



GAO

Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

November 30, 2007

Congressional Committees

Subject: *Operation Iraqi Freedom: DOD Assessment of Iraqi Security Forces' Units as Independent Not Clear Because ISF Support Capabilities Are Not Fully Developed*

The *National Strategy for Victory in Iraq*, issued by the National Security Council in November 2005, asserted the Coalition's intention to adjust its "posture and approaches as conditions evolve and Iraqi capabilities grow," and for Coalition troop levels in Iraq to decrease over time as the Iraqis take on more responsibilities for themselves. Some three months later, in response to the growing capability of the Iraqi Security Forces (ISF) and some other indicators of progress, the Department of Defense (DOD) recommended a decrease in the U.S. force structure in Iraq from 17 to 15 combat brigades—a reduction of about 7,000 troops. Following the bombing of the Golden Mosque of Samarra on February 22, 2006, however, an upsurge in violence throughout the country undermined political gains and challenged the Government of Iraq.

In light of these developments, the President commissioned a strategic review in November 2006 that resulted in a new U.S. strategy for Iraq, entitled the *New Way Forward*. President Bush announced this new strategy on January 10, 2007, noting that he had made clear to the Iraqi Prime Minister and Iraq's other leaders that America would hold the Iraqi Government to a set of political, security, and economic benchmarks. On May 25, 2007, the President signed into law the U.S. Troop Readiness, Veterans' Care, Katrina Recovery, and Iraq Accountability Appropriations Act of 2007 (the Act), which contained 18 benchmarks against which progress by the Government of Iraq was to be measured.¹ One of those benchmarks is the increase of the number of Iraqi Security Force units capable of operating independently.

Since passage of the Act, several reports assessing the ability of the Iraqi Security Forces to operate independently have been issued.

- DOD's June 2007 report to Congress² stated that although the United States, its Coalition partners, and the Iraqi government continued to expand the size and capability of the Iraqi forces to meet emerging requirements, the persistence of violence by insurgents, terrorists, and militias means that Iraqi forces will require continued training, development, and equipping from Coalition forces in order to progressively assume missions on their own. The report outlined four major areas on which the Coalition would focus, one of which was support for the expansion of the Iraqi army.
- Also in June 2007, the House Armed Services Subcommittee on Oversight & Investigations released its *Stand Up and Be Counted: The Continuing Challenge*

¹Pub. L. No 110—28, §1314 (2007).

²DOD, *Measuring Stability and Security in Iraq: Report to Congress in Accordance with the Department of Defense Appropriations Act 2007, Section 9010, Public Law 109-289* (June 7, 2007).

of Building the Iraqi Security Forces, in which it reported that despite making significant progress in generating a sizeable national force, the Iraqi Security Forces have not developed as fast as the Coalition planned; that the Iraqi Ministry of Defense (MOD) and Ministry of Interior (MOI) were not capable of accounting for, supporting, or fully controlling their forces in the field; and that the ISF did not have critical enablers such as intelligence and logistics systems and processes that permit independent planning and operations.

- In its *Initial Benchmark Assessment Report* to Congress, submitted on July 12, 2007, the Administration asserted that while the Coalition had significantly enhanced its training and mentoring commitment to the ISF, the Iraqi Government had made unsatisfactory progress toward increasing the number of Iraqi Security Force units capable of operating independently, and thus the presence of Coalition partners and support remained necessary for ISF operations.
- In GAO's September 4, 2007, report to Congress (*Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmarks*),³ we assessed that although the ISF had grown in size and was increasingly leading counterinsurgency operations the Government of Iraq had not met the benchmark of increasing the number of Iraqi Security Force units capable of operating independently. Furthermore, we reported that because of Iraq's immature logistics systems, many Iraqi military and police units would continue to depend on Multi-National Force-Iraq (MNF-I) for key sustainment and logistics support until December 2008.
- On September 6, 2007, the Independent Commission on the Security Forces of Iraq released its report, stating that in general Iraqi Security Forces have made uneven progress but would continue to rely on the Coalition to provide key enablers such as combat support (aviation support, intelligence, and communications), combat service support (logistics, supply chain management, and maintenance), and training.
- In its September 2007 report to Congress,⁴ DOD stated that although there had been further improvement in the maturation of the Army and, to a lesser degree, the police since its last (June 2007) report, Ministry of Defense logistics from tactical to strategic levels and Ministry of Interior logistics at the strategic level were fragile and not capable of independent execution.
- Finally, the Administration's September 14, 2007, *Benchmark Assessment Report* stated that although some Iraqi Army and police forces were operating independently, it also stated that the greatest constraints on independent operations were a shortage of trained leaders and an immature logistics capability, and that for the present time Coalition partnership and support remained necessary for most ISF operations.

Since January 2006, GAO has been assessing three support capabilities that all the aforementioned reports have cited in whole or in part as being key to the ISF's achieving independence. Those three capabilities are logistics, command and control, and intelligence.

³GAO, *Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmarks*, GAO-07-1195 (Washington, D.C.: September 2007).

⁴DOD, *Measuring Stability and Security in Iraq: Report to Congress in Accordance with the Department of Defense Appropriations Act 2007, Section 9010, Public Law 109-289* (September 14, 2007).

The first of our reports,⁵ issued in March 2007, presented our preliminary observations on the Iraqi Security Forces' support capabilities as of August 2006. In those reports we noted that significant challenges had to be overcome before the ISF attained self-sufficiency. Those challenges included developing an effective logistics infrastructure to support the Iraqi military and police; training Iraqi logisticians and communications and intelligence specialists; maintaining vehicles and equipment; and developing policies and procedures within the ministries. In light of the continuing broad congressional interest in Iraq, we have undertaken this follow-on engagement under the authority of the Comptroller General⁶ to conduct evaluations at his own initiative to examine in more detail the progress achieved in the development of these capabilities. Specifically, our objectives were to determine: (1) what progress has been made toward the development of Iraqi Security Forces' logistical, command and control, and intelligence capabilities, and what factors have affected further progress; and (2) to what extent can DOD reports that ISF units are capable of fully independent operations be supported. This report is one of a series of products that GAO has produced since June 2004 addressing the security situation in Iraq and the ISF. A list of our related unclassified GAO products appears at the end of this report.

We use the term ISF in this report to refer to the combined forces of the MOD and the MOI. However, the composition, structure, and logistical, command and control, and intelligence systems of the two ministries are significantly different. For example, the MOD is developing a centrally directed logistics system composed of organizations with specific responsibilities at various levels of the chain of command but the MOI's logistics concept envisions a system with a hybrid of centralized and decentralized logistics support structures and mechanisms. Likewise, command and control in the MOD is predicated on a classic military model headed by ministerial officials who rely on commissioned and noncommissioned officers supported by a communications and intelligence network that facilitates the transmission of information both up and down the chain of command, while command and control and intelligence in the MOI are organized very differently. Some MOI forces, such as the National Police, receive direction and intelligence from the ministry itself; others, most notably the Iraqi Police Service, receive their intelligence information from and are commanded and controlled by provincial officials. Because of these differences, the factors we have identified as impacting the development of each ministry's support capabilities have affected the ministries in commensurately different ways and we address the two in separate sections, starting with the Ministry of Defense.

To determine the factors that have affected progress toward the development of ISF support capabilities we reviewed relevant documents, orders, and data that we obtained from the Department of Defense. We also submitted written questions to DOD, received and reviewed those responses, and met with and interviewed DOD officials in the United States and Iraq, including representatives from the Office of the Secretary of Defense, the Joint Staff, and the Defense Security Cooperation Agency. We also conducted telephone, e-mail, and in-person interviews with former senior Coalition officials who recently returned to the United States after serving year-long tours in Iraq as advisers to the ISF and had teleconferences with Coalition officials still in Iraq, during which we obtained additional information directly from the appropriate individuals in Iraq. During our visits with individuals, we determined that the

⁵The first report we issued, GAO, *Operation Iraqi Freedom: Preliminary Observations on Iraqi Security Forces' Support Capabilities*, GAO-07-120C (Washington, D.C.: March 7, 2007) is classified secret. We then provided unclassified testimony on the development of the ISF's logistical capabilities in GAO, *Operation Iraqi Freedom: Preliminary Observations on Iraqi Security Forces' Logistical Capabilities*, GAO-07-582T (Washington, D.C.: March 9, 2007). The third report, GAO, *Operation Iraqi Freedom: Preliminary Observations on Iraqi Security Forces' Logistics and Command and Control Capabilities*, GAO-07-503R (Washington, D.C.: March 28, 2007) is an unclassified version of the first report.

⁶31 U.S.C. § 717(b)(1)(2000).

data they provided us was sufficiently reliable for the purposes of this report. We conducted our review from December 2006 through November 2007 in accordance with generally accepted government auditing standards. Finally, in order to determine what progress has been made in developing the support capabilities of the MOD and MOI, we compared the state of development of those capabilities as of summer 2007 with what we found to be their state of development as of August 2006.

