



January 2016

# BUILDING PARTNER CAPACITY

U.S. Agencies Can  
Improve Monitoring of  
Counter-Firearms  
Trafficking Efforts in  
Belize, Guatemala,  
and Mexico

# GAO Highlights

Highlights of [GAO-16-235](#), a report to congressional requesters

## Why GAO Did This Study

Trafficking of illicit materials, including firearms, is widespread across Mexico's more than 700-mile southern border with Guatemala and Belize. Such trafficking presents a challenge for law enforcement in all three countries and for U.S. security interests. State and other U.S. agencies, such as ATF, have provided support to build the capacity of their counterparts in these three countries to address problems related to firearms trafficking. GAO was asked to review U.S. support to the governments of Belize, Guatemala, and Mexico to stem firearms trafficking across their shared border. This report examines, for these three countries, (1) the activities undertaken by U.S. agencies to build partner capacity to combat firearms trafficking and the extent to which they considered key factors in selecting the activities and (2) progress the United States has made in building such capacity. GAO analyzed program documentation and conducted interviews with U.S., Belizean, Guatemalan, and Mexican officials. To examine progress, GAO selected a nongeneralizable sample of eight key activities based on a number of factors, including whether the activity addressed firearms trafficking.

## What GAO Recommends

GAO recommends that (1) ATF establish and document performance targets for its key counter-firearms trafficking activities in Belize, Guatemala, and Mexico, as appropriate, and (2) State work with other U.S. agencies and implementers to help ensure that progress reports identify key challenges and plans to address them. ATF and State agreed with these recommendations.

View [GAO-16-235](#). For more information, contact Jessica Farb at (202) 512-6991 or [farbj@gao.gov](mailto:farbj@gao.gov).

January 2016


## BUILDING PARTNER CAPACITY

### U.S. Agencies Can Improve Monitoring of Counter-Firearms Trafficking Efforts in Belize, Guatemala, and Mexico

#### What GAO Found

U.S. agencies and their implementing partners have undertaken a number of capacity-building activities that support counter-firearms trafficking efforts in Belize, Guatemala, and Mexico. The figure below outlines examples of the areas of effort under which these activities fall. Selected, in part, based on partner country needs, these activities include efforts to provide support in using the Bureau of Alcohol, Tobacco, Firearms and Explosives' (ATF) web-based firearms tracing system (eTrace) and providing forensics training, including on ballistics. Some of these activities, such as firearms identification training, relate directly to firearms trafficking, while others broadly support antitrafficking or border security efforts for which stemming the trafficking of firearms is one of many goals. Presidential Policy Directive 23 highlights key factors, including partner country needs, absorptive capacity, sustainability, and other U.S. and other donor efforts, as important in planning security sector assistance. Agencies considered these factors in determining what activities to fund.

**Examples of Areas of Effort for U.S. Counter-Firearms Trafficking Activities in Belize, Guatemala, and Mexico, Based, in Part, on Each Partner Country's Identified Needs**



	Belize	Guatemala	Mexico
Firearms training	✓	✓	✓
eTrace support and training	✓	✓	✓
Stockpile management	✓	✓	
Firearms marking equipment and training	✓	✓	
Forensic training and assistance	✓	✓	✓
Nonintrusive inspection equipment			✓

Sources: GAO analysis of agency documents (data); Map Resources (map). | GAO-16-235

U.S. agencies and implementing partners have achieved many of their goals for eight key counter-firearms trafficking activities GAO reviewed, but could enhance their efforts to measure and report on progress. Agencies and implementers established performance measures and targets for five of these eight activities. *Standards for Internal Control in the Federal Government* states that managers should compare actual performance against expected results, highlighting the importance of such measures and targets. ATF tracks its activities but has not established performance targets for them, without which it is difficult to measure the success of its efforts. Two of the five activities GAO reviewed that established metrics and targets are ongoing and are meeting their goals, while three other activities were completed and met or partially met their goals, according to Department of State (State) and implementer reports. For activities it funds, State requires implementers to include a discussion of key challenges and strategies to address those challenges in quarterly reports. However, implementers' reports for activities GAO reviewed were inconsistent and did not always identify challenges or strategies for addressing them. Without this information, agencies risk not fully meeting their goals and may be unable to maximize the use of U.S. resources.

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## Abbreviations

ATF	Bureau of Alcohol, Tobacco, Firearms and Explosives
CARSI	Central America Regional Security Initiative
CBP	U.S. Customs and Border Protection
IBIS	Integrated Ballistics Identification System
ICE	Immigration and Customs Enforcement
ICITAP	International Criminal Investigative Training Assistance Program
INL	Bureau of International Narcotics and Law Enforcement Affairs
NADR	Nonproliferation, Antiterrorism, Demining, and Related Programs
OAS	Organization of American States
PGR	Procuraduría General de la República (Government of Mexico's Office of Attorney General)
PM/WRA	Bureau of Political-Military Affairs, Office of Weapons Removal and Abatement
PPD 23	Presidential Policy Directive 23
State	Department of State

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January 13, 2016

The Honorable Eliot L. Engel  
Ranking Member  
Committee on Foreign Affairs  
House of Representatives

The Honorable Jeff Duncan  
Chairman  
Subcommittee on the Western Hemisphere  
Committee on Foreign Affairs  
House of Representatives

Trafficking of illicit materials, including firearms, is widespread across Mexico's more than 700-mile southern border with Guatemala and Belize. This trafficking is closely linked to the activities of transnational criminal organizations that are engaged in violent activities throughout the region. For example, from 2007 to 2014, there were more than 70,000 homicides related to criminal violence in Mexico. Similarly, fighting among criminal organizations over contested trafficking routes in Central America has fueled violence in Guatemala and Belize, which, according to the United Nations Office on Drugs and Crime, had two of the highest homicide rates in the world in 2012, the last year for which comprehensive data are available. This violence, accompanying the flow of drugs throughout the region, perpetuates the demand for firearms and presents a broader challenge for law enforcement in all three countries, as well as for U.S. security interests in the region.

U.S., Belizean, Guatemalan, and Mexican officials have all noted that countering firearms trafficking is a priority for the region. The governments of Belize, Guatemala, and Mexico have recognized the need to improve the capacity of law enforcement organizations and other criminal justice sector institutions to combat illegal firearms trafficking and have initiated efforts to enhance their abilities to fight transnational organized crime. The President of the United States has also acknowledged the need to stem the flow of firearms to the region and has committed U.S. support for these efforts. The Department of State (State)—primarily through programs such as the Merida Initiative and the Central America Regional Security Initiative (CARSI)—and other U.S. agencies, such as the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and U.S. Customs and Border Protection (CBP), have

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provided support to build the capacity of their Belizean, Guatemalan, and Mexican counterparts to address problems related to firearms trafficking.

You asked us to review U.S. support for the governments of Belize, Guatemala, and Mexico to stem firearms trafficking across their shared border. This report examines (1) the activities undertaken by U.S. agencies to build partner capacity to combat firearms trafficking in Belize, Guatemala, and Mexico and the extent to which they considered key factors in selecting the activities and (2) the progress the United States has made in building partner capacity in Belize, Guatemala, and Mexico to combat firearms trafficking.

To address these objectives, we analyzed information from State, ATF, CBP, the International Criminal Investigative Training Assistance Program (ICITAP), and Immigration and Customs Enforcement (ICE), as well as funding data for fiscal years 2010 through 2014 for programs that directly or indirectly addressed firearms trafficking.<sup>1</sup> We interviewed U.S. officials and officials from the Organization of American States (OAS) in Washington, D.C., and U.S. and Mexican officials in Mexico. Additionally, we conducted interviews with Guatemalan and Belizean officials. We compiled a list of activities that included combatting firearms trafficking as at least one goal, but because other activities may also indirectly touch on firearms trafficking, the list may not be comprehensive. To determine the extent to which U.S. agencies considered key factors in selecting capacity-building activities, we analyzed Presidential Policy Directive 23 (PPD 23), a directive on security sector assistance, and identified the key factors it instructs agencies to consider when planning security sector activities. We then analyzed agency documentation and interviewed U.S. and foreign government officials to determine whether U.S. agencies that conducted counter-firearms trafficking capacity-building activities considered these factors.

