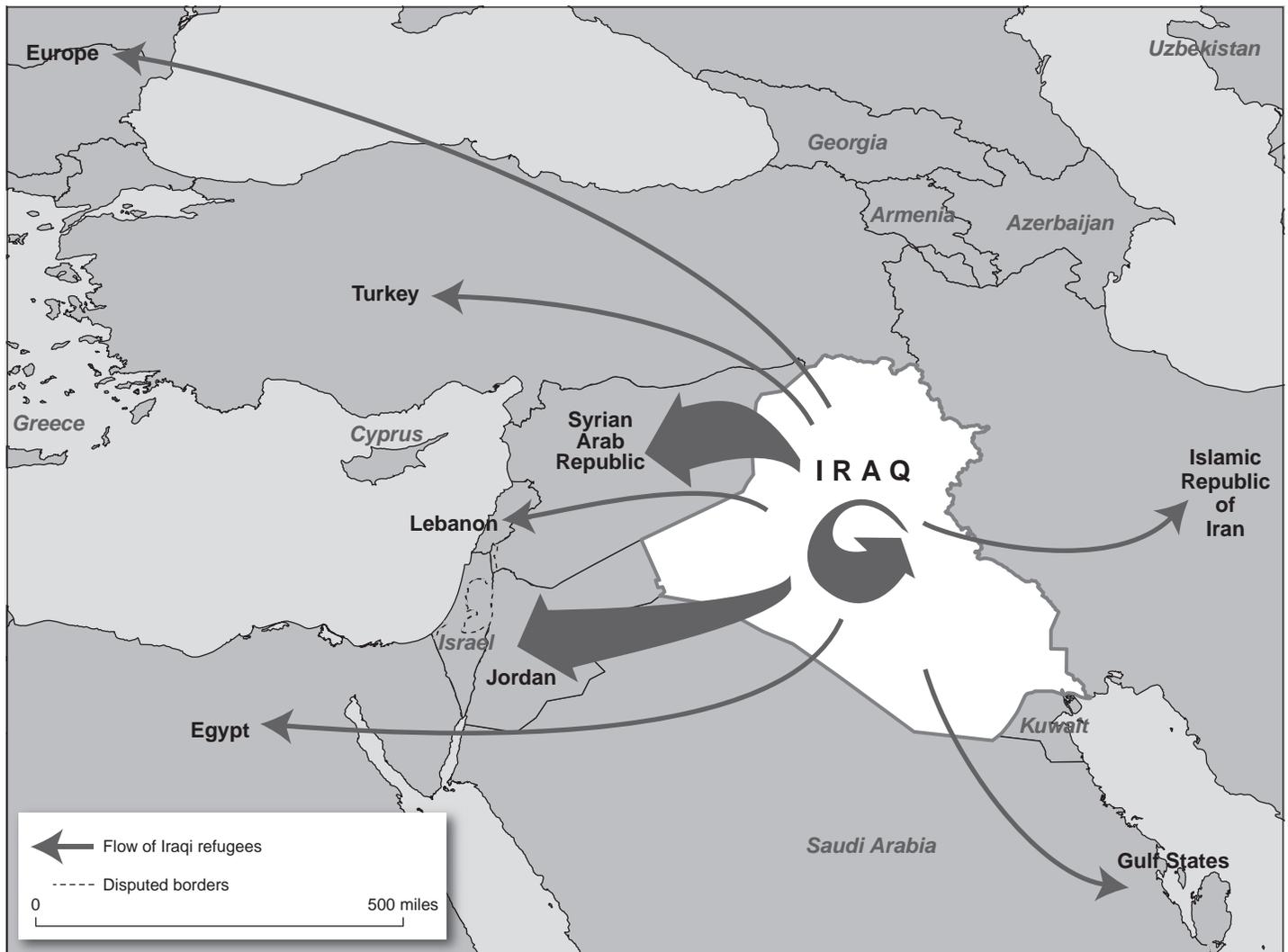
In written comments on a draft of this report, State generally agreed with each of our recommendations and noted aspects that the department believes might be difficult to implement. USAID commented that our recommendation regarding tracking and reporting USAID funding was resolved. However, we continue to believe that additional action is needed. State's and USAID's written comments and our evaluation of those comments are discussed in detail later in this report. State, DHS, and UNHCR provided technical comments, which we incorporated where appropriate.

Background

According to IOM, the bombing of the Al-Askari Mosque in Samara in February 2006 triggered sectarian violence that increased the number of displaced Iraqis. Although military operations, crime, and general insecurity remained factors, sectarian violence became the primary driver for population displacement.⁶ As displayed in figure 1, many Iraqis fled their country and immigrated to neighboring countries, particularly to Syria and Jordan.

⁶IOM, *Iraq Displacement & Return; 2008 Mid-year Review*.

Figure 1: Neighboring Countries Hosting Iraqi Refugees



Sources: GAO, based on maps from UNHCR; Map Resources (map).

According to UNHCR, the 1951 UN Convention Relating to the Status of Refugees and its 1967 Protocol provide the foundation for modern refugee protection. According to the Convention, a refugee is someone who, “owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside the country of his nationality, and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country....”

The 1951 Convention does not apply to persons who have committed crimes against peace, war crimes, or crimes against humanity. UNHCR recognizes and registers as refugees both those persons who fall within the 1951 Convention criteria and those falling within the extended definition of persons fleeing generalized armed conflict or civil unrest. Registration allows UNHCR to identify Iraqis in need of protection, offer them assistance, and screen them for possible resettlement. According to the UN, of the countries hosting Iraqi refugees in the Middle East, only Turkey, Egypt, and Iran are parties to the 1951 Convention. Syria and Jordan, the two countries hosting the largest number of Iraqi refugees, have not signed the 1951 Convention. As a result, according to the UN, although the refugees have been able to access public services, they have not been able to obtain legal employment and may face deportation if they do not comply with visa requirements, which have become more restrictive over the years.⁷ According to UNHCR, the identification, registration, intervention in detention and deportation, and monitoring of access to asylum are important UNHCR functions for refugees.

UNHCR coordinates the provision and delivery of shelter, food, water, sanitation, and medical care to refugees throughout the world. UNHCR is also mandated to find solutions to the plight of refugees. According to UNHCR, three solutions are available:⁸

- First, voluntary repatriation is the preferred solution for the majority of refugees. Most refugees prefer to return home as soon as circumstances permit (generally when a conflict has ended and a degree of stability has been restored). UNHCR promotes, supports, and facilitates voluntary repatriation as the best solution for displaced people, provided it is safe and reintegration is viable.
- Second, UNHCR may help refugees integrate and settle in the “asylum,” or host, country where they reside as refugees. Some refugees cannot or are unwilling to return because they would face persecution. According to UNHCR, relatively few countries allow refugees to settle.

⁷According to the UN, Syria has no domestic legislative framework securing the rights of Iraqi refugees and most Iraqis are issued 1- to 3-month residence permits, with a minority being granted 1- to 2-year resident permits or permits covering a school year. According to the UN, in Jordan all Iraqis and others that are permitted to enter are allowed to stay for 3 months in accordance with the Law on the Residence of Foreigners. In May 2008, Jordan announced that all Iraqis must obtain a visa prior to arrival.

⁸UNHCR, *Protecting Refugees & the Role of UNHCR, 2007-2008* (Geneva).

-
- Third, UNHCR may assist refugees in permanently resettling in third countries. According to UNHCR, only a small number of nations take part in UNHCR resettlement programs worldwide and accept annual quotas of refugees. According to State, historically, less than 1 percent of registered refugees are resettled in third countries.

Within the U.S. government, the Department of State's Bureau of Population, Refugees, and Migration (PRM) has primary responsibility for formulating U.S. foreign policy on population issues, protection and assistance to refugees and conflict victims, and international migration. It also administers U.S. refugee assistance and admission programs. In this capacity, PRM has the lead role within the department in responding to complex humanitarian emergencies around the world and in working to resolve protracted refugee situations. According to State, to protect and assist Iraqi refugees, PRM works closely with regional bureaus, U.S. embassies, and U.S. missions to provide guidance to its international organization and NGO implementing partners and to engage with other donor countries and countries hosting Iraqi refugees. PRM primarily implements its U.S. humanitarian assistance goals for Iraqi refugees by funding and monitoring international organization and nongovernmental organization projects. USAID also provides some humanitarian assistance that benefits Iraqi refugees, but according to State and USAID, most of its programs focus on efforts within Iraq. PRM is also responsible for managing the U.S. Refugee Admissions Program (USRAP). Within this program, DHS's U.S. Citizenship and Immigration Services (USCIS) is responsible for interviewing refugees and adjudicating their applications for resettlement in the United States.

Iraqis Benefit from Assistance, but State Has Not Measured Progress in Meeting Its Overall Goals, and State and Its Partners Face Monitoring Challenges

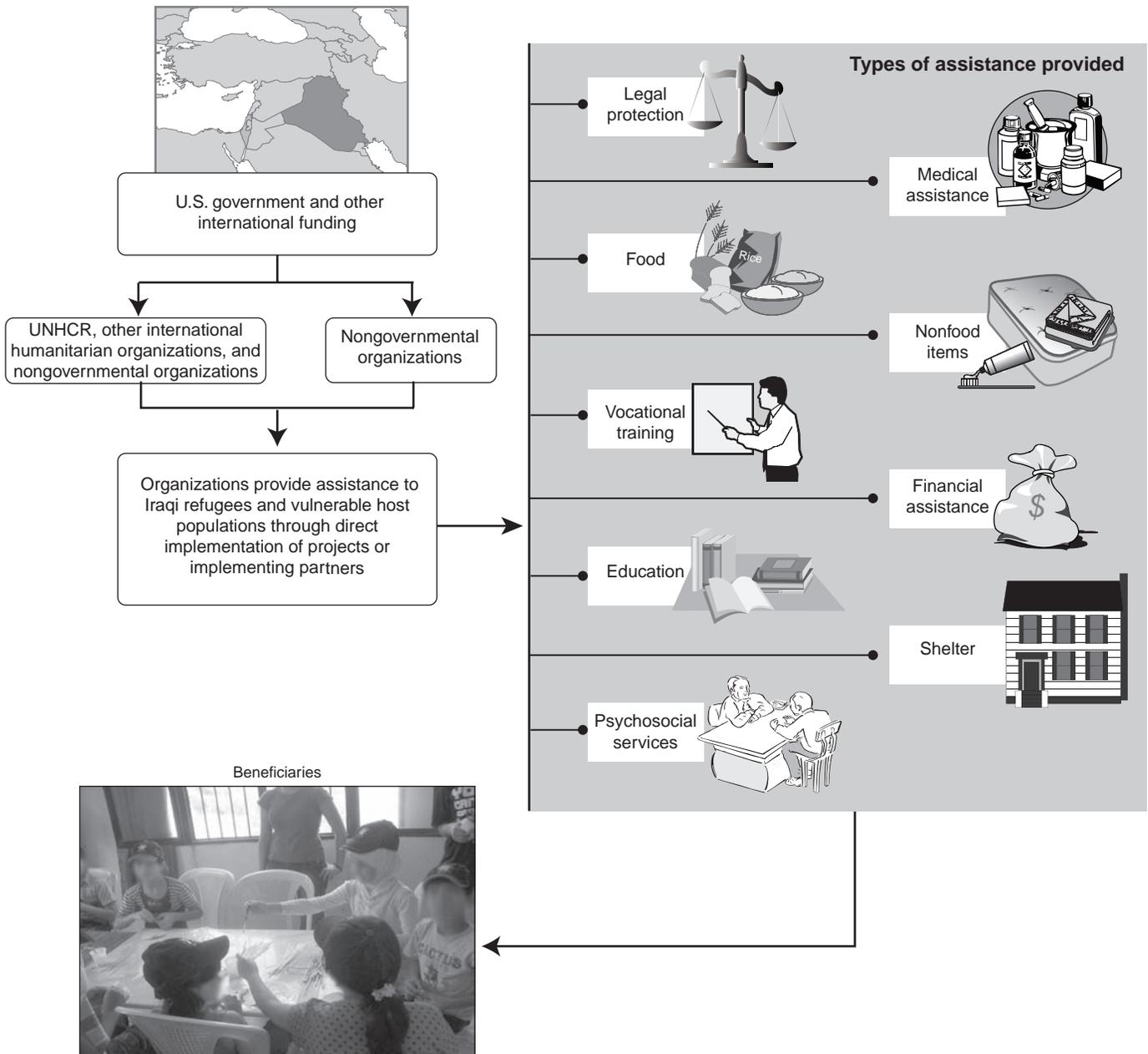
The Department of State and its international partners, including UN agencies and NGOs, have funded and implemented a number of programs and projects that benefit Iraqi refugees in Syria and Jordan. However, although State has established a broad goal and objectives for its 2008 efforts to protect and assist Iraqi refugees, it did not establish performance measures for assessing progress in achieving them. In addition, State and its implementing partners face challenges in monitoring their Iraqi refugee assistance projects.

State Department and UN
Fund Assistance to
Support Iraqi Refugees

To implement its goal and objectives for Iraqi refugees, State primarily funds and monitors the activities of its implementing partners, which include international organizations and NGOs.⁹ According to State, U.S. funding through these organizations has supported the most vulnerable refugees and host country populations. UNHCR, other international humanitarian organizations, and NGO partners provided education, health care, food, financial assistance, and other assistance to Iraqi refugees and vulnerable host country populations (see fig. 2).

⁹According to State officials, its international organization partners include UNHCR, the World Health Organization, the World Food Program, IOM, the International Federation of the Red Cross and Red Crescent Societies, and the United Nations Children's Fund. For fiscal years 2007 and 2008, State officials stated that they had 9 and 11 NGO partners implementing their program, respectively.

Figure 2: Types of Assistance Provided to Iraqi Refugees and Vulnerable Host Country Populations



Sources: GAO analysis of Department of State and UNHCR data; GAO (photo); Nova Development (clip art); Map Resources (map).

For example, in Syria, UNHCR and the World Food Program provided food rations and nonfood items such as mattresses, blankets, and household items to Iraqi refugees. Additionally, in Syria and Jordan, UNHCR provided monthly cash assistance primarily to vulnerable Iraqi refugees, including single female heads of households. In Syria, for example, the heads of households received approximately \$100 per month, with an additional \$10 for each dependent. Appendix V provides more details on the number of Iraqis who benefited from UNHCR assistance in 2008.

In terms of health care, we visited a clinic in Jordan, funded through the State Department's PRM bureau, which assisted Iraqi refugees, and met with outreach workers. According to the program manager, the project provided health care to Iraqis and stipends for some Iraqi women conducting community outreach. (See fig. 3, showing an Iraqi volunteer conducting outreach.)

Figure 3: Outreach Volunteer Conducting a Home Visit in Jordan



Source: International Relief and Development.

In Syria, we visited another PRM-funded project that provided medical assistance to Iraqi refugees and vulnerable host country populations (see fig. 4). According to the program manager, the clinic provided primary health care, child health screening, chronic noncommunicable disease care, maternal health care, and health education. We toured the pharmacy, the dental unit, and the laboratory where basic tests are performed.

Figure 4: PRM-Funded Clinic in Syria



Source: GAO.