Results in Brief

While the Ministry of Defense and Ministry of Interior, with Coalition assistance, made some progress since August 2006 in developing their respective logistics, command and control, and intelligence capabilities—for example, the MOD has formed most of its lower echelon logistics units and the MOI has established an intelligence organization—persistent violence⁷ and sectarianism, along with immature ministerial capacity, continue to impede this progress. For example, sustained violence caused the Iraqi government to decide to increase the size of the MOD forces and to prioritize the formation, replenishment, and sustainment of its combat forces over combat support, combat service support, and training formations. As a result, the development of a national depot and garrison support units has lagged behind that of lower level logistics units; Iraqi recruits designated for training as logistics specialists have been diverted to combat roles; training schools are inadequately staffed; and the shortage of noncommissioned officers throughout the Iraqi Army has worsened. Moreover, because the Ministry of Defense has yet to develop adequate personnel management and support functions, Iraqi support specialists are not being employed in the positions for which they were trained, and schools with the mission of training these specialists lack fuel, equipment, and supplies. For the Ministry of Interior, violence has prevented contractors from completing the installation of a command and control network, hampered intelligence capabilities, and caused the ministry to implement force structure increases that have aggravated its logistics challenges, while sectarianism threatens the MOI's ability to exert effective command and control over its forces. Further, the MOI has not sufficiently developed its capacity to maintain or sustain its police forces, nor has it developed a personnel management system to accurately account for its personnel, thus further hindering its ability to provide command and control and logistical support for its units.

Although DOD has, in multiple reports, stated that a certain number of ISF units are either “independent” or “fully independent,” it is unclear how DOD arrived at this determination for three reasons. First, since spring 2006 the process that Coalition transition teams use to assess ISF units does not allow the option of giving a rating of independent or fully independent; according to Multi-National Corps-Iraq's (MNC-I) *Transitional Readiness Assessment Report Implementing Instructions Update*, the highest rating any ISF unit can attain is “capable of planning, executing, and sustaining counterinsurgency operations.”⁸ Second, in each of the reports in which DOD asserts that a certain number of ISF units are independent or fully independent it apparently contradicts this assertion by appending significant qualifiers to the achievement of ISF independence. For example, DOD reported in June 2007 that a certain number of MOD units were either “in the lead with Coalition enablers” or “fully independent” but then added the qualifying statements that fielded MOD forces “often do not get the support they require without substantial Coalition assistance”

⁷In October 2007 we reported that although enemy-initiated attacks declined from a total of about 5,300 in June 2007 to about 3,000 in September 2007, the recent decrease in monthly attacks was primarily due to a decrease in the number of attacks against coalition forces. Attacks against Iraqi Security Forces and civilians have declined less than attacks against coalition forces. See GAO, *Securing, Stabilizing, and Rebuilding Iraq: GAO Audits and Key Oversight Issues*, GAO-08-231T (Washington, D.C.: October 30, 2007).

⁸The Transitional Readiness Assessment process is now known as the Operational Readiness Assessment process.

and “MOD’s continued limited logistics and sustainment capacity is a key hindrance to Iraqi forces’ ability to assume missions from the Coalition.” Third, the MOD and MOI have yet to develop those support capabilities by which they can logistically sustain their forces, effectively command and control their forces, and provide intelligence to their forces—all of which are inherent to independence. As a result of DOD’s lack of clarity, Congress and other decision makers may not obtain a clear picture of the progress of the ISF and whether it is becoming capable of truly conducting its operations independently, i.e., without Coalition assistance and support. Therefore, we recommend that DOD clarify its use of the terms “independent” or “fully independent” as they relate to the assessed capabilities of ISF units, and particularly as they relate to the logistical, command and control, and intelligence capabilities of those units. We also recommend that it clarify the process it uses to make this assessment.

In commenting on a draft of this report, the department partially concurred with our two recommendations, although it did not explicitly outline any actions it would take to adopt them. Consequently, we continue to believe that the actions we recommended are needed in order to ensure that Congress and other decision makers are provided a clear picture of ISF capabilities.

DOD agreed that the use of the terms “independent” and “fully independent” can cause confusion, but stated that these terms were still being used in reports and briefings because they are “more illustrative” than other terms, although the department also stated that it will evaluate its assessment terminology to more clearly describe progress in capability development for the Iraqi forces. We do not argue that some ISF units are more capable than others from an operational standpoint. However, given the present state of the ISF’s capabilities, especially in the areas of logistics, command and control, and intelligence, we believe that using the terms “independent” or “fully independent” without clarification to describe the ISF in reports and briefings perpetuates the very confusion DOD acknowledges. The department also partially concurred with our recommendation that it clarify the process it uses to assess ISF units and replied that both the objective and subjective criteria defining effectiveness used by transition teams is contained in Multi-National Corps-Iraq’s implementing instructions. The last time that DOD provided any information on this process in its quarterly reports to Congress, however, was July 2005. Since that time, the implementing instructions for the assessment process have changed at least twice. We believe, therefore, that in order to ensure Congress has a more complete and up-to-date understanding of the assessment process, DOD should provide it with an updated and detailed explanation of the current process. Finally, the department also provided more specific technical comments which we have reproduced and addressed individually at the end of this report.

Background

Multi-National Security Transition Command-Iraq (MNSTC-I), which operates under Multi-National Forces-Iraq, leads the Coalition effort to train, equip, and organize the ISF. Previously, once ISF units were trained and equipped, operational responsibility for their employment was turned over to Multi-National Corps-Iraq. As of June 2007, the Iraqi Ground Forces Command has assumed operational control of 8 of the 10 extant Iraqi Army divisions, and the Ministry of Interior has assumed operational control of the National Police.

Overall, the number of Iraqi military and police personnel the Coalition has trained and equipped increased from over 171,000 in July 2005 to about 359,600 in September 2007. The Iraqi Ministry of Defense forces consist of the Joint Headquarters; the Iraqi Ground Forces Command, which commands the Army and the Iraqi Special Operations Forces; the Air Force; and the Navy (including Marines). The Iraqi Ministry of Interior forces consist of the

Iraqi Police Service, the National Police, the Directorate of Border Enforcement, and other, smaller forces. According to the September 2007 DOD report to Congress, as of September 3, 2007, the Coalition has trained approximately 165,400 MOD personnel and 194,200 MOI personnel, although there is currently no reliable data concerning how many of these personnel are still serving with the MOI. Moreover, in 2006 the Iraqi Prime Minister, with Coalition support, decided to expand the size of Iraq's security forces by possibly as much as 62,500 by the end of 2007. This expansion includes an increase in the size of extant Iraqi Army units that will bring them to 120 percent of authorized strength, an initiative to expand the overall size of the Iraqi Army from 10 to 13 divisions, and an initiative to increase the number of Iraqi police.

Ministry of Defense

In early 2005, the Iraqi Ministry of Defense and MNF-I approved a multilayered logistics concept for the Iraqi military that called for the generation of a variety of organizations from the ministerial to the unit level. The provision of logistics support at the lowest levels is expected to be the purview of two organizations: Headquarters and Services Companies (HSC), which provide limited health, maintenance, supply, and transportation support to Iraqi Army battalions, brigades, and divisions; and Motorized Transport Regiments (MTR), which provide additional transportation, maintenance, and vehicle recovery support to each of the Iraqi Army's infantry divisions. Mid-level logistics support is expected to come from a National Depot, five Regional Support Units (RSU), and the number of logistics bases needed to support Iraqi Army requirements. A Support Command is to provide command and control of the National Depot and RSUs, while the Iraqi Joint Headquarters logistics staff (M-4) is to provide logistics input to plans and orders. Finally, atop the logistics structure are the Offices of the Director General, Armaments and Supply; Director General, Contracts and Purchases; Director General, Infrastructure; and Director General, Programs and Budget. These offices are tasked with management of the ministry's overall logistical capability and the acquisition of capital equipment, development of ministerial policies and procedures, and management of the budget. The envisioned end state is a comprehensive logistics system that will provide maintenance, supply, transportation, and garrison support to all elements of the Iraqi military.

Concurrently, command and control and intelligence infrastructures are also being developed for the Iraqi military. The command and control system envisions approximately 3,600 Iraqi soldiers, sailors, and airmen to operate and maintain a command and control communications system, in concert with contractor support, that is responsive to program managers at the Iraqi Joint Headquarters. An additional element of this command and control system is a trained noncommissioned and commissioned officer corps. The MOD's intelligence system envisions two main intelligence organizations: the Directorate General of Intelligence and Security and the Joint Headquarters Intelligence Directorate (M-2). Both organizations are to provide effective intelligence support to Iraqi counterinsurgency operations. Additionally, each Iraqi Army division is to have an Intelligence, Reconnaissance, and Surveillance (ISR) company.

To train the logistics, communications, and intelligence specialists for these systems, the Coalition and the MOD have established training schools at Taji. Logisticians are trained at the Iraqi Armed Service and Support Institute (IASSI), Iraqi communications specialists are trained at the Iraqi Signal School, and Iraqi intelligence specialists are trained at the Iraqi Military Intelligence School.

Ministry of Interior

By November 2006, the Coalition had developed a logistics concept of support for the Iraqi Ministry of Interior that both MNSTC-I and MNF-I subsequently approved. While the MOI did not adopt the MNSTC-I Logistics Concept of Support, the MOI Logistics Directorate published its own Logistics Policy. The Coalition and MOI have started to implement certain aspects of the MOI approved concept, a concept composed of a hybrid of national, provincial, and regional logistics support structures and mechanisms. At the national level, the ministry is responsible for purchasing and distributing vehicles, weapons, and ammunition for all its forces as well as allocating budgeted money to police forces in 15 of Iraq's 18 provinces.⁹ Additionally, through the allocation of funds the ministry is responsible for the sustainment and maintenance of the National Police, the National Information and Investigation Agency, and about 40 other organizations. In the provinces, provincial Directors of Police are responsible for the sustainment and maintenance of each of their respective Iraqi Police Service (IPS) forces. Using the funds distributed to them by the MOI, the provincial Directors of Police direct funds to IPS police stations in their provinces. These local police stations, in turn, use the allocated funds to pay local vendors for life support (e.g. food, water, electricity), fuel, and vehicle maintenance. Finally, there are five regional headquarters of the Department of Border Enforcement (DBE) and Ports of Entry (POE) that also receive funds from the ministry that they, in turn, use to purchase life support, maintenance, and fuel from local sources.