To assess U.S. progress in building partner capacity in Belize, Guatemala, and Mexico to combat firearms trafficking, we examined a subset of capacity-building activities. Our review of these activities is not generalizable to all activities conducted by U.S. agencies and their implementing partners. Each of the eight key activities we reviewed (1)

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<sup>1</sup>We also interviewed officials from other Department of Justice and Department of Homeland Security components and from the Department of Defense and determined that they did not conduct activities relevant to the scope of this review.

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included a specific component or objective that addresses firearms trafficking, (2) had a substantial portion of funds directed to the activity, or (3) was identified by U.S. and foreign officials as a key effort in building partner capacity to combat firearms trafficking. We reviewed State and implementing agency or organization progress reports that assessed progress against the performance measures and targets set for each activity. Based on interviews with knowledgeable agency officials and a review of State's relevant internal controls, we determined that data on funding for these activities provided by State and ATF were sufficiently reliable for the purposes of this report. For more information on our scope and methodology, see appendix I.

We conducted this performance audit from February 2015 to January 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

In Mexico, where, according to U.S. officials, the commercial sale or purchase of a firearm is prohibited and strict controls limit citizens' access to firearms, illicitly trafficked firearms fuel drug trafficking violence, as we reported in 2009.<sup>2</sup> According to data from ATF's web-based firearms tracing system, eTrace, the majority of the guns seized and traced in Mexico—about 70 percent from 2010 through 2014—have origins in the United States.<sup>3</sup>

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<sup>2</sup>GAO, *Firearms Trafficking: U.S. Efforts to Combat Arms Trafficking to Mexico Face Planning and Coordination Challenges*, [GAO-09-709](#) (Washington, D.C.: June 18, 2009).

<sup>3</sup>Because of the illicit nature of firearms trafficking, the exact number of firearms trafficked through Belize, Guatemala and Mexico is not known. Some firearms seized by law enforcement and other authorities may not consistently be submitted for tracing the same year they were seized, or may not be submitted at all. However, ATF uses the number of firearms seized and traced as an indicator to estimate the volume of and trends in illicit firearms trafficking more generally. For a more in-depth discussion of trends in firearms trafficking to Mexico, see *Firearms Trafficking: U.S. Efforts to Combat Firearms Trafficking to Mexico Have Improved, but Some Collaboration Challenges Remain*, [GAO-16-223](#) (Washington, D.C.: Jan. 11, 2016).

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As we also reported in 2009, the Mexican government initiated a new national security strategy in 2006 to combat the growing power of criminal organizations and curb their ability to operate with impunity in certain areas of Mexico. The organizations countered government pressure with increased violence against law enforcement entities and the government's efforts also appeared to result in increasing conflicts among criminal organizations over lucrative drug trafficking routes.<sup>4</sup> The United Nations Office on Drugs and Crime has noted that the Mexican government's shift in strategy also affected trafficking routes in Central America.<sup>5</sup> As it became more hazardous for traffickers to ship drugs, particularly cocaine, directly to Mexico via air and waterways, an increasing share of the drug trade began to move overland through Central America. Those routes entered Mexico through its shared southern land border with Guatemala and, to a lesser extent, Belize.<sup>6</sup>

According to the United Nations Office on Drugs and Crime, this change in trafficking patterns resulted in increased competition for territorial control among local organized crime groups. Over time, Mexican criminal organizations also increasingly moved south into Central America to gain control of trafficking routes. As a result, violence increased substantially in countries throughout Central America. In recent years, the people of Central America and Mexico have cited violent crime as one of the most important issues facing their countries. Many of the criminal organizations involved in the drug trade also traffic firearms across the region.

Although most of the firearms seized and traced in Mexico transited across its northern border with the United States, firearms also travel in both directions across Mexico's southern border. It is difficult to ascertain the volume of firearms trafficked across Mexico's border with Guatemala and Belize; however, according to the Mexican government, firearm seizure rates in Mexico's southern border states are low in comparison to those of northern border states and the rest of the country. According to a binational assessment conducted by U.S. and Mexican officials, many Central American countries lack the capability to trace firearms

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<sup>4</sup>[GAO-09-709](#).

<sup>5</sup>United Nations Office on Drugs and Crime, *Transnational Organized Crime in Central America and the Caribbean: A Threat Assessment* (Vienna, Austria: 2012).

<sup>6</sup>Maritime trafficking also remains a concern in Belize, where criminal organizations traffic drugs and other illicit goods over the Caribbean Sea.



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independently, which makes it difficult to determine the percentage of weapons seized and traced in Mexico that have an origin in Central America. Also, according to ATF officials, unlike Mexico, both Guatemala and Belize allow for the commercial sale and purchase of firearms, so the availability of legal firearms differs considerably across the three countries. Guatemala and Belize are much smaller countries than Mexico, and ATF data on seized and traced firearms indicate that the volume of firearms seized and traced in these countries is also much smaller than that in Mexico. For example, from 2010 to 2014, Mexico seized and traced about 83,000 firearms, while Guatemala seized and traced about 7,000 firearms and Belize seized and traced about 300 firearms.

A number of U.S. agencies provide capacity-building assistance in the three countries to help address concerns associated with firearms trafficking, among other things.

- **State:** State's Bureau of International Narcotics and Law Enforcement Affairs (INL) manages most of the funding for the Merida Initiative and CARSI, the two primary initiatives through which the U.S. government funds and manages activities to help address the problem of increasing crime and violence in Mexico and Central America, respectively. In cooperation with several other U.S. agencies, State is also responsible for the overall implementation of these two initiatives.

State's Bureau of Political-Military Affairs, Office of Weapons Removal and Abatement (PM/WRA) works to reduce the harmful, worldwide effects of at-risk, illicitly proliferated, and indiscriminately used conventional weapons of war, including small arms and light weapons. PM/WRA supports programs around the world that assist governments in securing or destroying abandoned or stockpiled munitions, with a goal of curbing illicit trafficking.

In most cases, State does not directly implement counter-firearms activities but instead provides funding for other U.S. agencies or other implementers, such as international organizations or nongovernmental organizations, to implement the activities. As the funding organization, State maintains responsibility for oversight of these efforts.

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- **Department of Justice:** For over 45 years, ATF has implemented efforts to combat arms trafficking within the United States and from the United States to other countries as part of its mission under the Gun Control Act.<sup>7</sup> ATF is responsible for investigating criminal and regulatory violations of federal firearms laws, among other responsibilities. ATF traces U.S. and foreign manufactured firearms for international, federal, state, and local law enforcement agencies, to link a firearm recovered in a criminal investigation to its first retail purchaser. It is the only entity within the U.S. government able to trace firearms recovered from crimes in Mexico.<sup>8</sup> ATF has four offices in Mexico and an office in El Salvador that provides assistance throughout Central America, including in Guatemala and Belize. Through these offices, ATF provides an international liaison to support ATF's mission to interdict and prevent illegal firearms trafficking and combat violent criminal gangs.

ICITAP works with foreign governments to develop professional and transparent law enforcement institutions that protect human rights, combat corruption, and reduce the threat of transnational crime and terrorism. ICITAP provides a wide range of public safety development expertise, including assistance in areas such as organizational development, criminal investigations, and forensics.

- **Department of Homeland Security:** CBP coordinates and supports foreign initiatives, programs, and activities with its external partners around the world. CBP strives to protect U.S. borders by implementing programs and initiatives that promote antiterrorism, global border security, nonproliferation, export controls, immigration, and capacity building.

For over 30 years, ICE—and previously the U.S. Customs Service—has implemented efforts to enforce U.S. export laws. ICE agents and other staff address a range of issues, including combating the illicit smuggling of money, people, drugs, and firearms. ICE has offices in

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<sup>7</sup>Gun Control Act of 1968, Pub. L. No. 90-618, 82 Stat. 1213. Oct. 22, 1968, as amended; codified at 18 U.S.C. § 921 et seq.

