



Report to the Ranking Member,  
Committee on Oversight and  
Government Reform, House of  
Representatives

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July 2017

# EMBASSY EVACUATIONS

## State Department Should Take Steps to Improve Emergency Preparedness

# GAO Highlights

Highlights of [GAO-17-714](#), a report to the Ranking Member, Committee on Oversight and Government Reform, House of Representatives

## Why GAO Did This Study

From October 2012 to September 2016, State evacuated overseas post staff and family members from 23 overseas posts in response to various threats, such as terrorism, civil unrest, and natural disasters. Overseas posts undergoing evacuations generally experience authorized departure or ordered departure of specific post staff or family members, potentially leading to suspended operations.

GAO was asked to review State policies and procedures for evacuating overseas posts. This report examines (1) the processes State has established to prepare posts for crises and to conduct evacuations and (2) State's implementation of preparedness processes for crises and evacuations. GAO reviewed State guidance and documents related to crisis and evacuation preparedness, including a sample of EAPs and State databases on EAP updates and post drills. GAO also interviewed U.S. officials in Washington, D.C., and in six countries selected because of posts' experiences with evacuations. This is the public version of a sensitive report that GAO issued in June 2017. Information that State deemed sensitive has been omitted.

## What GAO Recommends

In GAO's sensitive report, GAO made five recommendations to State focused on strengthening accountability for completion and review of posts' annual EAP updates and required emergency drills, enhancing the usability of EAPs, and ensuring that lessons learned reports are completed. State concurred with all five recommendations and described actions planned or under way to address them.

View [GAO-17-714](#). For more information, contact Michael J. Courts at (202) 512-8980 or [courtsm@gao.gov](mailto:courtsm@gao.gov).

July 2017

## EMBASSY EVACUATIONS

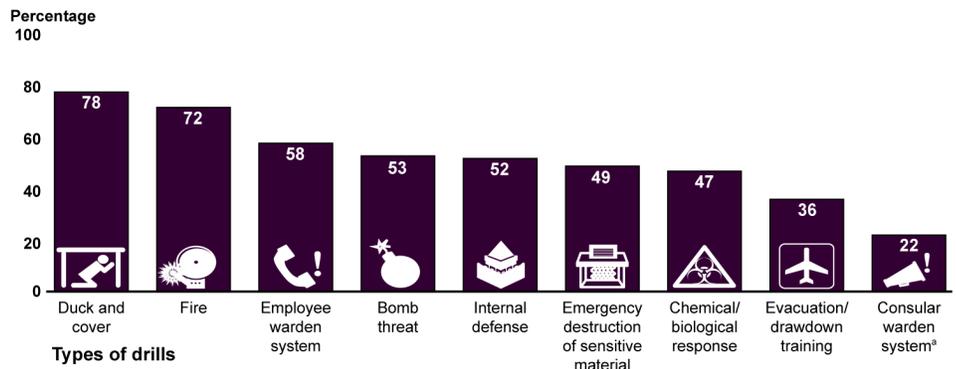
### State Department Should Take Steps to Improve Emergency Preparedness

## What GAO Found

The Department of State (State) has established processes to prepare overseas posts for crises and to conduct evacuations. In particular, posts prepare by developing and updating Emergency Action Plans (EAP) and conducting drills. EAPs are to contain information to assist posts in responding to emergencies, such as checklists of response procedures and decision points to help determine when to evacuate post staff or family members. Posts are required to conduct nine types of drills each fiscal year to prepare for crises and evacuations. State also has established processes for conducting post evacuations. Following an evacuation, post staff are required to transmit an after-action report identifying lessons learned to State headquarters.

State has gaps in its crisis and evacuation preparedness for overseas posts. In fiscal years 2013–2016, almost a quarter of posts, on average, were late completing required annual EAP updates. While the completion rate improved from 46 percent to 92 percent of posts completing updates on time in fiscal years 2013 and 2016, respectively, GAO's review of a nongeneralizable sample of EAPs from 20 posts that had been approved by State's Bureau of Diplomatic Security showed that only 2 of 20 had updated all key EAP sections. GAO also found that EAPs are viewed as lengthy and cumbersome documents that are not readily usable in emergency situations, as required. In addition, GAO found that, on average for fiscal years 2013–2016, posts worldwide reported completing 52 percent of required annual drills; posts rated high or critical in political violence or terrorism reported completing 44 percent of these drills. As shown in the figure below, 78 percent of posts reported completing duck and cover drills, but only 36 percent of posts reported completing evacuation training drills. Overall, less than 4 percent of posts reported completing all required drills during fiscal years 2013–2016. In addition, although posts are required to transmit an after-action report listing lessons learned to State headquarters following evacuations, no such reports were submitted in fiscal years 2013–2016. Taken together, the gaps in State's crisis and evacuation preparedness increase the risk that post staff are not sufficiently prepared to handle crisis and emergency situations.

Percentages of Overseas Posts That Reported Completing Each Type of Required Drill



Source: GAO analysis of Department of State data. | GAO-17-714

\*The consular warden system is a mechanism through which a post reaches out to American citizens in country, typically by phone or e-mail, in the event of an emergency, disaster, or threat, for the purposes of distributing information of interest.

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### Abbreviations

CMS	Crisis Management and Strategy
DOD	Department of Defense
DS	Bureau of Diplomatic Security
EAC	Emergency Action Committee
EAP	Emergency Action Plan
FACT	Foreign Affairs Counter Threat
FAH	Foreign Affairs Handbook
FAM	Foreign Affairs Manual
RSO	Regional Security Officer
State	Department of State
VP2	Vital Presence Validation Process

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July 17, 2017

The Honorable Elijah E. Cummings  
Ranking Member  
Committee on Oversight and Government Reform  
House of Representatives

Dear Ranking Member Cummings:

U.S. government personnel working at diplomatic and consular posts overseas—as well as family members present with them—continue to face threats to their security, including numerous attacks in high risk locations in recent years. According to the Department of State’s (State) Bureau of Diplomatic Security (DS), there were 22 attacks against U.S. embassy facilities, consulates, or staff in 2013 alone, including an attack against U.S. Embassy Ankara in Turkey in which a suicide bomber detonated a concealed bomb in the embassy access pavilion. From October 2012 to September 2016, in response to various threats, such as terrorism, civil unrest, and natural disasters, State evacuated post staff and their family members from 23 U.S. embassies and consulates. During this period, several overseas posts—such as Embassy Bujumbura in Burundi and Consulate Adana in Turkey—evacuated post staff or family members on more than one occasion.<sup>1</sup> At Embassy Sana’a in Yemen and Embassy Tripoli in Libya, the threats were so severe and persistent that State decided to suspend operations, withdrawing all post staff and family members.

You asked us to review State policies and procedures for evacuating overseas posts. This report examines (1) the processes State has established to prepare overseas posts for crises and to conduct evacuations and (2) State’s implementation of preparedness processes for crises and evacuations at overseas posts.

This report is a public version of a sensitive but unclassified report that was issued on June 28, 2017, copies of which are available upon request

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<sup>1</sup>For the purposes of this report, we use the term *overseas posts* to refer to U.S. embassies, consulates, and other types of types of diplomatic and consular posts, such as multilateral missions or American presence posts.

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for official use only by those with the appropriate need to know.<sup>2</sup> State deemed some of the information in our June report to be sensitive, which must be protected from public disclosure. Therefore, this report omits information identified by State as sensitive. Although the information provided in this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

To examine the processes State has established to prepare overseas posts for crises and to conduct evacuations, we reviewed State policies and procedures established within the Foreign Affairs Manual (FAM) and associated Foreign Affairs Handbooks (FAH), including a portion called the Emergency Planning Handbook. We also reviewed memoranda of agreement between State and the Department of Defense (DOD) regarding coordination of U.S. military support to posts during evacuations. We reviewed GAO's most recent work regarding evacuations overseas as well as DOD support for State in crises situations. We conducted interviews with State officials at headquarters, including with relevant regional bureaus and other groups that assist posts during crises and evacuations, and with post staff at four overseas posts. We also conducted interviews via secure video conferences with two other posts and a DOD combatant command to discuss State policies and procedures in embassy crisis and evacuation preparedness.

To assess State's implementation of preparedness processes for crises and evacuations at overseas posts, we conducted several analyses. First, we reviewed DS data to determine the dates when overseas posts completed required annual updates of their Emergency Action Plans (EAP) for fiscal years 2013–2016. Second, we analyzed a nongeneralizable, judgmental sample of 20 post EAPs that DS had reviewed and approved to assess whether this sample of EAPs contained evidence that key EAP sections, as identified by DS, had been updated. More specifically, for all 20 EAPs, we examined the dates indicating each key section's most recent update to determine if the post had reviewed and updated the information within required time frames. We selected the sample of post EAPs to review to ensure that we examined posts that had experienced evacuations or suspended operations since September 2012, whose evacuations or suspended operations had occurred for a variety of reasons (e.g., natural disasters as well as security threats), with

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<sup>2</sup>GAO, *Embassy Evacuations: State Should Take Steps to Improve Emergency Preparedness*, GAO-17-560SU (Washington, D.C.: June 28, 2017).

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different statuses regarding accompaniment of family members, and from different geographic regions. We determined that the EAP data were sufficiently reliable for the purposes of our report.

Third, we reviewed DS data on which overseas posts reported completion of required annual drills for fiscal years 2013–2016. We determined that these data were sufficiently reliable for that purpose. Fourth, we requested from State officials at headquarters any required lessons learned reports submitted by posts following evacuations for fiscal years 2013–2016. We also interviewed State and DOD officials at headquarters, at four overseas posts, and—via secure video conference—at two additional posts and a DOD combatant command to gather their perspectives on State’s implementation of crisis and evacuation preparedness processes for overseas posts. See appendix I for further details about our scope and methodology.

The performance audit upon which this report is based was conducted from March 2016 to June 2017 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. We subsequently worked with State from June 2017 to July 2017 to prepare this version of the original sensitive but unclassified report for public release. This public version was also prepared in accordance with these standards.

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## Background

Overseas posts that undergo evacuations in response to threats to post staff, family members, or facilities generally experience phased changes to their operational status, such as an authorized or ordered departure, potentially leading to suspended operations.

- Under an authorized departure, specific overseas post staff under chief-of-mission authority and family members may voluntarily choose to leave the post for a designated safe haven.<sup>3</sup>

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<sup>3</sup>The designated safe haven is generally the United States, although the nature of the threat that led to the departure or special needs of departing staff or family members can result in travel to safe havens in other countries.