As of July 2007 MOI had not yet approved a communications plan. Nonetheless, the MOI and Coalition are working together to build a command and control structure throughout Iraq that, like the logistics concept, has three parts—national, provincial, and local. The nexus of the MOI's command and control architecture at the national level is the National Command Center (NCC), which is responsible for exercising command and control over all matters pertaining to police, receiving input from local and provincial police organizations, and reporting to the Government of Iraq's National Operations Center and National Joint Operations Center. Providing provincial input to the NCC are more than 260 police, border, and port communication centers that are, in turn, supported by the Iraqi Command and Control Network (IC2N), which is designed to connect provincial sites to each other and the NCC. A second network, the Advanced First Responder Network (AFRN), is intended to link MOI first responders in 15 Iraqi cities with both MOD forces and to the MOI's National Command Center. Finally, underpinning this communications architecture are more than 108,000 radios used by MOI personnel. All told, the Coalition has spent approximately \$360 million to install this communications structure for the MOI.

Criminal intelligence operations for the MOI are the responsibility of one organization, the National Information and Investigation Agency (NIIA). While other MOI organizations gather law enforcement information, the NIIA is akin to the American FBI, and is tasked with analyzing information gathered through criminal investigations to counter serious crimes and threats to Iraq's national security. The NIIA is organized as a headquarters with 15 provincial offices and is authorized about 6,000 employees, including investigators, criminal analysts, and surveillance personnel who are to work closely with the IPS on the local level and liaison with other MOI organizations such as the National Police and port forces.

⁹The Kurdish Provinces are authorized 17 percent of Iraqi revenues (Gross National Product) from which the provinces fund budgets to meet all the financial obligations of their governments. There are two Ministries of Interior within Kurdistan. One is located in Sulaymaniyah and the other in Arbil. Both organizations are separate from the central Iraqi government's Ministry of Interior addressed in this report.

Funding for Development of ISF Support Capabilities

In September 2007, GAO reported that since 2003 the United States has provided about \$19.2 billion to train and equip about 350,000 Iraqi soldiers and police officers in an effort to develop Iraqi Security Forces, transfer security responsibilities to them and the Iraqi government, and ultimately withdraw U.S. troops from Iraq.¹⁰ This figure includes approximately \$3.8 billion in fiscal year 2007 supplemental funding for the Iraqi Security Forces Fund (ISFF) and an additional \$2.0 billion of ISFF funding for fiscal year 2008.¹¹ Meanwhile, in calendar year 2007 the Iraqi Government has budgeted \$4.14 billion for the MOD and \$3.18 billion for the MOI.

Based on DOD’s ISFF budget justifications, GAO has determined that DOD intends to allocate about \$3.5 billion—or more than half of the \$5.8 billion of fiscal year 2007 and 2008 ISFF money—to sustain the ISF and further develop its logistics, command and control, and intelligence capabilities. According to the categories in which DOD has organized its justifications, the \$3.5 billion is to be spent on infrastructure, equipment, and transportation for the ISF and the training, operation, and sustainment of Iraqi forces. See Table 1 for specific funding requests for sustainment and development of ISF support capabilities.

Table 1: FY07 and FY08 ISFF Requests for Sustainment and Development of ISF Support Capabilities

DOD Budget Justification Category	ISFF Funding Requested for Sustainment and Development of ISF Support Capabilities in FY07 and FY08 (in millions)
Infrastructure	\$409.8
Equipment & Transportation	\$1,835.6
Training & Operations	\$40.7
Sustainment	\$1,204.5
Total	\$3,490.6

Source: GAO analysis.

Some Progress Has Been Achieved, but Persistent Violence, Sectarianism, and a Lack of Ministerial Capacity Continue to Impede Development of the Iraqi Security Forces’ Support Capabilities

Although the Iraqi Ministry of Defense, with assistance from the Coalition, has made some progress in developing its logistical, command and control, and intelligence capabilities—for example, it has formed most of the lower echelon units required by its logistical concept, it has implemented more advanced communications training at its Signal School, and its intelligence architecture is nearly complete—challenges remain because of the impact of the persistent high levels of violence and the inability of the ministry to carry out its responsibilities. Most notably, the persistent violence in Iraq has induced the MOD to

¹⁰GAO, *Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmark*, GAO-07-1195 (Washington, D.C.: September 4, 2007).

¹¹To fund a portion of necessary expansion of the ISF, an additional \$1.0 billion was requested in the fiscal year 2008 ISSF amendment request.

prioritize the formation, replenishment, and sustainment of Iraqi Army combat forces above combat service support forces and training schools. As a result the development of mid-level logistics organizations has lagged behind the development of lower level logistics units; Iraqi recruits designated for training as logistics specialists have been diverted to combat roles; training schools are inadequately staffed; and the ratio of noncommissioned officers throughout the Iraqi Army has worsened. Moreover, because the Ministry of Defense has yet to develop adequate personnel management and support functions, Iraqi support specialists are not being used in the jobs for which they were trained, and schools with the mission to train these specialists lack fuel, equipment, and supplies.

The Iraqi Ministry of Interior has likewise made progress in developing its logistical, command and control, and intelligence capabilities—it is in the process of implementing a logistics concept; increasingly capable personnel are manning its command and control centers; and it has established and largely equipped an intelligence organization—but escalated violence and, to a much greater extent than in the MOD, sectarianism have compelled its expansion to an extent that has strained its logistical capabilities and undermined command and control. The inability of the MOI to effectively perform its ministerial functions has further undermined the implementation of the MOI's logistical concept of support and eroded some intelligence and command and control capabilities. Moreover, the MOI cannot accurately account for its personnel, which makes questionable its ability to develop an effective command and control or logistical support capability.

The Coalition and Iraqi Government have taken steps to address the persistent violence, sectarianism, and immature ministerial capacity that continue to impede progress in developing ISF support capabilities. For instance, the Iraqi government has decided to expand the size of MOD and MOI forces in response to this violence and since January 2007, the Iraqi government has replaced about 70 percent of the senior commanders in the National Police who were suspected of sectarianism. In addition, through its MOD and MOI transition teams, MNSTC-I works with both ministries to improve their capacity.

Persistent Violence and Lack of Ministerial Capacity Impede Development of MOD's Support Capabilities

For the MOD, persistent violence has caused the establishment of a national depot and garrison support units to lag behind that of lower level logistics units, a condition we observed in 2006 that has served to undermine the development of the Iraqi military's logistic support capability. The violence has also aggravated shortages of trained logisticians, training center faculty, and noncommissioned officers. Poor ministerial oversight has also adversely impacted the training institutions charged with training support specialists and spawned the development of a bartering system as a workaround for shortages.

Persistent Violence Has Forced the Prioritization of the Formation of Combat Over Critical Mid-Level Logistics Units

According to DOD and former senior Coalition officials, because of high levels of violence the Coalition and MOD have given priority to the formation, replenishment, and sustainment of combat units over mid-level combat service support units, a circumstance that has negatively impacted the development of the National Depot and Garrison Support Units (GSU). According to DOD, the goal is for the National Depot to be completely transitioned to Iraqi control in early 2008, while full transition of the GSUs to Iraqi control is projected for late 2007. Although the MOD's logistics concept does not specify any priority to the establishment of one type of logistics unit over another, since August 2006 the priority has been on generating lower echelon logistics formations, specifically HSCs and MTRs. In a previous GAO report, we noted that as of August 2006, most of the authorized HSCs and

MTRs were already formed. According to updated information we obtained in July 2007, all of the HSCs and MTRs originally envisioned for the Iraqi Army have been formed, while 32 additional HSCs and 2 additional MTRs required by the Iraqi Prime Minister's Initiative to increase the size of the Iraqi Army will be formed and transitioned to Iraqi control in 2008. But the development of the National Depot at Taji and the formation of Garrison Support Units, which provide base support for Iraqi military installations and comprise the basic building blocks of the Iraqi Armed Forces' area support sustainment structure, have lagged behind.

Coalition logisticians have emphasized that the development of all echelons of the logistics concept is crucial in order for the MOD to become capable of independently sustaining its forces. In February 2007, DOD underscored this by requesting approximately \$654 million for the development of infrastructure and various systems at the National Depot at Taji and another \$593 million for the development of Regional and Garrison Support Units. In its justification for these funds, DOD called the National Depot at Taji "the epicenter" of the logistical infrastructure for the ISF and stated that without the capability to provide logistical sustainment for the ISF through the National Depot, the ISF will be unable to effectively conduct operations without extensive Coalition support. Moreover, it emphasized that without the funding requested for Regional and Garrison Support Units, those facilities may go months or years without use while waiting for equipment to be delivered through Iraqi acquisition systems. Yet, despite significant U.S. funding, persistent violence in Iraq has dictated the prioritization of combat over mid-level combat service supports units, thereby hampering the MOD's ability to logistically sustain itself.