<sup>8</sup>Firearms tracing is the systematic tracking of the movement of a firearm recovered by law enforcement officials from its first sale by the manufacturer or importer through the distribution chain (wholesaler/retailer) to identify the first retail purchaser. ATF's paperless firearm trace submission system, eTrace, is accessible through the Internet; through which users can submit, retrieve, query, and store firearms trace information, as applicable.

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Mexico and Guatemala whose missions are to support domestic operations by coordinating investigations with foreign counterparts, disrupt criminal efforts to smuggle people and materials into the United States, and build international partnerships through outreach and training.

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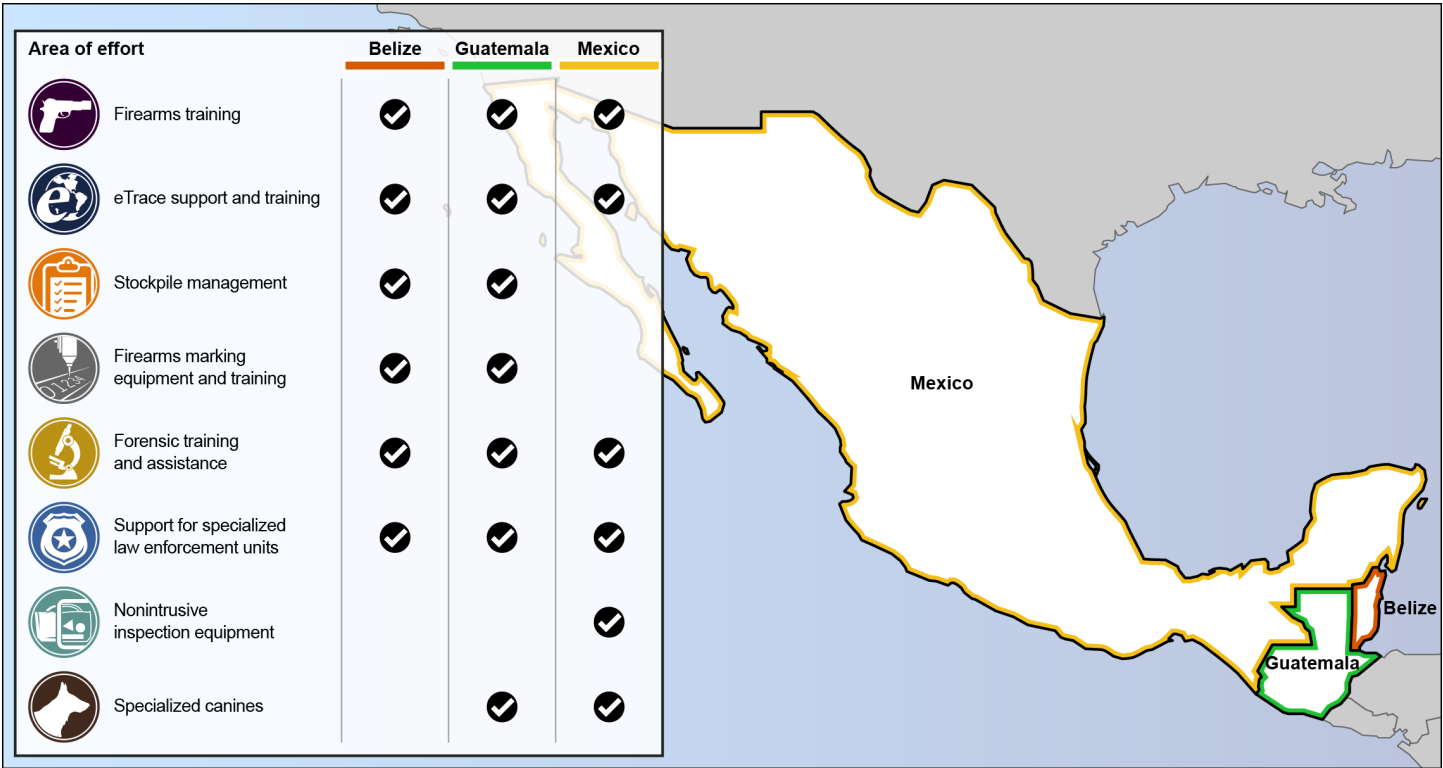
## U.S. Agencies Provide a Variety of Counter-Firearms Trafficking Capacity-Building Assistance and Considered Key Factors in Selecting Activities

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### U.S. Agencies Provide a Variety of Counter-Firearms Trafficking Capacity-Building Assistance in Belize, Guatemala, and Mexico

U.S. agencies and other implementing partners have undertaken a number of capacity-building activities that directly or indirectly support counter-firearms trafficking efforts in Belize, Guatemala, and Mexico. Figure 1 outlines the areas of effort under which these activities fall.

**Figure 1: Areas of Effort for U.S. Counter-Firearms Trafficking Activities in Belize, Guatemala, and Mexico, Based, in Part, on Each Partner Country’s Identified Needs**



Sources: GAO analysis of agency documents (data); Map Resources (map). | GAO-16-235

Note: According to U.S. and Organization of American States officials, the Mexican government has not requested assistance with stockpile management or firearms marking equipment and training.

As discussed below, these activities were selected based, in part, on the needs of each country. Some of these activities relate directly to firearms trafficking, such as ATF firearms identification training, while others broadly support antitrafficking or border security efforts that include efforts to stem the trafficking of firearms as one of many goals. For example, State has provided nonintrusive inspection equipment to Mexico that can be used to scan vehicles and containers for drugs or other contraband, including firearms. These activities are largely funded by State and implemented by other U.S. agencies or other implementing partners, including international organizations or nongovernmental organizations. The activities include the following:

- Firearms training:** ATF has an attaché in Mexico and a regional attaché in El Salvador who supports activities throughout Central America, including in Guatemala and Belize. Among their

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responsibilities is managing a series of training courses for local officials. In fiscal year 2014, ATF's Mexico office managed 27 courses that trained over 1,200 students. These training courses covered a number of topics related to firearms and explosives and included 10 firearms identification courses. In the same year, ATF's Central America office managed 3 courses that trained nearly 200 students. All 3 courses covered eTrace and 1 also covered investigative techniques.

- **Provision and support of eTrace:** ATF helps partner country governments improve their use of the eTrace system. In 2009, ATF launched a Spanish-language version of the system, which is used in Guatemala and Mexico. Belizean officials use the English version of eTrace. ATF officials work with host country officials to ensure that they understand how to use the system and to encourage them to input all crime weapons seized within the country into the system for tracing.
- **Stockpile management:** From 2010 through 2012, PM/WRA provided a grant to the OAS to assist in the destruction of excess firearms and ammunition in Guatemala.<sup>9</sup> In 2012, PM/WRA also provided funding for enhanced physical security of stockpile storage facilities in Belize.
- **Firearms marking equipment and training:** Under a PM/WRA grant, from 2009 through 2014, the OAS implemented a program to help facilitate the tracing process by distributing firearms marking machines throughout Latin America and the Caribbean, including in Guatemala and Belize. The program also included training on how to use the equipment. The program provided five machines to Guatemala and one machine to Belize, based on an assessment of the needs of each country.
- **Forensic training and assistance:** The United States initiated several efforts to enhance the capacity of forensics labs, including their ability to conduct ballistics work, in each of the three countries. In

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<sup>9</sup>The OAS is an international organization created in 1948 among American States in order to "achieve an order of peace and justice, to promote their solidarity, to strengthen their collaboration, and to defend their sovereignty, their territorial integrity, and their independence." Within the United Nations, the OAS is a regional agency. Thirty-five countries are members of the OAS, including the United States.

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Mexico, INL and ICITAP have provided support at the national and state levels, through two separate programs, to help forensics labs meet international standards. In Central America, INL supported a regional program in forensics training. Additionally, INL officials noted that INL has provided bilateral support to the forensics labs in both Guatemala and Belize, including bringing a ballistics expert to Belize for a yearlong detail in its forensics lab.<sup>10</sup> According to INL officials, INL intends to extend this detail by another year.

Additionally, the United States has supported the use of the Integrated Ballistics Identification System (IBIS) in forensics labs in each country. IBIS is designed to capture, file, and compare images of bullets and cartridge casings. Investigators can use the system in examining crime-related guns. INL has provided equipment, training, or both in all three countries to initiate or enhance the use of IBIS and has encouraged the countries to link their systems to those of neighboring countries to enhance law enforcement capabilities throughout the region.

