



September 2018

# CENTRAL AMERICAN POLICE TRAINING

State and USAID  
Should Ensure  
Human Rights  
Content Is Included  
as Appropriate, and  
State Should  
Improve Data

# GAO Highlights

Highlights of [GAO-18-618](#), a report to congressional committees

## Why GAO Did This Study

Several U.S. agencies train police in the Northern Triangle countries of El Salvador, Guatemala, and Honduras, where corruption and human rights abuses have traditionally plagued civilian police forces. State, the primary agency responsible for foreign police assistance, allocated about \$37 million to train police in these countries from appropriations for fiscal years 2014 through 2017. Although it is not a focus of their efforts, DOD and USAID also train police in the Northern Triangle.

Senate Report 115-125 includes a provision for GAO to report on various aspects of U.S. police training efforts in the Northern Triangle. In this report, GAO examines, among other objectives, the extent to which U.S. agencies have (1) established objectives for and delivered training to professionalize police, including promoting respect for human rights, and (2) collected data related to police training indicators. GAO analyzed agency data and project documents, including for 22 State and USAID-funded projects implemented during fiscal years 2014 through 2017 that agencies identified as including assistance for police. GAO also conducted fieldwork in El Salvador and interviewed agency officials in Honduras; Guatemala; and Washington, D.C., who oversee and conduct police training.

## What GAO Recommends

To improve oversight of police training in the Northern Triangle, State and USAID should design control mechanisms to ensure human rights content is included as appropriate, and State should improve police training data. State and USAID concurred.

View [GAO-18-618](#). For more information, contact Jennifer Grover at (202) 512-7141 or [GroverJ@gao.gov](mailto:GroverJ@gao.gov).

September 2018

## CENTRAL AMERICAN POLICE TRAINING

### State and USAID Should Ensure Human Rights Content Is Included as Appropriate, and State Should Improve Data

## What GAO Found

Agencies have established objectives and delivered training to professionalize police in Central America's Northern Triangle but have not consistently done so to promote police respect for human rights. U.S. strategies include objectives to professionalize police, and the Departments of State (State) and Defense (DOD) and U.S. Agency for International Development (USAID) have delivered related training (see figure). These strategies also highlight the importance of police respect for human rights, but agencies have few objectives or other control mechanisms to ensure police receive related training. For instance, none of the 14 State projects and 2 of the 8 USAID projects that GAO reviewed had such objectives. Officials said this is because objectives were designed to be broader in focus. DOD also does not have objectives but has other control mechanisms to ensure its training includes human rights content. Federal standards for internal control call for managers to establish control mechanisms consistent with priorities. Without them, it may be difficult for State and USAID to ensure that training supports agencies' goals to promote police respect for human rights.

#### Police in Honduras Receiving Training from U.S. Department of Defense Trainers



Source: U.S. Department of Defense. | GAO-18-618

DOD, State, and USAID collect information on police training, but State lacks readily available, reliable data on the number of police trained—a key indicator in the *U.S. Strategy for Central America*. State's data are not readily available because, according to officials, the process to track training is decentralized and data are not consolidated. Further, GAO found State's fiscal year 2017 police training data to be unreliable because, among other reasons, the data did not include training delivered by some implementers. Officials noted that State did not have sufficient internal control mechanisms and staff in place to collect data as it expanded police training in the Northern Triangle. Without such data, State cannot accurately assess its efforts in Central America.

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### Abbreviations

DHS	Department of Homeland Security
DOD	Department of Defense
DOJ	Department of Justice
ILEA	International Law Enforcement Academies
INL	Bureau of International Narcotics and Law Enforcement Affairs
SOUTHCOM	U.S. Southern Command
State	U.S. Department of State
TIGRES	Special Response Intelligence and Security Group
USAID	U.S. Agency for International Development

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September 5, 2018

Congressional Committees

The three Central American countries constituting the region’s “Northern Triangle”—El Salvador, Guatemala, and Honduras—face widespread insecurity and violence, with homicide rates among the highest in the world. The police forces in these countries are challenged by corruption, inadequate resources, insufficient training, and a lack of public trust, according to U.S. Department of State (State) documents.<sup>1</sup> Supporting the efforts of the Northern Triangle governments to professionalize and reform police forces is a focus of U.S. policy in the Western Hemisphere. The White House’s *U.S. Strategy for Central America* aims to improve governance and security in the region and emphasizes that security assistance should address corruption, promote governmental transparency, and protect human rights. In support of this strategy, the United States has devoted significant resources to train police units in the Northern Triangle.<sup>2</sup> For example, State’s Bureau of International Narcotics and Law Enforcement Affairs (INL) and the U.S. Agency for International Development (USAID) reported having allocated at least \$37 million and \$11 million, respectively, to train police in El Salvador, Guatemala, and Honduras from appropriations for fiscal years 2014 through 2017.

Congress has clearly articulated the importance of respect for human rights in U.S. assistance to partner nations’ security forces, and in Senate Report 115-125, accompanying the National Defense Authorization Act for Fiscal Year 2018, the Committee on Armed Services included a provision for us to report on various aspects of U.S. police training efforts in El Salvador, Honduras, and Guatemala. In this report, we examine, for the Northern Triangle, (1) the extent to which U.S. agencies have established objectives for and delivered training to professionalize police, including promoting respect for human rights; (2) the extent to which agencies have collected data related to police training indicators; and (3)

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<sup>1</sup>For the purposes of this report, we use “police” to refer to the civilian national police of the partner nations, which in some countries can include customs and maritime enforcement.

<sup>2</sup>For the purposes of this report, we define “training” as formal, classroom-style instruction and differentiate training from other forms of instruction, such as mentoring.