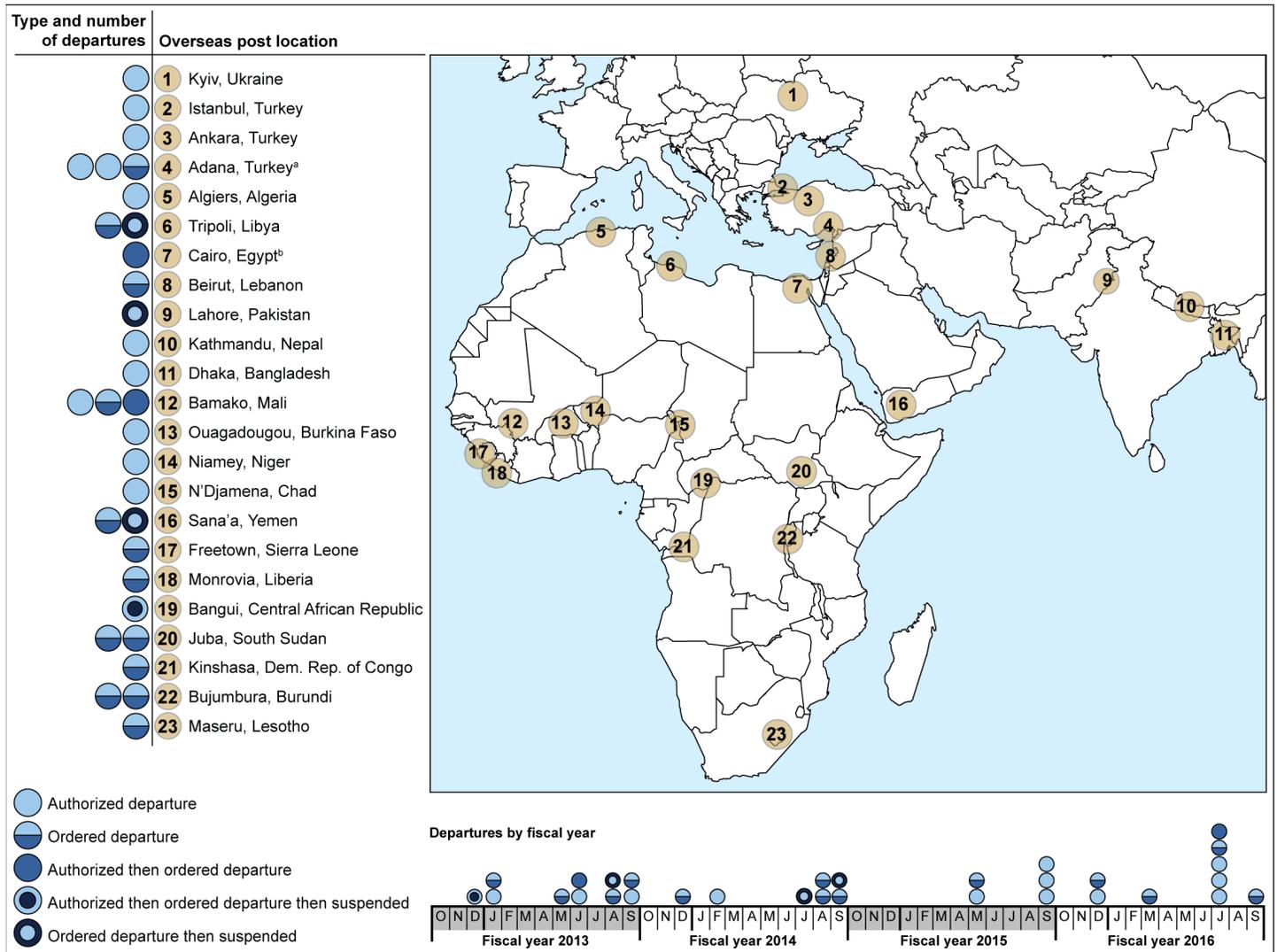
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- Under an ordered departure, specific overseas post staff and family members are ordered to leave for a designated safe haven. Some staff designated by the Chief of Mission to be critical for ongoing operations must remain at the post.
  - Under suspended operations, all remaining overseas post staff under chief-of-mission authority are ordered to leave for a designated safe haven.

An overseas post on authorized or ordered departure status goes through a monthly review to determine if the threats to the post have since abated. According to State officials, if the threats have abated, the post can be taken off of departure status and placed on normal status or on modified operating status. Figure 1 shows authorized departures, ordered departures, and suspended operations that have occurred at overseas posts during fiscal years 2013–2016.<sup>4</sup>

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<sup>4</sup>Several attacks and violent demonstrations occurred in the months prior to this period, including the attack in Benghazi, Libya, on September 11-12, 2012, as well as violent demonstrations on September 11, 2012, and after in Cairo, Egypt; Tunis, Tunisia; Sana'a, Yemen; Khartoum, Sudan; Chennai, India; Karachi, Pakistan; and Jakarta, Indonesia.

**Figure 1: Authorized Departures, Ordered Departures, and Suspended Operations at Overseas Posts during Fiscal Years 2013–2016**



Sources: GAO analysis of Department of State data; Map Resources (map). | GAO-17-714

Note: The 31 evacuations from posts listed above include instances where posts experienced sequential, phased changes to their operational status. For example, Embassy Cairo in Egypt was initially evacuated under an authorized departure; before the authorized departure was terminated, the post was further evacuated under an ordered departure.

<sup>a</sup>On March 29, 2016, an ordered departure was approved for Consulate Adana, and the Izmir and Mugla provinces.

<sup>b</sup>On June 28, 2013, an authorized departure was approved for Mission Egypt (Embassy Cairo and Consulate Alexandria).

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While overseas posts are primarily responsible for initiating evacuations of post staff and family members, other parts of State—and in some cases DOD—have supporting roles. State’s Office of Crisis Management and Strategy (CMS) provides posts with crisis management and evacuation expertise and support. DS is responsible for security services related to the protection of life, information, and property at overseas posts and coordinates with posts’ DS agents—the Regional Security Officers (RSO)—to respond to posts’ security needs. DS falls under the Under Secretary for Management, who is the State headquarters official responsible for approval of a number of evacuation-related decisions.

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## State Has Established Processes to Prepare Overseas Posts for Crises and to Conduct Evacuations

State has developed processes and requirements for overseas posts to prepare EAPs and conduct drills in order to prepare for crises and evacuations. It also has established processes for overseas posts to follow when considering or implementing a drawdown of post personnel, including evacuations under an authorized departure or an ordered departure. In addition, State also has established a process for determining whether U.S. presence in posts designated by State as high threat and high risk should continue, discontinue, or restart operations.

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## Overseas Posts Prepare for Crises and Evacuations by Developing and Updating EAPs and Conducting Required Drills

The FAH assists posts in establishing processes and requirements to create and annually update comprehensive, effective, and readily usable plans to handle emergency situations at overseas posts.<sup>5</sup> In particular, checklists within a post’s EAP are to specify procedures for responding to particular types of emergencies at overseas posts, such as civil disorder. In addition, the FAH directs DS to review EAPs submitted annually by overseas posts to ensure that EAPs include updated information needed by State headquarters and other agencies to monitor or assist in responding to emergency situations at posts.<sup>6</sup>

The FAH also requires the EAP to identify decision points, which CMS officials indicate help a post’s Emergency Action Committee (EAC) determine when to authorize or order post staff and family members to leave for a designated safe haven, when to initiate the evacuation of

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<sup>5</sup>See 12 FAH 1 H-012, 12 FAH-1 H-036.

<sup>6</sup>12 FAH-1 H-035.

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American citizens, and when to suspend operations.<sup>7</sup> The EAC is a group of subject-matter experts designated by the Chief of Mission to provide guidance in preparing for and responding to potential changes in risk that might impact the safety and security of the post and the American citizens in country.<sup>8</sup> The FAH lays out several important responsibilities for a post's EAC, including drafting and updating the post's EAP and conducting drills and other crisis preparedness functions at the post.<sup>9</sup>

The FAH also establishes requirements for overseas posts to regularly conduct nine types of drills to prepare for crises and evacuations.<sup>10</sup> These drills are shown in figure 2. The required frequency of drills is determined by a post's threat ratings in the two Security Environment Threat List categories: political violence and terrorism. Posts rated high or critical in either political violence or terrorism are required to conduct each of the drills at least twice every fiscal year. All other posts are required to conduct these drills at least once every fiscal year.

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<sup>7</sup>The EAC at a post is required to meet periodically—the FAH recommends that meetings occur at least once every other month—to discuss, among other things, the current security environment at the post. Under 12 FAH 1 H-232, the EAC also is required to meet when any one of a post's decision points is crossed; when a significant event that will strain a post's security planning and capabilities is upcoming; to evaluate threats as necessary; to review a post's drills or security incident responses; to regularly ensure EAC members are aware of ongoing work to support the safety and security of the mission; or in response to a specific State headquarters request for the EAC to meet.

<sup>8</sup>The EAC consists of many positions that vary based on the size and location of the post and may include the Deputy Chief of Mission, Principal Officer, Defense Attaché, Political Officer, Economic Officer, RSO, Management Officer, Consular Officer, Public Affairs Officer, Human Resources Officer, Medical Officer, U.S. Agency for International Development Mission Director, Community Liaison Office Coordinator, and others including non-State officials, as appropriate.

<sup>9</sup>12 FAH-1 H-765 instructs the EAC to task relevant incident commanders at posts, including the RSO, with organizing and implementing required drills under their respective areas of expertise or responsibility. For example, according to State officials, an EAC may task the Information Management Officer at a post with organizing and implementing the required drill for staff to practice the emergency destruction of sensitive material.

<sup>10</sup>12 FAH 1 H-012, 12 FAH-1 H-765.

**Figure 2: Nine Types of Drills Each Overseas Post Is to Complete Every Fiscal Year**

								
Duck and cover	Fire	Employee warden system	Internal defense	Bomb threat	Emergency destruction of sensitive material	Chemical/biological response	Evacuation/drawdown training	Consular warden system <sup>a</sup>

Source: GAO analysis of Department of State data. | GAO-17-714

<sup>a</sup>The consular warden system is a mechanism through which a post reaches out to American citizens in country, typically by phone or e-mail, in the event of an emergency, disaster, or threat, for the purposes of distributing information of interest.

