



# STATE DEPARTMENT

## Bureau of International Narcotics and Law Enforcement Affairs Needs to Fully Address Prior GAO Recommendations

Statement of Chelsa Kenney, Director,  
International Affairs and Trade

### Testimony

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Committee on Foreign Affairs, House of Representatives

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# GAO Highlights

For more information, contact Chelsa Kenney at [kenneyc@gao.gov](mailto:kenneyc@gao.gov).

Highlights of [GAO-25-108189](#), a testimony before the Subcommittee on Western Hemisphere, Committee on Foreign Affairs, House of Representatives

March 2025

## STATE DEPARTMENT

### **Bureau of International Narcotics and Law Enforcement Affairs Needs to Fully Address Prior GAO Recommendations**

#### **Why GAO Did This Study**

Combatting transnational crime and drug trafficking are long-standing national security priorities for the U.S., and the opioid crisis has been a public health emergency since 2017. Hundreds of thousands of Americans have died from misusing drugs, with more than 66 percent of these deaths involving synthetic opioids such as fentanyl. According to the Office of National Drug Control Policy, criminal organizations in Mexico supply most of the illicitly manufactured fentanyl smuggled into the U.S. INL's mission is to keep Americans safe by countering crime, illegal drugs, and instability abroad.

This statement discusses four key areas where State and INL have faced challenges implementing programs overseas: (1) performance management, (2) program monitoring, (3) program evaluation, and (4) fraud risk management.

This statement is based on GAO's prior work on a variety of State and INL programs. For that work, GAO analyzed State documents and data and interviewed agency officials. For a full list of the reports, see Related GAO Products at the conclusion of this statement.

#### **What GAO Recommends**

GAO made 16 recommendations in the reports covered by this statement, including to improve performance management, program monitoring, and program evaluation. As of March 2025, six of the recommendations have been implemented, and 10 remain open. GAO continues to monitor State's and INL's progress in implementing the open recommendations.

#### **What GAO Found**

The Department of State is responsible for coordinating U.S. assistance supporting international efforts to combat illicit narcotics, a role fulfilled by the Bureau of International Narcotics and Law Enforcement Affairs (INL).

## Fentanyl Seized in Nuevo Leon, Mexico



Source: Department of State: Bureau of International Narcotics and Law Enforcement. | GAO-25-108189

GAO previously identified challenges State and INL face in determining the effectiveness of assistance they provide to foreign partners. Performance management can help INL identify whether the billions of dollars appropriated to help meet its mission are spent effectively and help achieve its goals. In September 2023, GAO found that INL's efforts to implement assistance to Mexico had been hampered by incomplete performance management efforts. As a result, the U.S. government could not demonstrate that the more than \$3 billion of assistance it had provided to Mexico was spent effectively and helped achieve goals. GAO made three recommendations to INL to better ensure that it spends such assistance effectively. INL has taken steps to address these recommendations but has not fully implemented them.

GAO also previously identified challenges State and INL face in monitoring and evaluating projects. For example, in March 2023, GAO found that State had not conducted a comprehensive evaluation of the collective efforts of U.S. agencies to combat cybercrime and ensure that programs were achieving intended goals. GAO recommended that INL conduct a comprehensive evaluation of capacity building efforts to counter cybercrime. State officials said that INL planned to conduct such an evaluation. INL has taken steps to address this recommendation but has not fully implemented it.

In addition, GAO previously identified challenges INL faces in managing fraud risk in assistance to Mexico. Specifically, in March 2021, GAO found that INL had not fully assessed the potential risks of fraud in assistance to Mexico and made three recommendations to INL to help improve efforts in this area. While INL has developed a preliminary anti-fraud strategy for that assistance, it has not yet issued or implemented a final anti-fraud strategy.

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Chairwoman Salazar, Ranking Member Castro, and Members of the Subcommittee:

Thank you for the opportunity to discuss our work on the Department of State Bureau of International Narcotics and Law Enforcement Affairs (INL). Combatting transnational crime and drug trafficking are long-standing national security priorities for the U.S., and the opioid crisis has been a public health emergency since 2017. Hundreds of thousands of Americans have died from misusing drugs, with more than 66 percent of these deaths involving synthetic opioids such as fentanyl.<sup>1</sup> According to the Office of National Drug Control Policy, criminal organizations in Mexico supply most of the illicitly manufactured fentanyl smuggled into the U.S.<sup>2</sup>