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the actions U.S. agencies have planned and undertaken to support the ability of partner nations to sustain police training.

To address these objectives, we reviewed government-wide and agency strategies, guidance documents, project work plans, and reports from State, the Department of Defense (DOD), and USAID. We focused on State and USAID because officials identified them as the primary funders of police training in El Salvador, Guatemala, and Honduras. While DOD primarily provides assistance to foreign military entities, we included DOD in our analysis because some of the training funded by the agency includes police participants.<sup>3</sup> We included police training implemented by the Departments of Justice (DOJ) and Homeland Security (DHS) when their training efforts were funded by State, DOD, and USAID, but not separate efforts funded by DOJ and DHS. In addition to reviewing documents, we conducted fieldwork in El Salvador and interviewed agency officials in Honduras; Guatemala; and Washington, D.C., who oversee and conduct police training.

To determine the extent to which U.S. agencies have established objectives for and delivered training to professionalize police, including promoting respect for human rights, we reviewed agency documents and assessed them against federal standards for internal control, which state that management should set objectives or other control mechanisms to meet an entity's mission, strategic plan, and goals.<sup>4</sup> Our analysis included U.S. global, regional, and country-specific strategic documents such as government-wide Integrated Country Strategies and DOD country security assistance plans for El Salvador, Guatemala, and Honduras. We also reviewed documents from State, USAID, and DOD about police assistance efforts implemented during fiscal years 2014 through 2017 that included assistance for police in El Salvador, Guatemala, and Honduras. Specifically, we reviewed 22 projects<sup>5</sup>—14 funded by State and 8 funded by USAID—that the agencies identified as including

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<sup>3</sup>DOD-funded training wherein law enforcement participates does not indicate training of civilian police in military functions.

<sup>4</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>5</sup>For the purpose of this report, we use “project” to refer to the set of efforts or activities governed by an implementing agreement between the U.S. agency funding the project and the implementing partner.

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assistance for police.<sup>6</sup> For each of these 22 police assistance projects, we analyzed project documents—work plans or reports—to identify objectives or other internal control mechanisms related to police professionalization, including promoting respect for human rights, using definitions determined through our analysis and discussions with agency officials. Two analysts independently reviewed the project documents and discussed and resolved any disagreements in their initial determinations about the extent to which project documents included relevant objectives or other internal control mechanisms.

With respect to reporting on the extent to which training incorporated content to professionalize police, including promoting respect for human rights, we analyzed documents on police training, such as training agendas and course catalogs, and discussed training content with officials at implementing agencies. To analyze the content of training courses, we defined training to promote respect for human rights as training specifically addressing “human rights” or elements of human rights as defined in agency documents, such as the proper use of force and minority rights, and in the United Nations Universal Declaration of Human Rights.

To determine the extent to which agencies have collected data on police training indicators, we analyzed agency documents to identify indicators related to police training and assessed related data against federal internal control standards, which call for agencies to have readily available, reliable data to track progress toward goals.<sup>7</sup> We identified, and agency officials confirmed, one relevant indicator in the *U.S. Strategy for Central America*: the “number and percentage of civilian police trained by INL.” That strategy assigns State responsibility for tracking that indicator. We asked State to provide us with information related to the indicator and compared State’s data with training information from implementing agencies to determine the extent to which State’s data were reliable and readily available. We assessed State’s data on how many police were trained by comparing similar data from different sources; reviewing

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<sup>6</sup>We reviewed DOD country security strategies for El Salvador, Guatemala, and Honduras and found that they did not contain objectives specifically to train police. DOD officials confirmed that security assistance they provide in El Salvador, Guatemala, and Honduras is focused on military and other security force recipients and that they had no projects specifically to assist police forces. Because of this, we did not include DOD projects as part of our review.

<sup>7</sup>[GAO-14-704G](#).

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agency information regarding underlying data systems; and interviewing cognizant agency officials. We found that the data on police trained through INL's International Law Enforcement Academies program (hereafter referred to as ILEA) were sufficiently reliable for reporting on the number of police trained. However, overall, we found that State does not have readily available, reliable data on the total number of police trained, which we report as a finding.

To determine the actions U.S. agencies have planned and undertaken to support the ability of partner nations to sustain police training, we spoke with agency officials about related activities and analyzed project planning documents and reporting related to police assistance. Using this information, we determined the types of actions U.S. agencies had planned or undertaken and discussed these categories with agency officials to confirm that the categories accurately reflected agency actions. For more detail on our scope and methodology, see appendix I.

We conducted this performance audit from October 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

According to State and USAID, the Northern Triangle countries of El Salvador, Guatemala, and Honduras (see fig. 1) have a history of police corruption and gross violations of human rights. For example, State's *Guatemala 2016 Human Rights Report* describes human rights abuses by the police, including arbitrary and unlawful killings, abuse, and mistreatment. Agencies also described a number of factors that challenge police forces in the Northern Triangle, including a culture of impunity and limited partner nation capacity to address these challenges.

**Figure 1: Map of Central America's Northern Triangle Countries**



Source: GAO; Map Resources (map). | GAO-18-618

Many U.S. agencies implement assistance to civilian police in El Salvador, Guatemala, and Honduras, with State's INL being the primary source of funding. Federal law generally prohibits the use of foreign assistance funds for police training, but Congress provided several exceptions including for training in internationally recognized standards of human rights, the rule of law, anti-corruption, and the promotion of civilian police roles that support democracy.<sup>8</sup> Accordingly, as part of USAID's broader security sector reform assistance efforts, the agency provides some police training, which often includes training on community policing

<sup>8</sup>22 U.S.C. § 2420. Section 660 of the Foreign Assistance Act of 1961, as amended, generally prohibits the use of foreign assistance funds to provide advice, training, or any financial support for police, prisons, or other law enforcement forces of a foreign government. In addition to exceptions for human rights training and international narcotics control within the statute, annual appropriations acts have also included notwithstanding authority exempting U.S. agencies from this prohibition for the purposes of using funds appropriated under the act to provide community-based police assistance, including among other things, training and technical assistance on human rights. (See for example Pub. L. No. 115-31, § 7049(a), May 5, 2017.)