Overseas post staff we visited reported that in addition to maintaining EAPs and conducting required drills, other activities and training help their posts prepare for crises and evacuations. For instance, staff at one overseas post we visited reported that the Foreign Affairs Counter Threat (FACT) training course and new arrival briefings help them prepare for crises and evacuations. State established FACT to help safeguard and prepare personnel serving in high threat countries by providing instruction in personal security skills necessary for recognizing, avoiding, and responding to potential terrorist and other threat situations. FACT training will be required for all overseas post foreign affairs personnel and certain family members by 2019.<sup>11</sup> New arrival briefings—which the FAM requires each post’s RSO to provide—are helpful because they acquaint new post staff and family members with the post’s current security situation and threat environment.<sup>12</sup>

<sup>11</sup>In expanding the requirement for staff at all overseas posts to complete FACT training, State is using a phased approach. After January 1, 2019, staff at all overseas posts will be required to complete this training for mitigating the risks of operating in non-permissive environments. FACT training also is required for family members who are offered U.S. government employment before or after arriving at posts and is made available and strongly encouraged for family members not employed by a U.S. government entity at posts.

<sup>12</sup>12 FAM 424.1. Also see GAO, *Diplomatic Security: State Should Enhance Its Management of Transportation-Related Risks to Overseas U.S. Personnel*, [GAO-17-124](#) (Washington, D.C.: Oct. 4, 2016).

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## State Has Established Processes for Conducting Evacuations of Overseas Posts

The FAH establishes processes for overseas posts to follow when considering or implementing a drawdown of post personnel, including evacuations under an authorized departure or an ordered departure.<sup>13</sup> When a post determines that there is imminent danger to the lives of post staff or their family members, the post's Chief of Mission is to cable a request for either an authorized or an ordered departure to State's Under Secretary for Management. Under an authorized departure, certain post staff and all family members can voluntarily choose to depart the post by submitting a request through the post's EAC, which forwards it to the Chief of Mission for a final decision. Under an ordered departure, certain post staff and family members are ordered to depart the post. Authorized and ordered departures can be tailored to fit the posts' particular circumstances. For instance, a Chief of Mission could recommend an (1) authorized departure for certain family members only, such as children of a certain age or spouses; (2) ordered departure of certain family members only; or (3) ordered departure of certain family members coupled with authorized departure of certain post staff. The FAH also outlines how authorized and ordered departures are to be coordinated among various sections at an overseas post, the relevant regional bureau, and with others in State headquarters.<sup>14</sup>

State guidance establishes that authorized and ordered departures are approved for an initial period of 30 days, which may be extended in 30-day increments for a maximum of 180 days. Prior to the expiration of each 30-day period, posts are to submit a recommendation to State headquarters as to whether the authorized or ordered departure status should be continued. To that end, the EAC at a post on departure status is to meet to evaluate the security environment and determine if the crisis situation leading to the evacuation has abated. If the EAC decides that the crisis situation has abated, it can recommend that the Chief of Mission submit a cable to State's Under Secretary for Management requesting approval to terminate the authorized or ordered departure. If an overseas post continues on ordered departure status for 180 continuous days, State headquarters can automatically change that post's classification status to unaccompanied. At unaccompanied posts, only post staff and

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<sup>13</sup>12 FAH-1 Annex K.

<sup>14</sup>12 FAH-1 Annex K 2.

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their post-employed family members may be present; other family members are prohibited.<sup>15</sup>

According to DS officials, if the crisis situation in-country deteriorates and an overseas post requires U.S. military support to bolster its defensive capabilities, the post can coordinate with DOD to receive such assistance, depending on the location of the overseas post and the availability of DOD assets. Overseas posts also can coordinate with DOD in situations requiring U.S. military evacuation assistance from an overseas post. Such DOD-assisted evacuations are known as “noncombatant evacuation operations” and involve post personnel as well as American citizens in country.<sup>16</sup> According to the FAM, under State’s “no double standard” policy, an overseas post is required to share the same relevant threat information with private U.S. citizens in that country as the post communicates to the official U.S. government community. In cases where the evacuation of private U.S. citizens is necessary, the policy also requires that private U.S. citizens be given the same evacuation opportunities and assistance as the official U.S. government community, when appropriate and feasible.<sup>17</sup>

According to State officials, the costs associated with evacuations of State staff and their family members from overseas posts are covered by the appropriation for Emergencies in the Diplomatic and Consular Service, also known as the K Fund. Other agencies with staff and family members at overseas posts, such as the U.S. Agency for International Development, are responsible for covering the costs associated with the evacuation of their staff and family members. In fiscal years 2010 through 2016, State’s reported costs associated with evacuating from posts on 53 occasions were roughly \$25.5 million. According to State officials, costs associated with evacuations varied due to several factors, including the number of post staff and family members evacuated. In fiscal year 2014, costs associated with evacuating Embassy Maseru in Lesotho were roughly \$20,000, while in the same year, costs associated with

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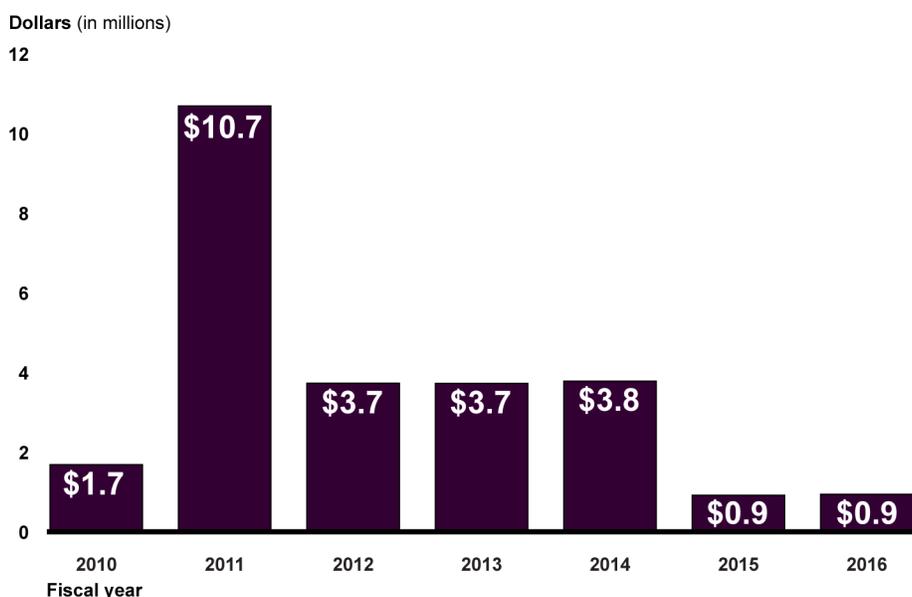
<sup>15</sup>At certain unaccompanied posts, post-employed family members may be prohibited as well.

<sup>16</sup>Noncombatant evacuation operations are directed by State, in coordination with DOD, whereby noncombatants are evacuated from foreign countries when their lives are endangered by war, civil unrest, or natural disaster, to the United States or other designated safe havens.

<sup>17</sup>12 FAH-1 Annex K Addendum 1.3.

evacuating Embassy Sana'a in Yemen were roughly \$1.9 million. Figure 3 displays the K Fund expenditures for post evacuations during fiscal years 2010–2016.

**Figure 3: Expenditures Reported by State Related to Post Evacuations from the K Fund (Emergencies in the Diplomatic and Consular Service), Fiscal Years 2010–2016**



Source: GAO analysis of Department of State (State) data. | GAO-17-714

Note: Fiscal year 2011 costs were associated with evacuating posts on 11 occasions; during fiscal years 2010–2016, the greatest number of evacuations occurred in fiscal year 2011.

After an authorized or ordered departure has been terminated at an overseas post, State guidance recommends that posts engage in a lessons learned discussion. CMS at headquarters is to work with the overseas post, the relevant regional bureau, and State's Management Bureau to facilitate a lessons learned discussion for the record. State guidance also requires post staff to transmit an after-action report listing lessons learned to State headquarters.<sup>18</sup>

<sup>18</sup>12 FAH-1 Annex K4.2-1.

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## Overseas Posts Deemed Likely to Experience Crises and Evacuations Are Subject to Additional Review through the Vital Presence Validation Process

According to State officials, because of the attacks in Benghazi, Libya, and other overseas posts in 2012, State developed and implemented a risk assessment process called the Vital Presence Validation Process (VP2). State officials indicated that VP2 is an annual assessment by senior management at State headquarters—in consultation with affected posts and respective regional bureaus—to determine whether the U.S. presence in the approximately 30 posts designated by State as high threat and high risk should continue, discontinue, or restart operations.<sup>19</sup> According to State officials, State also conducts VP2 reviews for opening or reopening overseas posts categorized as critical threat, or high threat, high risk. VP2 is not meant for determining short-term evacuations from a post, such as authorized or ordered departures. State's Office of Management, Policy, Rightsizing, and Innovation is responsible for coordinating VP2 assessments. During these assessments, the affected overseas post and respective regional bureau are to complete a document detailing, among other things, threats to a post and any mitigating factors; the post's staffing, mission, and programs; program implementation; and program benefits. The Core High Threat Post Review Board, which includes representatives from various State offices, is to review and endorse each VP2 assessment before sending it for approval to the Under Secretary for Political Affairs and the Under Secretary for Management. The VP2 assessment is then sent to the Deputy Secretary of State and the Deputy Secretary for Management and Resources for consideration and final approval.

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## State Has Gaps in Its Crisis and Evacuation Preparedness for Overseas Posts

State's implementation of preparedness processes for crises and evacuations at overseas posts has multiple gaps:

- Overseas posts have not updated EAPs annually within required time frames.
- When EAPs are submitted to DS for annual certification, DS does not fully review key EAP sections that should be updated each year.
- EAPs are lengthy and cumbersome documents that are not readily usable in emergency situations, according to State officials.

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<sup>19</sup>High threat and high risk posts are determined by their ratings in political violence and terrorism on DS's Security Environment Threat List, among other data points. VP2 assessments can also be conducted on an ad hoc basis.

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- Although overseas posts are required to conduct drills intended to prepare for crises and evacuations, for fiscal years 2013–2016, posts reported completing about half of their required drills.
  - Overseas posts have not submitted required lessons learned reports following evacuations.

The gaps in State’s implementation of preparedness processes for crises and evacuations at overseas posts increase the risk that post staff are not sufficiently prepared to handle crisis and emergency situations.