State is responsible for coordinating U.S. assistance supporting international efforts to combat illicit narcotics, a role that INL and its predecessors have fulfilled since 1978. INL's mission is to keep Americans safe by countering crime, illegal drugs, and instability abroad. To help inform the subcommittee's reauthorization of INL, my statement today focuses on 16 recommendations we have made over the past five years to help State and INL assess progress toward achieving their goals. Specifically, I will discuss recommendations we have made in four key areas: (1) performance management, (2) program monitoring, (3) program evaluation, and (4) fraud risk management. As of March 2025, State and INL have implemented six of these recommendations, and 10 remain unaddressed. Several of our open recommendations, if implemented, could strengthen efforts to combat illicit narcotics trafficking and firearms trafficking, which contribute to high levels of violence and instability in Mexico, Central America, and the Caribbean.<sup>3</sup> We continue to monitor State's and INL's progress in implementing the open recommendations.

This statement is based primarily on reports published from May 2020 to October 2024 related to State and INL programs where we made recommendations. For these reports, we analyzed State and INL documents and data related to the programs we reviewed and interviewed agency officials. We made 16 recommendations in the reports covered by this statement, including to improve performance management, program monitoring, program evaluation, and fraud risk management.

More detailed information on the objectives, scope, and methodology for that work can be found in the issued reports listed in [Related GAO Products](#) at the conclusion of this statement. We conducted the work on which this statement is based 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.

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<sup>1</sup>See The White House Executive Office of the President's Office of National Drug Control Policy (ONDCP), *National Drug Control Strategy 2022* and ONDCP, *National Drug Control Strategy 2024*. In March 2021, we added national efforts to prevent, respond to, and recover from drug misuse to our High-Risk List. See GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: Mar. 2, 2021). GAO's High-Risk Series identifies government operations with vulnerabilities to fraud, waste, abuse, and mismanagement, or in need of transformation to address economy, efficiency, or effectiveness challenges.

<sup>2</sup>ONDCP, *National Drug Control Strategy 2022* and ONDCP, *National Drug Control Strategy 2024*.

<sup>3</sup>We have also reported on U.S. government efforts to combat transnational criminal organizations and illicit drug trafficking in Venezuela and Colombia. References to those reports may be found in the Related GAO Products at the conclusion of this statement.

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## INL Has Opportunities to Better Meet Its Mission by Strengthening Its Performance Management

Improved performance management can help INL identify whether the billions of dollars appropriated to help meet its mission are spent effectively and are helping achieve its goals. Performance management includes identifying goals, objectives, and indicators. However, we have identified issues with INL's performance management and, since 2021, have made five recommendations to State and INL to address performance management issues. Of those five recommendations, State implemented one, related to combatting firearms trafficking to Mexico. However, it has not fully implemented the remaining four, which are related to assistance to Mexico and firearms trafficking in the Caribbean. As a result, opportunities remain to strengthen INL's performance management efforts and better support U.S. national security goals.

**Assistance to Mexico.** Since 2008, the goals of U.S. assistance to Mexico have generally focused on promoting the rule of law and countering the drug trade, with U.S. funding totaling over \$3 billion.<sup>4</sup> According to INL, U.S. assistance to Mexico has helped equip hundreds of courtrooms with technology, supported the training of thousands of forensic specialists, and helped Mexican law enforcement detect and seize tens of thousands of kilograms of illicit drugs and precursor chemicals used in synthetic drug production.

In September 2023, we found that INL's efforts to implement assistance to Mexico had been impeded by incomplete performance management efforts.<sup>5</sup> We evaluated INL's progress toward the broad strategic goals of the Bicentennial Framework, a U.S.-Mexico agreement to address shared goals. These goals include preventing transnational crime and pursuing criminal networks. Specifically, we analyzed INL's actions to address five key elements needed to assess progress toward those goals. We found that INL had addressed two of the five key elements, and that fully assessing its progress would better position INL to expand on successes and adjust less successful approaches. Without fully addressing the three remaining key elements, the U.S. government does not have assurance that it is achieving its security goals in Mexico and that its investments are being spent effectively.<sup>6</sup>

We made three recommendations to INL to better ensure that assistance to Mexico is spent effectively, including identifying projects, performance indicators, and monitoring and evaluation plans to help assess

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<sup>4</sup>In 2021, the U.S. and Mexico agreed to the Bicentennial Framework for Security, Public Health, and Safe Communities (Bicentennial Framework). The Bicentennial Framework replaced and expanded on the scope of the 2008 Mérida Initiative by adding new U.S. commitments to reduce drug demand in the U.S. and the flow of illegal firearms from the U.S. to Mexico.