Persistent Violence Has Undermined the Development of the National Depot and Garrison Support Units

In August 2006, the National Depot was plagued by manpower shortages, security issues, inadequate fuel stocks, and poor maintenance. According to a former senior Coalition adviser to the National Depot, as of June 2007 these challenges remained because of the relatively low priority afforded the development of the depot vis-à-vis the formation of Iraqi combat units. For example, according to this former Coalition official, although there was a 100 percent increase in the number of Iraqi personnel assigned to the National Depot since August 2006, that increase brought the depot to only about 50 percent of its authorized personnel complement. According to this official, manning levels at the depot went from about 300 personnel assigned to about 600 personnel assigned. The authorized complement is approximately 1,200. This official attributed this personnel shortage to the higher priority given to filling Iraqi Army combat over combat service support units.

Security at the National Depot is also problematic because of lack of personnel. We reported that in August 2006, the National Depot's security detachment was not filled. As of June 2007, this remained the case, necessitating the formation of an ad hoc security force composed of those Iraqi logisticians on hand, thereby further decrementing the depot's capacity. Fuel, too, remained a scarce commodity at the National Depot, a situation that adversely affected quality of life there, as well as the depot's maintenance, inventory management, and communications systems, all of which require generator-supplied electricity. According to a former senior Coalition official we interviewed, this fuel shortage was, like the shortage of trained logistics specialists, a direct effect of the decision to supply combat over combat service support units—again, a decision made in large part because of the operational environment.

The priority given to combat over combat service support units has also affected the development of GSUs. As of August 2006, the Coalition and MOD had not yet determined the exact number of GSUs to be formed, and only five were in the process of being formed. By

July 2007, the Coalition and MOD had agreed to form a total of 80 GSUs, but only 3 had been completed while another 14 were under construction. According to DOD, as the security situation in Iraq continues to be tenuous the force generation of security forces, to include those required by the Prime Minister's Initiative, has taken precedence over the generation of Iraqi soldiers with some of the special skill sets required to fill GSU sites. Underscoring this is an observation by a senior Coalition adviser to IASSI. He stated that those logisticians who were trained at IASSI were all sent to combat units. As a result, other purely logistical formations, such as Regional and Garrison Support Units, did not receive their quota of trained logisticians and were therefore short-staffed and ineffective.

Persistent Violence Aggravates Shortages of Trained Logisticians, Training Center Faculty, and Noncommissioned Officers

The persistent violence in Iraq has also affected the MOD's combat support and combat service support training institutions. For example, according to two former senior Coalition logistics advisers to the Iraqi Army, Iraqi Army recruits identified for training as logistics specialists were often diverted during their basic training into combat roles because of the Prime Minister's announced increases to the size of the Army's combat formations. That diversion contributes to a paucity of trained logistics specialists across the MOD.

According to DOD, the MOD's Military Intelligence School, which is responsible for training Iraqi soldiers in intelligence skills, has only 24 of 81 authorized instructors, a circumstance attributed in part to security concerns for Iraqi faculty members who live outside the military complex at Taji. Persistent violence also contributed to the faculty shortfalls at IASSI. As of July 2007, of the 217 faculty positions authorized for IASSI, only 153 were assigned and only 138 were present for duty. According to a former senior Coalition advisor to IASSI as well as information provided by DOD, this shortfall is a direct result of the higher priority given to combat units in the present operational environment.

Finally, the persistent violence in Iraq has also contributed to a dearth of trained noncommissioned officers in the Iraqi Army. As of July 2007, the Iraqi Army was short 18,000 corporals, 14,500 sergeants, and 7,500 sergeants first class. With MNSTC-I advice and assistance, the Iraqis are working a number of initiatives to address this leadership shortage. However, DOD notes that despite this shortage of trained noncommissioned officers—leaders that are critical to establishing effective command and control in the Iraqi military—attendance at noncommissioned officer schools is unsatisfactory because Iraqi Army commanders are challenged to balance the needs of the fight with the requirements to release students for training.

Underdeveloped Ministerial Capacity Undermines the Development of Support Capabilities

The lack of ministerial support has also stymied the development of the MOD's support capabilities by allowing Iraqi commanders to inappropriately assign trained logisticians and communications specialists and by perpetuating insufficiencies of fuel, equipment and instructional materials at the training institutions for these specialists. In our March 2007 report, we addressed some of these ministerial capacity challenges as they affected the development of the MOD's support capabilities. Updated information provided by DOD and obtained through interviews with former senior Coalition officials confirms the persistence of several of these challenges—particularly personnel management and support for IASSI and the Signal School.

For example, we noted in March 2007 that, according to a senior Iraqi Army signal officer, there was a tendency throughout the Iraqi Army to inappropriately assign the Signal School's enlisted graduates to jobs as infantrymen while officers, who may not have graduated from the Signal School, operated the radios. According to updated information obtained from DOD in July 2007, this practice persists for both communications and logistics specialists. DOD noted that although the Iraqi personnel management system is evolving and that new systems for automated tracking of personnel should improve the ability of senior levels of command to monitor the proper assignment of trained personnel, Iraqi Army commanders continue to have discretion regarding soldiers' position assignments.

The problem of managing trained personnel is also endemic in the Iraqi Army's intelligence, surveillance, and reconnaissance companies, one of which is assigned to each Iraqi Army division. According to DOD, ISR company soldiers are routinely used as personal security details and guards, or to fill out combat units within the division. As a result of these personnel decisions, as well as challenges in recruiting and maintaining personnel, as of July 2007 DOD's assessment is that, overall, ISR companies are mission-ineffective throughout Iraq. Additionally, according to a former senior Coalition adviser to the National Depot, trained logistics specialists also often tend to be assigned to personal security detachments or as aides to senior Iraqi officers.

According to former senior Coalition advisers and updated information provided by DOD, none of the three schools have enough fuel to run their generators, a circumstance DOD attributed to the Ministry of Defense receiving only about 50 percent of its stated fuel requirements. To mitigate the effect of these fuel shortages senior Iraqi leaders, supported by Coalition advisers, are to negotiate the hours for which fuel for generators and hence electricity will be provided so that the impact on training and critical life support is minimized. However, at both IASSI and the Signal School, this has not always been possible. In September 2006, for example, fuel shortages were so acute that the Iraqi commandant of IASSI was forced to shut down training completely. As a result, 450 Iraqi soldiers who were to be trained in a variety of logistics disciplines were sent back to their divisions. According to a former senior Coalition adviser to the Signal School, the Iraqi commandant there had also to shut down operations completely in January because of a lack of fuel.

Training equipment and instructional materials used to support that training were also in short supply, again the result of lack of support from the MOD. For example, according to a former senior Coalition adviser to the Signal School, MOD did not supply any instructional supplies, such as pens, pencils, or paper, to the school during this adviser's year-long tenure. All supplies were either purchased by Signal School faculty, obtained by students themselves while they were on leave, or donated by U.S. companies.

This lack of ministerial support also spawned a bartering system on which, according to former senior Coalition advisers, both IASSI and the Signal School came to rely and without which they could not perform their missions. For example, according to a former senior Coalition adviser to IASSI, during his year-long tenure there were never enough high mobility multipurpose wheeled vehicles (HMMWV) on which to train Iraqi mechanics because MOD support to IASSI was minimal or nonexistent. He said that IASSI was tasked with training 200 Iraqi mechanics per class and required 10 HMMWVs to do so effectively. However, IASSI had only 2 partial HMMWVs for the first 6 months of his tenure. In January 2007, IASSI picked up 2 more by bartering with a nearby Coalition unit and obtained another 2 later through the intervention of a Coalition general officer. Furthermore, both IASSI and the Signal School also obtained fuel through bartering. When IASSI had to shut down its training completely for lack of fuel in September 2006, the Signal School was able to obtain some in exchange for allowing a Coalition unit to use its buildings. According to a former Coalition adviser to IASSI, the practice of advisors obtaining fuel from Coalition fuel points for their Iraqi

counterparts became so pervasive that eventually the fuel points were instructed not to supply any more fuel to these advisors. Beyond fuel, however, the Signal School also obtained computer maintenance support through bartering. According to a former senior Coalition adviser to the Signal School, there were approximately 150 laptop and desktop computers at the school for use in instruction, yet the MOD had no means to repair them if they broke down. To alleviate this problem the Iraqi commandant of the Signal School bartered for computer repair services with a nearby U.S. sustainment unit. In exchange for the use of a civilian pickup truck, the U.S. sustainment unit agreed to provide computer maintenance support for the Signal School. According to this official, the Signal School would not have been able to accomplish its mission of training Iraqi communications specialists without this support.

Persistent Violence, Widespread Sectarianism, and Lack of Ministerial Capacity Impede Development of MOI Support Capabilities

The continued high levels of violence have hampered MOI communications networks and intelligence capabilities while sectarianism has undermined effective command and control in the Iraqi police forces. In addition, the inability of the MOI to perform certain basic ministerial functions has negatively impacted the development of its logistical, command and control, and intelligence capabilities.