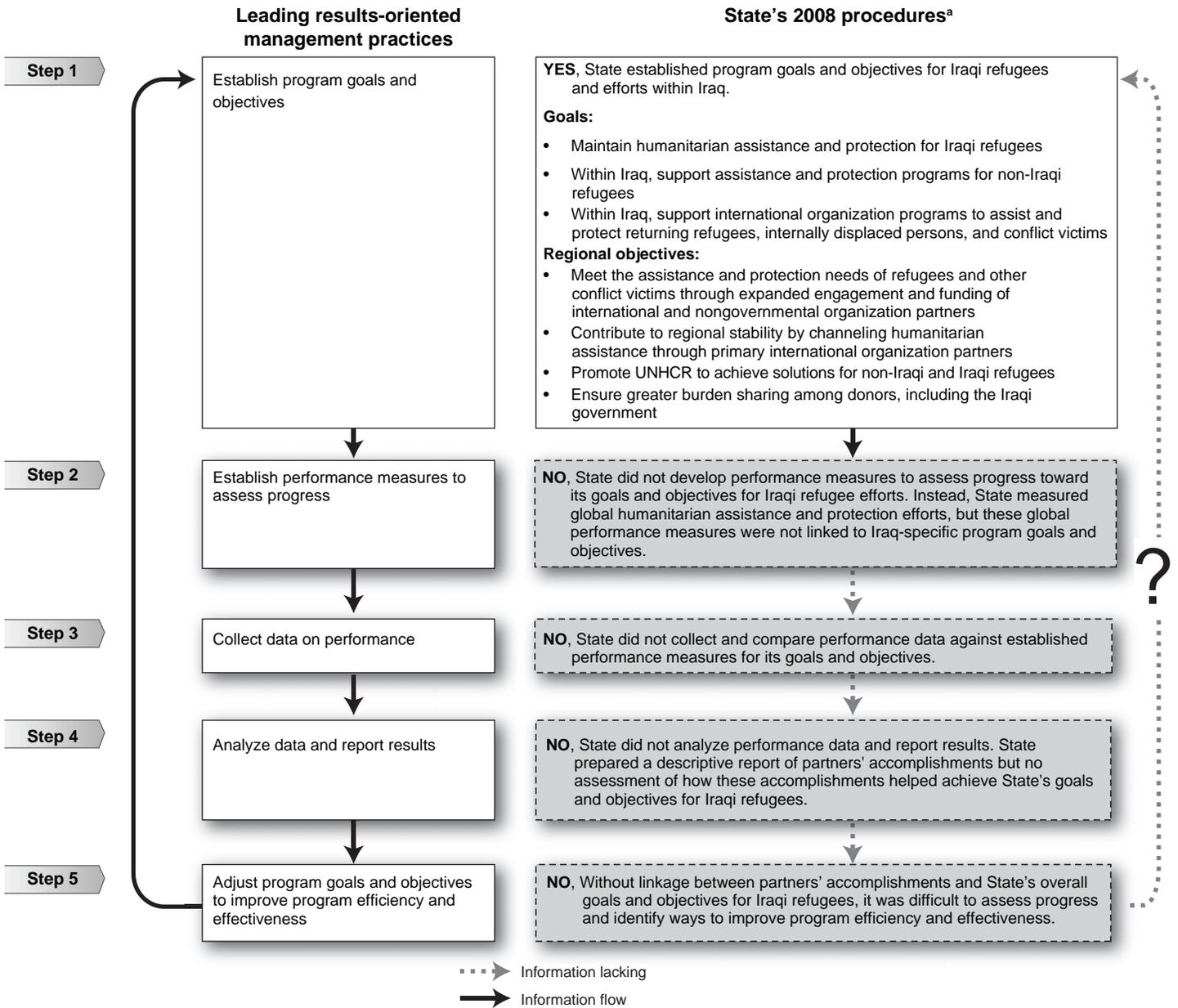
At another NGO project site in Syria, we visited a summer school program for Iraqi refugee children. According to the program manager, in addition to the academic lessons provided in Arabic, English, math, and science, Iraqi students participate in summer camp activities. During our visit, we observed children participating in various camp activities, including arts and crafts and a musical production. According to the program manager, all of the participants were Iraqi children. He also stated that the children received meals while attending the activities. The program manager stated that these activities were designed to promote the Iraqi students' emotional and social well-being.

The State Department Has Not Linked Progress to Overall Goals and Objectives

It is difficult to determine the progress of U.S. efforts to assist and protect Iraqi refugees because State's 2008 goal and regional objectives were broad and difficult to measure. In addition, State did not have corresponding performance measures that clearly linked the achievements of its Iraqi refugee activities to progress in meeting its overall 2008 goal and objectives for Iraqi refugees. Prior GAO work suggests that leading organizations promote accountability by establishing results-oriented goals and corresponding performance measures by which to gauge progress. Measuring performance allows organizations to track the progress they are making toward their goals and give managers crucial information on which to base their organizational and management decisions.¹⁰ Figure 5 provides more information on State's 2008 performance management efforts for Iraqi refugee assistance compared with leading results-oriented practices.

¹⁰Government Performance and Results Act principles include setting strategic goals, measuring performance, and reporting on the degree to which goals were met. See GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, GAO/GGD-96-118 (Washington, D.C.: June 1996).

Figure 5: Comparison of State Department 2008 Performance Management Procedures for Iraqi Refugee Assistance with Leading Results-Oriented Management Practices



Source: GAO analysis of Department of State data.

^aDepartment of State/Bureau of Population, Refugees, and Migration, *Policy and Implementation Paper for Iraq Refugees and Internally Displaced Persons (IDP) for FY 2008* (Washington, D.C.: Feb. 11, 2008).

As shown in figure 5, State established a goal and objectives for its 2008 efforts concerning Iraqi refugee efforts as part of its overall goals and objectives for its efforts to assist refugees, internally displaced persons, and other conflict victims.¹¹ However, on the basis of our review of State's assessment of progress achieved in fiscal year 2008, it was difficult to determine the extent to which State achieved its overall goal and objectives.¹² Although State reported progress achieved in 2008 by sector and at the country level,¹³ it did not aggregate these data to demonstrate how these activities that it funded helped State meet its overall goal of assisting and protecting Iraqi refugees. Similarly, State did not develop corresponding performance measures and milestones, nor did it compile and aggregate the data it needed to assess and report on its progress in achieving its objectives to expand engagement through funding of NGOs and international organizations, contribute to regional security by channeling humanitarian assistance through primary international organization partners, promote UNHCR to achieve solutions for Iraqi refugees, or ensure greater burden sharing.

State measures PRM's bureauwide progress for humanitarian assistance at the global level, but this effort does not include specific performance measures for assessing progress toward its goal and objectives for Iraqi refugees. According to State officials, the goal and objectives for Iraqi refugees are in line with the PRM bureau's overall humanitarian response strategic goal for fiscal year 2008 and with its performance goals for global refugee protection, solutions, and assistance. State officials said that progress on its global efforts is measured through bureauwide indicators, including acute malnutrition and crude mortality rates. Similarly, progress on protection efforts by PRM partners is measured at the global level through performance relating to "non-refoulement," as reported in

¹¹In addition to its goal to maintain humanitarian assistance and protection for Iraqi refugees, State's PRM established two goals for its efforts within Iraq to (1) support assistance and protection programs for non-Iraqi refugees while pursuing opportunities to resettle or temporarily relocate these refugees to safe havens where they can be processed for resettlement or repatriation and (2) support UNHCR and International Committee of the Red Cross programs to assist and protect returning refugees, IDPs, and conflict victims and develop policy and assistance frameworks for refugee and IDP returns. PRM's objectives apply to all three goals.

¹²The Fiscal Year 2009 Policy and Program Review Committee paper outlines State's goals and objectives for fiscal year 2009 and provides a review of performance in fiscal year 2008.

¹³Sectors include humanitarian assistance, protection, education, water and sanitation, and health, among others.

UNHCR’s annual protection reports.¹⁴ However, these indicators are not generally applicable to specific programs targeting Iraqi refugees. According to State, global acute malnutrition, for example, is used as a proxy of the overall health and well-being of a population. PRM monitors situations where more than 10 percent of refugee children are suffering from wasting;¹⁵ where this occurs, high malnutrition levels indicate a serious humanitarian crisis. However, according to State officials, the absence of reports of acute malnutrition occurring among Iraqi refugee children makes this indicator a poor choice for assessing the effectiveness of State’s Iraqi refugee programs.

State’s implementing partners reported progress against agreed-upon performance indicators for assessing Iraqi refugee-related activities.¹⁶ However, State did not aggregate individual project or program performance so that it could measure progress toward its overall goal and objectives. GAO previously reported that leading organizations seeking to become more results-oriented clearly define desired outcomes, measure performance to gauge progress, and use performance information as a basis for decision making.¹⁷ For example, in its 2008 and 2009 policy papers on Iraqi refugees, State reported on a number of individual projects but did not specifically report how these project-level accomplishments helped State achieve its overall goal and objectives for Iraqi refugees.¹⁸ In

¹⁴According to the UN High Commissioner for Refugees, “non-refoulement” is the principle protecting refugees from nonvoluntary repatriation to places where their lives or freedom would be threatened because of their race, religion, nationality, membership in a particular social group, or political opinion.

¹⁵Wasting is a measure of acute malnutrition.

¹⁶For international organizations, State officials noted that they provide input on objectives and performance measures through participation in board meetings, donor trips, and country operation planning meetings. Regarding NGOs, State officials noted that they work with each NGO partner to establish specific objectives and performance measures for projects in each country; these measures are documented in the partner agreements.

¹⁷See GAO, [GAO/GGD-96-118](#).

¹⁸State Department, *Policy and Program Review Committee (PPRC): Policy and Implementation Paper for Iraq Refugees and IDPs for FY 2008*, Washington, D.C.: Feb. 11, 2008. The 2009 paper is sensitive but unclassified.

addition, on the basis of our review of NGO monitoring reports,¹⁹ State received information on its partners' achievements but did not identify how it would use these data to measure and report on overall progress for its Iraqi refugee goal and objectives.²⁰ For example, in its NGO guidelines, State generally requires that a project demonstrate that at least 50 percent of beneficiaries are Iraqi refugees.²¹ According to State officials, NGO partners are required to submit beneficiary statistics by objectives and indicators. Our review of the 13 available final NGO reports showed that in 10 cases NGOs reported that 50 percent or more of beneficiaries were Iraqi refugees,²² while in 3 cases less than 50 percent were Iraqi refugees.²³ However, these data were not aggregated or reported as a measure of progress in meeting the U.S. goal and objectives for assisting Iraqi refugees.

For 2009, State has made progress in articulating more results-oriented goals and objectives; however, the elements that State identified as corresponding performance indicators are not clearly linked to the objectives and are not consistently measurable.²⁴ State reported that, on the basis of discussions with GAO, it established more detailed objectives and indicators for fiscal year 2009 to measure progress in providing assistance and protection to Iraqi refugees, internally displaced persons,

¹⁹We also reviewed 13 interim program evaluation reports prepared by State for 13 projects implemented by 8 NGO partners, the 13 final NGO reports available, and international organization partners' progress reports. We also interviewed State officials on their monitoring and evaluation efforts. (State Department officials prepare interim program evaluations for each NGO project from the information obtained from NGO reporting. These evaluations assess progress made and are used to make management decisions about an NGO's performance and future funding for Iraqi refugee programs.) We did not assess the reliability of the data in these reports.

²⁰For programs that were funded in fiscal year 2007, State officials stated that they required monitoring reports at 4 and 12 months, and for programs funded in fiscal year 2008, State required quarterly reports.

²¹The 2007 Guidelines for Proposal Submissions for NGO Protection and Assistance Programs Benefiting Iraqis in Jordan, Syria and Lebanon was issued as a part of the March 13, 2007, request for proposals.

²²We did not assess the reliability of the data provided in these reports.

²³As of the end of our fieldwork, the State Department had made available 13 of the 16 final NGO reports for our review. For one NGO for which State did not provide a final report, State reported that it did not meet the 50 percent requirement.

²⁴State considers the 2009 goals and objectives sensitive and not for public release.

and conflict victims. According to State, it has developed a spreadsheet to track progress toward these objectives and indicators throughout the year.

State Department and Its Partners Face Challenges in Project Monitoring

The Department of State and its implementing partners use a number of methods to monitor their refugee programs and activities; however, according to State and its implementing partners, a lack of resources, difficulty gaining physical access to projects and refugees, and a lack of reliable data create challenges to their monitoring and evaluation efforts. According to State officials, they monitor their partners' programs and projects by conducting site visits, reviewing progress and final reports, reviewing NGO project beneficiary statistics, meeting and conducting follow-up with program managers, and consulting other donors and humanitarian organizations. According to UNHCR officials, they have an extensive monitoring system that includes field monitoring, program evaluations, and financial account and document reviews. State is working with its partners to improve their monitoring and evaluation efforts. A Framework for Cooperation between State and UNHCR noted that enhancement of the quality of monitoring and evaluation activities that UNHCR undertakes deserved particular attention.²⁵ Additionally, in State's Framework for Cooperation with IOM, both parties committed to strengthening monitoring and evaluation capacity and to quantify program results and impact more effectively.²⁶

While there are challenges to monitoring and evaluation, State has taken steps to improve its oversight of NGO projects. For example, in the fiscal year 2007 NGO cooperative agreements, State required NGOs to provide two reports. The first report covered the first 4 months of the project, and the second report covered the last 8 months of the project. However, for NGOs funded in fiscal year 2008, State revised the formal reporting requirements included in the cooperative agreements. As a result, NGOs are required to provide quarterly reports on project progress, including progress against objectives and indicators. Additionally, State reported

²⁵Framework for Cooperation between the Office of the United Nations High Commissioner for Refugees and the Bureau of Population, Refugees, and Migration, U.S. Department of State, for the Year 2008 (Nov. 29, 2007).

²⁶Framework for Cooperation between the IOM Administration and the Bureau of Population, Refugees, and Migration, U.S. Department of State, for the Year 2007 (Apr. 18, 2007).

that it has expanded the template used to track the progress made by NGOs on a quarterly basis.

However, according to State and implementing partner officials, monitoring continues to be impeded by the following challenges.

- *Insufficient monitoring resources:* In April 2008, State reported that UNHCR effectively monitored approximately 40 to 59 percent of its implementing partners' program activity sites in Jordan.²⁷ State noted that it faced the same challenges, given that program activities are conducted at more than 200 sites and that PRM's officer would be able to visit only a fraction of these activities over the course of a year. During our visit to a small project site in Jordan, the embassy official responsible for monitoring in Jordan noted that this was the first visit to the site, given that it was one of the smaller projects and embassy staff had limited time to make site visits. Moreover, State reported that it expected the problem to increase for UNHCR as it continued with plans to decentralize its services to Iraqi refugees to 18 locations throughout Jordan. In commenting on a draft of this report, UNHCR noted that it has taken steps to mitigate the lack of monitoring resources in Jordan.²⁸ In Syria, monitoring efforts are limited by a lack of PRM monitoring staff at the U.S. embassy. In August 2008, a senior U.S. embassy official in Syria stated that the U.S. embassy had limited staffing resources to monitor all Iraqi refugee program activities. According to State, monitoring efforts for Syria, Lebanon, and Jordan are carried out by two PRM staff based at the U.S. embassy in Jordan and visiting PRM staff from Washington, D.C.
- *Difficulty gaining physical access to projects:* In November 2008, State reported that the refugee coordinator did not complete annual reviews of UNHCR programs in Syria and Lebanon because of difficulties getting into

²⁷Department of State, *The Annual Review of UNHCR Country Achievements and Future Planning, April 2008* (Washington, D.C.: Apr. 17, 2008). According to State, it determined these percentages based on discussions with UNHCR in Jordan regarding current and past programming. State reported that site visits are determined by several criteria, including policy priorities, performance history, funding level, and security conditions. However, State did not provide any specifics on the percentage of partners' program activity sites that should be monitored.