<sup>5</sup>GAO, *U.S. Assistance to Mexico: State Department Should Take Steps to Assess Overall Progress*, [GAO-23-103795](#) (Washington, D.C.: Sept. 12, 2023). Our analysis was based on key elements that we identified for assessing the results of strategic objectives. See GAO, *Foreign Assistance: Better Guidance for Strategy Development Could Help Agencies Align Their Efforts*, [GAO-18-499](#) (Washington, D.C.: July 12, 2018).

<sup>6</sup>Specifically, INL had not (1) identified projects needed to achieve results, (2) established milestones and performance indicators to assess progress towards broad goals, and (3) established monitoring and evaluation plans.

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progress towards goals.<sup>7</sup> INL has not fully implemented these recommendations. In February 2025, State officials told us that foreign assistance efforts were paused pending the results of a review directed by Executive Order 14169.<sup>8</sup>

**Firearms trafficking.** The Caribbean, Central America, and Mexico all face high rates of violence, often perpetrated by transnational criminal organizations and exacerbated by the availability of firearms to these criminal organizations.<sup>9</sup> We have reported that as much as 70 percent of the firearms recovered and traced in the Caribbean and Mexico, and 40 percent from Central America, originated in the U.S. In some countries, violence and insecurity have been identified as contributing factors in migration to the United States.<sup>10</sup> State bureaus, including INL, provide assistance to countries to help address violence and firearms trafficking, alongside several other U.S. agencies. For example, INL supports activities providing training, technical assistance, policy guidance, and basic equipment to enhance the capacity of countries to combat illicit small arms and ammunition trafficking through operational forensic ballistics. However, limitations in State's and INL's performance management related to their efforts to combat firearms trafficking have limited their ability to determine whether those efforts have been effective.<sup>11</sup>

In October 2024, we reported on U.S. efforts to combat firearms trafficking in the Caribbean, including INL's support for the Caribbean Basin Security Initiative (CBSI), a U.S. security partnership with 13 Caribbean countries.<sup>12</sup> We found that INL had developed a strategic framework to manage performance for CBSI, including identifying indicators and results to track progress toward goals such as reducing transnational crime. However, the framework lacked indicators related to reducing firearms trafficking in the Caribbean. We

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<sup>7</sup>In June 2024, we designated as a priority recommendation our recommendation that INL should develop monitoring and evaluation plans critical to assess progress towards the goals and objectives of the Bicentennial Framework. Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue. See GAO, *Priority Open Recommendations: Department of State*, [GAO-24-107318](#) (Washington, D.C.: June 4, 2024).

<sup>8</sup>See Exec. Order No. 14169, *Reevaluating and Realigning United States Foreign Aid*, 90 Fed. Reg. 8619 (Jan. 20, 2025).

<sup>9</sup>This statement discusses our work on U.S. efforts to combat firearms trafficking in Mexico and the Caribbean. In addition, we have reported on efforts to combat firearms trafficking in Central America. See GAO, *Firearms Trafficking: More Information is Needed to Inform U.S. Efforts in Central America*, [GAO-22-104680](#) (Washington, D.C.: Jan. 11, 2022). We recommended that State's Bureau for Western Hemisphere Affairs coordinate with relevant bureaus and partner countries to identify country-specific conditions in Belize, El Salvador, Guatemala, and Honduras to inform U.S. efforts to counter firearms trafficking. The State Department implemented this recommendation.

<sup>10</sup>See [GAO-22-104680](#).

<sup>11</sup>In addition to State, other U.S. agencies that have roles in combatting firearms trafficking include the Department of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives, and the Department of Homeland Security's U.S. Immigration and Customs Enforcement.

<sup>12</sup>GAO, *Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities*, [GAO-25-107007](#) (Washington, D.C.: Oct. 15, 2024). Our analysis was based on practices that agencies can take to assess progress. See GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 2023).