Persistent Violence Hampers MOI Communications Networks and Intelligence Capabilities and Exacerbates Logistics Challenges

Persistent high levels of violence have seriously degraded the MOI's national communications architecture, thereby leading to a commensurate degradation of the MOI's ability to provide effective command and control over its forces. Additionally, the high levels of violence have also curtailed MOI intelligence operations. According to DOD, persistent attacks on the Advanced First Responder Network in Basrah and southern Iraq in the summer of 2007 have degraded the network's capability. Likewise, persistence violence has also affected use of the Iraqi Command and Control Network. According to DOD, one IC2N communications site has been the target of insurgent activity, and a contractor has been unable to install the network's final node due to insurgent activity in the area. MOI intelligence capabilities have also been severely hampered by violence. According to DOD, the current security environment in Baghdad and other cities restricts the National Information and Investigation Agency's staff from traveling to crime scenes. Because of this, the NIIA's ability to conduct investigations and intelligence operations is significantly degraded. Due to the high levels of violence that have curtailed NIIA operations, as well as delays in the construction of the NIIA's headquarters which was supposed to be complete by May 2007 but for which construction had not begun as of July 2007,¹² the Coalition stated that it cannot estimate when the NIIA will be self-sufficient.

Persistent violence has also aggravated the MOI's logistics challenges. This is because, in response to the violence, the MOI has increased its authorized strength without a commensurate increase in its ability to support its increased size. In 2006 the Iraqi Minister of Interior, in conjunction with MNSTC-I, responded to the persistent violence in Iraq by expanding the authorized strength of the MOI from approximately 188,000 to about 195,000 personnel. Additionally, 2006 saw the incorporation of security forces from 27 different Iraqi ministries into one Facilities Protection Service, which, in turn, was placed under the MOI, bringing an estimated 98,000 more personnel into the ministry. However, the MOI's logistics infrastructure may not be able to accommodate these rapid increases in size and organizational structure. Indeed, MNSTC-I's 2007 *Campaign Action Plan* states that the

¹²DOD did not give a reason for these delays.

accelerated growth and transition of the MOI may exceed the ministry's ability to adapt both operationally and logistically. More specifically, a July 2007 Coalition assessment indicates that MOI increases in end strength will stress the MOI's ability to meet its requirements for general materials such as clothing, individual equipment, construction materials, and some major end items.

Widespread Sectarianism Has Undermined the Effective Command and Control of Iraqi Police Forces

The MOI continues to be plagued by sectarianism at the ministerial level as well as in the National Police and Iraqi Police Service. For example, in June 2007, DOD reported that sectarianism impacts every aspect of the ministerial offices in Baghdad and several other cities, an observation underscored by a recent MNSTC-I report which states that although it cannot quantify the amount of insurgent influence at the ministerial level, it suspects that various insurgent groups have significant influence throughout the ministry. According to both the former and current MNSTC-I commanders, the National Police are also beset with widespread sectarianism. In June 2007, the former MNSTC-I commander testified that the Iraqi National Police was the "single most sectarian organization in Iraq." Two months later, the current MNSTC-I commander echoed his predecessor's assessment, stating that the National Police were "overly infiltrated with militia elements" and that "there's no doubt that in the National Police the sectarian influence remains and will be hard to eradicate." Finally, evidence indicates that the Iraqi Police Service is also heavily infiltrated with sectarian elements. The former commander of the Iraq Assistance Group¹³ characterized the Iraqi Police Service as the ISF element most vulnerable to sectarianism, despite the MOI's removal of over 3,000 members considered to have a sectarian bias in January 2007. Finally, in September 2007, GAO determined that the Iraqi government has not eliminated militia control over local security forces, and that sectarianism in the ISF remains a serious problem in Baghdad and other areas of Iraq.¹⁴

Such widespread sectarianism in the MOI has undermined Coalition efforts to develop Iraqi police forces that are ethical, competent, loyal to the principles of the Iraqi constitution, and accountable to the civilian leadership and people of Iraq. Furthermore, efforts to root out sectarian influence in the MOI have resulted in personnel turbulence among senior police commanders. Since January 2007, the Iraqi government has replaced 70 percent of senior commanders in the National Police due to their sectarianism, a list that includes 2 division, 7 brigade, and 17 battalion commanders. These high level command changes are especially significant given that the National Police are facing a critical officer shortage; by the summer of 2007 they had filled fewer than half of their officer positions. Despite these officer changes, however, according to a July 2007 DOD report, there continues to be a sectarian bias in the appointment of senior Iraqi police commanders.

Undeveloped Ministerial Capacity Adversely Affects the Development of MOI Support Capabilities

The inability of the MOI to develop key ministerial functions at the national and local levels has also negatively impacted the development of the ministry's logistic, command and control, and intelligence capabilities. This, in turn, has had a negative impact on the ability of certain MOI forces to perform their missions and has caused DOD to request further funding for several of these programs. For example, according to a DOD assessment, because the MOI does not have a unit that maintains the National Police's vehicular fleet, the National

¹³The Iraq Assistance Group is the overall executive agency for MNC-I for all Iraqi Security Forces.

¹⁴GAO, *Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmarks*, GAO-07-1195 (Washington, D.C.: September 4, 2007).

Police cannot sustain deployments without support from either the Iraqi Army or the Coalition. Because of this, as well as an unexplained delay in the construction of MOI maintenance facilities, DOD explains that the Coalition may extend the duration of the Baghdad Area Maintenance Contract by six months. DOD officials stated that this contract, which provides maintenance for all MOI vehicles in Baghdad, is planned to cost the Coalition at least \$22 million. Maintenance support for the MOI's border and port forces is also a challenge. According to DOD, maintenance support for both the border and port forces is "virtually non-existent" and DOD estimates that the DBE will not be self-sufficient in maintenance until the summer of 2011, although in its 2007 Iraqi Security Forces Fund request DOD sought \$175 million to build and sustain MOI vehicle maintenance facilities in order to redress this shortcoming. Maintenance problems have also plagued the MOI's communications systems. For example, MOI personnel in two of the three zones in which the AFRN is located have not demonstrated the ability to maintain the network or the equipment required to run its systems, negatively impacting command and control. As a result, in fiscal year 2007 the Coalition planned to spend at least \$18 million to bolster the MOI's command and control architecture, which accounts for 90 percent of the amount the ministry had budgeted for command and control.

The MOI's inability to perform key ministerial functions also means it has had difficulty supplying its forces. For example, the MOI has had difficulty supplying adequate amounts of fuel for its forces. According to DOD, the MOI is not wholly responsible for this problem; one reason for this lack of fuel is that the Ministry of Oil has not supplied the MOI with sufficient amounts of fuel. This has most notably affected the MOI's National Police which, because of these fuel shortfalls, have had difficulty conducting patrols. However, the IPS and border and port forces, which are to use local vendors for fuel, have also experienced shortages. According to the Iraq Assistance Group, this is because only one-fourth of the National Police's fuel requirements are funded while the IPS, border, and port forces pay black market prices for fuel, which are substantially higher than the official price. Overall, although the Coalition transferred responsibility for fuel to the MOI in December 2006, because of these shortages it was still supplying fuel to the MOI as of July 2007. Moreover, the sustainment to two key MOI organizations, the National Police and the National Intelligence and Investigation Agency, is undermined by the fact that neither has an independent budget. Although the reason for this is unclear, the result is that sustainment requirements for both the National Police and the NIIA are subsumed in the budgets for other MOI organizations. One result of this circumstance is that the National Police have been unable to redress certain equipment shortfalls and the Coalition has stated that because of challenges regarding maintenance, fuel, budget independence, and manning, it cannot estimate when the National Police will be able to operate self-sufficiently. In an effort to rectify some of these challenges, DOD sought \$493 million in its 2007 ISFF request to modernize or replace MOI equipment that will be lost due to combat loss or life cycle attrition, including 52,200 weapons, 1,720 trucks, 130 police sedans, and equipment for personnel.

Internal organizational challenges have also impeded development of the MOI's command and control capability. For example, although the MOI has a nascent communications network in place, the MOI has yet to develop a comprehensive communications plan that governs its use and the absence of such a plan makes effective command and control of MOI forces difficult. According to Coalition sources, the needed communications plan has not been developed because of internecine disagreements within the ministry that have hindered its acceptance. Another organizational challenge is the fact that, although the MOI's logistical concept envisions organizations that will be responsible for vehicle maintenance, spare parts management, and the running of national and provincial warehouses, the MOI has yet to develop official organizational structures or equipment requirements for these organizations. Without these plans, it is unclear how the MOI can effectively implement an effective maintenance support plan. In addition, the inability of the MOI to effectively manage

contracts has led to challenges in sustainment and command and control. In its 2007 ISFF request, DOD sought \$25 million for sustainment of MOI training academies and medical facilities, explaining that the Government of Iraq does not have appropriate contracting and budgetary procedures established to sustain these facilities. MOI's ineffective contracting has also undermined the sustainability of one of two critical communications systems, the Advanced First Responder Network. According to DOD, in May 2007 the MOI signed a contract for the operation and maintenance of, and training of personnel for, the network. However, as of summer 2007, MNSTC-I reports that the MOI has not funded the contract, does not have the capacity to fund it, and is reluctant to fund it. The Coalition planned for the MOI to assume responsibility for operation and maintenance of the network by March 2007. However, because of the ministry's inability to maintain the network, as of July 2007 the Coalition was unable to estimate when the MOI would be self-sufficient in operation of the AFRN.