²⁸According to UNHCR, in 2009, UNHCR monitoring of implementing partners and their respective programs has expanded beyond a financial audit into an evaluative mode with the extensive use of multifunctional teams visiting project sites, undertaking home visits, and conducting focus group sessions with Iraqi refugees. According to UNHCR, over the past quarter a Project Control Officer and Senior Oversight Officer have arrived in Jordan and physical verification of projects is now a requirement. UNHCR has also decided to reduce its intended decentralization of services from 18 to 16 locations.

each country because of visa and security restrictions. According to State officials, the United States is constrained in monitoring its assistance efforts in Syria because of its poor relationship with the government of Syria and resulting restrictions on the visas of U.S. government visitors. In addition, according to two interim program evaluations, State personnel were unable to monitor the two NGO projects in Lebanon because of security constraints. The U.S. embassy in Beirut operates under strict security protocols that limit the ability and flexibility of the mission to host visitors. State monitoring officials planned to travel to Beirut in May 2008, but this trip was canceled after violence escalated.

- *Lack of reliable data:* According to the UN, in both Syria and Jordan, difficulty obtaining reliable data in the education and health sectors has hindered efforts to monitor progress. For example, according to the UN, student attendance data in Jordan are not disaggregated by gender and age. According to the UN, information management systems in the Syrian and Jordanian health sector need improvement to collect more reliable data on beneficiaries served.

Lack of Reliable Needs Estimates and Funding Data Affects U.S. and UNHCR Efforts to Assist Iraqi Refugees

U.S. and UNHCR efforts to provide sufficient humanitarian assistance to Iraqi refugees are challenged by the lack of reliable needs estimates and data on funding targeted at Iraqi refugee programs. Without a comprehensive assessment of the number and needs of Iraqi refugees in Jordan and Syria, it is difficult to prioritize and fund efforts to help ensure sufficient assistance and protection efforts. Donor countries are resistant to providing funds without further information on the needs. According to UN and donor representatives, they are also resistant because they believe the United States and Iraq should fund the majority of assistance efforts.

The Number of Iraqi Refugees and the Extent of Their Needs Are Unknown

Efforts to provide humanitarian assistance to Iraqi refugees are hindered by the lack of reliable information on their number, the extent of their needs, and the needs of the countries hosting them. Iraqi refugees primarily live interspersed among the local urban populations, rather than concentrated in camps, and are not easily identified. According to the UN, statistics on the number of Iraqi refugees in neighboring countries vary and are difficult to verify. The UN further notes that efforts are needed to

improve data collection on Iraqi refugees across the region.²⁹ In contrast to official host government estimates of Iraqi refugees, a significantly smaller number of refugees have registered with UNHCR for protection and assistance (see table 1). However, UNHCR officials stated that the registration numbers may not be a true proxy of the number of Iraqi refugees in each country because an unknown number of refugees do not register or seek assistance.³⁰ The actual number of Iraqi refugees in need may be somewhere in between these figures.

Table 1: Iraqi Refugees Registered with UNHCR and Neighboring Host Government Estimates of Iraqi Refugees, as Reported by UNHCR, as of September 30, 2008

Country hosting Iraqi refugees	Number of Iraqi refugees registered with UNHCR	Host government estimates of number of Iraqi refugees
Syrian Arab Republic	221,506	1,200,000-1,500,000 ^a
Hashemite Kingdom of Jordan	54,411	450,000-500,000
Lebanon	10,764	50,000
Egypt	10,163	Not available
Turkey	6,610	Not available
Islamic Republic of Iran	4,861	27,725
Gulf Cooperation Council countries ^b	2,112	200,000

Sources: UN High Commissioner for Refugees and the UN 2009 Consolidated Appeal for Iraq and the Region.

^aAccording to the UN, the total number of Iraqis in Syria remains unconfirmed, with estimates ranging from 700,000 to 1.5 million people. As of September 2008, the Syrian government reported that 1.2 million Iraqis currently hold residence permits.

^bGulf Cooperation Council countries include Bahrain, Kuwait, Qatar, Oman, Saudi Arabia, and the United Arab Emirates.

Further, neither Jordan nor Syria, the countries reporting the largest number of Iraqi refugees, has enabled an independent, comprehensive survey of refugees to be undertaken. As shown in table 1, as of September

²⁹According to the UN, government estimates largely rely on cross-border movements, which may result in counting persons more than once. See UN, *Iraq and the Region, 2009 Consolidated Appeal*, Office for the Coordination of Humanitarian Affairs (New York and Geneva).

³⁰According to the UN, Iraqi refugees may not register with UNHCR for a variety of reasons, including fear of being identified and deported, inability to reach a registration center, lack of understanding of the benefits of UNHCR registration, and lack of need for UNHCR protection or assistance.

30, 2008, UNHCR reported that the estimated number of refugees, as provided by the governments of Syria and Jordan, was 1.2 million to 1.5 million in Syria and 450,000 to 500,000 in Jordan.³¹ However, State, NGOs, and international organizations have questioned these high numbers.³² In 2007, the Jordanian government tasked Fafo, a Norwegian research institute, to estimate the number of Iraqi refugees living in the country.³³ After Fafo estimated that 161,000 Iraqi refugees resided in Jordan, the Jordanian government disagreed with the institute's findings, citing conflicting estimates. Fafo conducted further work with the Jordanian government that resulted in an estimate of 450,000 to 500,000 Iraqi refugees as of May 2007.³⁴ According to State, while some NGOs agree with this estimate, others believe the number may be as low as 200,000. State further reported that although the Jordanian government initially approved a UNHCR proposal for a joint study to assess Iraqi refugee needs in September 2008, it has yet to take any action to initiate the required work. In Syria, the United Nations Development Program (UNDP) produced a preliminary study in January 2008 that was intended to analyze the Syrian economy since 2003 and assess the macroeconomic impact of Iraqi refugees. However, the report, which included estimates of the numbers of Iraqi refugees in Syria, has not been released to the public.³⁵ According to a UNDP official, the study was only a preliminary report pending the commissioning of a survey on the number, geographic location, and socioeconomic characteristics of Iraqis in Syria. UNDP received comments from the Syrian government and agreed to incorporate them into the final report. UNDP also found that some of the results were contradicted by other studies and agreed with the Syrian government on

³¹According to UNHCR, the Iraqi embassy in Syria estimates that the total number of Iraqis in Syria is between 800,000 and 1,000,000.

³²According to State, in its interim program evaluations for NGOs, NGOs in Jordan set targets for numbers of Iraqi beneficiaries too high because they based them on faulty estimates of the total number of Iraqi refugees.

³³According to Fafo, it supplies decision makers and organizations, nationally and internationally, with research on working life and social policy.

³⁴Fafo, *Iraqis in Jordan 2007: Their Number and Characteristics* (Norway, 2007). We assessed Fafo's methodology and found that the number of 161,000 Iraqi refugees in Jordan as of May 2007 is reliable, but we were unable to establish the reliability of the numbers beyond the initial 161,000.

³⁵United Nations Development Program, *Macroeconomic Impact of Iraqi Refugees on the Syrian Economy* (January 2008).

the need to further analyze and validate the preliminary results once a survey is conducted.

Moreover, government officials in Jordan and Syria stress that their most vulnerable citizens as well as refugees need assistance. As a result, both countries prohibit parallel assistance systems that would provide refugees with increased aid and potentially create resentment within their respective populations. Both countries have primarily based their requests for international assistance on their countries' overall health and education needs rather than on the numbers of Iraqi refugees. In the 2009 UN Consolidated Appeal for Iraq and the Region, the UN notes that host countries have drawn on their existing social services to assist Iraqi refugees. The UN concludes that, therefore, efforts should continue to reinforce basic needs such as health and education, among others, for all refugees and local populations. Although the figure has been debated,³⁶ according to State, the Jordanian government contends that Iraqi migration into Jordan has cost it about \$2 billion over the last 3 years because of increased stress on its health, education, and water infrastructure in Amman, Zarqa, and Irbid.

However, the extent to which Iraqi refugees affect these sectors is not clear, government numbers are not clearly supported, and supporting government assessments are not publicly available. For example, according to State, the Jordanian government stated that a total of 24,000 Iraqis enrolled in public and private schools during the 2007 to 2008 school year, but some NGOs estimated that the public school attendance figure may have been as low as 9,000 students. Both State and the UN have reported that the Jordanian government has not made disaggregated figures available and has declined to allow independent confirmation of the number of students in the public school system. Further, NGOs reported that outreach efforts in Syria were discouraged by the Syrian government, limiting the ability to obtain information to better understand the needs of Iraqi refugees in Syria. Similarly, according to State, the Jordanian government has withheld permission from UNHCR to conduct mobile registration drives and public outreach campaigns.

In the absence of a comprehensive survey of the needs of all Iraqi refugees and a transparent assessment of the impact of Iraqis on host countries, the

³⁶Center for Strategic Studies, *The Iraq War's Impact on Growth and Inflation in Jordan*, University of Jordan, 2007.

UN relied on available information to identify refugee needs. In 2008, the UN expanded the efforts of its working groups and relied on the UNHCR central registration system as the most effective means for UN agencies to assess needs, estimate refugee movements, and understand the changing circumstances of the Iraqi refugee community. The UN also considered other information, such as public studies, limited surveys, and host government data. As a result of its working groups' assessments, in its 2009 Consolidated Appeal, the UN targeted assistance in areas such as protection, health, education, sexual and gender-based violence, food, psychosocial support and mental health, and skills development. The UN tailored programs for what was known at the time about the situation in each host country. According to UNHCR and NGO officials, to ensure that these programs reach Iraqi refugees, they target their assistance programs in Jordan and Syria in poor and underserved areas where Iraqi refugees are known to live. However, according to the UN, a growing number of Iraqi refugees are leaving costly urban areas, resulting in a more dispersed population and creating the need for further outreach.³⁷

The United States, Donors, and Iraq Have Funded Programs Benefiting Iraqi Refugees, but the Total Amount of Funding Explicitly for Iraqi Refugee Programs Is Unavailable

The amount of U.S., UN, and other funding spent to assist Iraqi refugees is not readily available. The U.S. government and UNHCR, reportedly the largest bilateral and multilateral funding sources, do not always designate and report funding solely for Iraqi refugee programs, which target refugees and the vulnerable populations of the countries that host them. Instead, the U.S. government reports funding for all Iraq-related humanitarian assistance that may include assistance to Iraqi refugees, internally displaced Iraqis, and other vulnerable populations in Iraq and host countries. According to funding data provided by State and USAID, for fiscal years 2003 through 2008, the U.S. government has apportioned about \$1.6 billion, obligated about \$1.5 billion, and expended about \$1.2 billion for all Iraq-related humanitarian assistance (see app. III).

Similarly, UNHCR includes Iraqi refugees in its Iraq Operation and obtains funding through a number of funding appeals made to the international community. Some appeals, such as the 2008 UN Iraq Consolidated Appeal, were for efforts inside Iraq; others, such as the 2008 UNHCR Iraq Situation Supplementary Appeal, were intended for programs that benefit Iraqi refugees, internally displaced persons in Iraq, non-Iraqi refugees in Iraq

³⁷According to UNHCR, as of March 2009, UNHCR and its partners now have approximately 200 Iraqi outreach workers in the region.

(such as Palestinian refugees in Iraq), and Iraqi returnees. For calendar years 2003 through 2008, UNHCR appeals for its Iraq operation, including Iraqi refugees, totaled about \$730 million and resulted in about \$542 million in contributions (see app. IV). The United States contributed about 58 percent of the donor contributions to these appeals.

Moreover, in addition to providing UNHCR funding, donor countries also fund the appeals and efforts of other UN agencies and international organizations that assist Iraqis and other conflict victims in the region. Because of the number of overlapping appeals, it is difficult to track the amount requested and funded for all Iraq-related humanitarian assistance. To better coordinate efforts among UN agencies, humanitarian organizations, and donors, in December 2008, for the first time, the UN consolidated all of its Iraq-related appeals for UN agencies and over 15 NGOs. The 2009 UN Consolidated Appeal for Iraq and the Region requests \$547.3 million, of which \$355 million is requested for efforts to assist Iraqi refugees and host country populations and \$192.3 million is requested for efforts within Iraq.

In addition to multilateral funding, an unknown amount of bilateral funding and private contributions is made to programs benefiting Iraqi refugees and others. The UN's Office for the Coordination of Humanitarian Affairs reports data on multilateral and bilateral contributions. However, it relies primarily on self-reporting, and the data may be incomplete. According to State, all donations from other countries meet a small fraction of the needs inside and out of Iraq. State officials also noted that the department demarched both the Gulf States and traditional donors in 2007 and 2008, asking for greater support. However, representatives of donor countries raised concerns regarding the uncertain numbers of Iraqi refugees and the extent of their needs, and they noted that the lack of objective and complete information made it difficult to garner support for funding. Some also noted that the United States, given its role in the Iraqi humanitarian crisis, and Iraq, given its budget surplus and that the refugees are its citizens, should bear most of the funding costs.

Although the Iraqi government pledged funds in 2007 to support the assistance of Iraqi refugees in neighboring host countries, it is unclear whether additional funds will be provided. The Iraqi government pledged \$25 million to assist neighboring countries hosting Iraqi refugees. Of this amount, the government provided \$15 million to Syria, \$2 million to Lebanon, and \$8 million to UNHCR in Jordan. For efforts within Iraq, the Iraqi government donated \$40 million, left over from the Oil for Food Program, to the World Food Program through the UN's 2008 Iraq

Consolidated Appeal. In August 2008, Iraq's Council of Representatives passed a supplemental budget that included an additional \$208 million primarily for IDPs and Iraqi returnees. It is unclear whether any of these funds are intended for or have been expended for Iraqi refugees. Iraqi officials noted that the government is reluctant to fund programs for Iraqi refugees because improving refugee conditions in neighboring countries may discourage refugees from returning to Iraq. Instead, the Iraqi government's position is to improve conditions in Iraq to encourage returns and focus government resources on those Iraqis who are displaced within the country. According to the UN, in 2009, the Iraqi government plans to direct more of its resources to the poorest Iraqi families in Iraq.

The U.S. Government and UNHCR Face Challenges in Offering Permanent Solutions for Iraqi Refugees

The U.S. government and UNHCR face challenges in offering permanent solutions for Iraqi refugees. Conditions in Iraq are not suitable for their return, and host countries such as Jordan and Syria prefer that the refugees return to Iraq. Although the United States is making progress resettling Iraqi refugees in the United States, a limited number of Iraqi refugees are being resettled abroad.