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recommended that INL establish specific firearms trafficking indicators to better enable it to measure progress of its efforts. INL concurred with our recommendation, and we are monitoring its actions to implement it.<sup>13</sup>

In February 2021, we reported on U.S. efforts to combat firearms trafficking to Mexico, including State's and INL's programs to build the capacity of local law enforcement.<sup>14</sup> We found that U.S. agencies and their components—including INL and other State bureaus—had undertaken efforts to disrupt firearms trafficking to Mexico but lacked fully developed performance measures and were therefore unable to assess progress toward disrupting trafficking. We recommended that State develop performance measures to assess the results of its assistance to Mexico related to firearms trafficking. State has since implemented our recommendation by updating its Mexico Integrated Country Strategy to include information on firearms-related activities and indicators.

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## INL Has Opportunities to Improve Its Program Monitoring

For INL to effectively manage the billions of dollars appropriated in support of its programs, it needs to consistently monitor the programs. In addition to performance management, INL, like other agencies and their components, should monitor implementation and performance at the project level to help ensure that it effectively manages foreign assistance, addresses impediments, and meets its assistance goals.<sup>15</sup> Since 2020, we have made six recommendations to INL to develop and implement internal monitoring procedures and oversight mechanisms for its programs. Of those six recommendations, INL has implemented the three that are related to its assistance to Mexico and rule of law programs. However, it has not fully implemented the three that are related to its wildlife trafficking programs.

**Assistance to Mexico.** In May 2020, we found that INL generally had not followed our key practices for developing monitoring plans for its programs in Mexico under the Mérida Initiative.<sup>16</sup> Further, we found that INL had not consistently tracked project performance data. As a result, INL may not have had sufficient information to assess the performance of the entities responsible for project implementation and determine whether corrective actions are needed or ensure that it has accurate and reliable performance data.

We recommended that INL establish procedures to verify that monitoring officials for Mérida Initiative projects followed the key practices. INL has addressed this recommendation. It developed new bureau-wide monitoring and evaluation guidance and various implementation tools, drawing on our leading practices, State guidance,

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<sup>13</sup>In February 2019, we reported on prior efforts to establish a mechanism to assess CBSI. See GAO, *Security Assistance: U.S. Agencies Should Establish a Mechanism to Assess Caribbean Basin Security Initiative Progress*, [GAO-19-201](#) (Washington, D.C.: Feb. 27, 2019). The report included two recommendations to State and INL to develop a reporting mechanism for CBSI and implement a data management system for collecting reliable CBSI data. State and INL implemented these recommendations.

<sup>14</sup>GAO, *Firearms Trafficking: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis*, [GAO-21-322](#) (Washington, D.C.: Feb. 22, 2021). This report also addressed recommendations to the DOJ's Bureau of Alcohol, Tobacco, Firearms and Explosives, DHS's U.S. Immigration and Customs Enforcement, and DHS's Customs and Border Protection.

<sup>15</sup>GAO, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices*, [GAO-19-466](#) (Washington, D.C.: July 31, 2019).

<sup>16</sup>GAO, *U.S. Assistance to Mexico: State Department Could Improve Its Monitoring of Mérida Initiative Projects*, [GAO-20-388](#) (Washington, D.C.: May 12, 2020). This report also addressed a recommendation to the U.S. Agency for International Development.

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and other sources. In addition, INL developed monitoring training that included guidance on establishing regular performance reviews.

**Rule of Law programs.** INL funds projects around the world that support the rule of law and help to protect fundamental rights, act as a foundation for democratic rule and economic growth, and combat crime and extremism. In November 2020, we found that INL had followed most, but not all, key practices for monitoring its rule of law assistance for the awards we reviewed from selected countries.<sup>17</sup> For example, we found that INL had not consistently demonstrated that project representatives included project goals and objectives in monitoring plans, identified risks in those plans, and assessed and approved monitoring reports from implementing partners. Without information on project goals and objectives or documentation of monitoring activities, INL could not be sure that projects were implemented effectively or that monitoring practices were followed.

We made two recommendations to INL to improve monitoring of rule of law projects by establishing procedures to ensure that (1) monitoring officials develop monitoring plans that identify project goals, objectives, and risks, and (2) these officials assess and approve monitoring reports from implementing partners. In January 2021, in response to our recommendations, INL updated its monitoring guidance, which summarizes monitoring requirements and explains its practices to implement those requirements.

**Wildlife trafficking.** INL funds partner organizations that support park rangers' efforts to protect wildlife around the world. Wildlife trafficking fuels corruption and destabilizes communities that depend on wildlife for biodiversity and ecotourism. INL supports activities like ranger patrols within protected areas to detect and deter poaching and training and equipment to enhance crime scene capabilities. In July 2024, we found that INL had not ensured that partners in its wildlife trafficking projects reported on the effectiveness of planned social safeguards, such as human rights training for rangers, and grievance and redress mechanisms for local communities.<sup>18</sup> Additionally, we identified abuse allegations that INL was unaware of, including an alleged incident involving sexual abuse by a ranger.