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practices. DOD generally is not authorized to train civilian police and focuses on building the capacity of its military and other national security counterparts. However, under its authority to build the capacity of foreign security forces for various purposes,<sup>9</sup> DOD has provided a limited amount of training for civilian police and military units that provide civilian security in El Salvador, Guatemala, and Honduras. For example, several U.S. agencies, including DOD, have delivered training to the Joint Group Cuscatlán in El Salvador, an interagency task force that includes police; and to the Special Response Intelligence and Security Group in Honduras (commonly called TIGRES, its acronym in Spanish), which, according to State, is an elite, vetted unit within the Honduran National Police, specializing in high-risk tactics.<sup>10</sup>

State, USAID, and DOD deliver training in a variety of ways, including through the agencies' own subject matter experts, interagency agreements with other U.S. agencies, and contracts with nongovernment implementing partners. For example, USAID has contracts and cooperative agreements with corporations, universities, and nongovernmental organizations to implement assistance projects that include training of police in El Salvador, Guatemala, and Honduras. State's INL uses contracts to procure the services of nongovernment implementing partners and interagency agreements to partner with several other U.S. government agencies and components, including DHS and DOJ, to implement police assistance and training. State's ILEA program also funds a network of police training academies, including one located in San Salvador, El Salvador (see fig. 2).<sup>11</sup>

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<sup>9</sup>10 U.S.C. § 333.

<sup>10</sup>TIGRES is the Spanish acronym for *Tropa de Inteligencia y Grupos de Respuesta Especial de Seguridad*.

<sup>11</sup>State's ILEA network includes training centers in six locations, including San Salvador, El Salvador, which has provided training to participants from El Salvador, Guatemala, and Honduras.

**Figure 2: U.S. Department of State's International Law Enforcement Academy in San Salvador, El Salvador**



Source: GAO. | GAO-18-618

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Agencies Have Established Objectives and Delivered Training to Professionalize Police but Have Not Consistently Done So Related to Respect for Human Rights

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Agencies Have Established Training Objectives to Professionalize Police and Have Delivered Such Training

Global, regional, and country-specific strategies outlining U.S. policy in El Salvador, Guatemala, and Honduras all include objectives to professionalize police. For example, the 2017 *National Security Strategy of the United States of America* includes an objective to support local efforts to professionalize police in the Western Hemisphere. The *U.S. Strategy for Central America*—a primary document outlining U.S. policy in El Salvador, Guatemala, and Honduras—also includes an objective specifically to “professionalize civilian police.”<sup>12</sup> In addition, government-wide Integrated Country Strategies outlining U.S. goals for fiscal year 2014 through 2017 efforts in El Salvador, Guatemala, and Honduras include police professionalization objectives.<sup>13</sup> For example, the Integrated Country Strategy for Guatemala for fiscal years 2016 and 2017 includes an objective to strengthen professionalism through training for law enforcement.

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<sup>12</sup>Officials from State, USAID, and DOD told us that all agency-funded classroom training delivered to police or other security forces in El Salvador, Guatemala, and Honduras is intended to professionalize those forces, and that training to promote respect for human rights is one element of such training.

<sup>13</sup>According to State, Integrated Country Strategies articulate whole-of-government priorities in a given country and represent the official U.S. government strategy for all security sector assistance. These strategies are developed collaboratively under State’s chief-of-mission leadership with the input of other in-country U.S. agencies. The Integrated Country Strategies for El Salvador, Guatemala, and Honduras covering fiscal years 2016 and 2017 were still in force as of June 2018.

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Consistent with these objectives, DOD, State, and USAID have planned and delivered training aimed at professionalizing police in El Salvador, Guatemala, and Honduras. First, while DOD's primary responsibility is to train its military counterparts, DOD country campaign plans for each of the three Northern Triangle countries include tasks related to professionalizing security forces, which would pertain to police they may train. For example, the plan for Guatemala for fiscal years 2016 and 2017 includes conducting professional development courses to improve skills to enhance partner nation security forces. During fiscal years 2014 through 2017, DOD delivered training to security forces, including a limited number of police participants, and officials told us that all DOD training delivered to security forces was intended to professionalize those forces.

Second, our analysis of project documents associated with 22 State and USAID police assistance efforts in El Salvador, Guatemala, and Honduras implemented during fiscal years 2014 through 2017 found that 21 of the projects included objectives to professionalize police.<sup>14</sup> For example, agreements between the DHS's U.S. Customs and Border Protection and State's INL for each of the three Northern Triangle countries have an objective to assist in the development of professional border security through police training. Similarly, USAID officials noted the police training incorporated in their broader assistance efforts consistently includes elements to professionalize those forces, and we found examples of such training incorporated in documents for each of the 8 USAID projects we reviewed.

In line with these objectives, State and USAID implementing partners delivered training to professionalize police from all three Northern Triangle countries. For example, DOJ's Drug Enforcement Administration delivered tactical training on the use of firearms to police in El Salvador (see fig. 3).