Conditions Are Not Suitable for Repatriation, and Neighboring Host Countries Resist Integrating Refugees

According to UNHCR, voluntary repatriation is the preferred permanent solution for the majority of refugees worldwide. However, in the case of Iraq, according to the UN and the IDP Working Group,³⁸ the conditions for their return are not yet suitable.³⁹ According to IOM, the Iraqi government has cited improvements in security and offered financial incentives (about 1 million Iraqi dinars) to returning refugee families. However, while the UN notes that some improvements have been made, the UN cites major obstacles to large-scale returns, including the uncertain security

³⁸The IDP Working Group members include UNHCR, IOM, other UN agencies, and NGOs. Its reporting is based on surveillance data gathered by IDP Working Group members and on information provided by the Iraqi Ministry of Displacement and Migration, the Kurdistan Regional Government, the International Committee of the Red Cross, and other NGOs.

³⁹See UN, *Iraq and the Region, 2009 Consolidated Appeal*, Office for the Coordination of Humanitarian Affairs (New York and Geneva: Dec. 2008); United Nations High Commissioner for Refugees, *Iraq Situation Update–August 2008* (Geneva: Aug. 2008); and IDP Working Group, *Internally Displaced Persons in Iraq–Update June 2008* (Amman: 2008).

situation,⁴⁰ lack of a mechanism for restoring ownership of property, lack of access to basic services, and the need for reconciliation among ethno-religious groups and political solutions. According to the U.S. Senior Coordinator for Iraqi Refugees and IDP Affairs, the most critical challenge is the uncertain security environment. According to the UN, although voluntary return is the preferred solution, Iraqi refugees should not be encouraged to return until the security situation allows for large-scale return and sufficient monitoring.

Nonetheless, according to the UN, a limited number of Iraqis may be returning, but it may be more due to increasing hardship in the host country and some recent improvements in security rather than significant improvements in Iraq. According to UNHCR, there is no clear trend regarding the number of Iraqis returning to or leaving their country. In Jordan and Syria, difficulties in renewing visas and a lack of funds, employment, and public services affect Iraqi refugees' decisions to stay or return to Iraq. Moreover, according to UNHCR, refugees may return to Iraq for religious holidays and school breaks or to visit family and property. Returning refugees may become internally displaced if their homes have been destroyed or occupied. In early August 2008, the Iraqi Chairman of the Committee for the Displaced noted the difficulties in removing the current occupants of homes owned by Iraqi refugees who want to return. According to UNHCR and the IDP Working Group, returnees primarily return to neighborhoods, districts, and governates under control of the sects to which they belong, and as of August 2008, few families had returned to areas under the control of another sect. Moreover, some refugees, including many with whom we met in Jordan and Syria, will not leave because they fear that they will be unable to return to their host country, if needed, because of the tightening of borders since they left Iraq. Others fear they cannot safely return to Iraq because of their ethnic or religious identity or employment by coalition forces. Although the Iraqi government, with the support of UNHCR and others in the international community, has initiated planning for the return of refugees, some

⁴⁰UNHCR reported in August 2008 that among the main dangers and concerns for returnees are detention and kidnappings, reported from all over the country but most frequently in Baghdad, Diyala, Kirkuk, Muthanna, Ninewa, Salah al Din, and Wassit governates.

international organizations reported that it is unknown whether the Iraqi government has the capacity to implement such plans.⁴¹

Meanwhile, according to the UN, the continued willingness of countries in the region to host Iraqi refugees is essential to ensuring refugee protection; however, opportunities for local integration in neighboring countries are limited for Iraqi refugees. The governments of Syria and Jordan consider Iraqi refugees to be “guests” and have stated their preference that the refugees return to Iraq once the security situation in Iraq improves rather than integrate and settle in their countries. On the one hand, a tradition of hosting and protecting Arab nationals provides a political and moral imperative to accept Iraqis in need of refuge, according to the UN and the international community. On the other hand, Syria and Jordan are determined not to establish arrangements that might lead to permanence, such as officially allowing employment of Iraqi refugees, according to UNHCR. According to Jordanian and Syrian government officials, neither government anticipated a long-term Iraqi presence. According to the UN, most countries in the region have provided Iraqi refugees with access to education and health care even though social services and infrastructure were already strained meeting the needs of the local population.

Although the international community has commended both Syria and Jordan—Syria in particular—for initially opening their borders to refugees, both countries have now tightened their borders because of security and economic factors and their own capacity to address the situation. According to State, UNHCR, and host government officials, both governments are concerned that the past Palestinian refugee experience may repeat itself. According to State, UNHCR, and host government officials, parallel assistance systems or institutions, such as schools, camps, and social services that were created to serve the Palestinian population became an incentive for Palestinians to stay in Jordan or Syria. These parallel structures created resentment among the host population, which led to a strong desire for these governments not to do the same for the Iraqis.⁴² State reported that the Jordanian government wishes to avoid

⁴¹See GAO, *Stabilizing and Rebuilding Iraq: U.S. Ministry Capacity Development Efforts Need an Overall Integrated Strategy to Guide Efforts and Manage Risk*, [GAO-08-117](#) (Washington, D.C.: Oct. 2007).

⁴²As of July 2008, Jordan, with a total population estimated at 6.2 million, hosted an estimated 1.8 million Palestinian refugees, and Syria, with a population of an estimated 19.7 million, hosted an estimated 522,100 Palestinian refugees (Central Intelligence Agency, *World Fact Book*, Aug. 21, 2008).

the perception that Iraqis, like Palestinians, intend to stay in Jordan and compete with Jordanians for jobs and resources.

The United States Has Made Recent Progress in Resettlement Efforts, but Limited Numbers of Refugees May Be Resettled Worldwide

The U.S. government has made progress in resettling Iraqi refugees under its U.S. Refugee Admissions Program; however, only a limited number of other countries have admitted Iraqi refugees through resettlement programs.⁴³ Once the program was announced, in February 2007, State estimated that if USRAP became fully operational, then the U.S. government would be able to admit 2,000 to 3,000 refugees in fiscal year 2007. For fiscal year 2008, the U.S. administration formally established an admission goal of 12,000 Iraqi refugees. Although the U.S. government did not meet State’s fiscal year 2007 goal, admitting 1,608 Iraqi refugees, it surpassed its fiscal year 2008 goal, admitting 13,823 Iraqi refugees as of September 30, 2008 (see table 2 for processing steps and progress made).

Table 2: U.S. Government Iraqi Refugee Processing and Admissions under USRAP, Fiscal Years 2007 and 2008

Key processing steps	Fiscal Year 2007	Fiscal Year 2008	Total Fiscal Year 2007 and 2008
Referrals and applications received	11,646	28,886	40,532
Prescreened by State Department’s overseas processing entity (OPE)	7,519	25,111	32,630
Applicants interviewed and adjudicated for refugee status by DHS	4,422	24,845	29,267
Applicant pending final DHS decision	32	1,073	1,105
Applicant denied by DHS	819	2,160	2,979
Applicant approved by DHS for refugee status (and awaiting completion of outprocessing coordinated by OPE)	2,378	21,812	24,190
Admitted to the United States	1,608	13,823	15,431

Source: GAO analysis based on information from the Department of State, Refugee Processing Center, Worldwide Refugee Admissions Processing System.

⁴³This report does not include information on the outcome of asylum procedures or the admission of refugees outside of resettlement programs.

PRM is responsible for managing USRAP. PRM's regional refugee coordinator accepts referrals from UNHCR, embassies, and certain NGOs⁴⁴ and provides them to an overseas processing entity (OPE).⁴⁵ Certain categories of Iraqis with U.S. affiliations may apply directly for consideration under the USRAP program in Jordan, Egypt, and Iraq.⁴⁶ The OPEs, working under a cooperative agreement with State, prescreen cases by collecting and verifying personal and family information, details of persecution or feared harm, and information for security name checks. State has cooperative agreements with IOM, which operates processing centers in Damascus, Amman, Cairo, and Baghdad, and the International Catholic Migration Commission, which operates centers in Istanbul and Beirut.⁴⁷ Once the OPE prescreens the case, it is then provided to USCIS, of DHS, which makes periodic visits to the regions to interview refugees and adjudicate their applications for resettlement in the United States.⁴⁸ Once USCIS approves or conditionally approves cases, they are returned to the OPE, which coordinates outprocessing, including security clearances, medical examinations, cultural orientation, and travel arrangements. Once the security background check and medical

⁴⁴The regional refugee coordinator was based in Cairo until the summer of 2008, when the new position was established in Amman. A refugee coordinator in Baghdad is responsible for in-country processing and embassy referrals from Iraq.

⁴⁵According to the U.S. government, the vast majority of submissions are UNHCR referrals.

⁴⁶With the passage of a provision in the National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, certain refugees of special humanitarian concern could apply directly to the U.S. Refugee Admissions Program. Such refugees include Iraqis who were or are employed by the U.S. government, a U.S. contractor, or a U.S.-based media organization or NGO, and their family members.

⁴⁷The Departments of State and Homeland Security have recently initiated in-country processing of Iraqis employed by the U.S. government. According to State, IOM provides rotational coverage in Baghdad using a mobile office from Amman.

⁴⁸Under Section 101 (a) (42) of the Immigration and Nationality Act, as amended, [8 U.S.C. § 1101 (a) (42)] the term *refugee* includes "any person who is outside any country of such person's nationality...and who is unable or unwilling to return to, and is unable or unwilling to avail himself or herself of the protection of that country because of persecution or a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion." Under this section, the term *refugee* also includes, in such special circumstances as the President after appropriate consultation [as defined in 8 U.S.C. § 1157 (e)] may specify, any person who is within the country of such person's nationality or, in the case of a person having no nationality, within the country in which such person is habitually residing, and who is persecuted or who has a well-founded fear of persecution on account of race, religion, nationality, membership in a particular social group, or political opinion.

examination are completed with no adverse findings, then the refugee and eligible family members are cleared for departure to the United States.

The U.S. government and UNHCR acknowledged that they initially faced challenges setting up and expanding their resettlement programs for Iraqi refugees. State's Office of Inspector General reported that State had little processing infrastructure in place in the region when the Iraqi resettlement program was announced in February 2007. According to the Inspector General, State had no permanent OPE presence in Damascus or Amman, UNHCR was not actively engaged in registering refugees, and USCIS had no permanent presence in the region. According to DHS and State, one reason for initial delays in processing resettlement referrals in Syria was the Syrian government's delays in approving visas for DHS officials and limitations set on IOM staffing and operations. However, according to UNHCR and State, a significant increase in the number of resettlement departures to the United States has occurred since June 2008.⁴⁹ According to State and IOM officials, this has been due to increased processing capabilities after the initial expansion of the U.S. refugee-processing program. According to the Inspector General, on average, the total processing time from case creation to arrival in the United States for Iraqi refugee cases is 222 days. This is less than the average of 452 days for all other refugee cases worldwide.⁵⁰ According to State officials, every case moves through USRAP at a different pace and can be delayed at any step along the way; however, if serious delays occur in any one case, they are generally due to the time it takes to complete security clearances.⁵¹

In contrast to U.S. efforts, only a small number of nations take part in resettlement programs and accept annual quotas of refugees from around the world, according to UNHCR. UNHCR refers cases to potential resettlement countries. According to State officials, most of its USRAP

⁴⁹According to the State Department, on average about 70 percent of UNHCR referrals in the region receive U.S. refugee status.

⁵⁰The Department of State and the Broadcasting Board of Governors, Office of Inspector General, Middle East Regional Office, *Status of U.S. Refugee Resettlement Processing for Iraqi Nationals*, MERO-IQO-08-02 (May 2008).

⁵¹State officials noted that about 53 percent of the Iraqi refugees who were approved for resettlement but have not left for the United States have not done so because State is awaiting completion of security clearances, known as security advisory opinions, from the Central Intelligence Agency. According to State, the lack of personnel resources at the Central Intelligence Agency has become a significant issue for all immigrant and refugee applicants needing security advisory opinions, not just Iraqis.

applicants come to the program through UNHCR referrals. According to UNHCR, the numbers referred to each country are negotiated based on the numbers each country is willing to consider for resettlement. In August 2008, UNHCR reported that since the first quarter of calendar year 2007, of the more than 40,000 Iraqis referred for resettlement, about 30,000 were referred to the United States. According to UNHCR, for calendar years 2007 and 2008, the United States had resettled a total of 15,170 Iraqi refugees, while other countries had resettled 5,852 Iraqi refugees, as of September 30, 2008 (see table 3).

Table 3: Iraqi Refugee Resettlement Departures by Country of Resettlement, Calendar Years 2007 through 2008, as of September 30, 2008

Resettlement country	Calendar year 2007	Calendar year 2008 through September	Total calendar years 2007 and 2008 through September
Canada	793	1,257	2,050
Australia	464	954	1,418
Sweden	856	427	1,283
Netherlands	124	162	286
Finland	23	113	136
Norway	54	32	86
Others	64	529	593
Subtotal	2,378	3,474	5,852
United States	2,615	12,555	15,170
Total	4,993	16,029	21,022

Source: GAO analysis based on data compiled by UNHCR from resettlement countries.

Note: While the U.S. government generally reports its data on a fiscal year basis, the UN and many international organizations report their data on a calendar year basis. According to UNHCR, data received from resettlement countries has not been verified.

Lack of Comprehensive International Strategic Planning Has Hindered Efforts to Assist and Protect Iraqi Refugees

According to U.S., UN, foreign government, and NGO officials, the international community lacks a comprehensive strategy to address the Iraqi refugee situation. We previously reported that strategic planning is a key element in results-oriented management.⁵² A strategic plan should contain long-term goals that cover a period of not less than 5 years from the year it is submitted and should be updated and revised at least every 3 years.⁵³ Although the international community has recognized the need to strategically plan for the Iraqi refugee situation, it has often focused on the crisis within Iraq and annual planning efforts while deferring strategic planning for the refugee situation. Specifically, the international community lacks a comprehensive international strategy that fully identifies and aligns the need with resources, identifies and addresses factors that may affect planning efforts, and ensures coordination among stakeholders.

UN Continues to Recognize Need for Comprehensive Strategic Planning for Iraqi Refugees, but Focus Remains on Annual Country Operations Plans and Funding Appeals

Although the international community has recognized the need for international strategic planning to address the Iraqi refugee situation, its strategic planning efforts have focused on the situation in Iraq while calling for more to be done for Iraqi refugees. In January 2007, UNHCR stated that its operational and contingency plans must be revised and undertaken as part of a wider effort that involves other UN agencies and government and NGO stakeholders.⁵⁴ UNHCR further noted that the security, political, social, and financial impact on Iraq, the region, and beyond would be felt for many years and that the response to Iraqi displacement must incorporate a long-term perspective to ensure protection for Iraqis and other displaced groups and overall stability in the region. According to the UN, beginning in January 2007, a series of high-level and technical consultations took place, involving key humanitarian agencies, UN headquarters, and UN member states, including the Iraqi government. These consultations resulted in the broad recognition that a

⁵²GAO has found that three practices appear to be critical for effective strategic planning. Organizations must (1) involve their stakeholders; (2) assess their internal and external environments; and (3) align their activities, core processes, and resources to support mission-related outcomes. See GAO, *Agencies' Strategic Plans Under GPRA: Key Questions to Facilitate Congressional Review*, [GAO/GGD-10.1.16](#) (Washington, D.C.: May 1997, Version 1).