- **Support for specialized units:** In all three countries, INL and other U.S. agencies have supported antitrafficking law enforcement units. In Guatemala, ICE has supported the creation and sustainment of a Transnational Criminal Investigative Unit—a unit of local law enforcement officers who receive training and work closely with ICE agents in investigating transnational crimes, including firearms trafficking. With support from INL, ICE's Mexico office also established two Transnational Criminal Investigative Units in 2015, according to U.S. officials. In Belize, INL and CBP have supported the creation and sustainment of a mobile interdiction team that combats trafficking of all illegal substances and materials, including firearms.

In Guatemala, INL and ATF have also provided support to the Attorney General's office, including to a firearms-specific group within its organized crime unit. For example, Guatemalan officials noted that ATF has provided technical guidance and expertise on firearms-related investigations. According to U.S. and Guatemalan officials, INL and ATF have also provided training and equipment to support the creation of a firearms and explosives unit within the Guatemalan National Police.

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<sup>10</sup>Officials noted that ATF has also provided technical support on firearms-related issues to the national forensics lab in Guatemala.

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- **Nonintrusive inspection equipment:** In Mexico, INL has provided nonintrusive inspection equipment and training at border ports of entry and other strategic locations to allow the Mexican government to scan and inspect passenger vehicles, cargo containers, and freight rail for firearms, among other things. CBP has also provided training on the use of this equipment.
  - **Specialized canines:** In Mexico, INL, in coordination with CBP, has provided specialized canines with the ability to detect smuggled firearms, among other things, and CBP has also provided training in their use. In Guatemala, an INL official noted that INL has provided support to a local canine training school that has outfitted government units with canines capable of detecting firearms and drugs, among other things.

A number of other U.S. efforts may touch on combatting firearms trafficking without having this as an explicitly stated goal. For example, Belizean officials noted that support provided by the U.S. Coast Guard has helped them interdict firearms trafficked along the Caribbean coast. Additionally, the United States has provided justice sector support in Mexico that is intended to improve the judicial system's ability to prosecute crimes of all types, including those related to firearms trafficking. Additionally, U.S. agencies, including CBP and ICE, provide assistance to each of the countries to strengthen border security. These efforts do not have a specific goal to counter firearms trafficking but complement antitrafficking efforts, according to Department of Homeland Security and State officials.

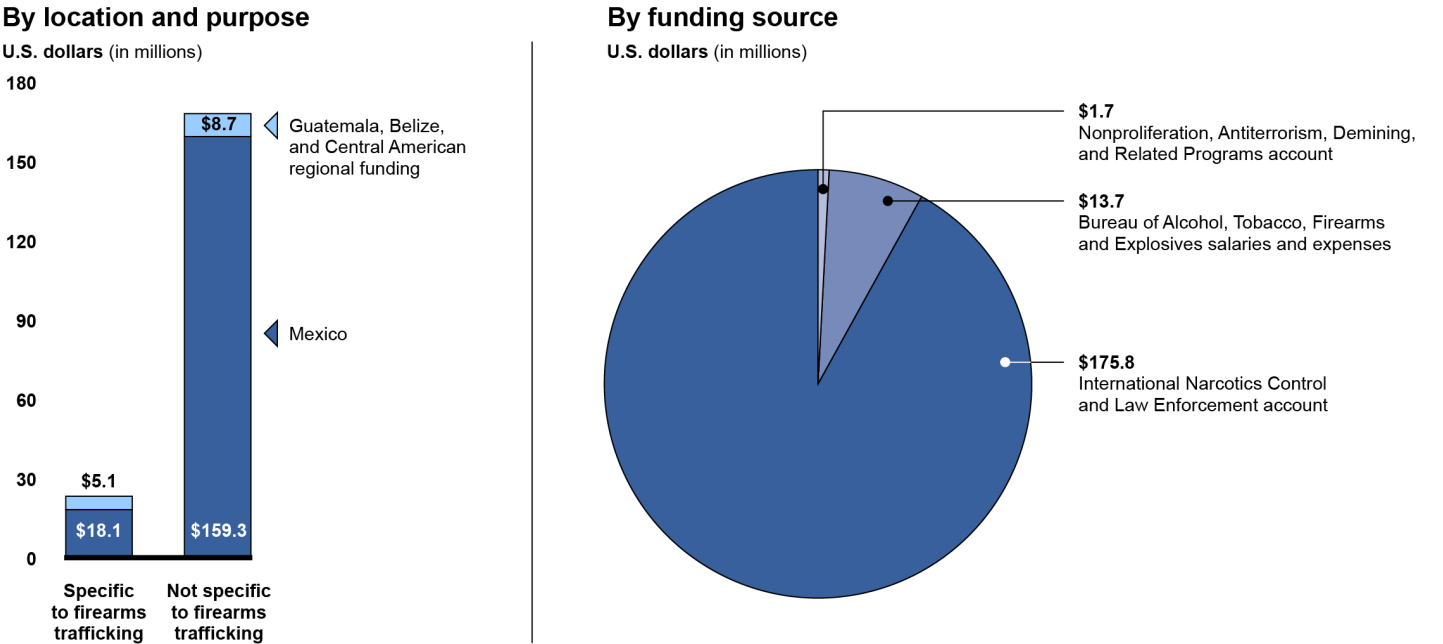
In total, U.S. agencies obligated about \$191 million in fiscal years 2010 through 2014 to support these efforts, most of which went to activities that were not specifically focused on countering firearms trafficking but included it as one of many goals (see fig. 2).<sup>11</sup> State's INL provided the majority—over 90 percent of total obligations reported by U.S. agencies—of this funding through the International Narcotics Control and Law Enforcement appropriations account. Additionally, about 93 percent of the total funding, or about \$177 million, went to activities in Mexico. Most of this—about \$149 million—is attributable to two activities in Mexico that are not specifically focused on countering firearms trafficking: (1) the

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<sup>11</sup>Some activities and agreements extended into fiscal year 2015, so some of the obligations reported by agencies may have been made in fiscal year 2015.

provision of nonintrusive inspection equipment and training and (2) assistance to the Mexican federal and state forensic laboratories. In total, U.S. agencies obligated about \$23 million for activities that specifically focused on countering firearms trafficking. This includes about \$8 million from INL to support activities in all three countries, nearly \$14 million that ATF provided in support of its activities in Mexico, and about \$2 million that PM/WRA provided for some of the efforts in Guatemala and Belize through the Nonproliferation, Antiterrorism, Demining, and Related Programs (NADR) appropriations account. About \$7.5 million of the overall total went to regional activities in Central America that included other countries in addition to Guatemala and Belize.

**Figure 2: Distribution of U.S. Funding for Capacity-Building Efforts to Counter Firearms Trafficking in Belize, Guatemala, and Mexico, by Location and by Source Account, Fiscal Years 2010 through 2014**



Source: GAO analysis of Department of State and Bureau of Alcohol, Tobacco, Firearms and Explosives data. | GAO-16-235

Note: Funding data represent total obligations.



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## U.S. Agencies Considered Key Factors in Selecting Counter-Firearms Trafficking Activities

Consistent with PPD 23, U.S. agencies considered key factors in selecting counter-firearms trafficking activities. In PPD 23—a directive governing U.S. security sector assistance, including firearms trafficking—the administration laid out policy guidelines for planning, implementing, and monitoring security sector assistance. PPD 23 asserts that U.S. agencies should consider several key factors in planning security sector assistance, including partner country needs, absorptive capacity, sustainability, and other donor and other U.S. efforts.

## Partner Country Needs

U.S. counter-firearms trafficking capacity-building efforts in Belize, Guatemala, and Mexico have largely focused on identified partner country needs. We found that the issues of concern to the governments of Central American countries, such as Guatemala and Belize, differ in some ways from those of the government of Mexico, while other concerns exist in all three countries.<sup>12</sup> Guatemala, for example, like some other Central American countries, has leftover stockpiles of weapons and ammunition from past conflicts, resulting in more arms than are needed for military and law enforcement purposes. Additionally, in both Guatemala and Belize, some stockpiles are aging—and are, therefore, more volatile—or are poorly secured. Firearms originating in or imported into Central America have often lacked markings that allow law enforcement to trace their origins. In all three countries, the ability to trace firearms has been a concern. Countries did not have systems for tracking the source of firearms and either lacked access to or did not regularly use ATF's eTrace system. Additionally, capacity gaps in investigating firearms-related crimes and the porous borders between Belize, Guatemala, and Mexico have been concerns in all three countries.