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<sup>14</sup>Of the 22 State and USAID projects whose work plans or reports we reviewed, 1 project's documents did not include a training objective specifically to professionalize police. That project, funded by State and implemented by DOJ's Office of Overseas Prosecutorial Development Assistance and Training, placed a legal advisor in Guatemala. The work plan we reviewed for this project included training to professionalize prosecutors, judges, and public defenders but did not specifically identify police among the intended recipients. However, DOJ officials said that police were among those who received the training.

**Figure 3: Police Receiving Firearms Training from U.S. Department of Justice Instructors in El Salvador**



Source: U.S Department of State. | GAO-18-618

### Agencies Have Established Few Police Training Objectives to Promote Respect for Human Rights and Vary in the Extent to Which They Have Delivered Such Training

Agencies have established few objectives to provide human rights training to police in El Salvador, Guatemala, and Honduras either in government-wide strategies for the countries or in police assistance project work plans. Federal standards for internal control state that management should set objectives or other internal control mechanisms to meet an entity's mission, strategic plan, and goals.<sup>15</sup> In the case of police training, global, regional, and country-specific strategies note the importance of a professional police force that respects human rights, and some cite risks associated with police forces lacking these attributes. For example, U.S. national security strategies associated with fiscal years 2014 through 2017 state that respect for human rights is an important aspect of U.S. national security strategy. At the regional level, the *U.S. Strategy for Central America* states that all security cooperation will emphasize respect for human rights. Further, the government-wide Integrated Country Strategies for El Salvador, Guatemala, and Honduras

<sup>15</sup>[GAO-14-704G](#).

for fiscal years 2014 through 2017 emphasize the importance of promoting respect for human rights. Despite the consistent, government-wide emphasis on the importance of promoting respect for human rights, government-wide strategies and police assistance project documents include few objectives specifically to provide human rights training to police in El Salvador, Guatemala, and Honduras.

First, government-wide country strategies contain few objectives to provide human rights training to police. Of the three current government-wide Integrated Country Strategies for El Salvador, Guatemala, and Honduras, only the document for El Salvador contains an objective to provide human rights training to police (see table 1).

**Table 1: Human Rights Police Training Objectives in Integrated Country Strategies for El Salvador, Guatemala, and Honduras for Fiscal Years 2014–2017**

Country	Integrated Country Strategy fiscal years 2014–2016	Integrated Country Strategy fiscal years 2016–2017
El Salvador	○	●
Honduras	●	○
Guatemala	○	○

Legend: ● = includes an objective; ○ = does not include an objective

Source: GAO analysis of Integrated Country Strategies. | GAO-18-618

Officials from INL, the State bureau responsible for achieving the human rights police training objective for El Salvador, noted that efforts related to this objective have focused on institutionalizing human rights training through the country’s police academy. State officials did not know why the strategy for Honduras for fiscal years 2016 and 2017 lacked such an objective while the strategy for fiscal years 2014 through 2016 included one. Similarly, officials did not know if the officials who drafted the Integrated Country Strategy for Guatemala for fiscal years 2016 and 2017 had considered including an objective to train police in human rights.<sup>16</sup>

Second, police assistance project documents also vary in the extent to which they include objectives or other internal control mechanisms to ensure human rights content is incorporated in police training. Further,

<sup>16</sup>The Integrated Country Strategy for Guatemala for fiscal years 2016 and 2017 includes an objective to provide human rights training specifically for the military.

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agencies also vary in the extent to which they included respect for human rights in police training delivered during fiscal years 2014 through 2017.

Department of Defense (DOD)

DOD has not established specific objectives to train police on human rights, but internal control mechanisms, such as written policies, have helped ensure that training DOD delivers to police consistently incorporates content on respect for human rights, according to agency officials. As mentioned previously, DOD primarily provides training for partner nation militaries and national security forces and does not have strategic objectives specific to training civilian police. Nonetheless, the U.S. Southern Command (SOUTHCOM)—whose area of responsibility includes El Salvador, Guatemala, and Honduras—uses a written policy to require that all SOUTHCOM-sponsored operational and intelligence training provided to security forces contain a human rights component.<sup>17</sup>

Further, in fiscal year 2017, DOD’s Global Train and Equip Program consolidated some types of assistance DOD had previously used to provide training for foreign security forces in El Salvador, Guatemala, and Honduras.<sup>18</sup> The legal authority for this program requires that projects executed under the authority include elements that promote observance of and respect for the law of armed conflict, human rights and fundamental freedoms, the rule of law, and civilian control of the military.<sup>19</sup>

DOD officials explained that based on these requirements, human rights training was either imbedded in or provided as a component of all DOD training delivered to security forces, which they stated generally focused on operational or tactical topics. We reviewed agendas for training that

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<sup>17</sup>Department of Defense, United States Southern Command, *Regulation 1-20, Human Rights Policy and Procedures* (Doral, Fla: Apr. 25, 2011).

<sup>18</sup>For additional information on the Global Train and Equip program, see GAO, *Counterterrorism: DOD Should Enhance Management of and Reporting on Its Global Train and Equip Program*, [GAO-16-368](#) (Washington, D.C.: Apr. 18, 2016) and *Counterterrorism: DOD Should Fully Address Security Assistance Planning Elements in Global Train and Equip Project Proposals*, [GAO-18-449](#) (Washington, D.C.: May 30, 2018.)

<sup>19</sup>10 U.S.C. § 333(c)(2). In addition, 10 U.S.C. § 333(c)(3) requires the Secretary of Defense to certify, prior to the initiation of a Section 333 capacity building program, that the Department of Defense is already undertaking, or will undertake as part of the security sector assistance provided to the foreign country concerned, human rights training that includes a comprehensive curriculum on human rights and the law of armed conflict, as applicable, to such national security forces.