⁵³Government Performance and Results Act, Section 3 (a) and (b).

⁵⁴See UNHCR, *Strategy for the Iraq Situation* (Geneva: revised Jan. 1, 2007); and UNHCR, *Iraq Situation Response Supplementary Appeal* (Geneva: Jan. 2007).

humanitarian crisis was unfolding in Iraq and that a multisector interagency response was required.

Accordingly, in April 2007, the UN Country Team for Iraq, under the leadership of the UN Humanitarian Coordinator, developed the *Strategic Framework for Humanitarian Action in Iraq* as a basis for a coordinated response by the international community.⁵⁵ However, this framework solely focused on the immediate measures needed to expedite humanitarian assistance inside Iraq. It also called for a comprehensive approach to addressing the concerns of the Iraqi population displaced to neighboring countries, particularly Jordan and Syria. Moreover, when governments in the region, donors, international organizations, and NGOs convened in April 2007 at a UNHCR-initiated international humanitarian conference on displaced Iraqis, the NGOs called for a multifaceted international strategy to address the Iraqi refugee situation.⁵⁶ However, a comprehensive long term approach has yet to be developed.

UNHCR and State have focused on UNHCR's annual planning efforts for UNHCR and its implementing partners and myriad funding appeals rather than on a comprehensive international strategic plan. State and UNHCR note that planning for Iraqi and other refugees is done through the annual UNHCR country operations plans. Each year, with donor input, UNHCR develops country operations plans that provide a summary of UNHCR's program goals and objectives for refugees in each country in which it operates. However, these plans, focusing on the efforts of UNHCR and its implementing partners, do not contain a mechanism to measure longer term progress in achieving strategic goals. Further, the complete plan has not always been made public.⁵⁷ In January 2008, UNHCR issued its Iraq Situation Supplementary Appeal, which sought funds and support to address the immediate protection and assistance needs of Iraqi refugees,

⁵⁵*Strategic Framework for Humanitarian Action in Iraq*, United Nations and Partners, April 2007.

⁵⁶*NGO Statement on Regional Consequences of the Humanitarian Crisis in Iraq; International Conference on Addressing the Humanitarian Needs of Refugees and Internally Displaced Persons inside Iraq and in Neighboring Countries* (Geneva: Apr.17-18, 2007).

⁵⁷UNHCR develops annual country operations plans that address its plans and performance measures for the refugee situation in each country. Country operations plans or summaries of plans for Syria and Jordan were made public from 2004 through 2006. Plans from 2007 through 2009 were not made public until UNHCR responded to a draft of this report. Moreover, recent plans now cover a period of 2 years.

internally displaced Iraqis, refugees returning to Iraq, and refugees from other countries living in Iraq. Although the appeal provided information on activities, objectives, and targets, it did not prioritize efforts for funding and sets targets only for the immediate appeal. In February 2008, UNHCR stated that the international community needed to develop strategies and allocate resources that not only address immediate and medium-term needs, but also acknowledge that, over the long term, a significant portion of displaced Iraqis may never return.⁵⁸ According to the 2007 study by Fafo, a Norwegian research institute, only one in five Iraqis in Jordan had concrete plans to immigrate to a third country.⁵⁹

With the release of its 2009 Consolidated Appeal for Iraq and the Region in December 2008, the UN has shown progress in its strategic planning efforts for Iraqi refugees. However, the 2009 UN Consolidated Appeal is a 1-year funding request and plan and does not include or refer to strategic plans for the longer term. According to the UN, the 2009 UN Consolidated Appeal's Pillar II, which focuses on Iraqi refugees, targets Iraqi refugee needs in accordance with priorities agreed to by all concerned humanitarian actors and, for the first time, presents a comprehensive statement of their planned response. Rather than have separate and sometimes overlapping appeals and strategies as in the past, UN agencies came together, and with NGO and donor input, developed one funding appeal and plan for the Iraqi refugee situation. Pillar II states the mission,⁶⁰ and the objectives of the humanitarian action plans for each host country are clearly aligned with the strategic objectives for the year and with UNHCR's overall goals to protect and assist refugees.⁶¹ The UN expects its 2009 Consolidated Appeal to serve as a framework for UN and NGO collaboration across the region. The 2009 UN Consolidated Appeal also includes a monitoring and evaluation plan and notes that there will be a

⁵⁸UNHCR, *Estimating the Immediate Needs of Iraqi Refugees in the Middle East, February 2008*.

⁵⁹Fafo, *Iraqis in Jordan 2007; Their Number and Characteristics* (Norway: 2007).

⁶⁰Pillar II's mission is to "ensure host countries maintain welcoming environments in which Iraqi refugees can live their lives in safety and dignity while awaiting return or resettlement." It also notes that ultimately the 2009 UN Consolidated Appeal for Iraq and the Region must be measured by its impact on the lives of the Iraqi refugees.

⁶¹Pillar II objectives within the UN's 2009 Consolidated Appeal for Iraq and the Region are to (1) ensure that Iraqis are able to seek asylum and continue to receive protection; (2) ensure that Iraqi refugees' basic needs are met, with special attention to the most vulnerable; (3) support targeted resettlement for vulnerable Iraqis; and (4) undertake contingency measures for potential voluntary returns.

midyear progress report in June 2009. However, the 2009 UN Consolidated Appeal lacks long term goals, and while it uses available information to assess needs, it is not based on a comprehensive needs assessment and is unclear on how efforts will be prioritized if the appeal is not fully funded. Further, the 2009 UN Consolidated Appeal relies on existing coordination mechanisms that the NGOs stated were problematic.⁶²

Lack of International Strategic Planning Has Hindered Efforts to Assist Iraqi Refugees in Neighboring Host Countries

According to NGOs, the lack of a comprehensive international strategy has hindered efforts to effectively assist Iraqi refugees in Jordan and Syria. Specifically, the international community lacks a strategic planning effort for the assistance of Iraqi refugees that includes (1) a comprehensive assessment of the needs of Iraqi refugees and vulnerable host government populations and uses this assessment to prioritize activities for funding; (2) a discussion of the limitations of annual budget cycles and efforts to mitigate these limitations; and (3) a coordination mechanism involving all stakeholders, including host country governments, international organizations, international and local NGOs (including local churches), and donor countries.

First, the international community lacks a comprehensive assessment of the needs of vulnerable Iraqi refugees and the economically vulnerable populations that host them that would establish a baseline for strategic planning. Without a comprehensive needs assessment in host countries such as Jordan and Syria, it is difficult to determine the scope of the problem and to appropriately prioritize and align resources to address the Iraqi refugee situation. This is particularly important given the limited amount of funding and resources, as well as the decision to avoid developing parallel systems. However, to date, host countries' unwillingness to enable completion of these assessments impedes strategic planning.

Second, State, UNHCR, and NGOs do not have a strategy that addresses concerns raised about factors that may impact assistance efforts, such as the limitations of working with annual budget cycles and efforts to mitigate these limitations. According to State, UNHCR, and NGOs, the annual budget cycle of UNHCR and State's annual funding determinations

⁶²In commenting on a draft of this report, UNHCR noted that it has appointed a senior regional coordinator that will be based in Amman beginning in mid-April 2009 to address coordination issues in the region.

for NGOs impede strategic planning efforts. According to State, planning is constrained by a reliance on donors whose contributions are inconsistent from year to year and whose annual budget cycles undermine multiyear planning on the part of UNHCR and other international humanitarian organizations. According to a UNHCR official, the organization is constrained by a supplementary budget process that has to be approved and renewed each year, thus forcing UNHCR to focus on annual objectives and targets. According to NGOs, the annual budget focus of UNHCR and key donor countries, including the United States, makes it difficult for them to conduct longer-term planning because they do not know whether their efforts will be funded from one year to the next. Thus, they may focus on shorter term efforts in lieu of more effective long term efforts.

Third, NGOs noted that a comprehensive international strategy with long-term goals is needed to improve coordination among all stakeholders to provide humanitarian assistance, effectively use the limited resources available, and prevent duplication of effort. On the basis of discussions with NGOs and UNHCR and a review of NGO progress reports and State's interim progress evaluations of its NGO implementing partners, we found that the lack of coordination among stakeholders has hindered progress. For example, according to interviews and reporting, the international community in Syria lacks an adequate coordination mechanism. UNHCR, to maintain a good working relationship with Syrian authorities, will officially meet and coordinate only with NGOs formally approved to work in the country by the Syrian Arab Red Crescent (SARC). According to U.S., UNHCR, and NGO officials, the SARC registration process is lengthy and nontransparent. Few NGOs have obtained formal SARC approval, although the number of approvals is increasing. According to NGOs, unapproved NGOs are not invited to UN coordination meetings and attempts to meet with UN agencies in Syria and develop formal beneficiary referral processes have been unsuccessful, even for those implementing U.S. programs.

Moreover, NGOs in Syria further stated that there is limited information sharing between church and other humanitarian organizations and UNHCR and relevant UN organizations. The Syrian government has not required SARC approval for assistance provided by churches in Syria. Church officials stated that they were unaware of UNHCR coordination meetings. According to UNHCR, its religious organization partners are aware of coordination meetings but may not attend because they want to maintain a low profile. An NGO that was approved by SARC reported to State that the lack of full NGO participation, including that of churches, means that coordination meetings do not include all NGO activities

assisting Iraqis in Syria. According to a State official, the department ensures coordination among its NGO implementing partners. NGOs noted that more needs to be done to coordinate efforts in Syria as the number of NGOs increases.

In Jordan, UNHCR reported that implementing partners do not speak directly with each other to coordinate areas and types of coverage. For example, UNHCR reported in its Annual Program Interim Report for 2008 that its effort to decentralize the delivery of essential services and humanitarian assistance in 17 geographical areas in Jordan was not fully implemented and was delayed because of operational constraints and lack of coordination among implementing partners. As a result, UNHCR decided to decentralize fewer services in fewer locations and conduct outreach to other locations. Also, according to NGOs in Jordan, coordination is made difficult by the large number of NGOs operating in Jordan on similar programs. NGO officials stated that at one point, the same beneficiaries were attending multiple programs offering the same services and that NGOs were competing for and taking beneficiaries from each other's programs. UNHCR commented that as soon as the organization became aware of the situation, it took immediate action. According to NGOs, they are now working by sector (health, education, etc.) in conjunction with UN agencies to prevent duplication that may have occurred among their programs. UNHCR is also developing a database of beneficiaries in Jordan—the Beneficiary Information System—that is intended to make enrollment in NGO programs more transparent. However, UNHCR encountered difficulties establishing the new system, including delays in data entry, inconsistent use of the system, and noncompliance with established procedures and guidelines on the part of implementing partners. According to UNHCR's 2008 annual interim program report, it has provided additional data entry staff and training for implementing partners to address these issues.

According to international organization, NGO, and State officials, it may be difficult to engage countries hosting Iraqi refugees in international strategic planning efforts because these countries want the refugees to be repatriated as soon as feasible. According to Jordanian, Syrian, and Iraqi government officials, they did not initially expect the refugee situation to be a long term problem. However, Jordanian and Syrian government officials spoke of the long term needs of their education and health sectors, which they said were most affected by the refugee situation. In accordance with host country requirements that parallel assistance systems not be developed, refugee assistance programs have been targeted to both refugees and vulnerable populations in each country. Moreover,

according to UNHCR, although repatriation is the primary goal, the return of refugees to Iraq will need to be phased in over time. While NGOs praise Syria and Jordan for hosting refugees, they also note that more needs to be done to coordinate efforts to register refugees and facilitate the work of relief and resettlement organizations.

Conclusion

The global community is looking to the United States to address the Iraqi refugee situation. However, without a comprehensive assessment of the number and needs of Iraqi refugees in Jordan and Syria, it is difficult to prioritize and fund efforts to help ensure assistance and protection for these refugees. Given that programs and funding currently target both refugees and vulnerable host country populations, the lack of transparent and complete assessments of the impact of the refugees on critical sectors, such as health and education, further exacerbates planning efforts. Similarly, the lack of transparent data on funding complicates efforts to make decisions regarding the assistance to be provided for neighboring countries. Further, without performance measures that assess overall progress in achieving U.S. goals and objectives for Iraqi refugees, it is not possible to show the full impact of U.S. assistance efforts. Moreover, without a comprehensive international strategy with long-term goals and the involvement of all stakeholders, it is difficult to effectively use the limited resources available.

Recommendations for Executive Action

To enhance the ability of the Department of State to evaluate and report progress toward its stated goals and objectives to assist Iraqi refugees, we recommend that the Secretary of State develop performance measures to fully assess and report progress in achieving U.S. goals and objectives for Iraqi refugees. Performance measures and indicators should be clearly linked to progress in achieving stated goals and objectives. Performance goals, objectives, and measures should clearly and transparently address the extent to which programs should target refugees and host government populations, respectively, to the extent practicable.

To provide more transparency in funding provided for Iraqi refugee programs and help Congress and the Administration consider funding requests for neighboring countries, we recommend that the Secretary of State and the USAID Administrator develop systems to separately track and report funding apportioned, obligated, and expended for Iraqi refugee programs in each host country, to the extent practicable.

To enhance the ability of the U.S. government and the international community to plan their assistance programs based on need and provide longer term solutions for Iraqi refugees, we recommend that the Secretary of State take the following two actions:

1. Work with UNHCR and the governments of Jordan, Syria, and other relevant host governments to expedite efforts to conduct independent comprehensive assessments of the number and needs of Iraqi refugees and the related needs of the countries hosting them.
2. In conjunction with relevant U. S. agencies and in coordination with the donor community, work with UNHCR and the governments of Iraq, Jordan, Syria, and other relevant host governments to build on the efforts in the 2009 UN Consolidated Appeal for Iraq and the Region and develop a comprehensive international strategy for providing assistance and solutions for Iraqi refugees.

Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of State and Homeland Security, USAID, and UNHCR. State and USAID provided written comments, which are reprinted in appendixes VI and VII, respectively. State, DHS, and UNHCR provided technical comments, which we incorporated where appropriate.

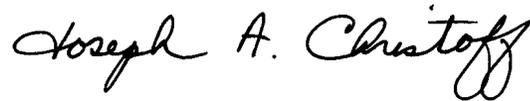
In commenting on a draft of this report, State generally agreed with our recommendations regarding the need for improvements in measuring progress, assessing needs, tracking and reporting funding, and developing an international strategic plan for Iraqi refugees. However, State commented that it does not measure progress for specific refugee populations because such specificity runs counter to State's principles of universality and impartiality. We recognize throughout the report that State's refugee programs help both Iraqi refugees and vulnerable populations in the host countries. However, State's NGO guidelines generally require that its projects demonstrate that at least 50 percent of beneficiaries are Iraqi refugees. Given the importance of the Iraqi refugee situation to the United States, and the fact that State established goals and objectives specifically for Iraqi refugees and efforts within Iraq for 2008 and 2009, we believe that it is important that State establish performance measures and indicators that are clearly linked to its goals and objectives.