We made three recommendations to INL to improve monitoring of wildlife trafficking projects, including developing internal guidance for officials who review social safeguard plans, requiring implementing partners to report on social safeguard implementation, and clarify reporting requirements for grievances and human rights abuse allegations. INL has taken steps to address these three recommendations but has not yet fully implemented them. Without ensuring that partners provide monitoring updates and notify INL of abuse allegations in a timely manner, INL may be unaware of abuses or of whether social safeguards are working as intended.

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<sup>17</sup>GAO, *Rule of Law Assistance: State and USAID Could Improve Monitoring Efforts*, [GAO-21-14](#) (Washington, D.C.: Nov. 9, 2020). This report also addressed a recommendation to the U.S. Agency for International Development. We also reported in 2020 on State's overseas missions' efforts to coordinate rule of law assistance. See GAO, *Rule of Law Assistance: Agency Efforts Are Guided by Various Strategies, and Overseas Missions Should Ensure that Programming Is Fully Coordinated*, [GAO-20-393](#) (Washington, D.C.: June 9, 2020). While that report discussed efforts by INL, the resulting recommendation was addressed to State's overseas missions and is therefore not included in this statement.

<sup>18</sup>GAO, *Wildlife Trafficking: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities*, [GAO-24-106553](#) (Washington, D.C.: July 23, 2024). This report also addressed recommendations to the U.S. Agency for International Development and the U.S. Fish and Wildlife Service.



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## INL Has Opportunities to Better Determine the Effectiveness of Its Efforts by Conducting Program Evaluations

To ensure that its efforts have intended effects and to inform future expenditures, it is important that INL conducts evaluations of its programs. Program evaluations typically examine achievement of program objectives and assess how well a program is working. They examine a broader range of information than monitoring activities. Since 2023, we have made two recommendations for INL to conduct program evaluations of its efforts to (1) help build police capacity in Haiti and (2) combat global cybercrime. As of March 2025, INL had not implemented either of these recommendations.

**Building Haiti's police capacity.** After the catastrophic 2010 earthquake in Haiti, INL provided assistance focused on developing the Haitian National Police through trainings, advisory support, and the provision of equipment. In March 2023 we found that program monitoring reports indicated that INL's activities achieved mixed results and focused on outputs such as the number of trainings provided. We also found that INL had no plans to evaluate its efforts, which limited information about their effectiveness.<sup>19</sup> We reported that by evaluating its activities intended to build Haiti's police capacity, INL could better understand the effectiveness of its efforts and how to strengthen assistance.

We recommended that INL conduct an evaluation of the effectiveness of its activities to develop the Haitian National Police. In State's response to the report, State told us that it planned to conduct an independent program evaluation and develop findings and recommendations that would guide future program decision-making. In March 2025, INL told us that their activities had been delayed due to the security environment in Haiti and other factors, but that they were finalizing a Statement of Work for the evaluation.

**Combatting global cybercrime.** INL is State's lead office for foreign assistance to combat cybercrime, which includes assisting foreign criminal justice partners and engaging in information sharing with foreign partners and U.S. law enforcement agencies. In March 2023 we found that INL and its interagency partners had accomplished key activities, such as nations joining international treaties aimed at combatting cybercrime and that INL had controls in place to assess the effects of these efforts.<sup>20</sup> However, we also found that INL had not conducted a comprehensive evaluation of U.S. agencies' collective efforts to ensure that programs were achieving intended goals. We reported that such a comprehensive evaluation could inform INL as to whether its capacity building efforts are meeting objectives to strengthen partner nations' law enforcement capacity and enhance international efforts to combat cybercrime.

We recommended that INL conduct a comprehensive evaluation of capacity building efforts to counter cybercrime. According to State, INL planned to conduct such an evaluation. In March 2025, INL told us that they had provided a draft evaluation report to implementing partners for review and extended the review and finalization period for the report through April 30, 2025.

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<sup>19</sup>GAO, *Haiti: USAID and State Should Improve Management and Assessment of Reconstruction Activities*, [GAO-23-105211](#) (Washington, D.C.: Mar. 16, 2023). This report also addressed recommendations to the U.S. Agency for International Development.