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DOD officials identified as having included police participants, and found such content. For example, the agenda for a 4.5-day training on the legal aspects of combatting terrorism delivered by DOD's Defense Institute of International Legal Studies to Salvadoran security force participants, among whom were 12 civilian police, included at least 5 hours of training on human rights topics such as international law and the proper use of force.

U.S. Agency for International  
Development (USAID)

While USAID has established few specific objectives or other internal control mechanisms to include human rights content in police training, according to USAID officials, training delivered to police in El Salvador, Guatemala, and Honduras during fiscal years 2014 through 2017 included content on respect for human rights. Our analysis of project documents related to the eight USAID projects that officials identified as including police assistance in fiscal years 2014 through 2017 found that two projects included objectives to provide police training specifically on human rights. For example, the USAID-funded Rights and Dignity Project for El Salvador included an objective to provide human rights training to several security sector entities, including the country's national police. For a third project, USAID used an internal control mechanism to ensure human rights related content was included in police training. In this instance, the terms and conditions of USAID's cooperative agreement included technical direction to the implementer that substantive instruction should address issues of gender-based violence, a human rights concern pertinent in the recipient countries. The remaining five USAID projects included no objectives or other internal control mechanisms to ensure that human rights content was incorporated. USAID officials explained that project documents did not include specific objectives to provide police training on respect for human rights because USAID projects generally have broader goals that are not specific to training police.

Despite having few specific objectives or other internal control mechanisms intended to ensure that police training includes human rights content, USAID officials told us that USAID-funded police training delivered in fiscal years 2014 through 2017 consistently included such content. For example, according to these officials, training on community policing constituted a significant portion of police-related assistance in El Salvador, Guatemala, and Honduras, and USAID's civilian policing policy guidance identifies respect for human rights as a core component of its

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community policing curriculum.<sup>20</sup> Further, USAID officials posted in El Salvador, Guatemala, and Honduras, noted that police training delivered in each country incorporated human rights precepts. For example, in Honduras, USAID officials said the agency's efforts included training police on human rights issues specifically to improve police engagement with vulnerable populations such as women and members of the lesbian, gay, bisexual, and transgender community.

In addition to the information provided by USAID officials we spoke with, we reviewed reports from USAID's implementing partners that contained information about police training delivered in fiscal years 2014 through 2017, some of which noted content related to human rights. For example, one implementing partner reported on providing training that included content on human rights, ethics, and the proper use of force. USAID officials told us that the decision to include training on respect for human rights is based on a series of factors, including USAID staff discretion, and noted that an internal control mechanism would help ensure that officials consistently consider the extent to which content related to respect for human rights would be appropriate to include in police training.

Department of State (State)

State has not established specific objectives or other internal control mechanisms to ensure police training incorporates content promoting respect for human rights. We reviewed documents related to 14 INL-funded projects for El Salvador, Guatemala, and Honduras that officials identified as including assistance for police and that were implemented in fiscal years 2014 through 2017. None of the project documents we reviewed for the 14 INL-funded projects included police training objectives or other internal control mechanisms related to human rights.<sup>21</sup> Officials explained that they do not have specific objectives to provide training on

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<sup>20</sup>United States Agency for International Development, *A Field Guide for USAID Democracy and Governance Officers: Assistance to Civilian Law Enforcement In Developing Countries* (January 2011).

<sup>21</sup>Among the 14 INL-funded projects we reviewed was one implemented by DOJ's International Criminal Investigative Training Assistance Program that included an objective to mentor, but not train, police in El Salvador on ethics and human rights. We did not include this mentoring objective among those related to police training because of the differences INL identifies between *training*—defined as formalized learning experiences that use a prescribed curriculum to transfer practical knowledge and skills—and *mentoring*—a dynamic, collaborative, reciprocal, and sustained relationship between an experienced and a less-experienced professional focused on the transfer of knowledge and skills.

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respect for human rights because they have designed objectives with a broader focus, such as to reduce insecurity and corruption. However, they agreed that establishing internal control mechanisms specific to human rights could help ensure training includes such content as appropriate.

Although State has not established objectives or other internal control mechanisms to ensure that human rights content is included in police training, State officials told us that some INL-funded police training includes such content. For example, the ILEA program offers training that includes human rights content, such as its Human Rights course. However, ILEA and other INL-funded training implementers also offer training of a technical nature, such as first responder training and crime scene management, which may not warrant inclusion of human rights content. Officials also explained that because training content is developed and maintained by INL's implementing partners, INL could not readily provide detailed information on the content of the training delivered to police. These officials said that the implementing partners, such as ILEA and other U.S. agencies, could provide more specific information on the content of INL-funded training.

Our analysis of ILEA training delivered to police from El Salvador, Guatemala, and Honduras during fiscal years 2015 through 2017 found that 84 of 189 courses (or 44 percent) focused on or included content related to human rights.<sup>22</sup> For example, the ILEA Human Rights course included content on fundamental human rights and relevant issues and challenges in participants' countries. The ILEA Human Trafficking and Child Exploitation course included human rights content related to minority rights and vulnerable populations. Officials explained that some training, such as courses on crime scene management and other courses on topics of a technical nature, may not warrant the inclusion of content related to human rights.

Absent objectives from State to deliver training to promote respect for human rights, officials from 10 key DHS and DOJ offices that implement INL-funded police training noted various extents to which respect for human rights is included in police training they deliver. For example,

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<sup>22</sup>To determine the extent to which ILEA training incorporated content related to human rights, we analyzed course descriptions in course catalogs and other relevant documents related to 189 training courses ILEA reported to have delivered to participants from El Salvador, Guatemala, and Honduras during fiscal years 2015 through 2017. For more detail, see app. I.