Finally, because of problems with its personnel management system, the MOI is facing the fundamental challenge of not being able to accurately account for its personnel. According to DOD's June and September 2007 reports to Congress, there is currently no reliable data on how many Coalition-trained personnel are still serving in the MOI's forces. Moreover, DOD has also reported that the MOI has hired a significant number of police beyond those trained by the Coalition. According to testimony by the former MNSTC-I commander, the MOI's payroll accounts for about 60,000 to 74,000 more personnel than the number trained and equipped by the Coalition. However, he also stated that about 20 percent of this overage are "ghosts," meaning personnel whose names appear on the MOI's payroll but who are not actually serving. Effecting command and control or fashioning a logistics system for an organization of indeterminate size is problematic because both these capabilities are, by their very nature, determined by the size of the organization for which they are designed. It is unlikely that the MOI can effectively ensure command and control of forces that it cannot accurately count, especially if thousands of the personnel who appear on its payrolls do not exist. In addition, basic logistics functions such as budgeting for and procuring the requisite sustainment stocks also require accurate knowledge of a force's size.

DOD's Determination of ISF Independence Is Not Clear

Although DOD has in multiple reports stated that a certain number of ISF units are either "independent" or "fully independent," it is unclear how DOD arrived at this determination for three reasons. First, the process by which ISF units are assessed does not allow for a rating of "independent" or "fully independent." Second, statements in DOD reports seemingly contradict claims of ISF independence. Third, the MOD and MOI are still experiencing significant challenges with regard to developing the support capabilities on which independence is contingent.

Assessments of ISF Independence Are Problematic

Since October 2005, DOD has asserted in its quarterly reports to Congress that a certain number of ISF units are "independent" or "fully independent," yet it is unclear how this determination can be made given the process by which ISF units are evaluated, qualifying language about ISF independence that DOD uses in its reports, and the challenges facing the development of the ISF's support capabilities.

DOD began issuing quarterly reports to Congress in July 2005. In each of these reports, except for the first,¹⁵ DOD reported that a certain number of ISF units had been assessed as

¹⁵DOD did provide a classified annex to its first report that contained a rollup assessment of Iraqi Army unit capabilities.

either “in the lead with Coalition enablers or fully independent” or “capable of planning, executing, and sustaining counterinsurgency operations independently or with Iraqi or Coalition forces.” For example, in its most recent report to Congress, issued in September 2007, DOD stated that 95 Army, Special Operations Combat Forces, and Iraqi Army Infrastructure units; an indeterminate number of MOD logistics enablers; 7 National Police Combat Battalions; and 3 National Police Brigade Headquarters were all “capable of planning, executing, and sustaining counterinsurgency operations independently or with Iraqi or Coalition forces.” Although in none of these reports does DOD distinguish between those forces that are capable of operating independently and those that require Coalition or Iraqi assistance, the tables in which DOD’s data are presented lead one to believe that at least one if not more than one of the units was rated as independent. This was underscored during the MNF-I commander’s September 10 and 11, 2007 testimony, during which he briefed the Congress that in every month since November 2005, with only one exception (February 2006) the Coalition has assessed at least one ISF unit as “fully independent.”

However, despite DOD’s reports and the MNF-I commander’s recent testimony that a certain number of ISF have been assessed as “fully independent,” after March 2006 it was no longer possible for a Coalition transition team member to rate the readiness of an ISF unit using these terms. Previously, in guidance provided to Coalition transition teams for use in evaluating Iraqi Security Forces, a level 1 unit was said to be “fully capable of planning, executing, and sustaining independent operations.” However, in the spring of 2006, MNC-I removed the words “fully” and “independent” from the definition. When we asked DOD officials for the reason for this change they were not able to provide us with an explanation. Therefore, according to the current guidance, a level 1 unit is one that is “capable of planning, executing, and sustaining counterinsurgency operations.” It is important to note that, according to the guidance, a Coalition transition team cannot judge an ISF unit as “independent.” However, in its most recent report to Congress, DOD asserted that an “independent unit is one that is capable of planning, executing, and sustaining counterinsurgency operations.” Thus, DOD’s continued reporting that some ISF units are “independent” or “fully independent” is not congruent with MNC-I’s instructions for filling out the Operational Readiness Assessments on which DOD’s assertions and reports seem to be based. If independence is still a relevant descriptor of ISF unit capabilities, then why was the term removed from the definition of a level 1 unit in 2006?

Further obfuscating the issue are statements that DOD has made in each of its reports to Congress that apparently contradict the assertion that at least some ISF units are “fully independent.” For example, in its August 2006 report, DOD stated that in the absence of a self-reliant logistics system, MNF-I must provide extensive support to Iraqi forces. In its November 2006 report, DOD stated that perhaps the most significant shortcoming in both the MOD and MOI forces’ capabilities lay in planning and executing their logistics and sustainment requirements, and that efforts were underway to reduce Iraqi forces’ reliance on U.S. support and sustainment. The March 2007 report echoed this observation, stating that the most significant shortcoming in both the MOD and MOI forces’ capabilities lay in planning and executing sustainment requirements. In its June 2007 report to Congress, DOD stated that building the logistics and sustainment capabilities of the MOD and MOI constitutes one of four major areas on which the Coalition is focusing. The report goes on to note that fielded MOD forces often do not get the support they require without substantial Coalition assistance. Finally, in its most recent report to Congress, released in September 2007, DOD stated that MOD logistics from the tactical to strategic levels, and MOI logistics at the strategic level, are fragile and not capable of independent execution. Underscoring these qualifying statements are the comments of the MNF-I commander, who stated during his recent Congressional testimony that although there are about 95 ISF units capable of taking the lead in operations, they still need some Coalition support and that, furthermore, were U.S. forces to withdraw rapidly from Iraq, the ISF would face “a high risk of disintegration.”

Finally, because of the many challenges facing the Coalition and Iraqi government in developing the ISF's support capabilities, it is clear that the ISF is not independent of the Coalition. From January 2006, when we began our investigation of ISF support capabilities, to September 2007, the date of the latest information contained in this report, the ISF have been unable to fully meet their logistics, command and control, and intelligence requirements. Because these capabilities are inherent to independence, until the ISF develops them, neither the MOD nor MOI can be considered independent.

Although we are not discounting DOD assertions that there are some ISF units that are more capable than others from an operational standpoint, we find that using the terms "independent" or "fully independent" to describe their overarching development is both confusing and misleading. Every ISF unit, regardless of its operational ability, is dependent upon institutional logistic, command and control, and intelligence capabilities that are designed to support it and as this report and our previous reports demonstrate, these capabilities in both the MOD and MOI are facing significant challenges to their development.

Conclusions

The MOD and MOI face significant challenges in developing their logistic, command and control, and intelligence capabilities. Two factors, in particular, have thwarted their development—the persistence of high levels of violence and sectarianism and a lack of ministerial capacity. As a result, the ability of both ministries to maintain and sustain their forces, provide effective command and control of their forces, and provide their forces with intelligence is undermined and cannot be accomplished without Coalition support. Furthermore, since these support capabilities have yet to be fully developed, DOD claims that ISF units are either "independent" or "fully independent" are confusing and misleading. Although we are not discounting DOD reports that there are some ISF units that are more capable than others from an operational standpoint, we do not find sufficient evidence for an assessment of "independent" or "fully independent" for any ISF unit. Moreover, without clarity regarding the criteria according to which ISF units are assessed as independent, especially with regard to their logistical, command and control, and intelligence capabilities, Congress cannot have clear visibility over DOD's role in assisting the ISF in becoming independent of Coalition support.

Recommendations

In order to provide the Congress and other decision makers with a clear picture of ISF capabilities, we recommend that DOD clarify 1) its use of the terms "independent" or "fully independent" as they relate to the assessed capabilities of ISF units, especially with regard to the logistical, command and control, and intelligence capabilities of those units, and 2) the process it uses to make this assessment.

Agency Comments and Our Evaluation

In written comments on a draft of this report, DOD partially concurred with our two recommendations and provided a matrix of narrower technical comments. In its written comments, DOD stated that it would evaluate its assessment terminology to more clearly describe progress in capability development for the Iraqi forces. However, DOD did not explicitly outline any actions it would take to adopt our recommendation to clarify its terminology. Furthermore, DOD stated that while the terms "independent" and "fully independent" can cause confusion, they are still being used in reports and briefings because they are "more illustrative" than other terms. Consequently, we continue to believe that the actions we recommended are needed in order to ensure that Congress and other decision

makers are provided a clear picture of ISF capabilities. DOD's written comments and its technical comment matrix are reprinted in appendix I.

With regard to the first recommendation that DOD clarify its use of the terms "independent" or "fully independent" as they relate to the assessed capabilities of Iraqi Security Force units, especially with regard to the logistical, command and control, and intelligence capabilities of those units, the department partially concurred. DOD agreed that the use of the terms "independent" and "fully independent" can cause confusion, but stated that these terms were still being used in reports and briefings because they are "more illustrative" than other terms, although the department also stated that it will evaluate its assessment terminology to more clearly describe progress in capability development for the Iraqi forces. We believe, however, that DOD's evaluation of the terms is insufficient; that the continued use of "independent" or "fully independent" in briefings and reports only perpetuates the very confusion that DOD recognizes; and that therefore our recommendation that DOD clarify its terms is warranted for three reasons. First, the process by which ISF units are assessed does not allow for a rating of "independent" or "fully independent," a point amplified by the definition of a level 1 unit DOD supplied in its written comments. Second, statements in DOD reports seemingly contradict claims of ISF independence. This was underscored by the written statement submitted by the MNF-I commander in conjunction with his September 2007 Congressional testimony, in which he stated that although there are about 95 ISF units capable of taking the lead in operations, they still need some Coalition support and that were U.S. forces to withdraw rapidly from Iraq, the ISF would face "a high risk of disintegration." Finally, as this report demonstrates, the MOD and MOI are still experiencing significant challenges with regard to developing the logistics, command and control, and intelligence capabilities on which independence is contingent.