<sup>20</sup>GAO, *Global Cybercrime: Federal Agency Efforts to Address International Partners' Capacity to Combat Crime*, [GAO-23-104768](#) (Washington, D.C.: Mar. 1, 2023).

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## INL Has Opportunities to Mitigate Vulnerabilities by Assessing Fraud Risk in Assistance to Mexico

**Assistance to Mexico.** U.S. agencies including those that provide assistance to other countries are responsible for managing fraud risks.<sup>21</sup> In Mexico, programs face a risk that U.S. assistance could be provided to individuals or organizations involved in illicit activities, such as contract fraud, human rights abuses, drug trafficking, or other crimes. In March 2021, we reported on INL’s fraud risk management for programs in Mexico under the Mérida Initiative.<sup>22</sup> We found that while INL had some fraud controls for programs under the Mérida Initiative, such as employee background checks and fraud hotlines, INL had not fully assessed the potential risks of fraud in those programs and therefore had opportunities to further mitigate vulnerabilities.<sup>23</sup>

We made three recommendations to INL to help improve fraud risk management for assistance to Mexico. INL has implemented two of these recommendations, including establishing a time frame to conduct a fraud risk assessment and updating policies and guidance on requiring fraud awareness training for managers, employees, and stakeholders with responsibility for implementing and overseeing State programs under the Mérida Initiative. However, the agency has not implemented our recommendation to implement an anti-fraud strategy for programs under the Mérida Initiative. While INL officials told us they developed a preliminary anti-fraud strategy, INL has not yet issued or implemented a final anti-fraud strategy for these programs. An anti-fraud strategy is important because it communicates staff roles and responsibilities and documents the program’s activities for preventing, detecting, and responding to fraud, among other things, for managing a program’s fraud risks. An opportunity therefore remains to further strengthen INL’s fraud risk management of assistance to Mexico.

In conclusion, performance management, monitoring, and evaluation are important efforts for U.S. agencies and their components—including State and INL—to ensure taxpayer dollars are spent effectively and U.S. goals are achieved. INL should identify clear goals and activities that can help achieve those goals, monitor whether those activities are implemented appropriately, and evaluate the contribution of those activities to meeting the agencies’ goals. As INL provides support to law enforcement around the world and in support of U.S. interests it needs to improve how it assesses the effectiveness of the assistance it delivers. Moreover, fraud risk management is an important aspect of oversight, and while INL has taken actions to address issues

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<sup>21</sup>See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014). Fraud is obtaining something of value through willful misrepresentation. Fraud risk is a function of likelihood and impact and exists when individuals have an opportunity to engage in fraud, have an incentive or are under pressure to commit fraud, or are able to rationalize committing fraud. Fraud risk management is a process for ensuring program integrity by continuously and strategically mitigating the likelihood and impact of fraud. When fraud risks can be identified and mitigated, fraud may be less likely to occur. Although the occurrence of fraud indicates that there is a fraud risk, a fraud risk can exist even if actual fraud has not occurred. GAO, *Fraud Risk Management: Key Areas for Federal Agency and Congressional Action*, [GAO-23-106567](#) (Washington, D.C.: Apr. 13, 2023). Also see GAO, *A Framework for Managing Fraud Risks in Federal Programs*, [GAO-15-593SP](#) (Washington, D.C.: July 2015).

<sup>22</sup>GAO, *U.S. Assistance to Mexico: State and USAID Should Strengthen Risk Management for Programs under the Mérida Initiative*, [GAO-21-335](#) (Washington, D.C.: Mar. 01, 2021). This report also addressed recommendations to the Embassy of Mexico City and the U.S. Agency for International Development.

<sup>23</sup>Subsequently, INL officials said that their programs in support of the Bicentennial Framework remain largely the same as under the previous Mérida Initiative, because ongoing projects support shared security goals that have remained consistent. See [GAO-23-103795](#).

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related to fraud risk management in its assistance to Mexico, an opportunity remains to further strengthen its oversight.

Chairwoman Salazar, Ranking Member Castro, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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## GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Chelsa Kenney, Director, International Affairs and Trade at [kenneyc@gao.gov](mailto:kenneyc@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are Cheryl Goodman (Assistant Director), Benjamin L. Sponholtz (Analyst in Charge), Christopher Hayes, and Debbie Chung. Additional staff who made contributions to this testimony are Kirstin Crook, Rachel Girshick, Chris Keblitis, Donna Morgan, Benjamin Moser, Cameron Shapiro, and Jennifer Young. Staff who made key contributions to the reports cited in the testimony are identified in the source products.