U.S. agency activities have largely focused on these needs. For example, agencies undertook stockpile management and firearms marking activities in both Guatemala and Belize and have initiated efforts to improve firearms tracing and investigations, as well as border security, in all three countries. U.S. and foreign government officials noted that they regularly meet to discuss how U.S. assistance can meet partner country needs. In Mexico, U.S. and Mexican officials instituted a practice under the current Mexican administration, through which all proposals for Merida Initiative assistance are discussed in regular meetings with

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<sup>12</sup>We identified issues of concern based on interviews with U.S. and foreign government officials as well as a review of U.S. government documents and international organizations' reports.

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representatives of a single office within the Mexican Interior Ministry. This provides a single contact through which all Merida Initiative assistance is coordinated and approved. In Guatemala and Belize, U.S. and host country officials described a process in which they meet to discuss needs on a regular basis.

### Absorptive Capacity

Our analysis of State and implementing partner documents shows that State and implementers considered absorptive capacity in selecting and designing programs. For example, in choosing not to recommend one proposal for a forensics program in Central America, INL noted that the proposal focused too heavily on advanced technological approaches, which may not be appropriately tailored to host country capabilities. In the interagency agreement between INL and ICITAP for a forensics program in Mexico, ICITAP said that it met with Mexican officials to discuss needs and assess the existing capacity of Mexican state labs in designing the program. Additionally, CBP noted that trainees for its nonintrusive inspection equipment training program would be selected based on their proficiency in using nonintrusive inspection equipment and on their work performance and developed a series of courses to build this expertise over time.

### Sustainability

Our analysis of documents and interviews with agency officials shows that agencies considered sustainability for counter-firearms trafficking activities, with some officials noting that ensuring sustainability can be challenging. Most of the interagency agreements we reviewed had a section on sustainability, indicating that U.S. agencies and other implementers considered how to create a sustainable program. In Mexico and Guatemala, U.S. officials noted that it can be difficult to sustain enhanced capacity because of regular turnover among host country officials. However, in some cases, U.S. agencies incorporated efforts to address this concern into their programs' design. For example, in Mexico, agencies have instituted train-the-trainer programs in which they train host country officials who then train others within their organizations. The goal of such programs is to establish a level of expertise among some officials to help ensure long-term sustainability of U.S. training efforts.

The long-term sustainability of equipment has been a concern in the firearms marking program in Central America. In particular, an OAS official stated that the marking equipment provided in Central America began requiring maintenance shortly into the program, but no funding had been allocated by State for that purpose. PM/WRA officials noted, however, that the memorandums of understanding established with

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recipient countries noted that maintenance was the countries' responsibility.

#### Other Donor and Other U.S. Efforts

Foreign officials said that the United States is often the only donor supporting these types of counter-firearms trafficking efforts. Nonetheless, State officials said that they meet with other donors to ensure that efforts are not duplicative or conflicting. State also includes an assessment of other donors' efforts in some strategic planning documents to ensure that planned U.S. efforts do not overlap with ongoing or planned programs by other donors.

U.S. agencies indicated that they have generally considered other U.S. efforts in their planning. According to U.S. officials, coordination among U.S. government officials within each of the three countries is generally good. They noted that U.S. agencies within each country meet regularly and discuss ongoing activities to ensure that they are sharing information and coordinating efforts. In one case, a lack of communication between PM/WRA officials in Washington, D.C., and embassy officials in Belize resulted in delays to a program's implementation. In 2012, PM/WRA provided \$300,000 in obligated NADR funds to the U.S. Embassy in Belize for stockpile management, but less than one-third of it was expended by the embassy. State officials noted that embassy officials in Belize were unaware of the remaining obligated but unexpended funds until relevant officials informed them in spring 2015 that the funding needed to be spent or deobligated.<sup>13</sup> PM/WRA officials noted that it is unusual for them to transfer funding directly to an embassy. They said they typically would provide the funding directly to a contractor or other implementing partner but provided it to the embassy in this case for the sake of expedience. Once they were aware of the unexpended NADR funds, embassy officials identified unmet needs for which these funds could be used and submitted a proposal to PM/WRA to provide additional security equipment to the Belizean government.

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<sup>13</sup>NADR funds that are obligated within the initial 2-year period of availability for obligation remain available for obligation for an additional 4 years. See Consolidated Appropriations Act, 2012, Pub. L. No. 112-74, § 7011, Dec. 23, 2011.

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## U.S. Agencies and Implementers Achieved Many of Their Goals for Counter-Firearms Trafficking Activities We Reviewed, but Efforts to Track and Report on Progress Are Inconsistent

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### Agencies Established Performance Measures and Targets for Most but Not All Key Counter-Firearms Trafficking Activities We Reviewed

U.S. agencies and other implementers established performance measures and targets for five of eight key activities we reviewed that assist in building capacity to combat firearms trafficking in Belize, Guatemala, and Mexico. According to *Standards for Internal Control in the Federal Government*, managers should compare actual performance against planned or expected results and analyze significant differences.<sup>14</sup> In PPD 23 the administration also highlights the importance of monitoring and evaluating security sector assistance efforts to make resource allocation decisions. As we have previously reported, performance measurement allows organizations to track progress in achieving their goals and gives managers crucial information to identify gaps in program performance and plan any needed improvements.<sup>15</sup> Table 1 outlines eight key counter-firearms trafficking activities in Belize, Guatemala, and

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<sup>14</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: Nov. 1999). GAO recently revised and reissued *Standards for Internal Control in the Federal Government*, with the new revision effective beginning with fiscal year 2016. See [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

<sup>15</sup>GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

Mexico—within the broader areas of effort presented in figure 1—and notes whether performance targets were established for each activity.<sup>16</sup>

**Table 1: Status of Key Counter-Firearms Activities GAO Reviewed in Belize, Guatemala, and Mexico in Establishing Targets**

Area of effort	Activity	Implementer	Location	Dates	Performance targets established
Forensic training and assistance	Forensic assistance to Attorney General	ICITAP	Mexico	Ongoing	Yes
	Forensic assistance to Mexican states	ICITAP	Mexico	Ongoing	Yes
Firearms training	Firearms training	ATF	Belize, Guatemala, Mexico	Ongoing	No
eTrace support and training	eTrace support and training	ATF	Belize, Guatemala, Mexico	Ongoing	No
Stockpile management	Physical security and stockpile management	U.S. Embassy Belize	Belize	Ongoing	No
	Stockpile destruction	OAS	Guatemala	Sept. 2010 to June 2012	Yes
Firearms marking equipment and training	Firearms marking	OAS	Belize, Guatemala	Sept. 2009 to June 2014	Yes
Nonintrusive inspection equipment	Nonintrusive inspection equipment training	CBP	Mexico	Apr. 2013 to Dec. 2014	Yes

Legend: ATF = Bureau of Alcohol, Tobacco, Firearms and Explosives; CBP = U.S. Customs and Border Protection; ICITAP = International Criminal Investigative Training Assistance Program; OAS = Organization of American States.

Source: GAO analysis of Department of State and Department of Justice documents and agency interviews. | GAO-16-235

Agencies and other implementers that established performance metrics and targets for these key activities did so as part of a broader performance management framework. They articulated an overall objective or goal for the activity and, to track progress toward these

<sup>16</sup>These eight key activities are a subset of the activities discussed earlier in the report. We selected these as key activities because each of them (1) included a specific component or objective that addresses firearms trafficking, (2) had a substantial portion of funds directed to the activity, or (3) was identified by U.S. and foreign officials as a key effort in building partner capacity to combat firearms trafficking.