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### Overseas Posts Have Not Updated Emergency Action Plans within Required Time Frames

Although the FAH requires each overseas post to comprehensively review and update its EAP annually, from fiscal year 2013 to 2016, almost a quarter of overseas posts, on average, did not complete required annual EAP updates within specified time frames.<sup>20</sup> During the comprehensive review, each post must update any out-of-date information and certify that all other information remains current. Overseas posts have made considerable improvements in their timeliness in completing EAP updates during fiscal years 2015-2016 compared to fiscal years 2013-2014. State headquarters officials noted that, following the attack in Benghazi, Libya, in September 2012, State took actions to encourage overseas posts to improve their timeliness in completing annual EAP updates. These actions included State headquarters becoming more involved in annually reviewing decision points in posts’ EAPs as well as State headquarters issuing cables emphasizing that posts need to update their EAPs annually.

In fiscal year 2016, about 1 in 12 overseas posts were late in completing required annual updates. On average, these posts were about 6 months late in completing their EAP updates.<sup>21</sup> For fiscal year 2016, the list of posts that were late in completing their annual EAP updates included 7 posts rated high or critical in political violence or terrorism. Table 1 shows, for fiscal years 2013 to 2016, the percentage of overseas posts that did not complete required annual updates of EAPs within the 1-year deadline

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<sup>20</sup>12 FAH-1 H-036. In addition, federal internal control standards call for agency management to evaluate performance and hold individuals accountable for their internal control responsibilities. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>21</sup>All data are as of March 10, 2017. We identified EAPs that were submitted a number of months after their due date as well as EAPs that had not yet been submitted as of March 10, 2017. We identified one EAP that was not submitted by March 10, 2017. For this EAP, we calculated months late as the difference between the due date and the date we last received updated data from DS.

and the average number of months these EAP updates were late. See appendix II for additional details on posts that were late in completing their EAP updates for fiscal year 2016.

**Table 1: Number and Percentage of Overseas Posts Late in Completing the Required Annual Update of Emergency Action Plans (EAP) for Fiscal Years 2013–2016 and the Average Number of Months Late**

Fiscal year	Number of overseas posts required to complete annual update of EAPs <sup>a</sup>	Percentage of overseas posts late in completing required annual update of EAPs	Average number of months late in completing required annual update of EAPs <sup>b</sup>
2013	179	54	7
2014	164	30	8
2015	211	11	12
2016	203	8	6

Source: GAO analysis of Department of State (State) data. | GAO-17-714

Note: GAO’s analysis is based on a review of State’s Bureau of Diplomatic Security (DS) data on dates when overseas posts completed their required annual updates of their EAPs for fiscal years 2013–2016.

<sup>a</sup>The total number of overseas posts required to complete annual updates of EAPs varies from fiscal year to fiscal year and is determined by DS. For example, if a post submitted its annual EAP update for fiscal year 2014 12 months late in fiscal year 2015, DS can determine that the post is no longer required to submit a separate annual EAP update for fiscal year 2015. In this case, DS can determine that the post’s next annual EAP update would be due in fiscal year 2016.

<sup>b</sup>All data are as of March 10, 2017. We identified EAPs that were submitted a number of months after their due date as well as EAPs that had not yet been submitted as of March 10, 2017. We identified one EAP that was not submitted by March 10, 2017. For this EAP, we calculated months late as the difference between their due date and the date we last received updated data from DS. As a result, the average months late for 2016—shown in italics—cannot be compared with the average for the prior years.

Officials at all six overseas posts we met with reported some difficulties using the current electronic system to update their EAPs. Difficulties in using the current system, as well as challenges in reviewing and updating a relatively large document, may impact posts’ timely completion of EAP updates. Overseas posts with EAPs that have not been annually reviewed and updated as required could leave post staff insufficiently prepared to handle emergency situations, placing them and others with them at increased risk of harm.

According to DS officials, in response to our ongoing work, in December 2016 DS developed new guidance and policy to encourage posts to complete their annual EAP updates on time. In particular, DS developed a standardized 60-day notice e-mail and established policy to send these standardized notices to all posts 60 days before the deadline for posts’ annual EAP update submissions. While implementation of this action may

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assist in reminding all posts of the relevant requirements, further steps, such as focusing follow-up efforts on the posts that are late in their submission, could result in improved timeliness.

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### DS Does Not Fully Review Key Sections of EAPs Submitted by Overseas Posts

The FAH directs DS to review each EAP submitted by an overseas post during the annual EAP review cycle to ensure that EAPs include updated information needed by State headquarters and other agencies to monitor or assist in responding to emergency situations at posts.<sup>22</sup> To conduct these annual reviews, DS Emergency Plans Review Officers in Washington use a list of 27 key EAP sections that the Emergency Plans Review Office has determined should be updated each year.<sup>23</sup> According to DS officials, Emergency Plans Review Officers spot check these 27 key EAP sections to review and approve each EAP. In addition, DS officials told us that Review Officers consider forms included in key EAP sections that they spot check to meet the annual update requirement if the forms were updated up to 3 years prior to the check.<sup>24</sup>

DS does not document its annual EAP review process. We requested the results of the Emergency Plans Review Officer reviews, including data on who conducted them and what deficiencies, if any, were found. Federal internal control standards call for agency management to evaluate performance and hold individuals accountable for their internal control responsibilities.<sup>25</sup> However, DS was unable to provide copies of the reviews completed because the Emergency Plans Review Officers do not document these results.

Our analysis of a nongeneralizable sample of EAPs for 20 posts that DS had reviewed and approved showed that only 2 of the 20 posts' EAPs

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<sup>22</sup>12 FAH-1 H-035.

<sup>23</sup>Key sections of the EAP to be reviewed and approved by DS include sections covering information on a post's emergency food supplies; medical supplies; chemical, biological, and radiological countermeasures equipment; and evacuation procedures. For a full list of the 27 key EAP sections, see app. III.

<sup>24</sup>According to DS officials, in response to our ongoing work examining the processes that DS uses to review and approve EAPs, in December 2016 DS modified its spot check reviews to consider only forms updated within 1 year prior to the check to meet the annual update requirement. Since State is still in the process of implementing these efforts, we did not evaluate their effectiveness.

<sup>25</sup>[GAO-14-704G](#).

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included evidence that posts had updated all 27 key sections.<sup>26</sup> In the remaining 18 of 20 posts' EAPs, we found at least 1 key EAP section that had not been updated. The extent to which each post had not updated its EAP varied. For example, one post had not updated almost 90 percent of the 27 key EAP sections that we reviewed, while another post had not updated about 20 percent of the 27 key EAP sections that we reviewed.<sup>27</sup> For all 20 EAPs we reviewed, on average, posts had not updated over 50 percent of the key EAP sections we reviewed. In addition, in several EAPs we reviewed, we found emergency supplies listed that were a year or more past their expiration dates. Because DS Emergency Plans Review Officers do not check all 27 key EAP sections, EAPs submitted to DS have not been fully reviewed. Overseas posts with EAPs that have not been fully reviewed may leave post staff—especially new staff—insufficiently prepared to respond to emergencies and leave State and other agencies without accurate information to assist an affected post during an emergency.

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### Emergency Action Plans Are Viewed As Lengthy and Cumbersome Documents That Are Not Readily Usable in Emergency Situations

According to the FAH, EAPs should be readily usable plans to handle emergency situations and should contain information to assist post staff in responding to emergencies.<sup>28</sup> In addition, federal internal control standards call for an agency to internally communicate necessary quality information to achieve the agency's objectives.<sup>29</sup>

However, at both State headquarters and at all six posts we met with, officials told us that EAPs are lengthy and cumbersome documents that

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<sup>26</sup>We reviewed available unclassified and classified portions of the 20 EAPs requested. However, because the classified and unclassified portions of these EAPs were not current as of the same date, we restricted our analysis to the unclassified portions. By reviewing the available unclassified portions of these EAPs, we were able to assess an average of over 70 percent of the 27 key EAP sections for the 20 EAPs in our nongeneralizable sample. State officials explained that each overseas post determines which portions of its EAP should be classified. The portions of EAPs that were classified varied by post—both the number that were classified and which ones—due to the differing situations and risks faced by each post.

<sup>27</sup>In the first example, we found the post had not updated 24 of the 27 key EAP sections that we reviewed. In the second example, we found the post had not updated 5 of the 27 key EAP sections that we reviewed.

<sup>28</sup>12 FAH-1 H-012.

<sup>29</sup>[GAO-14-704G](#).

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are not readily usable in emergency situations.<sup>30</sup> Officials at all six posts also said that EAPs are voluminous documents that contain large amounts of boilerplate content, and officials at four of six posts we met with noted that this includes especially explicit instructions on how to fill out each of the plan's sections and subsections. The boilerplate content in EAPs is automatically generated by the electronic system that all posts use to draft and update their EAPs; this content focuses on information about how posts should update their plans rather than information on how to handle emergency situations. In addition, none of the nongeneralizable sample of 20 EAPs that we reviewed had a single, comprehensive table of contents or index, potentially making it challenging for post staff to search for and find a particular section quickly, especially during an emergency.<sup>31</sup>

While officials from State headquarters and all six posts we met with told us that EAPs are not readily usable in emergency situations, officials at five of the six posts we met with also said there is value for post staff to participate in the process of updating EAPs to prepare for emergencies. The process of updating the EAP, they noted, includes reviewing applicable checklists and contact lists before an emergency occurs, which can help post staff be better prepared in the event of an emergency. Officials at two of the six posts we met with also observed that EAPs contain large amounts of guidance because it is easier for responsible staff at post to complete required updates to their specific sections if all the guidance they need is directly written into each EAP.

However, officials at five of the six posts we met with suggested that having a streamlined version of the EAP—such as a shorter EAP with just checklists and contact lists—in addition to the full EAP could make the EAP more readily usable in emergency situations. Officials at five of the six posts we met with also suggested that making a streamlined EAP that is not marked as sensitive or classified and could be stored on a mobile device could also be helpful in an emergency situation. This could allow staff at post who do not have security clearances—such as locally employed security personnel—to more readily access the EAP. While the

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<sup>30</sup>Post officials noted that EAPs often are more than 800 pages long. Our review of a nongeneralizable sample of 20 EAPs confirmed this; the 20 EAPs in our sample ranged from 913 to 1,356 pages long.

<sup>31</sup>Our review of EAPs found that, while each major section, annex, and appendix of an EAP had its own table of contents, the full EAP lacked a single, comprehensive table of contents or index.

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FAH requires posts to maintain full copies of their EAPs—in printed hard copy and CD-ROM forms—it does not contain a provision for preparing or maintaining alternate streamlined versions of the posts' EAPs.<sup>32</sup> Absent such a change in State's relevant policy and procedures, officials may not have readily usable important information during a crisis.