Additionally, regarding our recommendation to track and report U.S. funding for Iraqi refugee programs, State noted that it is not practicable to track and report multilateral contributions for Iraqi refugees at the country

level. We realize that State may not always be able to specifically track and report funding that is comingled by multilateral and international organizations before being apportioned to projects in each host country. However, State could provide Congress with information on the large percentage of U.S. contributions to UNHCR appeals and information from UNHCR on projects funded in each country. In addition, State should track and report bilateral funding for neighboring countries hosting Iraqi refugees, funding for its NGO implementing partners, and funding for specific multilateral and international organization projects. As a result, Congress and the Administration would be better able to assess funding requests from Iraq's neighboring countries and incorporate funding data into future planning efforts.

In response to our recommendation that the USAID Administrator develop systems to separately track and report funding for Iraqi refugee programs, USAID noted that the issue was resolved because the agency no longer provides assistance to Iraqi refugees. We continue to believe that USAID needs improvement in tracking and reporting funding for Iraqi refugee assistance. First, based on data that USAID provided, it appears that the agency is still expending funds on Iraqi refugee programs. Second, the agency had considerable difficulty tracking, reporting, and verifying the accuracy of its funding data when GAO requested the information, resulting in a protracted effort that extended over a period of months. USAID had difficulty reconciling its funding data with amounts it previously reported to State as Iraq-related humanitarian assistance. USAID officials stated that the agency does not have a centralized system for tracking funding for Iraq-related humanitarian assistance. To help Congress and the Administration consider funding requests for neighboring countries and to better incorporate these requests into planning efforts, USAID should develop a system for tracking and reporting funding for Iraqi refugee assistance.

We are sending copies of this report to interested congressional committees and the Secretary of State, the Secretary of Homeland Security, and the Administrator for USAID. We will also make copies available at no charge on the GAO Web site at <http://www.gao.gov>. If you or your staff have any questions about this report, please contact me at (202) 512-8979 or christoffj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VIII.



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List of Congressional Committees

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Chair
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The Honorable John F. Tierney
Chair
Subcommittee on National Security and Foreign Affairs
Committee on Oversight and Government Reform
House of Representatives

The Honorable Edward M. Kennedy
United States Senate

Appendix I: Special Immigrant Visa Programs

Two U.S. special immigrant visa (SIV) programs afford qualified Iraqis with opportunities to immigrate to the United States. Some Iraqi refugees may qualify under these programs. The first SIV program, established in fiscal year 2006, targeted Iraqi and Afghan translators and their dependents and resulted in 2,130 visas issued in fiscal years 2007 and 2008.¹ The second SIV program, established in fiscal year 2008, targeted certain Iraqis who had been U.S. government employees, contractors, or subcontractors and their dependents.² This program resulted in a total of 705 visas issued in fiscal year 2008.

Management and Processing of Special Immigrant Visas for Iraqis

The Department of State's (State) Bureau of Consular Affairs administers laws, formulates regulations, and implements policies relating to consular services and immigration. Consular Affairs administers two SIV programs, in conjunction with the Department of Homeland Security (DHS), to further assist Iraqis wanting to permanently immigrate to the United States. Principal applicants and their families who meet the conditions may file a petition (Form I-360) with DHS's U.S. Citizenship and Immigration Services (USCIS). The petition is to include information about the petitioners and their immediate family members, proof of nationality, a favorable recommendation documenting their service, and other supporting documents. USCIS examiners evaluate the petition and, if it is approved, send it to State's National Visa Center. The center contacts the applicants and sets an embassy or consulate location for a visa interview, informs the applicant about the materials and documents required, verifies by e-mail that applicants have collected all required documents, and may request a security advisory opinion. The applicants and family members formally submit their application to a consular officer in person at the embassy or consulate. Consular officers interview applicants and review documents submitted and security and medical clearances and issue an immigrant visa if candidates satisfy all criteria. Iraqi SIV recipients are eligible for the same resettlement assistance, entitlement programs, and other benefits as Iraqi refugees admitted under the U.S. Refugee Admissions Program (USRAP).³ Finally, DHS officers

¹National Defense Authorization Act for Fiscal Year 2006, Pub. L. No. 109-163, Section 1059.

²National Defense Authorization Act for Fiscal Year 2008, Pub. L. No. 110-181, Section 1244.

³After December 26, 2007, Iraqis and Afghans who receive special immigrant status are eligible for a period up to 6 months for resettlement assistance, entitlement programs, and other benefits available to refugees admitted under section 207 of the Immigration and Nationality Act. See Consolidated Appropriations Act, 2008 (Pub. L. No. 110-161).

verify the entire SIV package upon the applicants' arrival in the United States before granting individuals admission as lawful permanent resident aliens. Recipients of SIVs have lawful permanent residence status upon entry into the United States and are eligible to apply for U.S. citizenship after residing for 5 years in the United States.

State and DHS Implemented Two Special Immigrant Visa Programs That Were Available to Qualified Iraqi Refugees and Others

The Departments of State and Homeland Security have implemented two SIV programs, established by Congress, to further assist qualified Iraqis who worked for the U.S. government and want to immigrate to the United States.⁴ Qualifying Iraqi refugees may apply for these programs. However, the Departments of State and Defense have not maintained a complete record of Iraqis working for the U.S. government. In August 2008, the Congressional Budget Office reported that between 2003 and 2007, an estimated 70,500 Iraqi nationals worked as contractors for the U.S. government. However, this number does not include Iraqi subcontractors because the Department of State and the U.S. Agency for International Development could not provide this information.⁵

The first SIV program, established under section 1059 of the National Defense Authorization Act for fiscal year 2006, targeted Iraqi and Afghan translators and their dependents and resulted in a total of 2,130 visas issued in fiscal years 2007 and 2008, as of September 30, 2008. In January 2006, Congress authorized that up to 50 Iraqi or Afghan translators who worked directly with U.S. armed forces and met other conditions as outlined in the law could receive SIVs during any fiscal year. Those who qualified are known as principal applicants. Spouses and children of principal applicants could also receive SIVs, but they were not counted against the authorized cap. In June 2007, Congress amended the program, authorizing an increase in the limit to 500 SIVs for each fiscal year 2007 and 2008 and expanding it to cover both translators and interpreters who worked directly for the U.S. armed forces and those that worked under the

⁴Under these programs, Iraqi nationals who worked for the U.S. government, as defined in each program's authorizing legislation, and met other conditions are eligible to receive special immigrant visas.

⁵Congressional Budget Office, *Contractors' Support of U.S. Operations in Iraq, August 2008* (Washington, D.C.: Aug. 2008).

chief of mission authority.⁶ According to State, given that Congress increased the limit late in the fiscal year, the department had little time to notify and process an additional 450 applicants. Therefore, according to State, it exercised its authority, under section 203(g) of the Immigration and Nationality Act, as amended, to estimate and anticipate the future number of visa approvals and thus scheduled far more applicants for interviews than the available number of SIVs. According to State, this was done on the assumptions that some would not appear for the interview, clearances would not be received, or some might not qualify. State officials said that while a cutoff date is usually imposed for other immigrant visa categories, it was not imposed for this program because these applicants faced imminent danger and State did not want to fall short of the cap. The result was that State exceeded its 500 limit in fiscal year 2007 by issuing 526 SIVs for principal applicants and in fiscal year 2008 by issuing 560 SIVs for principal applicants (see table 4).

Table 4: U.S. Special Immigrant Visas Issued for Iraqi and Afghan Translators/Interpreters and Their Dependents, under Section 1059, as of September 30, 2008

Fiscal year	Authorized number of principal applicant visas	Number of principal applicants issued visas				Number of spouses and children of principal applicants issued visas				Total number of issued visas
		Iraqi	Afghan	Other	Total	Iraqi	Afghan	Other	Total	
2007	500	429	92	5	526	383	69	10	462	988
2008	500	357	202	1	560	350	221	11	582	1,142
Totals	1,000	786	294	6	1,086	733	290	21	1,044	2,130

Source: GAO analysis of State Department data.

Note: "Other" includes Iraqi and Afghani nationals who were born in a country other than Afghanistan or Iraq. The State Department tracks data by the applicant's country of birth.

The second SIV program, established under section 1244 of the National Defense Authorization Act for fiscal year 2008, targets certain Iraqis who have been U.S. government employees, contractors, or subcontractors and their

⁶In fiscal year 2009, however, the authorized number of SIVs for this program will revert to 50 annually. See An Act to Increase the Number of Iraqi and Afghani Translators and Interpreters Who May Be Admitted to the United States as Special Immigrants, and For Other Purposes, Pub. L. No. 110-36, June 15, 2007.

dependents.⁷ This program had resulted in 705 visas issued in fiscal year 2008. In January 2008, Congress authorized up to 5,000 Iraqis, per year for the next 5 fiscal years, who worked for or on behalf of the U.S. government in Iraq and had experienced or are experiencing an ongoing serious threat as a consequence of that employment and who meet other conditions outlined in the law, could receive SIVs. Further, the law allowed that if the 5,000 ceiling was not met in any given year, the unused authorized amounts could be carried over to the following year. Additionally, spouses and children of principal applicants are also eligible to receive SIVs, although these are not counted against the 5,000 cap. In June 2008, Congress amended section 1244 to allow processing to begin immediately and authorized State to convert approved section 1059 SIV petitions filed before October 1, 2008, for which a visa was not immediately available, to section 1244 SIV petitions.⁸ As of September 30, 2008, State had issued 371 visas to Iraqi and Afghan principal applicants under section 1244, all of which were converted from section 1059 petitions (see table 5).

Table 5: U.S. Special Immigrant Visas Issued for Iraqis and Afghans and Their Dependents, under Section 1244, as of September 30, 2008

Fiscal year	Authorized number of principal applicant visas	Number of principal applicants issued visas				Number of spouses and children of principal applicants issued visas				Total number of issued visas
		Iraqi	Afghan	Other	Total	Iraqi	Afghan	Other	Total	
2008	5,000	169	198	4	371	125	195	14	334	705

Source: GAO analysis of State Department data.

Notes: While petitions for these visas were approved under the section 1059 program, since visas were not immediately available under this program, they were converted to the section 1244 program for issuance. Authority to convert these petitions was given to State and DHS in Pub. Law No. 110-242 in June 2008.

“Other” includes Iraqi and Afghan nationals who were born in a country other than Afghanistan or Iraq. The State Department tracks data by the applicant’s country of birth.

⁷Under the 1244 program, the Chief of Mission or his or her designee is required to conduct a risk assessment of the principal applicant and an independent review of records maintained by the U.S. government or hiring organization to confirm employment and faithful and valuable service to the U.S. government prior to approval of a petition. According to State, the Chief of Mission has delegated this responsibility to the Senior Coordinator for Refugees and Internally Displaced Persons.

⁸Pub. L. No. 110-181, as passed in January 2008, did not allow processing to begin until fiscal year 2009. However, Pub. L. No. 110-242, passed on June 3, 2008, amended the legislation to allow processing to begin in fiscal year 2008 and continue through 2012, and if any unused amounts remained, into 2013.

According to a May 2008 State Department Office of Inspector General report, several challenges may delay processing of Iraqi employees under the second SIV program.⁹ Officials we spoke with reiterated two key challenges:

- Eligibility screening takes time because no central repository or database containing the names of the thousands of Iraqis that have been employed on behalf of the U.S. government since March 2003 is available.
- Embassies in Amman, Baghdad, and Damascus will require additional staff and physical changes to their workspaces to accommodate the increased workload, according to the Office of Inspector General and consular officers we spoke with in Amman, Baghdad, and Damascus. According to State's Bureau of Consular Affairs, since the publication of the Office of Inspector General report, it has (1) added an officer in Amman and is working with the embassy to add additional interview space and an interviewing window, and (2) authorized an additional officer and two locally employed staff for the consular section in Baghdad.

⁹U.S. Department of State and the Broadcasting Board of Governors Office of Inspector General, Middle East Regional Office, *Status of Iraqi Special Immigrant Visa Programs* (May 2008).

Appendix II: Objectives, Scope, and Methodology

To examine efforts to protect and assist Iraqi refugees, we assessed challenges in (1) measuring and monitoring progress in achieving U.S. goals for assisting Iraqi refugees, (2) providing humanitarian assistance to Iraqi refugees, (3) offering solutions for Iraqi refugees, and (4) developing an international strategic plan to address the Iraqi refugee situation. In addition, we reviewed the progress made in implementing special immigrant visa (SIV) programs for Iraqis, which may also benefit some refugees but are not designed specifically for them (see app. I). We also conducted fieldwork in Washington, D.C.; Geneva, Switzerland; Rome, Italy; Amman, Jordan; Damascus, Syria; and, to a limited extent, Iraq.

To assess progress in achieving U.S. goals for Iraqi refugees, we interviewed officials from the Department of State (State), the United Nations High Commissioner for Refugees (UNHCR), and their implementing partners and reviewed their policies, strategies, planning, programming, progress reporting, and monitoring documents. We also reviewed 13 Department of State interim program evaluation reports and 13 final nongovernmental organization (NGO) reports to assess progress in meeting goals.¹ In Washington, D.C., we met with officials within State's Population, Refugee, and Migration (PRM) bureau from the Office of Policy and Resource Planning and the Office of Assistance for Asia and the Near East. We obtained and assessed information on the general management of refugee assistance programs, coordination with international partners, and progress and program performance reporting. In Jordan and Syria, we interviewed U.S. embassy officials responsible for monitoring the programs and their implementing partners, including UNHCR and nongovernmental organizations. We also toured U.S. and UNHCR projects and met with project implementers. We discussed implementation and monitoring challenges with NGOs in Washington, D.C.; Jordan; and Syria.

To assess U.S. government and international efforts to provide humanitarian assistance to Iraqi refugees and to assess international strategic planning efforts to address the Iraqi refugee situation, we interviewed officials of the U.S., Jordanian, Syrian, and Iraqi governments; UNHCR, the International Organization for Migration (IOM), and other United Nations (UN) agencies; nongovernmental organizations; and research institutes. We reviewed and analyzed relevant strategies, funding appeals, planning and reporting documentation, studies, and other related

¹We did not assess the reliability of the data in these reports.

documents. We also held discussion groups with NGOs with a presence in Jordan, Syria, and/or Iraq to discuss program and overarching challenges and held discussion groups with Iraqi refugees in Jordan and Syria to discuss their situations, needs, assistance received, and challenges encountered. To further assess the numbers and needs of Iraqi refugees, we reviewed and assessed the reliability of available assessments and report data. To identify the nature and extent of U.S. and international funding, we reviewed funding data provided by State's PRM, the U.S. Agency for International Development (USAID), the UN, UNHCR, and the Iraqi government. According to PRM, its official data were obtained from its Global Financial Management System. USAID's Office of U.S. Foreign Disaster Assistance provided its official data from its Abacus and Phoenix systems, and USAID's Food for Peace program provided its data from its Food for Peace Information System, New Management System, and Phoenix system. UNHCR's Donor Relations & Resource Mobilization Service, the UN's Office for the Coordination of Humanitarian Affairs, and State's PRM bureau provided funding data for the UNHCR appeals and contributions received by the United States and other donors. To verify our summarization of the funding data, we sent out draft tables to agency and UN contributors and made supported changes.