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officials from DOJ's Bureau of Alcohol, Tobacco, Firearms, and Explosives noted that they have delivered training on topics such as post-blast investigations and the eTrace firearms tracing system that does not warrant the inclusion of content related to respect for human rights. Officials from DHS's U.S. Customs and Border Protection noted that police training they deliver, such as on conducting highway checkpoints, does not specifically address respect for human rights but contains best practices grounded in respect for human rights. Officials from 1 of the 10 offices we contacted—DOJ's International Criminal Investigative Training Assistance Program—noted that all INL-funded police training that it delivered included a human rights component.

While there is no requirement that all State- and USAID-funded police training include human rights content, these agencies consistently emphasize the importance of building police and other security forces that respect human rights. By establishing specific objectives in government-wide strategies or project-specific work plans or other internal control mechanisms, such as written policies, State and USAID could help ensure that police training incorporates human rights content, or continues to do so, as appropriate. Further, without such objectives or internal control mechanisms, it may be difficult for these agencies to account for the extent to which implementing partners include human rights content or to assess progress being made with respect to partner nation police forces' respect for human rights—a key goal of U.S. strategy in Central America.

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## Agencies Collect Some Information on the Number of Police Trained, but State Lacks Readily Available, Reliable Data on This Indicator

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### DOD and USAID Have Collected Some Information on the Number of Police Trained

While DOD and USAID training for recipients in the Northern Triangle may include police participants, police training is not a primary element of DOD and USAID assistance in El Salvador, Guatemala, and Honduras. Neither agency collects data in relation to a specific indicator on police training. Nonetheless, both agencies gather some information regarding civilian police they have trained.

DOD's primary security assistance objectives in El Salvador, Guatemala, and Honduras pertain to partner nation militaries; thus the agency does not collect data in relation to specific police training indicators.<sup>23</sup> Nevertheless, information on training participants from civilian institutions such as police forces is available, according to DOD officials. For example, DOD officials identified civilian police participants from El Salvador and Guatemala who participated in DOD's Defense Institute of International Legal Studies training events during fiscal year 2013.<sup>24</sup> Further, the Foreign Military Training report tracks DOD training and

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<sup>23</sup>The DOD plan covering fiscal years 2016 and 2017 efforts in Honduras included an objective to improve civil-military relations with human rights nongovernmental organizations. While this objective is not specific to providing training to police on human rights, one of the tasks outlined to address the objective included conducting human rights mobile education team events with military, civilian, and nongovernment officials. The sole indicator established for this objective and task was to track whether nongovernment participants attended.

<sup>24</sup>DOD Officials identified one fiscal year 2013 Defense Institute of International Legal Studies training event for each of El Salvador and Guatemala that included civilian police. While we focus our reporting on fiscal years 2014 through 2017, we included these examples because officials from the Defense Institute of International Legal Studies did not identify any relevant training for which police from El Salvador, Guatemala, and Honduras were noted as participants during fiscal years 2014 through 2017.

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includes participants' units, which can be used to identify police and other civilian trainees.<sup>25</sup> For instance, the report for fiscal years 2014 and 2015 identifies a 3-month counterdrug course delivered in fiscal year 2014 to 200 members of the elite Honduran police unit, the TIGRES. DOD also included police participants in courses primarily attended by military officials. For example, the report for fiscal years 2016 and 2017 indicated 3 members of the Salvadoran National Police attended a fiscal year 2016 course titled "Countering Transnational Threats in the Americas," along with at least 20 military officials.

USAID's assistance in El Salvador, Guatemala, and Honduras consists of broader security sector reform efforts that include, but do not focus on, police training. Hence, USAID does not have indicators to specifically track police training. Consequently, officials explained that the level of detail that implementing partners reported on police training would vary project by project and would most likely be found in project-level reporting submitted by implementing partners. We reviewed quarterly and annual reports for USAID projects we included in our analysis and found examples of various levels of detail regarding the number of police trained. For example:

- In reporting on efforts to improve security in Honduras by increasing the capacity of community members and police, the implementing partner of USAID's *Convive!* project noted that they had delivered training on community policing to 447 officers from April 2016 to June 2017.
- The implementing partner of USAID's Security and Justice Sector Reform project in Guatemala reported holding workshops to build investigators' capacity to gather information, write reports, and plan operations in a way that respects human rights, but the implementing partners' reports did not specify the number of participants in those workshops.
- USAID's implementing partner for its Justice Sector Strengthening project in El Salvador submitted a report on activities during October through December 2017 noting that they had (1) trained 150 officers in the fundamentals of community policing and (2) supported workshops on human rights, ethics, and the proper use of force for 113 officers.

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<sup>25</sup>See Department of Defense and Department of State, *Foreign Military Training: Fiscal Years 2014 and 2015 Joint Report to Congress*, Volume 1.

**State Lacks Readily Available, Reliable Data on the Total Number of Police Trained**

State is responsible for tracking progress toward a key indicator related to training police in El Salvador, Guatemala, and Honduras. Objective 3.1 of the *U.S. Strategy for Central America* is to “Professionalize Civilian Police,” and a related indicator is the “number and percentage of civilian police trained by INL.” However, INL officials in Washington, D.C., told us that while they collect data for certain types of police training, such as training provided through the ILEA program, they do not have reliable information readily available on the total number of police trained through INL-funded projects.