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objectives and goals, developed performance metrics and targets that monitored specific actions that supported the objectives and goals.<sup>17</sup>

All of the performance measures and targets agencies and other implementers established for the key activities we reviewed were assessable. State guidance on establishing performance metrics outlines a variety of options for measuring success in various activities, such as training courses and advising or mentoring. The types of performance measures used for these activities varied in their degree of specificity. For example, one of the performance measures for CBP's activity to train Mexican agency officials on the use of nonintrusive inspection equipment is that trainees will demonstrate proficiency through an evaluation of practical exercises. The firearms destruction activity in Guatemala, managed by the OAS, identified specific numbers for the amounts of expired or unstable ammunition and weapons the program intended to destroy.

Some agencies established performance measures for some of the key activities we reviewed but did not establish targets for them. As a result, we were unable to assess whether these activities met their goals. For example, although ATF tracks data on firearms-related training and outcomes associated with eTrace in Belize, Guatemala, and Mexico, the agency has not established performance targets for these activities, making it difficult for ATF managers and other decision makers to determine whether its counter-firearms trafficking efforts are successful. ATF officials noted that measuring the overall success of capacity-building activities is difficult because the efforts rely on actions taken by other governments. Additionally, they noted that the activities they undertake may differ from year to year, depending on partner country needs. State also did not initially establish measures and targets for its physical security and stockpile management program in Belize, but has since done so for the use of the program's remaining funding. Additional information about these activities follows.

- **Firearms training (ATF):** For firearms-related training, ATF tracks the number of training courses it manages in a fiscal year and the number of students who participate. ATF produces weekly activity reports for

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<sup>17</sup> PM/WRA funded the two OAS-implemented activities through grants to the OAS. The grant agreements between the OAS and PM/WRA laid out the goals and targets of each effort as well as the reporting requirements.

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its efforts in Central America that recount law enforcement activities, referrals, and training or proposed training, among other things. ATF also collects student course evaluations and feedback provided by the students to the instructors. However, ATF has not established targets for these activities, such as the number or type of courses it plans to hold in a year. Doing so could help ATF leverage the existing feedback it collects, such as requests for longer courses or that ATF offer a second, more in-depth course on a given topic. Targets could also help to ensure that ATF is providing enough of the specific types of courses that it and partner countries determine to be most important for countering firearms trafficking activities.

- **eTrace support and training (ATF):** ATF tracks the number of seized weapons traced through eTrace in each country, as well as the number of eTrace training courses conducted. ATF also tracks referrals that result from traces performed with eTrace. According to ATF officials, referrals are firearms traces that lead to investigations in the United States. In the past, ATF and State established targets for expanding the use of Spanish-language eTrace in Mexico in country-wide strategic planning documents. However, ATF officials noted that these targets were specific to the years following the rollout of Spanish eTrace and are no longer used. ATF currently does not have any targets related to the use of eTrace in Mexico or Central America. State officials noted that without information against which it can measure progress, it can be difficult to determine whether the investment in promoting the use of eTrace in Central America is worthwhile. ATF officials stated that it can be difficult to set targets for eTrace referrals because it relies on host country officials inputting these data. However, this does not preclude it from establishing other targets related to eTrace, such as targets for expanding or consistently using eTrace. Tracking data against performance targets could potentially help ATF and State better understand the value of these efforts.
- **Physical security and stockpile management (State):** In 2012, in response to a weapons pilferage incident, the Department of Defense's Defense Threat Reduction Agency reviewed the condition of Belize's munitions storage facilities and made a number of equipment recommendations to bolster security. PM/WRA provided \$300,000 in obligated NADR funds to the U.S. Embassy in Belize to implement these recommendations. As of September 2015, less than one-third of the \$300,000 award had been expended and not all recommended equipment had been purchased. PM/WRA officials stated that they typically require implementers to develop

performance measures and targets but could not provide evidence of whether targets were developed in this case. Officials stated that some of the funds were obligated but not expended because staff at the embassy were unclear about the remaining availability of funds following the initial procurement in 2012. The embassy developed a plan for expending the remainder of the funds in summer 2015 to avoid deobligation of the funds. The plan includes a clear target of procuring and installing a new storage container at one Belizean military site.

## Two Ongoing Activities Are Meeting Their Goals, and Three Completed Activities Met or Partially Met Their Goals, According to Agency and Implementer Reports

As of the second quarter of fiscal year 2015, agency reports show that implementing agencies and organizations of the five activities that established performance targets had met or partially met their targets for all measures. Two of these activities are ongoing and three have been completed.<sup>18</sup> Through interagency agreements or grant agreements, State requires the implementers it funds to submit quarterly reports on the progress of their activities. Our review of these assessments, as well as assessments completed by State, indicates that the two ongoing activities were meeting established goals for the firearms-related component of their training as of the second quarter of fiscal year 2015, as shown in table 2.

**Table 2: Status of Key Ongoing Activities to Counter Firearms Trafficking in Belize, Guatemala, and Mexico, as of the Second Quarter of Fiscal Year 2015**

Activity	Implementer	Location	Activity dates	Primary objective	Status of efforts <sup>a</sup>
Forensic assistance to Attorney General <sup>b</sup>	ICITAP	Mexico	Dec. 2010 to Sept. 2016	To support the firearms and tool mark <sup>c</sup> analysis capabilities of the Mexican Attorney General's forensic laboratories to ensure application of consensus guidelines and compliance with international standards.	Meeting goals
Forensic assistance to Mexican states <sup>b</sup>	ICITAP	Mexico	May 2012 to Sept. 2016	To enhance the firearms and tool mark analysis capabilities of the Mexican state laboratories to ensure the application of consensus guidelines and compliance with international standards.	Meeting goals

Legend: ICITAP = International Criminal Investigative Training Assistance Program.

Source: GAO analysis of Department of State documents. | GAO-16-235

<sup>a</sup>Our assessment of the status of efforts is based on the Department of State's and implementers' progress reports.

<sup>18</sup>We reviewed ongoing efforts and completed efforts separately since ongoing efforts would not be expected to have met all of their goals prior to the program's completion.



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<sup>b</sup>Forensic assistance to the Mexican Attorney General's and Mexican states' laboratories includes multiple components. We reviewed assessments of the firearms and tool marks component to determine if the effort was meeting its goals because of its direct relationship with firearms trafficking.

<sup>c</sup>Tool mark identification determines if a tool mark left at a crime scene was produced by a particular suspect tool. Microscopic comparisons are conducted of striations on a tool (such as a bolt cutter or screwdriver) to evidence marked by that tool (such as a pad lock or pried open door to a home) recovered from a suspect. According to ICITAP, tool mark examinations are not common in Mexico, but they can be very useful for solving a variety of criminal cases, especially robberies and burglaries, which are state-level offenses. Tool mark analysis is generally placed under the firearms units because they require comparative analysis similar to those conducted on firearms.

These activities are part of the U.S. government's efforts to increase the capacity of federal and state-level Mexican forensics laboratories, as described below.

- **Forensic assistance to the Attorney General (ICITAP):** ICITAP's 2014 Interagency Agreement with INL outlines performance measures for its assistance to the Forensic Laboratory of Mexico's Procuraduría General de la República, or Office of Attorney General (PGR). Each of the components that make up the project has a number of performance measures; however, we evaluated the firearms and tool marks component because of its direct relationship with firearms trafficking. As of the second quarter of fiscal year 2015, State assessed that this component was on target.<sup>19</sup> The overall objective of the project is to achieve international accreditation for the PGR forensic laboratory in five core disciplines, including ballistics. One of the main goals for the firearms and tool marks component is compliance with international standards for testing laboratories. As of December 2015, according to ICITAP officials, ICITAP was preparing for an accreditation audit and projected that this component would be in compliance with international standards early in 2016. Initiated in 2010, the project made significant progress until the end of 2012, according to ICITAP. The project was slowed from December 2012 until May 2014, following the change in the Mexican presidential administration.
- **Forensic assistance to Mexican states (ICITAP):** ICITAP initiated this project providing assistance to Mexican states' forensics laboratories in June 2013. ICITAP's 2014 Interagency Agreement with

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<sup>19</sup>This project includes seven components, one of which covers firearms and tool marks. According to State's assessment, two of the seven components of the project were "on target" as of the second quarter of fiscal year 2015, including the firearms and tool marks component; the other five were assessed as "below target" or "slightly below target."