To assess the key challenges the U.S. government and UNHCR face in offering solutions for Iraqi refugees and the special immigrant visa program, we interviewed and assessed documentation from State's PRM; State's Bureau of Consular Affairs; State's Office of Inspector General; the Department of Homeland Security's U.S. Citizenship and Immigration Services (USCIS); U.S. embassy officials in Jordan, Syria, and Iraq; UNHCR, Office for the Coordination of Humanitarian Affairs, IOM, and other UN agencies; nongovernmental organizations; and research institutes. In the United States, we held discussion sessions with nongovernmental organizations with a presence in Iraq, Syria, and Jordan. In Jordan and Syria, we held discussion sessions with Iraqi refugees and visited U.S.- and UN-funded programs. To further assess the U.S. Refugee Admissions program, we obtained and assessed data from State's Worldwide Refugee Admissions Program System. We toured State's overseas processing entities managed by IOM and reviewed processing steps and data with IOM, USCIS, State, and U.S. embassy officials, including refugee coordinators. We analyzed U.S. admissions data and found the data to be sufficiently reliable for the purposes of this report. To further address the SIV programs, we reviewed the legislative requirements for the two SIV programs found in Section 1059 of the Fiscal Year 2006 National Defense Authorization Act and Section 1244 of the Fiscal Year 2008 National Defense Authorization Act. We reviewed

relevant documents from the Bureau of Consular Affairs concerning Iraqi interpreter/translator SIV program planning, processes, resources, and implementation. Also, we met with Consular Affairs officials in Washington, D.C.; Iraq; Syria; and Jordan, who provided information on general consular management and oversight, visa processing and procedures, staffing, and resource needs. We analyzed SIV data and found the data to be sufficiently reliable for the purposes of this report.

We conducted this performance audit from January 2008 to January 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix III: Status of U.S. Appropriation Funds Apportioned to Iraq-Related Humanitarian Assistance, and Intended Beneficiaries, as of September 30, 2008

Dollars in millions

Source of funds	Agency/ program	Funding			Intended program beneficiaries
		Apportioned ^a	Obligated	Expended	
2003 Iraq Relief and Reconstruction Fund (IRRF 1)/ P.L. 108-11	State/ Population, Refugees, and Migration Bureau (PRM)	\$160.5	\$160.4	\$159.0	In Iraq: Internally displaced persons (IDP) and vulnerable populations ^b
2004 Iraq Relief and Reconstruction Fund (IRRF 2)/ P.L. 108-106					In region: Iraqi refugees and host country populations ^c
	USAID/Office of U.S. Foreign Disaster Assistance (OFDA)	129.3	129.3	126.8	In Iraq: IDPs and vulnerable populations In region: none
Food for Peace/ P.L. 480 Title II; 108-7, P.L. 108-447, P.L. 110-5, P.L. 110-161	USAID/ Office of Food for Peace	218.2	218.2	218.2	In Iraq: IDPs In region: Iraqi refugees and host country populations
Food for Peace/P.L. 108-7 ^d	USAID/ Office of Food for Peace	191.1	191.1	191.1	In Iraq: Iraqi population In region: none
Migration and Refugee Assistance/ P.L. 108-7, P.L. 109-102, P.L. 110-5, P.L. 110-161	State/PRM	170.9	170.8	124.7	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
Supplemental for Migration and Refugee Assistance/ P.L. 110-28, P.L.110-252	State/PRM	173.5	118.2	48.0	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
International Disaster and Famine Assistance/ P.L. 108-7, P.L. 107-115, P.L. 108-447, P.L. 109-102, P.L. 110-28, P.L. 110-161, P.L. 110-252	USAID/OFDA	163.5	127.7	59.4	In Iraq: IDPs and vulnerable populations In region: none
2003 Economic Support Fund/ P.L. 108-7	USAID/OFDA	12.0	12.0	11.6	In Iraq: IDPs and vulnerable populations In region: none
2006 Economic Support Fund/ P.L. 109-234	State/PRM	50.0	50.0	31.8	In Iraq: none In region: Iraqi refugees and host country populations in Jordan, Syria, Lebanon, and Egypt
2007 Supplemental for Economic Support Fund/ P.L. 110-28	USAID/ Office of Middle Eastern Affairs	10.3	10.3	1.2	In Iraq: none In region: government of Jordan to meet the needs of Iraqi refugees and host country population

**Appendix III: Status of U.S. Appropriation
Funds Apportioned to Iraq-Related
Humanitarian Assistance, and Intended
Beneficiaries, as of September 30, 2008**

Source of funds	Agency/ program	Funding			Intended program beneficiaries
		Apportioned ^a	Obligated	Expended	
2008 Supplemental for Economic Support Fund/ P.L. 110-252	State/PRM	45.0	45.0	0	In Iraq: none In region: Iraqi refugees in Jordan and host country population
	USAID/ Office of Middle Eastern Affairs	155.0	155.0	110.0	In Iraq: none In region: government of Jordan to meet the needs of Iraqi refugees and host country population
Emergency Refugee and Migration Assistance ^e / Presidential Determination (P.D.) 2003-17, P.D. 2003-13, and P.D. 2001-22, P.D. 2007-31	State/PRM	51.9	51.6	48.8	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
Development Assistance/ P.L. 108-7	USAID/OFDA	28.5	28.5	26.3	In Iraq: IDPs and vulnerable populations In region: none
Child Survival and Health/ P.L. 108-7	USAID/OFDA	5.8	5.8	5.7	In Iraq: IDPs In region: none
Total		\$1,565.5	\$1,473.9	\$1,162.6	

Source: GAO analysis based on data and information from the Department of State and USAID.

^aUSAID-apportioned funds also include funds recovered or unallocated in prior years.

^bVulnerable populations in Iraq may include other Iraqis at risk; Iraqis who have returned from other countries; refugees in Iraq from other countries, such as Palestinians; and other conflict victims.

^cU.S. refugee programs benefit the host country population because countries hosting Iraqi refugees in the region, such as Jordan and Syria, do not allow donors to provide assistance solely to Iraqi refugees. Host countries receiving assistance are identified when the information was made available. In instances where the host country is not identified, a portion of the funds was contributed to international organizations that may have spent the funds in one or a number of the countries hosting Iraqis in the region.

^dAccording to USAID, in 2003, USAID's Food for Peace Program received \$191.1 million, which was reallocated from funds originally appropriated in P.L. 108-7 to Development Assistance, Economic Support Fund, Child Survival and Health, and International Disaster and Famine Assistance accounts.

^eThe U.S. Emergency Refugee and Migration Assistance (ERMA) fund is drawn upon by the President to meet unexpected urgent refugee and migration needs whenever the President determines that it is in the U.S. national interest to do so. Funds are appropriated annually to the ERMA fund and remain available until expended.

Appendix IV: U.S. Contributions to UNHCR Appeals for Iraq-Related Humanitarian Assistance, and Intended Beneficiaries, Calendar Years 2003 through 2008

Dollars in millions

UNHCR appeals for Iraq Operation	Amount of appeal	Amount of appeal funded		U.S. portion of new contributions	U.S. portion of new contributions (percentage)	Intended program beneficiaries
		Carryover ^a	New contribution ^b			
2003 UNHCR Appeal for the Iraq Situation, and UNHCR Iraq Revised Appeal— Ensuring Protection and Enabling Return ^c	\$90.6	0	\$77.4	\$31.0	40.1%	In Iraq: Internally displaced persons (IDP) and vulnerable populations ^d In region: Iraqi refugees and host country populations ^e
2004 UNHCR Iraq Operation Appeal	74.1	\$20.2	30.5	16.2	53.1	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
2005 UNHCR Iraq Operation Supplementary Appeal	42.0	18.9	21.7	19.2	88.6	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
2006 UNHCR Iraq Operation Supplementary Appeal	29.8	8.9	15.0	8.0	53.3	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
2007 UNHCR Iraq Situation Response, and UNHCR Supplementary Appeal Iraq Situation Response ^f	123.7	3.5	112.2	36.0	32.1	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
UNHCR Portion of 2007 UNHCR and UNICEF Joint Appeal — Providing Education Opportunities to Iraqi Children in Host Countries: A Regional Perspective ^g	99.0	0	39.9	30.0	75.2	In Iraq: none In region: Iraqi refugees and host country populations
2008 UNHCR Iraq Situation Supplementary Appeal ^h	271.1	9.1	245.0	175.4	71.6	In Iraq: IDPs and vulnerable populations In region: Iraqi refugees and host country populations
Total	\$730.3	Not applicable	\$541.7	\$315.8	58.3%	

Source: GAO analysis based on data and information from the UN High Commissioner for Refugees, the UN Office for the Coordination of Humanitarian Affairs, and the U.S. State Department.

**Appendix IV: U.S. Contributions to UNHCR
Appeals for Iraq-Related Humanitarian
Assistance, and Intended Beneficiaries,
Calendar Years 2003 through 2008**

^aCarryover includes funds contributed but not used from prior year.

^bNew contributions include funds from donors for that year's appeal.

^cThe 2003 UNHCR Iraq Revised Appeal reduced the original appeal from \$154.1 million to \$90.6 million.

^dVulnerable populations in Iraq may include other Iraqis at risk; Iraqis who have returned from other countries; refugees in Iraq from other countries, such as Palestinians; and other conflict victims.

^eRefugee programs benefit the host country population because countries hosting Iraqi refugees in the region, such as Jordan and Syria, do not allow donors to provide assistance solely to Iraqi refugees.

^fThe 2007 UNHCR Iraq Situation Response appeal increased the appeal from \$59.7 million to \$123.7 million. UNHCR's portion of a 2007 Joint Health Sector Appeal and contributions made were folded into the 2007 UNHCR Iraq Situation Response appeal.

^gThe UNICEF portion of the Joint Education Appeal included additional funding requirements for \$31.0 million. The amount of this portion of the appeal that was funded was \$9.4 million, including \$9.0 million in contributions from the United States, representing 95.7 percent of total contributions to the UNICEF portion of the Joint Education Appeal.

^hContributions to the 2008 UNHCR Iraq Situation Supplementary Appeal included here are as of December 10, 2008.

Appendix V: Individual Iraqi Refugee Beneficiaries of UNHCR Assistance in Syria and Jordan, Calendar Year 2008

Type of assistance provided	Syria (individuals)	Jordan (individuals)
Food and nonfood items ^a	144,900	13,909
Cash assistance	38,234	18,074
Health care	570,000	25,498
Education support ^b	35,224	10,631
Students supported in public universities	154	Data not available
Legal support	12,930	1,380
Psychosocial services	13,861	6,152
Outreach	72,000	21,128
People with disabilities assisted	779	912

Source: UNHCR data.

Note: We did not assess the reliability of the data provided by UNHCR.

^aFood (i.e., oil, rice, lentils, sugar, tea, tomato paste, pasta, and cracked wheat) and nonfood items (i.e., mattresses, blankets, soap, detergent, and sanitary materials) provided to Iraqi refugees in Jordan included 5,087 hygiene kits, nonfood items for 602 individuals, and food for 8,220 persons.

^bEducation support provided to Iraqi refugees in Syria included uniforms, shoes, and school materials. Education support provided to Iraqi refugees in Jordan included 2,615 school kits, 1,685 school fees, vocational training for 2,063 students, nonformal education for 2,493 individuals, and formal education provided to 1,775 students.

Appendix VI: Comments from the Department of State

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



United States Department of State

*Assistant Secretary for Resource Management
and Chief Financial Officer*

Washington, D.C. 20520

MAR 3 1 2009

Ms. Jacquelyn Williams-Bridgers
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Ms. Williams-Bridgers:

We appreciate the opportunity to review your draft report, "IRAQI REFUGEE ASSISTANCE: Improvements Needed In Measuring Progress, Assessing Needs, Tracking Funds, and Developing an International Strategic Plan" GAO Job Code 320565.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Hilary Ingraham, Program Officer, Bureau of Population, Refugees and Migration at (202) 663-3715.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Millette".

James L. Millette

cc: GAO – Audrey Solis
PRM – Sam Witten (Acting)
State/OIG – Mark Duda

Department of State Comments on Draft GAO Report

**Iraqi Refugee Assistance: Improvements Needed in Measuring
Progress, Assessing Needs, Tracking Funds, and Developing an
International Strategic Plan**
(GAO-09-120, GAO Code 320565)

Thank you for the opportunity to comment on the draft report. The Department of State appreciates that the GAO recognizes the multiple challenges inherent in identifying durable solutions and providing protection and humanitarian assistance for displaced Iraqis. The report acknowledges that many of the challenges require the active participation of non-U.S. government actors to achieve progress. The report also recognizes the progress that has been made to date, reflecting our efforts to continually look for ways to improve the delivery of assistance and provide protection to Iraqi refugees. However, the title of the GAO report only conveys the challenges identified and not the broader scope of the report's findings. The Department requests that the GAO change the title of the report in order to better capture the report's findings and acknowledge both the challenges and progress.

Recommendations for Executive Action

The GAO recommends that the Secretary of State, with relevant others, take four actions:

1. Develop performance measures to assess and report progress in achieving overall U.S. goals and objectives for Iraqi refugees. Performance measures and indicators should be clearly linked to progress in achieving stated goals and objectives. Performance goals, objectives, and measures should clearly and transparently address the extent to which programs should target refugees and host government populations, respectively, to the extent practicable.
2. In conjunction with the USAID Administrator, develop systems to separately track and report funding apportioned, obligated, and expended for Iraqi refugee programs in each host country.
3. Work with UNHCR and the governments of Jordan, Syria, and other relevant host countries to expedite efforts to conduct independent comprehensive assessments of the number and needs of Iraqi refugees and the related needs of the countries hosting them.

4. In conjunction with relevant U.S. agencies and in coordination with the donor community, work with UNHCR and the governments of Iraq, Jordan, Syria, and other relevant host governments to build on the efforts in the 2009 UN Consolidated Appeal for Iraq and the Region and develop a comprehensive international strategy for providing assistance and solutions for Iraqi refugees.

Develop Performance Measures

The Department of State concurs with the recommendation to strengthen the Bureau of Population, Refugees, and Migration's (PRM) performance planning, monitoring, and reporting. As reflected in its Congressional Budget Justification, Congressional Presentation Document, and Bureau Strategic Plan, PRM has established global performance goals and measures, collects and analyzes performance results data on these measures, and adjusts targets based on past performance. Moreover, as noted in the GAO report, the Bureau has already developed more specific, measurable goals and objectives for its assistance and protection efforts for Iraqi refugees. The Bureau is working with both international organization partners as well as non-governmental organization (NGO) partners to continue strengthening program-level indicators. PRM is also refining a standardized list of key humanitarian indicators in an effort to collect information at the program level which could be aggregated to capture performance by sector at the program level, and, as appropriate, to inform the existing global-level performance measures of the Bureau. All of these activities and enhancements to our existing practices are fully consistent with GAO's recommendation to strengthen performance planning, monitoring, and reporting.

However, the GAO recommendation goes further and suggests that PRM's performance planning, monitoring and reporting should focus on programs defined by "refugee population" (e.g., Iraqi refugees). The Department of State, and PRM in particular, does not define its programs in this way for several reasons:

- 1) In many refugee situations - including the primarily urban displacements of the Iraqi situation - it is not desirable, and frequently not possible, to disentangle populations by nationality for purposes of program planning and performance monitoring. Moreover, we note that refugee populations vary significantly in terms of size, geographic

distribution, relevant policy concerns, and humanitarian needs, and that international practice in assisting refugees does not rely on metrics that are firmly limited to a particular nationality in this kind of a complex situation.