INL collects some information on the number of police trained through efforts that it funds.<sup>26</sup> For instance, officials from INL’s ILEA program were readily able to provide us with data showing that the program had provided 252 training courses to more than 1,600 police participants from El Salvador, Guatemala, and Honduras during fiscal years 2014 through 2017 (see table 2).<sup>27</sup>

**Table 2: Number of Salvadoran, Guatemalan, and Honduran Police Trained at State’s International Law Enforcement Academies (ILEA), Fiscal Years 2014–2017**

Country	2014	2015	2016	2017	Total
El Salvador	185	221	249	200	855
Guatemala	133	107	58	97	395
Honduras	110	117	68	89	384
<b>Total</b>	<b>428</b>	<b>445</b>	<b>375</b>	<b>386</b>	<b>1,634</b>

Source: GAO analysis of ILEA data. | GAO-18-618

In response to our request for information about INL’s fiscal year 2014 through 2017 police training efforts delivered through implementing partners other than ILEA, INL officials told us that they did not have readily available data on the number of police trained in El Salvador, Guatemala, and Honduras. They noted that they could ask INL staff at the

<sup>26</sup>The implementing agreement for 1 of the 14 State-funded projects we reviewed included a provision requiring the implementing partner to collect information on the number of police trained. INL staff included information related to these indicators among fiscal year 2017 police training data provided to us.

<sup>27</sup>While we found significant weaknesses with other data provided by INL, we found the data specifically from INL’s ILEA program to be sufficiently reliable to report in detail. For more information, see app. I.

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U.S. embassies in those countries to manually compile data related to fiscal year 2017 training events, but that it would take officials months to produce similar data for prior fiscal years.

After we narrowed our data request to fiscal year 2017 training events only, data we received in April 2018 from the embassies indicated that about 8,400 police—about 3,000 from El Salvador, 4,600 from Guatemala, and 800 from Honduras—received training from ILEA, the Colombian National Police Training program, U.S. agency trainers, and other INL-funded implementing partners. However, our analysis found that the data State provided were unreliable in that they did not include training delivered by some implementing partners or align with other training data provided to us by implementing partners. For example:

- First, fiscal year 2017 data from INL in El Salvador included INL-funded training delivered by Colombian police and two nongovernment implementing partners but no training delivered by U.S. government implementing partners. However, State and DOJ officials in Washington, D.C., told us that DOJ's Drug Enforcement Administration and Federal Bureau of Investigation had delivered INL-funded courses to Salvadoran police during fiscal year 2017.
- Second, INL officials at the U.S. embassy in Guatemala told us that the training data they provided excluded training delivered by DOJ's Federal Bureau of Investigation and the Miami-Dade Police Department. These officials assured us that more complete data associated with additional police training activities did exist, but they stated that they did not include these data because doing so would have required them to collect and compile data from several different sources—a difficult and time-consuming effort.
- Third, data from INL officials at the U.S. embassy in Honduras were similarly unreliable in that they did not align with training data we collected from implementing partners. For example, embassy data indicated there were 6 police participants of a training provided by DOJ's Drug Enforcement Administration in Honduras, but DOJ reported that 34 Honduran police participated in the same training.
- Fourth, data from all three embassies included information about ILEA training that did not align with the data we received directly from the ILEA program. Officials from the U.S. embassy in Guatemala acknowledged that the ILEA data they had provided to us were likely unreliable. Officials from the ILEA program noted that they provide data on the number of police trained directly to

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headquarters INL officials who may have a need for such information.

INL officials at the U.S. embassies in the Northern Triangle agreed the fiscal year 2017 data they provided to us may be unreliable in that the data are incomplete and may be inconsistent with data available from implementing partners. Despite acknowledging the information they provided had problems with reliability, INL officials told us that they would use a similar process to compile data for reporting progress related to the *U.S. Strategy for Central America* indicator on the number and percentage of civilian police trained by INL.

In May 2018, State and USAID issued the first report to Congress on results of that strategy, which included data on the number of civilian police from El Salvador, Guatemala, and Honduras that INL trained during fiscal year 2017.<sup>28</sup> Although INL officials told us that they used the same process to provide data to us in April 2018 and to compile data for the May 2018 report, we found the two sets of data differed.<sup>29</sup> INL officials explained that these discrepancies were because State included training delivered to additional types of police and by more training implementers in its May 2018 report than they included in the data provided to us in April 2018.<sup>30</sup> Despite identifying reasons for these discrepancies, INL officials acknowledged their data collection process is decentralized and agreed that improvements could be made in the availability and reliability of the data on the number of police trained. Moreover, INL noted challenges collecting these data. Specifically:

- INL officials from U.S. embassies in the Northern Triangle responsible for collecting police training data noted that a large number of implementing partners deliver training, which makes collecting data more difficult. These officials told us they are beginning to use a smaller number of institutions, such as local police academies, where implementing partners deliver INL-

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<sup>28</sup>U.S. Department of State and the U.S. Agency for International Development, *Progress Report for the United States Strategy for Central America's Plan for Monitoring and Evaluation* (May 2018).

<sup>29</sup>The May 2018 progress report data on fiscal year 2017 civilian police trainees from El Salvador, Guatemala, and Honduras included about 5,000 trainees more than the data provided to us in April 2018—a difference of more than 60 percent.

<sup>30</sup>For example, data in the May 2018 report include training supported by INL but delivered by the Honduran National Police, which was not included in the April 2018 data that we analyzed.