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INL outlines performance measures for this assistance. Each of the components that make up the project has a number of performance measures; however, we evaluated the firearms and tool marks component because of its direct relationship with firearms trafficking. State's fiscal year 2015 second quarter and ICITAP's fiscal year 2015 third quarter progress reports do not explicitly provide an assessment of the firearms and tool marks component. However, State officials noted that in their judgment, this project is meeting its goals for the firearms and tool marks component.<sup>20</sup> The overall objective of the project is to enhance the capabilities of the forensic laboratory system at the state level to adhere to international standards for testing laboratories and use forensic-specific standards, where appropriate, as the basis for development, resulting in up to 10 fully accredited forensic laboratories—1 or 2 in each political region of the country. The planned life of this project is 4 years, following which ICITAP intends for all 32 state labs to have initiated the process to move toward accreditation.

According to State's and implementers' progress reports, one of three completed activities for which performance measures and targets had been established fully met its goals. As shown in table 3, the OAS-managed firearms marking effort fully met its goals, and implementers partially met established goals for the other two activities.

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<sup>20</sup>This project includes eight components, one of which covers firearms and tool marks. As of the second quarter of fiscal year 2015, State assessed the overall program as being "below target," noting that activity had occurred in six of the eight components and that the activity was limited to a few states even though the interagency agreement called for assistance to all 32 Mexican states. State's assessment noted that in order to reach all performance measures before the period of performance ends, ICITAP would need to significantly increase its efforts and activities.

**Table 3: Status of Completed Key Activities to Counter Firearms Trafficking in Belize, Guatemala, and Mexico**

Activity	Implementer	Location	Activity dates	Primary objective	Status of efforts <sup>a</sup>
Nonintrusive inspection equipment training	CBP	Mexico	Apr. 2013 to Dec. 2014	To improve and develop the Mexican government's capacity in operating nonintrusive inspection equipment by providing advanced training.	Partially met goals
Firearms marking	OAS	Belize, Guatemala	Sept. 2009 to June 2014	To contribute to the prevention of firearms trafficking and help reduce armed violence in the region.	Met goals
Stockpile destruction	OAS	Guatemala	Sept. 2010 to June 2012	To eliminate stockpiled weapons and ammunition to reduce the risk of transfer to unauthorized persons or groups and diminish the possibility of accidental explosions at storage facilities.	Partially met goals

Legend: CBP = U.S. Customs and Border Protection; OAS = Organization of American States.

Source: GAO analysis of Department of State and Organization of American States documents. | GAO-16-235

<sup>a</sup>Our assessment of the status of efforts is based on the Department of State's and implementers' progress reports.

The progress made by agencies and implementers in achieving their established goals for these activities is described below.

- Nonintrusive inspection equipment training (CBP):** CBP's goals for this activity were partially met. As of September 2014, State assessed that this program was performing slightly below target. Although the project was meeting most of its benchmarks and timeline, it was unclear whether one of the project's four performance targets would be met—incorporating successfully trained personnel into Mexico's cadre of instructors. CBP's 2013 Interagency Agreement with INL outlines performance measures for technical assistance and training on nonintrusive inspection equipment designed to interdict contraband, including firearms. One initial target was to train a cadre of 24 Mexican instructors; by the end of fiscal year 2014, CBP certified 13 instructors who planned to train 400 Mexican officials in the 2015 calendar year. State noted that the 13 instructors were well qualified with extensive experience in border management. However, as of the end of fiscal year 2014, it was unclear whether Mexican agencies would incorporate the successfully trained participants into their cadre of instructors. This project was initiated in April 2013 and ended in December 2014.
- Firearms marking (OAS):** This OAS-managed regional project to promote firearms marking in Latin America and the Caribbean achieved all of its goals. The program was initiated in 2009 and completed in 2014 and included the participation of Guatemala and

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Belize. The goals of the project included creating a regional study of firearms marking laws and practices, distributing at least one firearm marking machine to every participating country, organizing a regional workshop on firearms marking, and organizing a roundtable on firearms marking. Guatemala was provided five marking machines—more than any other country in Central America—and Belize was provided one machine. According to State officials, Guatemala was provided more machines because of the high number of weapons in that country. In June 2014, the OAS reported that it had met all of the project's goals.

- **Stockpile Destruction (OAS):** An OAS-implemented stockpile destruction program in Guatemala achieved one of its two goals. Initiated in September 2010, the project's goals were to destroy 250 tons of expired or unstable ammunition and 12,000 small arms/light weapons belonging to the Ministry of Defense. By December 2011, about 269 tons of ammunition had been destroyed, exceeding the goal. In February 2012, the Guatemalan government announced its plans to create two new military brigades to counter illegal drug cartels, shifting the plans of the Ministry of Defense in relation to stockpile destruction and rendering the second objective unattainable. In total, 2,091 weapons were destroyed—representing 17 percent of the goal of destroying 12,000 weapons.

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### Assessments of the Key Activities We Reviewed Did Not Consistently Identify Challenges to Meeting Program Goals or Strategies for Overcoming Them

State has a process for identifying and addressing challenges to achieving program goals, but these efforts were not consistently documented in implementing agency assessments of the key activities we reviewed, as required. State's agreements with implementing agencies and organizations require that quarterly reports include a summary of any critical issues or challenges and a plan of action in response to them. According to State officials, an implementer may also communicate significant challenges to the State official overseeing its activity via conversations, meetings, and correspondence. For example, in Central America, agencies meet weekly to discuss program activities, which may include a discussion of any challenges. As a result, State officials noted that implementers may not include challenges in quarterly reports if they have been discussed in another venue. However, challenges and potential solutions should also be articulated in quarterly reports, according to State officials.

We found that implementers' progress reports on the key counter-firearms trafficking activities we reviewed were inconsistent in identifying

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key challenges or presenting strategies to address these challenges. For example, a quarterly report for the OAS-managed firearms destruction effort in Guatemala discussed a shift in host government priorities that resulted in the delay of the destruction of firearms belonging to one government agency. In response, implementing officials modified their focus to instead destroy weapons managed by another branch of the Guatemalan government. Although the goal was not fully satisfied, this quarterly report comprehensively documented the challenge, the strategy for resolving the challenge, and the final outcome.

In other cases, quarterly reports we reviewed did not identify challenges or plans for addressing them. For example, ICITAP's fiscal year 2015 third quarter report for its assistance to the PGR laboratories did not discuss any challenges in delivering the assistance. Although State assessed the firearms and tool marks component of this program as meeting its targets, it also noted that other components of the program were below target. However, the quarterly report did not discuss any challenges or reasons why these components were not on target. Additionally, a State assessment of the nonintrusive inspection equipment training effort indicated that the biggest challenge to the program's success was securing support from host government agencies to continue to allow the program's trainees to train host country officials as a group and to assess whether Mexican agencies would incorporate the training into their internal curricula. CBP's fiscal year 2014 fourth quarter report mentioned a challenge associated with interagency communication; however, it did not identify concerns about the host country integrating the training into its curricula as a challenge.

According to State officials, agency quarterly reports are important for understanding the progress of an activity toward meeting its goals. They noted that including a discussion of challenges in quarterly reports helps to ensure that all relevant stakeholders are aware of potential issues. State officials noted that balancing resources across competing priorities can be difficult and also said they use implementers' quarterly progress reports to inform resource allocation decisions. For example, if an activity is not meeting its goals, State may look to end the program and allocate resources to a different priority. Alternatively, if an activity is particularly successful, State may look for opportunities to expand it. Without information about challenges and plans for their resolution, State is missing an opportunity to gain valuable knowledge that could help facilitate future decision making about efforts to counter firearms trafficking.