State is in the process of developing a new electronic system for overseas posts to draft and update their EAPs to address issues with the current system, according to State headquarters officials. For example, officials told us that post staff have complained that the current system is cumbersome to work with, difficult to search and navigate, and makes drafting and updating their EAPs difficult and time consuming. State headquarters officials also said they hope the new system will allow staff to more quickly and easily draft and update their EAPs. They also said they hope the new system will result in more streamlined EAPs. State plans to launch the new system in the second half of 2017. As State develops its system, officials could consider turning their hopes for streamlined EAPs into specific requirements for the planned system.

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### Overseas Posts Reported Completing About Half of Required Drills Intended to Prepare Post Staff for Crises and Evacuations

Although the FAH establishes requirements for overseas posts to annually conduct nine types of drills to prepare for crises and evacuations, we found that, on average for fiscal years 2013–2016, overseas posts reported completing 52 percent of required drills.<sup>33</sup> Officials at headquarters and at all six overseas posts we met with told us that regularly conducting required annual drills is one of the most important steps to help prepare post staff for crises and evacuations and to keep them safe during crisis events. The required frequency of required drills is determined by ratings in the two Security Environment Threat List categories of political violence and terrorism. Posts that are not rated high or critical in political violence or terrorism are required to conduct nine types of drills at least once per fiscal year. Posts that are rated high or critical in political violence or terrorism are required to conduct the same nine types of drills at least twice per fiscal year.

Relevant incident commanders at posts, including RSOs, are tasked with organizing and conducting required drills under their respective areas of

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<sup>32</sup>12 FAH-1 H-035.

<sup>33</sup>12 FAH 1 H-765. In addition to the relevant requirements in State guidance, federal internal control standards call for agency management to hold individuals accountable for their internal control responsibilities and to establish and operate monitoring activities to monitor the internal control system and evaluate the results. See [GAO-14-704G](#).

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expertise or responsibilities. RSOs record their posts' completion of drills into DS's Security Management Console, which logs the drill records into a drilling database maintained by DS. While DS collects the information submitted by RSOs in the database, DS does not independently verify the data to ensure its accuracy or validity.

State officials told us that when posts are identified as being noncompliant with drilling reporting during post security program reviews, DS works with posts either to retroactively input data on completed drills or conduct remaining drills in a timely manner.<sup>34</sup> DS officials also told us that, partly in response to our ongoing work, the bureau has recently developed a standard operating procedure to review drilling data quarterly. However, the results of the first analysis of these data were unavailable at the time of our review.

As shown in table 2, for fiscal years 2013 through 2016, overseas posts reported completing an average of 52 percent of required annual drills. For fiscal years 2013 through 2016, overseas posts rated high or critical in political violence or terrorism reported completing an average of 44 percent of required annual drills.

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<sup>34</sup>DS is to conduct post security program reviews every 1 to 3 years depending on a post's ranking on the Security Environment Threat List. These reviews help ensure that posts competently manage life safety, emergency preparedness, and information security programs with full mission support and participation, adequate personnel, sufficient resources, and appropriate management controls.

**Table 2: Percentage of Required Annual Drills Reported Completed by Overseas Posts, Fiscal Years 2013–2016**

Fiscal year	Percentage of required drills reported completed by overseas posts	Percentage of required drills reported completed by posts rated high or critical in political violence or terrorism <sup>a</sup>
2013	50	41
2014	50	41
2015	51	42
2016	56	50
Average	52	44

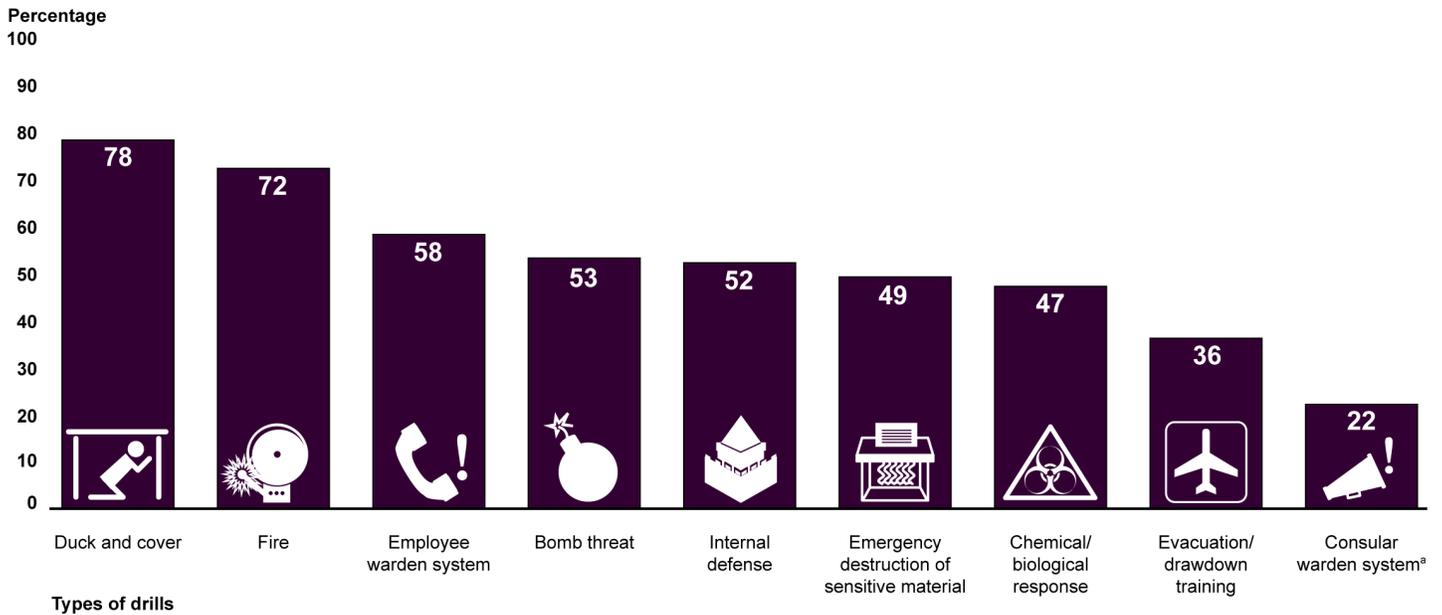
GAO analysis of Department of State data. GAO-17-714

Note: Diplomatic Security's Security Environment Threat List includes ratings for political violence and terrorism at all U.S. overseas posts.

<sup>a</sup>Posts that are rated high or critical in political violence or terrorism are required to conduct all nine types of drills twice per fiscal year.

Figure 4 provides a breakdown by drill type of the percentage of overseas posts reporting completion of each type of required annual drill, on average, for fiscal years 2013 through 2016. Completion rates for the drills ranged from a high of 78 percent to a low of 22 percent, depending on the type of drill. For example, in fiscal years 2013 through 2016, an average of 78 percent of posts reported completing required duck and cover drills; an average of 58 percent of posts reported completing required employee warden system drills; an average of 36 percent of posts reported completing required evacuation/drawdown training drills; and an average of 22 percent of posts reported completing the required consular warden system drills.

**Figure 4: Percentage of Overseas Posts That Reported Completing Drilling Requirements by Drill Type, Fiscal Years 2013–2016**



Source: GAO analysis of Department of State data. | GAO-17-714

<sup>a</sup>The consular warden system is a mechanism through which a post reaches out to American citizens in country, typically by phone or e-mail, in the event of an emergency, disaster, or threat, for the purposes of distributing information of interest.

For fiscal years 2013 through 2016, we found that, on average, 3.4 percent of posts reported completing all required annual drills (see table 3).

**Table 3: Overseas Posts Reporting Completion of Required Annual Drills, Fiscal Years 2013–2016**

Fiscal year	Number of overseas posts reporting completion of drills <sup>a</sup>	Number of overseas posts reporting completion of all required annual drills <sup>b</sup>	Percentage of overseas posts reporting completion of all required annual drills
2013	253	7	2.8
2014	257	4	1.6
2015	274	12	4.4
2016	261	13	5.0
Average	261	9	3.4

Source: GAO analysis of Department of State (State) data. GAO-17-714

<sup>a</sup>The number of overseas posts fluctuates from year to year. According to State’s Security Environment Threat List, there were 277 overseas posts in fiscal year 2016, which includes posts where operations had been suspended. Drills are not conducted at posts where operations have been suspended, and we did not factor those posts into our analysis.

<sup>b</sup>Posts that are not rated high or critical in political violence or terrorism are required to conduct nine types of drills at least once per fiscal year. Posts that are rated high or critical in political violence or terrorism are required to conduct the same nine types of drills at least twice per fiscal year.

For those posts rated high or critical in political violence or terrorism, we found that, on average for fiscal years 2013 through 2016, 2.3 percent of posts reported completing all drills at least twice per fiscal year as required (see table 4).

**Table 4: Overseas Posts Rated High or Critical in Political Violence or Terrorism Reporting Completion of Required Annual Drills, Fiscal Years 2013–2016**

Fiscal year	Number of overseas posts rated high or critical in political violence or terrorism reporting completion of drills <sup>a</sup>	Number of overseas posts rated high or critical in political violence or terrorism reporting completion of all required annual drills <sup>b</sup>	Percentage of overseas posts rated high or critical in political violence or terrorism reporting completion of all required annual drills
2013	106	2	1.9
2014	106	1	0.9
2015	114	3	2.6
2016	102	4	3.9
Average	107	2.5	2.3

Source: GAO analysis of Department of State (State) data. GAO-17-714

<sup>a</sup>The number of overseas posts fluctuates from year to year. According to State’s Security Environment Threat List, there were 277 overseas posts in fiscal year 2016, which includes posts where operations had been suspended. Drills are not conducted at posts where operations have been suspended, and we did not factor those posts into our analysis.

<sup>b</sup>Posts that are not rated high or critical in political violence or terrorism are required to conduct nine types of drills at least once per fiscal year. Posts that are rated high or critical in political violence or terrorism are required to conduct the same nine types of drills at least twice per fiscal year.

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State headquarters officials told us that, while posts are aware of the requirements to report completed drills, posts may be underreporting drills completed. They said that post RSOs have significant workloads and that this may result in RSOs failing to report a post's completion of some required drills. When RSOs report completion of drills in the DS Security Management Console, the FAH also requires that they record information about how the drill was conducted, including post participation, deficiencies identified, and corrective actions. These additional reporting requirements further add to RSO workloads and may contribute to underreporting, according to State headquarters officials. Moreover, State officials told us that incident commanders responsible for conducting certain types of drills may not notify RSOs about completed drills. Absent more complete drill reporting, State headquarters and post leadership lack information on posts' preparedness for responding to crises and conducting evacuations.