- 2) Universality and impartiality are cardinal principles of humanitarian assistance. PRM and its partners strive to meet the assistance and protection needs of refugees around the world (universality), regardless of nationality, ethnicity, religion or political opinion (impartiality). To require goals and objectives that are uniquely developed for a specific refugee population runs counter to these humanitarian principles, as the U.S. and other international donors have long maintained that assistance standards are universal.
- 3) Most PRM contributions to multilateral humanitarian organizations, such as UNHCR and the International Committee of the Red Cross (ICRC), are loosely earmarked at a regional level to maximize the flexibility these organizations need to respond to dynamic and sometimes mixed population movements, changing field conditions, and cross-border operations. Many UN appeals are regional. (e.g., UNHCR appeals for the Afghan or Sudanese repatriation operations, multiple relief operations in Africa) Contributing to regional appeals is longstanding practice of the United States in general and PRM in particular. Indeed, the Bureau's authorities under the Migration and Refugee Assistance Act of 1962, as amended, and its policy approach emphasize this multilateral support.

Track and Report Funding in Each Host Country

The Department of State concurs with this recommendation, but notes that in most cases it is not practicable to track and report multilateral contributions at the country level. The Department takes its fiscal and programmatic accountability responsibilities very seriously. We agree that it is important to track and report funding apportioned, obligated and expended. The Department will continue to track and report funding for Iraqi refugee programs in each host country when possible. For example, the Department of State and USAID have tracked and reported on bilateral funding used specifically for programs to assist Iraqi refugees in Jordan. The Department coordinates its oversight with the appropriate host governmental authorities.

The Department affirms the GAO's understanding that programs assisting Iraqi refugees should include assistance to vulnerable members of the host

population. Programs that only benefit refugees may lead to animosity and discrimination from local communities, cause protection concerns for refugees, and potentially destabilize what may be a strained domestic political situation. Inclusive programs are also more palatable to the host governments, which adamantly do not want to establish separate systems to assist Iraqis.

The Department will continue to track funding contributed to NGO programs at the country level (e.g., programming by specific NGOs funded by PRM in Syria, Jordan, and Lebanon). We will make sure this information is available in the public domain through including it, as appropriate, in press releases on USG support for humanitarian assistance to Iraqis. We will also report on any multilateral contributions we make at the country level. In general, country-specific multilateral contributions are made to an appeal which is for activities in a specific country. For example, in FY 2008 the U.S. contributed to the World Food Program's Emergency Operation in Syria.

In most cases, it is not practicable to track multilateral funding at the country level. In order to do this, we would either need to (i) ask international organizations to issue country-specific appeals, or (ii) earmark all regional appeal contributions to specific countries. For the reasons that the GAO itself cites on page 28 of this report, we agree that the UN should continue to recognize the regional context in humanitarian situations and consolidate its appeals as it did in the 2009 UN Consolidated Appeal, thereby not issuing individual appeals for each host country. Indeed, an integrated appeal framework helps to inform a regional strategy, another of GAO's specific recommendations. In this respect, as part of a collective effort to provide humanitarian assistance more efficiently, the U.S. government has joined thirty-five other donor governments in supporting the framework of principles and standards which comprises the Good Humanitarian Donorship (GHD) initiative, co-chairing the group of governments in 2008. One of these principles calls for donors to provide flexible funding, vice earmarked funding, to multilateral organizations in order to give these organizations the ability to prioritize beneficiaries' most urgent needs and adapt to changing circumstances. The Department recognizes the importance of giving international organizations flexibility in responding to humanitarian needs of beneficiaries, and generally strives to minimize earmarking contributions at the country level or below (e.g., the sector or project level).

The Department does not believe that the benefits of being able to track multilateral funding at the country level are outweighed by the negative repercussions these changes would have on USG partners' ability to effectively provide protection and assistance to Iraqi refugees.

Independent and Comprehensive Assessments in Host Countries

The Department of State concurs with this recommendation but notes that our ability to take action on it requires the active concurrence of host country governments. It has long been clear to the Department of State, international organizations, and other donor countries that a comprehensive assessment of the numbers and needs of Iraqi refugees in host countries would greatly improve the international community's ability to plan and implement assistance activities for Iraqi refugees. The international humanitarian community has urged host countries to facilitate an accurate count of Iraqi refugees and assess their needs. Despite this, host countries have not permitted independent, comprehensive assessments of the needs and numbers of Iraqis living within their borders. We continue to look for ways to constructively raise these issues with host governments.

The Department assesses needs for specific services and programs in coordination with its implementing partners. UNHCR, other international organizations, and NGOs analyze information they have gathered on the needs and number of vulnerable Iraqi refugees through and use it to develop assistance and protection programs. UNHCR relies primarily on information collected during the registration of Iraqi refugees and through other outreach mechanisms. The UN's Consolidated Appeals Process (CAP) also provides a coordinated overview of Iraqi needs based on input from UN agencies, other international organizations, and NGOs. NGOs routinely conduct smaller-scale needs assessments when the organizations are designing project proposals to compete for PRM or other donor funding. During program implementation, international organizations and NGOs assess their activities to ensure that project activities meet the needs of Iraqi refugees, measure the impact of the services provided and identify unmet needs. Taken collectively, these assessments provide insight into the needs of Iraqi refugees across sectors and geographic locations. Finally, PRM identifies gaps in the humanitarian assistance provided by multilateral organizations and responds by selecting and funding NGO projects to clearly respond to these identified needs and gaps.

Comprehensive International Strategy

The Department of State concurs with this recommendation. As the GAO report notes on page one, the U.S. government has taken the lead in efforts to mitigate the humanitarian crisis facing displaced Iraqis. The Department of State continues to work in coordination with relevant U.S. agencies, UNHCR, other donor governments, and the Governments of Iraq, Jordan and Syria, to develop a strategy to provide needed protection and assistance to displaced Iraqis. Efforts to build a comprehensive strategy are hampered by the lack of comprehensive needs and numbers assessments of displaced Iraqis and the lack of agreement within the international community on the relative vulnerability of this displaced population in comparison to other refugee crises worldwide when donors apportion limited international humanitarian assistance funds.

The Department continues to lead the way in international fora, urging international organizations to develop accurate needs-based budgets to assist displaced Iraqis. PRM continues to meet with other partners to discuss changing circumstances facing displaced Iraqis. For example, in mid-March 2009, PRM and USAID's Office of U.S. Foreign Disaster Assistance (OFDA) jointly hosted a meeting in Jordan to discuss ways the international community could support the return of Iraqi refugees and internally displaced persons (IDPs) and prepare for future, large-scale returns. PRM and OFDA met with UN agencies, other international organizations and NGOs active inside Iraq and identified sectors that need support. The group determined that the international community needed to support community based programs and development activities to enable Iraq to absorb its returning citizens. As follow up to the conference, PRM and OFDA are working together to coordinate U.S. government support for programs assisting current returns and to build the capacity of the Government of Iraq to be ready to meet the needs of Iraqi citizens when they start returning home in large numbers.

President Obama made it clear in his February 27 speech on Iraq that the U.S. has a strategic interest and moral responsibility to assist displaced Iraqis. PRM is an active participant in the interagency discussions that are informing the development of a comprehensive Iraq strategy for the new administration. The U.S. recognizes that continued provision of protection and assistance to displaced Iraqis and the simultaneous development of

programs to support sustainable returns are critical components of this much larger, interrelated policy strategy.

Additional Comments on Text

PRM Engagement

Throughout the report, the GAO frequently refers to two primary ways PRM works to assist displaced Iraqis: PRM contributes funding to international organizations like UNHCR, other UN agencies and NGOs, and monitors the implementation of partners' program activities. [See, for example, page 10, "To implement its goals and objectives for Iraqi refugees, State's PRM bureau primarily funds and monitors the activities of its implementing partners."] However the GAO does not mention other important components of our work, particularly that of providing guidance to international organization and NGO partners and strong diplomatic engagement with host and donor governments on issues relating to protection and assistance for Iraqis. In these efforts, PRM works closely with Department colleagues in regional bureaus, U.S. Embassies, and U.S. Missions in New York, Brussels, and Geneva.

See comment 1.

We are an active participant in UNHCR's Executive Committee (ExCom) which meets four times per year (once in the spring, once in the summer, and twice in the fall) to provide guidance on UNHCR operations, program standards, and policies. At ExCom meetings, the U.S. government joins other donor governments in reviewing and approving all UNHCR programs and budgets, giving the USG a significant voice in UNHCR's operations. Outside the Executive Committee meetings, PRM staff discuss the needs of displaced Iraqis and various program activities with a wide variety of UNHCR officials at minimum on a weekly basis. Our interlocutors range from the High Commissioner, Deputy High Commissioner, and the Middle East Regional Director to UNHCR Country Representatives in Jordan, Syria, Lebanon and Iraq and other program staff within these country operations.

With regard to NGO programs, PRM and its NGO partners establish the agreed upon parameters for the assistance programs NGOs are committing to undertake with PRM funding. PRM and NGOs agree on targets for program activities and ways to measure the organization's progress towards meeting those targets. PRM selects NGO programs to fill gaps the Bureau has identified in the assistance provided by international organizations.

Monitoring

The Department agrees with monitoring challenges identified by the GAO in the report. We remain very concerned, however, that the data used on page 21 to validate this finding are largely drawn from a single element of an assessment PRM conducted in April 2008 to help the Bureau identify program performance areas within UNHCR's operations in Jordan that needed improvement. GAO quotes PRM's assessment that, at that time, UNHCR was able to effectively monitor approximately 40-59% of its implementing partners. The report misrepresents this percentage - taking it out of context in the full assessment - and represents it as a conclusion valid for the entire time period of the report. It is therefore misleading and understates the highly professional and systematic monitoring that is actually undertaken by UNHCR and PRM.

See comment 2.

Specifically, at the time of the assessment, UNHCR's implementing partners conducted program activities at more than 200 program sites across Jordan. The monitoring statistic given in the PRM assessment primarily reflects the percentage of the sites UNHCR could physically visit as part of its monitoring plan. While site visits, including unannounced site visits, are an important component of monitoring, effective and complete monitoring includes many other components: review of progress and final program reports, review of financial reports, follow-up with program managers and other personnel, and consultations with other donors and humanitarian organizations active in the same geographic areas or sectors. Indeed, the GAO report fails to mention that, in the same element of the April 2008 assessment, PRM notes that UNHCR monitors the finances of its implementing partners on a quarterly basis and all implementing partners undergo a comprehensive audit. Finally, we note that the 200 sites mentioned in the GAO report are activity sites, not distinct implementing partner programs. We have full confidence in UNHCR's effective monitoring of its implementing partners during 2008. We continue to regularly discuss with UNHCR its program implementation and ongoing monitoring efforts in Iraq and the region in its efforts to assist displaced Iraqis.

Individuals eligible for Special Immigrant Visas and the U.S. Refugee Admissions Program

On page 48, the report asserts that the State Department recommends that individuals not pursue the Special Immigrant Visa (SIV) program if they have a refugee interview date already scheduled under the U.S. Refugee

See comment 3.

Admissions Program (USRAP) because refugee processing is quicker than SIV processing. In actuality, processing under the SIV program is significantly faster than the in-country refugee program under USRAP. The SIV process requires one interview in contrast to the USRAP, which requires one interview with IOM and a second one with DHS. The State Department encourages otherwise qualified applicants to apply for the SIV program.

See comment 4.

Chief of Mission approval process for SIV applicants

As the report states on page 50, the Special Immigrant Visa (SIV) program, established under section 1244 of the National Defense Authorization Act for fiscal year 2008, provides 5,000 SIVs for certain Iraqis who have been U.S. government employees, contractors, subcontractors or their dependents. The report makes no mention of the 1244 program's new requirement for Chief of Mission Approval (COM). The SIV COM approval process, as mandated in the legislation, has the Chief of Mission or the COM's designee at Embassy Baghdad review application requests, conduct verification of U.S. government employment and a risk assessment. The COM has delegated this responsibility to the Senior Coordinator for Refugees and Internally Displaced Persons (IDPs). SIV applicants send their documents via email to refugee office staff for processing and then final review and approval by the Senior Coordinator. In an effort to reduce staffing and life-support needs in Baghdad, in April 2009 the majority of the SIV COM processing will be moved from Baghdad offices to the National Visa Center, which is part of the Bureau of Consular Affairs at the Department of State.

The following are GAO's comments to the Department of State's letter dated March 31, 2009

GAO Comments

1. We added text in the background to describe other components of PRM's work.
2. As stated in the draft of this report, in April 2008, State reported that UNHCR "effectively monitors 40 to 59 percent of its partners." In State's written and technical comments, the department notes that the statement in its document should have read "implementing partners' program activity sites." We have revised this report to correct State's reporting error. Further, despite our requests for an updated evaluation, State did not provide updated percentages of site visits. UNHCR, in its technical comments on the draft, provided evidence on the steps it has taken in 2009 to mitigate this challenge. We incorporated this information, as appropriate.
3. This statement was deleted from the text.
4. We added a footnote to provide information on the 1244 program's requirement for Chief of Mission approval and the approval process.

Appendix VII: Comments from the U.S. Agency for International Development



USAID
FROM THE AMERICAN PEOPLE

APR 1 2009

Joseph A. Christoff, Director
International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Christoff:

I am pleased to provide the U.S. Agency for International Development's (USAID) formal response on the draft GAO report entitled "Iraqi Refugee Assistance: Improvements Needed in Measuring Progress, Assessing Needs, Tracking Funds, and Developing an International Strategic Plan" (GAO-09-120).

Thank you for your recommendation to USAID regarding the tracking of funding for refugee assistance programs. In Iraq, USAID provides assistance for Internally Displaced People (IDP) through our office of Foreign Disaster Assistance (OFDA). While refugee programs are overseen primarily by the State Department's bureau of Population, Refugees, and Migration (PRM); USAID also does provide some assistance to Jordan to assist their efforts in supporting Iraqi refugees.

While early on in our Iraq assistance we did provide limited refugee assistance, we no longer fund these types of activities under our humanitarian assistance program. The tracking of refugee assistance is no longer a concern for USAID's humanitarian assistance program. In addition, we have an established system of tracking and monitoring for our assistance in Jordan. Therefore, we feel this issue has been resolved.

Thank you for the opportunity to respond to the GAO draft report and for the courtesies extended by your staff in the conduct of this review.

Sincerely,

A handwritten signature in black ink that reads "Drew W. Luten". The signature is written in a cursive style.

Drew W. Luten
Acting Assistant Administrator
Bureau for Management

U.S. Agency for International Development
1300 Pennsylvania Avenue, NW
Washington, DC 20523
www.usaid.gov

Appendix VIII: GAO Contact and Staff Acknowledgments

GAO Contact

Joseph A. Christoff (202) 512-8979 or christoffj@gao.gov

Acknowledgments

In addition, Audrey Solis, Assistant Director; Minty Abraham; Lynn Cothorn; David Dornisch; Timothy Fairbanks; Kathleen Monahan; Mary Moutsos; Andrew Stavisky; and Heather Whitehead made key contributions to this report. Technical assistance was provided by Shirley Brothwell, Elizabeth Curda, Aniruddha Dasgupta, Etana Finkler, David Hancock, and Jeremy Sebest.

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