DOD also partially concurred with our recommendation that it clarify the process its uses to assess ISF units, stating that although MNC-I modified the wording used to describe a level 1 unit in 2006, the metrics and processes transition teams use to assess Ministry of Interior and Defense units have not changed and that this process is clearly defined in the MNC-I *Transition Readiness Assessment Report Implementing Instructions Update*. We examined both the March 2006 and the December 2006 updates (the latter being, according to DOD, the most current update). Even a cursory look at the example forms reproduced in the respective updates shows that the metrics have, in fact, changed. For example, the number of sustainment and logistics categories by which units are evaluated has gone from 3 to 5 and the subjective and objective criteria used to determine unit ratings in the areas of leadership, communications, administration, and training have also changed. Furthermore, the last time that DOD provided any information on the ISF assessment process in its quarterly reports to Congress was July 2005. Since that time, the implementing instructions for the assessment process have changed at least twice. We believe, therefore, that in order to ensure Congress has a more complete and up-to-date understanding of the assessment process, DOD should provide it with an updated and detailed explanation of the current process.

We are sending copies of this report to interested congressional committees and the Secretary of Defense. We will also make copies available to others upon request. This report will also be available at no charge on the GAO web site at <http://www.gao.gov>.

Please contact me at (202) 512-8365 or solisw@gao.gov if you or your staff have any questions concerning this report. Contact points for our Office of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report included Marilyn Wasleski, Assistant Director, Whitney Havens, Kate Lenane, Guy LoFaro, Terry Richardson, Leo Sullivan, Christopher Turner, and Cheryl Weissman.

A handwritten signature in black ink, appearing to read 'W. Solis', with a long horizontal flourish extending to the right.

William M. Solis, Director
Defense Capabilities and Management

List of Congressional Committees

The Honorable Carl Levin
Chairman
The Honorable John McCain
Ranking Minority Member
Committee on Armed Services
United States Senate

The Honorable Joseph R. Biden, Jr.
Chairman
The Honorable Richard G. Lugar
Ranking Minority Member
Committee on Foreign Relations
United States Senate

The Honorable Joseph Lieberman
Chairman
The Honorable Susan M. Collins
Ranking Minority Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Daniel K. Inouye
Chairman
The Honorable Ted Stevens
Ranking Minority Member
Committee on Appropriations
United States Senate

The Honorable Ike Skelton
Chairman
The Honorable Duncan L. Hunter
Ranking Minority Member
Committee on Armed Services
House of Representatives

The Honorable Tom Lantos
Chairman
The Honorable Ileana Ros-Lehtinen
Ranking Minority Member
Committee on Foreign Relations
House of Representatives

The Honorable Henry A. Waxman
Chairman
The Honorable Tom Davis
Ranking Minority Member
Committee on Oversight and Government Reform
House of Representatives

The Honorable John F. Tierney
Chairman
The Honorable Christopher Shays
Ranking Minority Member
Subcommittee on National Security and Foreign Affairs
Committee on Oversight and Government Reform
House of Representatives

The Honorable John P. Murtha
Chairman
The Honorable C.W. Bill Young
Ranking Minority Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

Appendix I: Comments from the Department of Defense

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



INTERNATIONAL
SECURITY AFFAIRS

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
2400 DEFENSE PENTAGON
WASHINGTON, DC 20301-2400

NOV 08 2007

Mr. William M. Solis
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street N.W.
Washington, DC 20548

Dear Mr. Solis:

This is the Department of Defense (DoD) response to the Government Accountability Office (GAO) draft report, GAO-08-143R, "OPERATION IRAQI FREEDOM: DOD Assessment of Iraqi Security Forces' Units as Independent Not Clear Because ISF Support Capabilities Are Not Fully Developed," dated October 5, 2007 (GAO Code 350948).

Recommendations: The GAO recommends that DoD clarify 1) its use of the terms "independent" or "fully independent" as they relate to the assessed capabilities of Iraqi Security Forces units, especially with regard to the logistical, command and control, and intelligence capabilities of those units, and 2) the process it uses to make this assessment.

DoD Response:

1) Partially Concur. The use of the terms "independent" and "fully independent" can cause confusion. The term "independent" was removed from the Operational Readiness Assessment (ORA) Level 1 definition 18 months ago. However, because it is more illustrative than terms such as "ORA 1," it is still used in briefings and reports. The current, complete definition for a Level 1 unit as found in the ORA states:

"Level 1 (green): A Level 1 Iraqi Army (IA) unit is capable of planning, executing and sustaining counter insurgency operations. The status of resources and training will neither limit flexibility in methods for mission accomplishment nor increase vulnerability of unit personnel and equipment. The unit does not require any compensation for deficiencies by Coalition forces. Extreme situations may cause Coalition forces' mitigation."



In February 2007, the Multi-National Corps-Iraq (MNC-I), recognizing the limitations of the existing Transition Readiness Assessment (TRA) metrics, added a new metric called "Operational Effectiveness." This measure allows the senior transition team advisor and the Iraqi contingent to provide a subjective assessment of a unit's ability to conduct operations, regardless of other measures. Assessment of this metric is based on historical performance and on the level of outside assistance required to execute a unit's missions. Concurrently, the assessment process was renamed Operational Readiness Assessment (ORA).

2) Partially Concur. Although MNC-I modified the wording used to describe a Level 1 unit in 2006, the metrics and processes transition teams use to assess Ministry of Interior and Defense units have not changed. The process is clearly defined in the MNC-I Transition Readiness Assessment (TRA) Report Implementing Instructions Update. The instruction, which remains in place as guidance for the ORA process, defines the objective criteria used to determine capabilities and the subjective rating criteria defining effectiveness used by transition teams to apply to the conditions on the ground.

DoD will evaluate the assessment terminology to more clearly describe progress in capability development for the Iraqi forces.

Attached is a comment matrix with technical comments to the draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin Rand", written in a cursive style.

Brigadier General Robin Rand
Principal Director
for the Middle East

CENTCOM/MNF-I Comments
 UNCLASSIFIED GAO Draft Report
 Operation IRAQI FREEDOM: DoD Assessment of Iraqi Security Forces' Units as Independent Not Clear Because ISF Support Capabilities Are Not Fully Developed (GAO-08-143R)

FORMAL COMMENT RESOLUTION MATRIX

Serial	Page #	Para #	Type * (A,S,C) Formal/Informal	Recommendation	Comment / Rationale
1	9	1	(S)/Formal	Change: "and 80 Garrison Support Units" to "and the number of logistics bases needed to support Iraqi Army requirements".	Based on current analysis, pending approval of the MoD and JHQ Logistic Concept and procedures, discussions envision one logistics base for every Iraqi Army division, with Regional Support Units and a National Depot.
2	10	1	(C)/Formal	Change: "But for reasons that remain unclear, as of March 2007 the MOI itself had yet to approve the concept. Despite lacking the MOI's official endorsement, the Coalition and MOI have started to implement certain aspects of the concept, ..." To: "While the MOI did not adopt the MNSTC-I Logistics Concept of Support the MOI Logistics Directorate published its own Logistics Policy. The Coalition and MOI have started to implement certain aspects of the <i>MOI approved</i> concept, ..."	The report refers to MNSTC-I FRAGO 06-085, approved by MNSTCI on 6 November 2006. While this has never been endorsed by the MOI, the MOI Logistics Directorate has adopted many of the concepts into their own plans and has published its own Logistics policy. The MOI has documented and distributed its logistics procedures, they have established and automated their accountability system, and they have streamlined their procedures for receipt, store and issue functions. The MOI has demonstrated initiative and the capability to procure material and equipment independent of coalition support, although

* A= Administrative; S = Substantive; C = Critical
 * Formal – recommends comments should be published as part of official DoD response to GAO.
 * Informal – recommends comments should be provided to GAO but not be published in report.

See comment 1.

See comment 2.

Serial	Page #	Para #	Type * (A,S,C) Formal/Informal	Recommendation	Comment / Rationale
					they are still hampered by contracting and finance laws, rules and procedures; specifically for imported goods. This has been mitigated by embracing the US Foreign Military Sales Program. In addition they have developed a logistics reporting policy that provides visibility into the Provinces' logistical readiness. The overall MOI logistics system remains, however, problematic. One of the benefits of successful offensive operations of recent months has been the rapid growth of the Police Force. This growth has strained an already ailing MOI Maintenance System.
3	11	2	(S)/Formal	Change: "Intelligence operations for the MOI are the responsibility of one organization, the National Information and Intelligence Agency (NIIA)." To: "the National Information and Investigation Agency"	NIIA is the National Information and Investigation Agency, and is responsible for conducting intelligence analysis in support of law enforcement investigation of national level crimes and domestic terrorism and insurgency activities. Note that the report repeatedly expands the NIIA acronym as "Intelligence" vice the true name "Investigation."
4	12	1	(S)/Formal	Add footnote after "...for fiscal year 2008." To address the increased request for ISFF funding to \$3.0B in the FY08 GWOT Budget Amendment Request.	To fund a portion of necessary expansion of the ISF, an additional \$1.0B of ISFF was requested in the FY08 GWOT Budget Amendment request.

See comment 3.

See comment 4.

* A= Administrative; S = Substantive; C = Critical
 * Formal – recommends comments should be published as part of official DoD response to GAO.
 * Informal – recommends comments should be provided to GAO but not be published in report.