DS officials told us that—partly in response to our ongoing work—the bureau recently has established a DS Drills Working Group to clarify RSO roles and requirements for reporting drills and to address some of the challenges leading to underreporting the completion of required drills. DS officials also told us that they plan to modify the new electronic system for drafting and updating EAPs to include a post drills reporting feature. This feature, projected by DS to be incorporated into the new system in 2018, would allow incident commanders to report completion of drills for which they are responsible. DS officials said that they hope this new feature will improve the reporting of completed required drills.

Nevertheless, officials at three posts we met with told us that posts may not be completing required drills because compliance with annual drilling requirements is not a priority in State's organizational culture. For example, officials at one post rated high in political violence and terrorism told us that the previous RSO had not adhered to the post's drilling schedule for meeting annual drilling requirements. The new RSO at this post told us that the previous RSO had completed less than 40 percent of required drills in fiscal year 2016. Another official at the same post told us that the Ambassador had denied requests for additional drills that the new RSO deemed necessary, saying that the post was too busy to hold such drills. If drills are not conducted as required, overseas post staff may lack the preparation to respond to a crisis, which could endanger post staff and family members.

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## Overseas Posts Have Not Submitted Required Lessons Learned Reports following Evacuations

During fiscal years 2013 through 2016, there were 31 evacuations from overseas posts; however, according to CMS, none of the posts submitted required lessons learned reports to State headquarters following the termination of their authorized or ordered departures. We requested that State headquarters provide us with any documents—produced by overseas posts—containing lessons learned or any challenges encountered by posts that experienced an evacuation during fiscal years 2013 through 2016. State was unable to provide any documents responsive to our request. CMS officials told us that State currently does not have an established process for centrally collecting and assessing lessons learned documents, but that CMS is taking steps to develop and implement such a process. In September 2016, CMS formed a new unit to work on, among other tasks, lessons learned projects to ease the burden on posts and to develop a collection and assessment process for lessons learned. Separately from CMS, DS provided us with two classified reports containing some lessons learned about overseas posts that had experienced evacuations. However, neither of these documents was produced by the overseas posts themselves and, according to DS and CMS officials, DS is not the entity within State that is responsible for collecting and assessing lessons learned reports from posts following evacuations.<sup>35</sup>

As previously discussed, State guidance recommends that posts engage in a lessons learned discussion after an authorized or ordered departure has been terminated. State's CMS team at headquarters is to work with the overseas post, the relevant regional bureau, and State's Management Bureau to facilitate a lessons learned discussion for the record. Additionally, the FAH requires post staff to transmit an after-action report listing any lessons learned from their experience to State headquarters.<sup>36</sup> In addition, federal internal control standards call for agency management to hold individuals accountable for their internal control responsibilities and to establish and operate monitoring activities to monitor the internal control system and evaluate the results.<sup>37</sup>

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<sup>35</sup>Working separately from CMS, DS had started collecting various lessons learned documents on its own; these documents convey multiple aspects of DS's responsibilities and can cover evacuations as well as other emergency preparedness activities. DS's collection includes over 500 lessons learned documents.

<sup>36</sup>12 FAH-1 Annex K 4.2-1.

<sup>37</sup>[GAO-14-704G](#).

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CMS officials told us that overseas posts often lack sufficient resources to produce lessons learned reports following termination of the post's authorized or ordered departure. CMS officials also told us that even after the crisis leading to an evacuation has abated and staff have returned to post, there is often a backlog of tasks to be completed. They also said completing these tasks is a priority for post staff, which limits their ability to develop and submit lessons learned reports. Moreover, CMS officials said that post staff curtailments also can challenge a post's ability to develop and submit lessons learned reports following an evacuation, as staff present during the evacuation may no longer be present when the post resumes normal operations.<sup>38</sup>

We learned of several challenges that posts faced in different evacuations in discussions with officials from the six posts with whom we met. Different posts mentioned various challenges, including disorganized evacuation logistics and transportation, unclear communication with local staff, confusion surrounding the policy for evacuating pets, problems with shipment and delivery of personal effects, difficulty tracking the destination of staff who were relocated, poor communication with senior State leadership regarding the post's evacuation status, difficulties getting reimbursement for lodging or personal expenses related to the evacuation, and other similar challenges.

Absent a functioning lessons learned process, State's ability to identify lessons learned and to share best practices from staff that have experienced evacuations may be constrained. According to CMS officials, holding lessons learned exercises can help to identify challenges that a post faced during an evacuation within a reasonable time frame. The subsequent after-action reports could be used to modify guidance for posts on how to best respond to emergency situations. According to CMS officials, these reports also can help staff at other overseas posts learn about the challenges the evacuated posts faced, identify relevant insights and best practices, and prepare for potential future evacuations.

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<sup>38</sup>Curtailments are the shortening of an employee's tour of duty from his or her assignment. It may include the employee's immediate departure from a bureau or post.

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## Conclusions

U.S. personnel working at overseas posts, along with the family members who accompany them, face a range of threats to their safety and security—such as terrorism, civil unrest, and natural disasters. To help protect them, State has established processes to prepare overseas posts for crises and to conduct evacuations. However, State has significant gaps in implementation of its preparedness processes for crises and evacuations at overseas posts. Overseas posts are not completing required annual EAP updates, DS is not identifying incomplete updates in its EAP reviews, and the EAPs themselves are not readily usable during emergency situations. In addition, although regular drilling is a critical crisis preparedness task, very few overseas posts have completed all required annual drills. Finally, because overseas posts are not submitting required after-action reports containing lessons learned following evacuations, State is missing important opportunities to identify challenges and best practices and to make changes to prepare for future evacuations from overseas posts. While State has taken initial actions—including some actions in response to our ongoing work—to improve implementation of its preparedness processes for crises and evacuations, significant shortcomings exist. While each of these gaps is of concern, taken together, they increase the risk that post staff are not sufficiently prepared to handle crisis and emergency situations.

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## Recommendations for Executive Action

To address gaps in State's crisis and evacuation preparedness, we recommend that the Secretary of State take the following five actions:

1. Take additional steps to ensure that overseas posts complete annual updates of their EAPs within required time frames, such as identifying posts that are late in completing their annual updates and continuing to follow up with those posts until they complete their annual EAP updates.
2. Establish a monitoring and tracking process to ensure that DS fully reviews and documents the review of key sections of EAPs submitted to it during the annual EAP review cycle.
3. Take steps to make the EAP more readily usable during emergency situations. For example, State could develop a more streamlined version of the EAP—consisting of key sections, checklists, and contact lists—that could be used by overseas post staff, in addition to the full EAP. In addition, for its new system planned for later this year, State could consider including requirements for streamlined EAPs.

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4. Take steps to ensure that overseas posts complete and report completion of required drills within mandated time frames.
  5. Take steps to ensure that overseas posts complete required lessons learned reports following authorized or ordered departures and submit the reports to State headquarters for analysis.

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## Agency Comments

We provided a draft of the sensitive but unclassified report to State and DOD for comment. State's comments on the sensitive but unclassified report are reprinted in appendix IV. In its comments, State concurred with all five recommendations and described actions planned or under way to address them. For example, State concurred with our recommendation that the department take steps to make the EAP more readily usable during emergency situations. State further said that it is developing a redesigned EAP that minimizes redundancy, groups content according to posts' planning and response needs, and makes the EAP organized and user-friendly for all EAC members and other users. State also provided technical comments on the draft of the sensitive but unclassified report, which we incorporated as appropriate. DOD did not provide comments on the draft of the sensitive but unclassified report.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of State, and the Secretary of Defense. In addition, the report is 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) 512-8980 or [courtsm@gao.gov](mailto:courtsm@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 key contributions to this report are listed in appendix V.

Sincerely yours,



Michael J. Courts  
Director, International Affairs and Trade

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) the processes the Department of State (State) has established to prepare overseas posts for crises and to conduct evacuations and (2) State's implementation of preparedness processes for crises and evacuations at overseas posts. This report is a public version of a sensitive but unclassified report that was issued on June 28, 2017, copies of which are available upon request for official use only by those with the appropriate need to know.<sup>1</sup> State deemed some of the information in our June report to be sensitive, which must be protected from public disclosure. Therefore, this report omits information identified by State as sensitive. Although the information provided in this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

To conduct this review, we obtained and analyzed guidance from State's Foreign Affairs Manual (FAM) and Foreign Affairs Handbooks (FAH), including a portion called the Emergency Planning Handbook. We analyzed information from State's Emergency Action Plans (EAP) drilling database, Security Environment Threat List, and the State account for Emergencies in the Diplomatic and Consular Service known as the K fund. In addition, we interviewed officials from State's Bureau of Diplomatic Security (DS); Office of Management Policy, Rightsizing, and Innovation; Crisis Management Support; Africa Regional Bureau; Western Hemisphere Regional Bureau; Near Eastern Affairs Regional Bureau; and European Regional Bureau. We reviewed GAO's most recent work regarding evacuations and the Department of Defense's (DOD) support for State in crisis situations.<sup>2</sup> We also interviewed representatives from DOD's Under Secretary of Defense for Policy.

We conducted fieldwork at four overseas posts in the Africa and the Near East geographic regions. We are not naming the specific posts we visited for this review due to security concerns. In addition, we conducted interviews—via secure video conference—with two additional posts in the Near East and Africa geographic regions, and with a DOD combatant command to gather their perspectives on State's implementation of crisis

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<sup>1</sup>GAO, *Embassy Evacuations: State Should Take Steps to Improve Emergency Preparedness*, GAO-17-560SU (Washington, D.C.: June 28, 2017).

<sup>2</sup>GAO, *State Department: Evacuation Planning and Preparations for Overseas Posts Can Be Improved*, [GAO-08-23](#) (Washington, D.C.: Oct. 19, 2007) and *Interagency Coordination: DOD and State Need to Clarify DOD Roles and Responsibilities to Protect U.S. Personnel and Facilities Overseas in High-Threat Areas*, [GAO-15-219C](#) (Washington, D. C.: Mar. 4, 2015).

and evacuation preparedness processes for overseas posts. This sample of countries was designed to account for geographic diversity and to include posts that have experienced authorized departure, ordered departure, and suspended operations since September 2012; had a mix of posts where family members or members of household were authorized or not authorized to reside; and a mix of both high-risk posts and posts where a Vital Presence Validation Process (VP2) assessment had been conducted. At posts we visited, we met with a variety of post staff including Emergency Action Committee members, Ambassadors, Deputy Chiefs of Mission, Regional Security Officers (RSO), Management Counselors, Community Liaison Office Coordinators, and U.S. staff and locally employed staff who had experienced previous evacuations.