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# Related GAO Products

## Products Referenced in This Statement

*Caribbean Firearms: Agencies Have Anti-Trafficking Efforts in Place, But State Could Better Assess Activities*, [GAO-25-107007](#) (Washington, D.C.: Oct. 15, 2024).

*Wildlife Trafficking: Agencies Should Improve Efforts to Protect Human Rights in Overseas Activities*, [GAO-24-106553](#) (Washington, D.C.: July 23, 2024).

*U.S. Assistance to Mexico: State Department Should Take Steps to Assess Overall Progress*, [GAO-23-103795](#) (Washington, D.C.: Sept. 12, 2023).

*Haiti: USAID and State Should Improve Management and Assessment of Reconstruction Activities*, [GAO-23-105211](#) (Washington, D.C.: Mar. 16, 2023).

*Global Cybercrime: Federal Agency Efforts to Address International Partners' Capacity to Combat Crime*, [GAO-23-104768](#) (Washington, D.C.: Mar. 1, 2023).

*Firearms Trafficking: More Information is Needed to Inform U.S. Efforts in Central America*, [GAO-22-104680](#) (Washington, D.C.: Jan. 11, 2022).

*U.S. Assistance to Mexico: State and USAID Should Strengthen Risk Management for Programs under the Mérida Initiative*, [GAO-21-335](#) (Washington, D.C.: Mar. 1, 2021).

*Firearms Trafficking: U.S. Efforts to Disrupt Gun Smuggling into Mexico Would Benefit from Additional Data and Analysis*, [GAO-21-322](#) (Washington, D.C.: Feb. 22, 2021).

*Rule of Law Assistance: State and USAID Could Improve Monitoring Efforts*, [GAO-21-14](#) (Washington, D.C.: Nov. 9, 2020).

*Rule of Law Assistance: Agency Efforts Are Guided by Various Strategies, and Overseas Missions Should Ensure that Programming Is Fully Coordinated*, [GAO-20-393](#) (Washington, D.C.: June 9, 2020).

*U.S. Assistance to Mexico: State Department Could Improve Its Monitoring of Mérida Initiative Projects*, [GAO-20-388](#) (Washington, D.C.: May 12, 2020).

*Security Assistance: U.S. Agencies Should Establish a Mechanism to Assess Caribbean Basin Security Initiative Progress*, [GAO-19-201](#) (Washington, D.C.: Feb. 27, 2019).

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# Other Related Products

## Central America

*Northern Triangle of Central America: The 2019 Suspension and Reprogramming of U.S. Funding Adversely Affected Assistance Projects*, [GAO-21-104366](#) (Washington, D.C.: Sept. 24, 2021).

*U.S. Assistance to Central America: Status of Funding*, [GAO-20-163R](#) (Washington, D.C.: Mar. 4, 2020).

## Counternarcotics

*Counternarcotics: Treasury Reports Some Results from Designating Drug Kingpins, but Should Improve Information on Agencies' Expenditures*, [GAO-20-112](#) (Washington, D.C.: Dec. 16, 2019).

## Democracy Assistance

*Democracy Assistance: State Should Improve Information Sharing with Embassies*, [GAO-20-173](#) (Washington, D.C.: Jan. 28, 2020).

## Money Laundering

*Trade-Based Money Laundering: U.S. Government Has Worked with Partners to Combat the Threat, but Could Strengthen Its Efforts*, [GAO-20-333](#) (Washington, D.C.: Apr. 2, 2020).

*Anti-Money Laundering: U.S. Efforts to Combat Narcotics-Related Money Laundering in the Western Hemisphere*, [GAO-17-684](#) (Washington, D.C.: Aug. 22, 2017).

## Sanctions

*Economic Sanctions: Treasury and State Have Received Increased Resources for Sanctions Implementation but Face Hiring Challenges*, [GAO-20-324](#) (Washington, D.C.: Mar. 11, 2020).

## South America

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<sup>1</sup>The Department of State determined that this report contained SENSITIVE BUT UNCLASSIFIED information and therefore cannot be released to the public.

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<sup>2</sup>The Department of State determined that this report contained SENSITIVE BUT UNCLASSIFIED information and therefore cannot be released to the public.



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