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## Conclusions

Building capacity to counter firearms trafficking is a priority for the U.S. government and the governments of Belize, Guatemala, and Mexico. The United States has worked well with partner countries to implement a variety of capacity-building activities focused on partner country needs. U.S. agencies have established performance metrics and targets for most of the eight key counter-firearms trafficking efforts in Belize, Guatemala, and Mexico that we reviewed, but ATF has not set targets by which it can measure progress for its activities to provide firearms training and support the use of eTrace. Without such targets, ATF management and other decision makers may have difficulty evaluating the success of these efforts and ensuring that they are focusing on the most pressing needs. According to State's and implementers' reports, other U.S. agencies funded by State have made progress toward key activities to counter firearms trafficking, but they have not consistently reported on key challenges to meeting their goals or on the strategies they intended to use to address these challenges. Consistently identifying challenges and mitigation strategies in quarterly progress reports ensures that all relevant parties are aware of program risks and are able to make decisions with full information. Without this information, implementers may not fully meet their goals. Additionally, without this information, State, as the primary funder of these activities, is limited in its ability to ensure that it is able to maximize the use of U.S. resources.

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## Recommendations for Executive Action

We recommend the following two actions to enhance U.S. agencies' performance monitoring of counter-firearms trafficking activities:

- The Director of the Bureau of Alcohol, Tobacco, Firearms and Explosives should establish and document performance targets for the bureau's key counter-firearms trafficking activities in Belize, Guatemala, and Mexico, as appropriate.
- The Secretary of State should work with other U.S. agencies and implementers to help ensure that quarterly progress reports identify key challenges and plans to address them.

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## Agency Comments

We provided a draft of this report to the Departments of State, Justice, and Homeland Security and OAS for comment. In its written comments, reproduced in appendix II, State generally concurred with our recommendation and stated that it will work with other agencies to implement it. The Department of Justice's ATF provided its comments via email and stated that it concurred with our recommendation and plans to

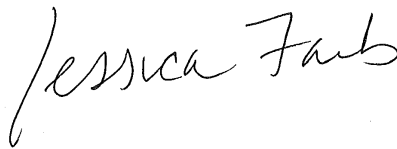
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implement it. The Departments of Homeland Security and Justice also provided technical comments that we incorporated, as appropriate. OAS did not provide comments.

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As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of State, the Secretary of Homeland Security, the Attorney General of the United States, the Director of the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the OAS Secretary General. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6991 or [farbj@gao.gov](mailto:farbj@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

A handwritten signature in cursive script that reads "Jessica Farb".

Jessica Farb  
Acting Director, International Affairs and Trade

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# Appendix I: Objectives, Scope, and Methodology

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In this report, we examined (1) the activities undertaken by U.S. agencies to build partner capacity to combat firearms trafficking in Belize, Guatemala, and Mexico and the extent to which they considered key factors in selecting the activities and (2) the progress the United States has made in building partner capacity in Belize, Guatemala, and Mexico to combat firearms trafficking.

To determine what activities U.S. agencies have undertaken and the extent to which U.S. agencies considered key factors in determining what activities to undertake to build partner capacity to combat firearms trafficking in Belize, Guatemala, and Mexico, we first identified U.S. activities that either directly or indirectly addressed firearms trafficking. We interviewed officials from the Departments of State (State), Justice, and Homeland Security—and their component agencies, as appropriate—and collected documentation on U.S. activities.<sup>1</sup> We compiled a list of relevant activities based on these interviews, interviews with host country officials, and our review of documentation. We included an activity in the scope of our review if it specifically included firearms among the issues it was intended to address. Because other activities may also indirectly touch on firearms trafficking, the list may not be comprehensive.

To understand broader strategies underlying these activities, we reviewed strategic planning documents specific to Belize, Guatemala, and Mexico, including State's Integrated Country Strategies, as well as several interagency strategic and planning documents regarding U.S. engagement with Central America, including the *U.S. Strategy for Engagement in Central America*, the *U.S. Strategy to Combat Transnational Organized Crime*, and the *National Southwest Border Counternarcotics Strategy*. We collected funding data from State and the Department of Justice's Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) for these activities for fiscal years 2010 through 2014 and, based on interviews with knowledgeable agency officials and a review of State's relevant internal controls, determined that these data were sufficiently reliable for our purposes.

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<sup>1</sup>We also interviewed officials from the Department of Defense and determined that the department did not conduct activities relevant to the scope of this review.



We identified key factors for agencies to consider in Presidential Policy Directive 23, a presidential directive covering security sector assistance, including firearms trafficking. To determine whether agencies considered these factors, we reviewed agency documentation and interviewed U.S. and foreign officials. We interviewed U.S. officials and officials from the Organization of American States in Washington, D.C., and U.S. and Mexican officials in Mexico. Additionally, we conducted interviews with U.S. and host country officials in Guatemala and Belize and with the ATF Regional Attaché in San Salvador, who supports counter-firearms trafficking efforts in both Guatemala and Belize.

To determine what progress the United States has made in building partner capacity in Belize, Guatemala, and Mexico to combat firearms trafficking, we identified eight key activities from the activities presented in the first objective. Our review of these eight key activities is not generalizable to all activities conducted by U.S. agencies and their implementing partners. We defined an activity as a key activity if (1) the activity had a specific component or objective to address firearms trafficking, (2) a substantial portion of funding was directed to the activity, or (3) U.S. or foreign officials identified the activity as a key effort to building partner capacity to combat firearms trafficking.

For each key activity, we reviewed program documentation—including grant agreements, interagency agreements (where applicable), and progress reports—and interviewed agency officials to determine whether the funding and implementing agencies had developed performance measures and targets for the activity. If an agency had developed performance measures and targets, we reviewed State’s and implementers’ progress reports to determine whether the agency had met its goals for the program. We reviewed ongoing efforts and completed efforts separately since ongoing efforts would not be expected to have met all of their goals prior to the program’s completion. For both ongoing and completed efforts, we based our assessment of whether the activity was on track for meeting its goals on agency and State progress reports. We did not independently verify the data included in these reports. We reviewed State’s interagency agreements and grant agreements with implementing partners to determine what reporting requirements existed for State-funded programs. We reviewed agency and other implementers’ quarterly reports to determine whether the reporting requirements were met.

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We conducted this performance audit from February 2015 to January 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the U.S. Department of State



United States Department of State  
Comptroller  
Washington, DC 20520

DEC 18 2015

Dr. Loren Yager  
Managing Director  
International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548-0001


Dear Dr. Yager:

We appreciate the opportunity to review your draft report, "BUILDING PARTNER CAPACITY: U.S. Agencies Can Improve Monitoring of Counter-Firearms Trafficking Efforts in Belize, Guatemala and Mexico." GAO Job Code 100071.

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

If you have any questions concerning this response, please contact Christina Porche, Program Analyst, Office of Resource Management, Bureau of International Narcotics and Law Enforcement Affairs at (202) 281-8050.

Sincerely,

  
Christopher H. Flaggs

Enclosure:  
As stated.

cc: GAO – Charles M. Johnson  
INL – William R. Brownfield  
State/OIG - Norman Brown

**State Department Response to GAO Draft Report**

**BUILDING PARTNER CAPACITY: U.S. Agencies Can Improve  
Monitoring Of Counter-Firearms Trafficking Efforts In  
Belize, Guatemala, And Mexico  
(GAO 16-235, GAO Code 100071)**

Thank you for the opportunity to comment on your draft report entitled:  
“Building Partner Capacity: U.S. Agencies Can Improve Monitoring of Counter-  
Firearms Trafficking Efforts in Belize, Guatemala, and Mexico.”

The Department of State agrees with the recommendation that State work with other U.S. agencies and implementers to help ensure that progress reports identify key challenges and plans to address them. INL’s quarterly reporting template for the interagency currently contains a segment entitled “Problems or Challenges and Corrective Action Plan/Risk Identification Mitigation.” The interagency is expected to detail any problems or challenges in implementing any of the program components and activities. If and when challenges may seriously impede the progress of the project, the implementer is asked to provide a corrective action plan for the subsequent quarter, with an updated timeline of program activities. INL will continue to remind the interagency of this requirement and assist with correct completion of the reporting templates.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Jessica Farb, (202) 512-6991 or [farbj@gao.gov](mailto:farbj@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Juan Gobel (Assistant Director), Kara Marshall, Qahira El'Amin, Julia Jebo Grant, Lynn Cothorn, Charles Michael Johnson, Jr., Ashley Alley, Oziel Trevino, and Justin Fisher made key contributions to this report.

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