To examine the processes State has established to prepare overseas posts for crises and to conduct evacuations, we reviewed State's policies and procedures in the FAM and associated FAH requiring posts to prepare EAPs and to conduct crisis-situation and evacuation drills, as well as policies and procedures to conduct evacuations at overseas posts. We also reviewed memoranda of agreement between State and DOD regarding coordination of U.S. military support to posts during evacuations. We interviewed State officials at headquarters, including from relevant regional bureaus and other offices and groups that assist posts during crises and evacuations, and at four overseas posts. Further, we interviewed officials via secure video conferences at two additional posts and a DOD combatant command to discuss State policies and procedures that define their roles in crisis and evacuation preparedness.

To determine the amount State had spent on evacuation-related expenses, we assessed State-provided expenditure data from the K Fund by totaling the amounts reported for overseas post evacuations that took place in fiscal years 2010–2016; we did not conduct a financial audit of the expenditure data. The K Fund is used to cover post evacuation-related expenditures. State provided K Fund data on overseas post evacuations that it collects and tracks through its Global Financial Management System for these years. We assessed the reliability of these data by querying knowledgeable State officials about them. We determined that the data were sufficiently reliable to present State's expenditures on evacuations in fiscal years 2010 through 2016.

To assess State's implementation of preparedness processes for crises and evacuations at overseas posts, we conducted several analyses. First, to assess the extent to which overseas posts annually updated EAPs within required time frames, we reviewed DS data to identify the dates

when overseas posts completed the required annual updates of their EAPs for fiscal years 2013–2016. To assess the reliability of DS data on when posts completed their annual EAP updates, we performed basic logic checks on the data provided and reviewed DS's responses to a series of data reliability questions. We concluded that the DS data on EAP annual updates were sufficiently reliable for the purposes of our report. Second, to determine the extent to which DS met requirements to fully review key sections of EAPs submitted by overseas posts, we requested documentation from DS on the reviews completed, including who conducted them and what deficiencies, if any, were found.

Third, we analyzed a nongeneralizable, judgmental sample of 20 post EAPs that DS had reviewed and approved to assess whether this sample of EAPs contained evidence that key EAP sections, as identified by DS, had been updated. We selected the sample of post EAPs to ensure that we examined EAPs from posts that had experienced evacuations or suspended operations since September 2012, whose evacuations or suspended operations had occurred for a variety of reasons (e.g., natural disasters as well as security threats), with different statuses regarding accompaniment of family members, and from different geographic regions. For all 20 EAPs, we examined the dates indicating each key section's most recent update to determine if the overseas post had reviewed and updated the information within required time frames. The dates we reviewed are updated by State's current electronic system for generating and updating EAPs whenever a section of the EAP is edited and put through the approval process for republication. We reviewed available unclassified and classified portions of the 20 EAPs requested. However, the classified and unclassified portions of these EAPs were not current as of the same date; therefore, we restricted our analysis to the unclassified portions. By reviewing the available unclassified portions of these EAPs, we were able to assess an average of over 70 percent of the 27 key EAP sections for the 20 EAPs in our nongeneralizable sample. State officials explained that each overseas post determines which portions of its EAP should be classified. The portions of EAPs that were classified varied by post—both the number of portions that were classified and which ones—due to the differing situations and risks faced by each post. To assess the degree to which the EAPs are readily usable in emergency situations, we interviewed staff at overseas posts and State headquarters about the utility of EAPs in emergency situations. In addition, for the sample of 20 EAPs we reviewed, we determined the average number of pages of those documents.

Fourth, to understand the extent to which posts have complied with requirements to conduct drills intended to prepare them for crises and evacuations, we reviewed DS's drilling database for overseas posts for fiscal years 2013–2016. RSOs report completion of their post's drills into DS's RSO Security Management Console, which logs the drill records into a drilling database maintained by DS. The data elements we assessed from the drilling database were for overseas posts that reported completing required drills for fiscal years 2013–2016. DS officials indicated that some posts may be underreporting completion of their required drills. In addition, DS is unable to confirm that all drills completed by posts for fiscal years 2013–2016 were reported in DS's RSO Security Management Console. Consequently, the data elements we assessed from the drilling database do not fully capture the extent to which drills might have been completed at posts for fiscal years 2013–2016. In analyzing the data, we also requested and received from DS information on those posts that were rated high or critical for terrorism or political violence on its Security Environment Threat List for fiscal years 2013–2016, as those posts have more frequent annual drilling requirements.

Upon reviewing the Security Environment Threat List data along with the data on posts from the drilling database, we found 23 posts with potential data anomalies. We sent DS follow-up questions to clarify these anomalies and received responses from DS. To assess the reliability of the drilling database, we performed basic logic checks on the database and reviewed State's responses to a series of data reliability questions. We concluded that, although State does not independently verify the accuracy of data reported within DS's RSO Security Management Console to ensure its accuracy or validity, the data are sufficiently reliable for the purposes of reviewing which overseas posts reported completing required annual drills for fiscal years 2013–2016.

Fifth, to determine the extent to which overseas posts that had experienced evacuations complied with requirements to submit lessons learned reports to State headquarters following the termination of an authorized or ordered departure, we requested from State officials at headquarters any required lessons learned reports submitted by posts following evacuations for fiscal years 2013–2016. State was unable to provide us with any lessons learned reports.

The performance audit upon which this report is based was conducted from March 2016 to June 2017 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

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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. We subsequently worked with State from June 2017 to July 2017 to prepare this version of the original sensitive but unclassified report for public release. This public version was also prepared in accordance with these standards.

# Appendix II: U.S. Overseas Posts Late in Completing Required Annual Update of Their Emergency Action Plan for Fiscal Year 2016

For fiscal year 2016, 203 overseas posts were required to complete annual updates of their Emergency Action Plans (EAP). Of these, the 17 posts listed below were late in completing their required annual updates.

**Table 5: Overseas Posts Late in Completing the Required Annual Update of Their Emergency Action Plan (EAP) for Fiscal Year 2016 and the Number of Months That These Posts Were Late**

Overseas post <sup>a</sup>	Number of months late <sup>b</sup>	Completed update as of March 10, 2017
Vienna	10	Yes
Manama	10	Yes
Pristina	10	Yes
Yerevan	8	Yes
Seoul	8	No
Sarajevo	7	Yes
Frankfurt	7	Yes
Quebec	6	Yes
Matamoros	5	Yes
Recife	4	Yes
Port-au-Prince	4	Yes
Ulaanbaatar	4	Yes
Wellington	4	Yes
Skopje	3	Yes
Shanghai	2	Yes
Surabaya	2	Yes
Bamako	1	Yes

Source: GAO analysis of Department of State (State) data. | GAO-17-714

Note: GAO's analysis is based on its review of data from State's Bureau of Diplomatic Security (DS) containing the dates when overseas posts completed their required annual updates of their EAP for fiscal year 2016.

<sup>a</sup>The total number of overseas posts required to complete annual updates of EAPs varies from fiscal year to fiscal year and is determined by DS. For example, if a post submitted its annual EAP update for fiscal year 2014 12 months late, in fiscal year 2015, DS can determine that the post is no longer required to submit a separate annual EAP update for fiscal year 2015. In this case, DS can determine that the post's next annual EAP update would be due in fiscal year 2016.

<sup>b</sup>All data are as of March 10, 2017. We identified EAPs that were submitted a number of months after their due date as well as EAPs that had not yet been submitted as of March 10, 2017. We identified one EAP that was not submitted by March 10, 2017. For this EAP, we calculated months late as the difference between the due date and the date we last received updated data from DS.

# Appendix III: Main Sections, Annexes, and Appendixes of the Emergency Action Plan (EAP) and 27 Key EAP Sections

The Foreign Affairs Handbook directs the Department of State's (State) Bureau of Diplomatic Security (DS) to review the Emergency Action Plans (EAP) annually submitted by overseas posts to ensure that it contains the necessary information. Each EAP for an overseas post includes the main sections, annexes, and appendixes listed below. To conduct the annual reviews, DS Emergency Plans Review Officers in Washington, D.C., use a list of 27 key EAP sections that the program office has determined should be updated each year. The 27 key EAP sections reviewed by DS are also listed below, indicated with a ↔ (key) symbol. Several of the key EAP sections contain related checklists or forms.

**Table 6: Main Sections, Annexes, and Appendixes of the Emergency Action Plan (EAP) and 27 Key EAP Sections Reviewed by the Department of State's Bureau of Diplomatic Security (DS)**

Main EAP section, annex, or appendix	
H-000	Emergency Planning Handbook (EPH)
H-100	Legal
H-200	Organization
	↔ H-282 – Cut-off plan
H-300	Consular services
H-400	Public affairs
H-500	Medical
	↔ H-525 – Medical supplies
H-600	Mission security
H-700	Crisis preparedness
Annex A	Bomb
	↔ Annex A-2.4 – Evacuation
	↔ Annex A-3.2 – Imminent danger
Annex B	Fire
	↔ Annex B-2.1 – Discovery of fire
Annex C	Civil disorder
	↔ Annex C-4.1 – Procedures for planned or on-going event (violent event targeting U.S. citizens)
Annex D	Internal defense
	↔ Annex D-2.2 – Defense of outermost perimeter
	↔ Annex D-2.3 – Breach of perimeters
Annex E	Destruction of sensitive material
	↔ Annex E-3.2 – Flash destruction procedures
	↔ Annex E-4.2 – Facility planning details for destruction

**Appendix III: Main Sections, Annexes, and Appendixes of the Emergency Action Plan (EAP) and 27 Key EAP Sections**

<b>Main EAP section, annex, or appendix</b>	
Annex F	Weapons of mass destruction and other hazardous materials ↳ <b>Annex F-4.3 – Chemical, biological, and radiological countermeasures equipment</b>
Annex G	Hostage taking and personnel recovery
Annex H	Hijacking
Annex I	Assist to U.S. citizens in major accident/disaster
Annex J	Assist to host country in major accident/disaster
Annex K	Drawdowns and evacuations ↳ <b>Annex K-5.1 – Preparation (charter-assisted evacuation)</b> ↳ <b>Annex K-5.2 – Assembly and processing</b> ↳ <b>Annex K 5.3 – Departure</b> ↳ <b>Annex K-6.1 – Preparation (implementation of military evacuation)</b> ↳ <b>Annex K-6.2 – Assembling and processing</b> ↳ <b>Annex K-6.3 – Departure</b>
Annex L	Receipt of evacuees
Appendix 1	Master contact list
Appendix 2	Mission organization for emergencies
Appendix 3	Command and control locations ↳ <b>Appendix 3.2-1 – Command centers</b> ↳ <b>Appendix 3.2-2 – Safe havens</b> ↳ <b>Appendix 3.2-3 – Off-site safe areas</b>
Appendix 4	Assembly and movement surveys ↳ <b>Appendix 4.2-1 – Assembly area data</b> ↳ <b>Appendix 4.2-2 – Helicopter landing zone data</b> ↳ <b>Appendix 4.2-3 – Airport data</b> ↳ <b>Appendix 4.2-4 – Seaport data</b>
Appendix 5	Medical services surveys
Appendix 6	Logistics and transport ↳ <b>Appendix 6.2-1 – Supplies</b> ↳ <b>Appendix 6.2-4 – Sources of additional vehicles</b> ↳ <b>Appendix 7.2-2 – Emergency communications</b>
Appendix 7	Communications
Appendix 8	Unified command
Appendix 9	Facility information