See comment 5.

See comment 6.

See comment 7.

Serial	Page #	Para #	Type * (A,S,C) Formal/Informal	Recommendation	Comment / Rationale
5	13	1	(C)/Formal	Change: "and the shortage of noncommissioned officers throughout the Iraqi Army has worsened." To: "and the ratio of noncommissioned officers throughout the Iraqi Army has worsened."	It is recognized that efforts are needed to increase Iraqi Army noncommissioned officer numbers and that there are a number of initiatives including recall and the early promotion of the top 10% of basic training graduates. However, the continuing rapid growth of the IA will have an adverse effect on the proportion of SNCOs available and therefore the perception of deepening leader shortages within the Iraqi Army.
6	15	1	(C)/Formal	Delete: "But the development of the National Depot at Taji and the formation of GSUs, which provide base support for Iraqi military installations and comprise the basic building block of the Iraqi Armed Forces' area support sustainment structure, have lagged behind."	The National Depot is not lagging behind. Indeed, in coordination with the Iraqi MoD, the depot is expanding rapidly. In December 2007, the Small Arms Weapon Repair Facility will begin operation, followed in 2008 by both the Tracked and Wheeled Maintenance Depots. The Depot Warehouse is expanding its capability for receipt, warehouse accountability, and issue of supplies and equipment. This also includes personnel training, warehouse refurbishment, and on-site life support functions.
7	17	3	(S)/Formal	Change: "As of Jul 2007 the MODs Mil Intelligence Academy, which is responsible for training Iraqi Soldiers in intelligence skills had only 43% of its authorized	There was no MTOE in July from which to base a number. There are currently 24 of 81 authorized instructors, which is 30%, the number has remained constant since July,

* A= Administrative; S = Substantive; C = Critical

* Formal – recommends comments should be published as part of official DoD response to GAO.

* Informal – recommends comments should be provided to GAO but not be published in report.

See comment 8.

Serial	Page #	Para #	Type * (A,S,C) Formal/Informal	Recommendation	Comment / Rationale
				instructors.” To: “...had only 24 authorized Instructors”	although there are plans to redress this imbalance.
8	22	1	(C)/Formal	Change: “The Coalition stated that it cannot estimate when NIAA will be self sufficient.” To: “the Coalition recognizes that NIAA self sufficiency is condition dependent.”	NIAA will become self sufficient when the following conditions are met: Basing: Construction of the new HQ complex and Baghdad Bureau, scheduled to be completed in April 2008. Basing improvements to the 14 other provincial and various border and ports of entry offices planned for 2008. Command and Control: Establishment of a secured communications architecture linking the new HQs with the provinces and ports of entry offices planned for 2008. Training: Establishment of an in-house training capacity in advanced investigative and technical skills such as polygraph, forensics, and biometrics. Resources: A separate and independent budget authorization for the NIAA. Political Reconciliation: A work environment free of intimidation and threats based on religious and tribal affiliations.

* A= Administrative; S = Substantive; C = Critical

* Formal – recommends comments should be published as part of official DoD response to GAO.

* Informal – recommends comments should be provided to GAO but not be published in report.

GAO's Responses to DOD's Technical Comments.

1. We revised the text to reflect DOD's comments.
2. We revised the text to reflect DOD's comments.
3. We revised the text to reflect DOD's comments.
4. We revised the text to reflect DOD's comments.
5. We revised the text to reflect DOD's comments.
6. Although we have not assessed the rate at which the National Depot at Taji is currently expanding, according to information we obtained from DOD in July 2007 and interviews with a former senior Coalition official who was assigned to the depot until June 2007, many of the same challenges affecting the development of the National Depot that we identified in our March 2007 reports remain and continue to hamper its capacity. Moreover, in light of the persistent violence in Iraq new challenges have cropped up as well. As we point out in this report, the formation of lower-echelon logistics units is complete, save those required by the Prime Minister's expansion plan. DOD documents confirm that since August 2006 the priority has been on creating lower-echelon logistics units over national and regional logistics center, to include GSUs. Hence, both by design and because of persistent violence, the development of the National Depot and GSUs has lagged behind.
7. We have changed the sentence to read "According to DOD, the MOD's Military Intelligence School, which is responsible for training Iraqi soldiers in intelligence skills, has only 24 of 81 authorized instructors, a circumstance attributed in part to security concerns for Iraqi faculty members who live outside the military complex at Taji."
8. In written replies to our questions about the NIIA, DOD outlined the conditions by which NIIA self-sufficiency could be achieved. However, DOD could not give an estimate of when it expects those conditions would come about.

Appendix II: Related GAO Products

Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmarks. GAO-07-1220T. Washington, D.C.: September 4, 2007

Securing, Stabilizing, and Rebuilding Iraq: Iraqi Government Has Not Met Most Legislative, Security, and Economic Benchmarks. GAO-07-1195. Washington, D.C.: September 4, 2007.

Stabilizing Iraq: DOD Cannot Ensure That U.S.-Funded Equipment Has Reached Iraqi Security Forces. GAO-07-711. Washington, D.C.: July 31, 2007.

Stabilizing and Rebuilding Iraq: Conditions in Iraq Are Conducive to Fraud, Waste, and Abuse. GAO-07-525T. Washington, D.C.: April 23, 2007.

Operation Iraqi Freedom: Preliminary Observations on Iraqi Security Forces' Logistics and Command and Control Capabilities. GAO-07-503R. Washington, D.C.: March 28, 2007.

Stabilizing Iraq: Preliminary Observations on Budget and Management Challenges of Iraq's Security Ministries. GAO-07-637T. Washington, D.C.: March 22, 2007.

Operation Iraqi Freedom: DOD Should Apply Lessons Learned Concerning the Need for Security over Conventional Munitions Storage Sites to Future Operations Planning. GAO-07-444. Washington, D.C.: March 22, 2007

Stabilizing Iraq: Factors Impeding the Development of Capable Iraqi Security Forces. GAO-07-612T. Washington, D.C.: March 13, 2007.

Operation Iraqi Freedom: Preliminary Observations on Iraqi Security Forces' Logistical Capabilities. GAO-07-582T. Washington, D.C.: March 9, 2007.

Securing, Stabilizing, and Rebuilding Iraq: GAO Audit Approach and Findings. GAO-07-385T. Washington, D.C.: January 18, 2007.

Securing, Stabilizing, and Rebuilding Iraq: Key Issues for Congressional Oversight. GAO-07-308SP. Washington, D.C.: January 9, 2007.

Rebuilding Iraq: Status of DOD's Reconstruction Program. GAO-07-30R. Washington, D.C.: December 15, 2006.

Rebuilding Iraq: Status of Competition for Iraq Reconstruction Contracts. GAO-07-40. Washington, D.C.: October 6, 2006.

Rebuilding Iraq: Continued Progress Requires Overcoming Contract Management Challenges. GAO-06-1130T. Washington, D.C.: September 28, 2006.

Stabilizing Iraq: An Assessment of the Security Situation, GAO-06-1094T. Washington, D.C.: September 11, 2006.

Rebuilding Iraq: More Comprehensive National Strategy Needed to Help Achieve U.S. Goals. GAO-06-788. Washington, D.C.: July 11, 2006.

Rebuilding Iraq: More Comprehensive National Strategy Needed to Help Achieve U.S. Goals and Overcome Challenges. GAO-06-953T. Washington, D.C.: July 11, 2006.

Rebuilding Iraq: Actions Still Needed to Improve the Use of Private Security Providers, GAO-06-865T. Washington, D.C.: June 13, 2006.

Rebuilding Iraq: Governance, Security, Reconstruction, and Financing Challenges. GAO-06-697T. Washington, D.C.: April 25, 2006.

Rebuilding Iraq: Enhancing Security, Measuring Program Results, and Maintaining Infrastructure Are Necessary to Make Significant and Sustainable Progress. GAO-06-179T. Washington, D.C.: October 18, 2005.

Rebuilding Iraq: Actions Needed To Improve Use of Private Security Providers. GAO-05-737. Washington, D.C.: July 28, 2005.

Rebuilding Iraq: Preliminary Observations on Challenges in Transferring Security Responsibilities to Iraqi Military and Police. GAO-05-431T. Washington, D.C.: March 14, 2005.

Rebuilding Iraq: Resource, Security, Governance, Essential Services, and Oversight Issues. GAO-04-902R. Washington, D.C.: June 28, 2004.

(350948)

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's Web site (www.gao.gov). Each weekday, GAO posts newly released reports, testimony, and correspondence on its Web site. To have GAO e-mail you a list of newly posted products every afternoon, go to www.gao.gov and select "E-mail Updates."

Order by Mail or Phone

The first copy of each printed report is free. Additional copies are \$2 each. A check or money order should be made out to the Superintendent of Documents. GAO also accepts VISA and Mastercard. Orders for 100 or more copies mailed to a single address are discounted 25 percent. Orders should be sent to:

U.S. Government Accountability Office
441 G Street NW, Room LM
Washington, DC 20548

To order by Phone: Voice: (202) 512-6000
TDD: (202) 512-2537
Fax: (202) 512-6061

To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Web site: www.gao.gov/fraudnet/fraudnet.htm

E-mail: fraudnet@gao.gov

Automated answering system: (800) 424-5454 or (202) 512-7470

Congressional Relations

Gloria Jarmon, Managing Director, jarmong@gao.gov, (202) 512-4400
U.S. Government Accountability Office, 441 G Street NW, Room 7125
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.