Source: GAO analysis of Department of State (State) data. | GAO-17-714

Note: The Foreign Affairs Handbook directs DS to review EAPs annually submitted by overseas posts to ensure they contain necessary information. Each EAP for an overseas post includes the main sections, annexes, and appendixes listed above. To conduct the annual reviews, DS Emergency Plans Review Officers in Washington, D.C., use a list of 27 key EAP sections that the program office has determined should be updated each year. The 27 key EAP sections reviewed by DS are also

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**Appendix III: Main Sections, Annexes, and  
Appendixes of the Emergency Action Plan  
(EAP) and 27 Key EAP Sections**

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listed above, indicated with a ⇨ (key) symbol. Several of the key EAP sections contain related checklists or forms

# Appendix IV: Comments from the Department of State



United States Department of State

Comptroller

Washington, DC 20520

JUNE 06 2017

Charles M. Johnson, Jr.  
Managing Director  
International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548-0001

Dear Mr. Johnson:

We appreciate the opportunity to review your draft report, "EMBASSY EVACUATIONS: State Should Take Steps to Improve Emergency Preparedness" GAO Job Code 100614.

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 Paul Ginsburg, Policy Analyst, Office of the Executive Director, Bureau of Diplomatic Security at (571) 345-9696.

Sincerely,

A handwritten signature in blue ink that reads "Chris H. Flaggs".

Christopher H. Flaggs

Enclosure:  
As stated

cc: GAO – Michael Courts  
DS – Bill Miller (Acting)  
State/OIG - Norman Brown

**Department of State Comments on GAO Draft Report**

**EMBASSY EVACUATIONS: State Should Take Steps to  
Improve Emergency Preparedness  
(GAO-17-560SU, GAO Code 100614)**

Thank you for the opportunity to comment on your draft report entitled *“Embassy Evacuations: State Should Take Steps to Improve Emergency Preparedness.”* The report includes five recommendations for the Department of State. The Department concurs with these recommendations that assist us in further refining and monitoring our strong and robust security programs.

First, GAO recommends that the Department take additional steps to ensure overseas posts complete their emergency action plans (EAPs) within required time frames, such as identifying posts that are late in completing their annual updates and continuing to follow up with these posts until they complete their annual EAP updates.

The Department agrees with this recommendation. The DS Emergency Planning Staff (EP) works with posts to ensure they complete their required EAP annual reviews within the required timeframe, which is one year after their last annual review certification date. As noted in the report, the on-time EAP submission rate has increased in the last three years due to the sustained efforts to engage early and often with posts. Starting in February 2017, EP has generated a 60-day outreach e-mail template sent to the Deputy Chief of Mission (DCM), Management Officer, and Regional Security Officer (RSO). EP also expanded the audience for the monthly “overdue list” to include senior Department officials to inform them of posts that are overdue in certifying their EAPs. DS believes the combination of proactive engagement and systematic follow-up with posts meets the intent of this recommendation and has already demonstrated success.

Second, GAO recommends that the Department establish a monitoring and tracking process to ensure that DS fully reviews and documents the review of key sections of EAPs submitted to it during the annual EAP review cycle.

The Department agrees with this recommendation. Currently, any Crisis and Emergency Planning Application (CEPA) user is able to view the history of individual EAP sections, to include the tracking data for the review and publication history for that EAP section. Although DS does not currently have a mechanism to consolidate this data into a single report due to limitations of the CEPA software,

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this feature will be added as a requirement for the new EAP authoring tool, the Post Emergency Guidance and Authoring System (PEGASYS). This requirement will be included in the first deployment of PEGASYS which is expected to be released by late 2017.

Third, GAO recommends that the Department take steps to make the EAP more readily usable during emergency situations. For example, the Department could develop a more streamlined version of the EAP – consisting of key sections, checklists, and contact lists – that could be used by overseas post staff, in addition to the full EAP. In addition, for its new system planned for later this year, the Department could consider including requirements for streamlined EAPs.

The Department agrees with this recommendation. As stated in 15 STATE 46592 (“Your Mission’s Management of Risk: New Tools for the Emergency Action Committee”) the Department is developing a redesigned EAP that minimizes redundancy, groups content according to posts’ planning and response needs, and makes it organized and user-friendly for all EAC members and other users. Post’s existing EAP content will be organized into four distinct documents strategically grouped by the type of information each contains:

- Planning Guide: Information to assist posts in planning, including general guidance and information for planning crisis response, supporting information for the Immediate Action Guide, and response plans for slower-developing crises;
- Immediate Action Guide: Post-specific checklists, requisite forms, and other quick reminders about what to do during the immediate on-set of emergency situations;
- Master Emergency Contact List: Contact details for key employees and external contacts who can help/who have a role for specific crisis situations; and
- Decision Points: Post’s Decision Points (formerly known as “Tripwires”), includes Operating Assumptions and a consolidated list of mitigating Actions to Consider.

DS/EP is currently working with the Operations Center’s Crisis Management and Strategy (CMS) to incorporate a streamlined EAP format into PEGASYS to make EAPs more readily usable during emergency situations. DS anticipates PEGASYS will launch in late 2017.

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Fourth, GAO recommends that the Department take steps to ensure that overseas posts complete and report completion of required drills within mandated time frames.

The Department agrees with this recommendation. DS formed a Drills Working Group to review and assess existing guidance and to develop new policy to assist posts in meeting their drilling requirements. The findings of the Drills Working Group led to a rewrite of the 12 FAH-1 H-760 to better define the skill sets and essential elements of drills to include possible scenarios and other helpful information for posts to conduct effective drills. DS anticipates releasing our drills guidance to all posts by September 2017 via cable. Moreover, DS believes the underreporting of completed drills may be due to the requirement for RSOs vice drill incident commanders to record drills into the RSO Security Management Console. The RSO is only one of many designated incident commanders responsible for planning and completing drills. Since October 2016, as part of the EAP annual certification, the EAC chair for each post is now required to certify that all drills have been conducted and that a table-top exercise has been run at post. Since January 2017, DS has conducted quarterly reviews of all posts' drill data in the RSO SMC and engaged with posts that are not on target to complete their required drills. Ultimately, DS plans to incorporate the drill reporting requirement into PEGASYS so that incident commanders can directly record their drills and EAC chairs have direct visibility to track and certify the completion of required drills.

Fifth, GAO recommends that the Department take steps to ensure that overseas posts complete required lessons learned reports following authorized or ordered departures and submit the report to Department headquarters for analysis.

The Department agrees with this recommendation. CMS developed resources to guide embassies' efforts to conduct post-crisis lessons learned discussions, such as those required by 12 FAH-1 Annex K 4.2-1. These resources include a cable that CMS sends to Post which provides a concise list of questions for consideration and can be used as the basis for formal and informal reports. CMS will provide technical assistance and lead lessons learned discussions remotely, if requested and resources permit. Besides publicizing posts' best practices on our website and through the Department's Crisis Management Council (CMC) and other forums, CMS will use posts' data to conduct trend and other analysis, which will help determine after-action recommendations, such as policy improvements and new guidance.

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CMS designed a searchable knowledge management hub that will house lessons learned materials, resources, reports, and cables. The hub will initially be available to those with access to the Department's intranet site, with the possibility of expanding access to the interagency as resources allow. CMS is in the process of negotiating data-sharing agreements with several interagency partners, including the United States Agency for International Development, Office of U.S. Foreign Disaster Assistance (USAID/OFDA), to include their lessons learned reports in the searchable database. CMS is also in the process of identifying archive materials, including cables from evacuated posts, to include in the database. Once funded, CMS will oversee the hub's technical development and rollout; we hope to make this tool available to the Department by the end of this fiscal year.

These specific efforts are just one element of CMS's broader strategy to ensure the Department's crisis management mechanisms continuously improve. Since the September 2016 establishment of a new unit in CMS to manage strategic and long-term issues, CMS has made significant progress establishing a formal crisis-related lessons learned collection and assessment mechanism on behalf of the Department.

- CMS leads the Department's Crisis Management Council (CMC). The CMC, established by the Executive Secretary in April 2016, enhances the Department's crisis management capacity and facilitates ongoing coordination efforts. It brings together crisis management practitioners and stakeholders from across the Department to promote innovation and collaboration, synchronize policy, and advise principals on a range of cross-cutting issues related to risk management and crisis preparedness and response. CMS serves as the chair of the CMC Lessons Learned Working Group, which includes representatives from a variety of bureaus, including DS, Consular Affairs, and the regional bureaus. The Working Group provides a forum to share information about bureaus' internal crisis-related lessons learned efforts as well as discuss and make recommendations on Department-wide lessons learned policies and practices. CMS maintains a website for Working Group members which includes links to different bureaus' and offices' collections of crisis-related lessons learned material.
- CMS created a lessons learned process to apply to critical operational events, per 1 FAM 022.2-3. The CMC Lessons Learned Working Group provided feedback on the proposed process, which is currently being piloted in response to recent crises. Following the pilot phase, the process will be further refined, formalized in the FAM, and shared with the field via an All

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Diplomatic and Consular Posts (ALDAC) cable; CMS currently envisions the completion of these steps by the end of the fiscal year.

In conclusion, the Department thanks the GAO for this constructive audit and will promptly implement the above recommendations.

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# Appendix V: GAO Contact and Staff Acknowledgments

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## GAO Contact

Michael J. Courts, (202) 512-8980 or [mcourtsm@gao.gov](mailto:mcourtsm@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Thomas Costa (Assistant Director), Ian Ferguson (Analyst-in-Charge), Mason Thorpe Calhoun, David Dayton, Neil Doherty, Ming Chen, Martin de Alteriis, and Mark Dowling made key contributions to this report.

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