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funded training. Officials believe this change has helped improve the reliability of their data on police training because a greater portion of the training is delivered through a small number of institutions, making it easier for implementing partners to track participation. However, the officials also noted that processes such as reviewing travel orders to find U.S. trainers who had visited the country and requesting data from individual implementing partners are still routinely employed to compile training data when such data are requested.<sup>31</sup>

- INL officials in Washington, D.C., where police training data are aggregated for reporting purposes, told us that it is difficult to compile reliable information in a timely manner. This is because embassies use unique processes and systems to collect information on police training events and the data collected are not systematically consolidated within the individual embassies or centrally at INL headquarters. Further, they explained that following the establishment of the *U.S. Strategy for Central America* State received increased funding for police training efforts, particularly in fiscal year 2016.<sup>32</sup> Although they used some of these funds to provide more training, they told us that INL was not fully prepared to implement proper internal control mechanisms to help ensure the collection of reliable data. According to these officials, this shortcoming was exacerbated by a worldwide hiring freeze for State that precluded INL from employing additional staff at the affected embassies to assist with data collection and analysis.

INL officials stated that they recognize that effective data collection is a necessary element of high quality monitoring and evaluation. For that reason, in September 2017, the INL office for Western Hemisphere Programs contracted a private firm to conduct data collection and develop a data management system for INL efforts throughout the hemisphere, including those related to police training. INL officials told us they intend to extend the contract for the optional second year and are considering the potential need to procure additional contractor services to continue

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<sup>31</sup>While helpful in determining that trainers from a U.S. government implementing partner traveled to an embassy, according to these officials, travel orders may not indicate what training was delivered and do not include a reliable number of participants, as the training would not have been delivered at the time the travel orders were processed.

<sup>32</sup>Specifically, INL officials reported that INL funding for Northern Triangle countries increased from \$25 million in fiscal year 2014 to \$125 million in fiscal year 2016.

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the effort after that. INL officials said that the contractors have made some progress toward the goals set forth in the contract but acknowledged that it is early in the process and that data reliability challenges remain. For example, according to agency officials, in June 2018, contractors were still developing a broad set of indicators related to INL efforts in the Western Hemisphere and had begun the process of collecting data related to some of them in June 2018. Further, the contractors reported that as of March 2018 they had yet to build a data management system or produce training materials and reporting templates for data collection.

Readily available and reliable data allow managers to make informed decisions and evaluate an entity's performance. Without such information, INL cannot accurately assess the number of police trained in the Northern Triangle—a key indicator in the *U.S. Strategy for Central America*. Further, it may be difficult to fully assess the extent to which training is having the desired effect.

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## Agencies Have Planned and Undertaken Various Actions to Support the Ability of Partner Nations to Sustain Police Training, Including for Human Rights

State, USAID, and DOD have established plans and taken action to support the ability of partner nations to sustain police training, including training on promoting respect for human rights. INL's *Sustainability Guide* defines sustainability as the ability of host-country partners and beneficiaries to take complete responsibility for the foreign assistance programming, and maintain or improve program outcomes and impacts beyond the life of the program and U.S. government funding.<sup>33</sup>

Government-wide and funding agency guidance discusses the importance of sustainability for police assistance. According to *Presidential Policy Directive 23 on Security Sector Assistance*, a principal goal is to help partner nations build sustainable capacity to address common security challenges. Guidance from agencies that fund police training—including State, USAID, and DOD—also stresses the importance of sustainability in assistance for police. For example, State's *INL Guide to Police Assistance* notes that police assistance projects should emphasize sustainable, institutional capacity building to achieve maximum effect. In line with such guidance, country-level and agency strategic and project documents have established objectives related to

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<sup>33</sup>Department of State, Bureau of International Narcotics and Law Enforcement Affairs, *Program Management Guides: Sustainability Guide*.

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sustaining police training. For example, the Integrated Country Strategy for Guatemala for fiscal years 2014 through 2016 has an objective to assist the government in establishing, training, and maintaining anti-gang investigative units. Agency police training project documents also address sustainability. For example, the interagency agreement between INL and DHS's U.S. Customs and Border Protection to enhance border security and build capacity in Honduras aims to create a trained law enforcement unit that is sustained by local resources.

To enhance the sustainability of police training programs, agency officials identified various activities they undertake, including the following:

- **Training-the-trainer.** State's *INL Guide to Police Assistance* states that train-the-trainer models can create a sustainable training program, and officials from multiple agencies told us that they use train-the-trainer programs to sustain police training. For example, the INL-funded Gang Resistance Education and Training program is a regional training program that trains police officers to teach children and young adults to resist the pressures to join gangs or engage in other risky behaviors. According to INL, this police training program has certified over 1,171 regional police officers as teachers and taught more than 211,000 at-risk youth in Central America.
- **Developing policy or guidance.** Officials from USAID stated that helping partner nations develop policy or guidance for law enforcement can help strengthen institutions and make police training more sustainable. For example, a USAID project in El Salvador supported the development of a new use-of-force policy that was adopted by the national police. Further, USAID supported the dissemination of the new policy by distributing 10,000 copies, training police instructors who subsequently taught the policy to other officers, and holding workshops on human rights, ethics, and the proper use of force.
- **Supporting police academies.** The ability of partner nations to incorporate and institutionalize training in their own police academies is among the most significant determinants of sustainability, according to U.S. officials from several agencies. For example, State officials said they try to incorporate curriculum from U.S. training into the law enforcement academies' training curriculum in partner nations. They said doing so has a more lasting effect than individual training events and leads to the host government paying for the training going forward. In El Salvador, USAID developed community policing training in conjunction with

the civilian national police that, according to officials, is now administered to every new police officer in the country at the country's National Academy of Public Security (see fig. 4). At the same institution, INL supported the development of online training that includes a human rights component. According to INL officials, the Salvadoran police were planning to make the online training a yearly continuing education requirement for the entire police force.

**Figure 4: Academia Nacional de Seguridad Pública (National Academy of Public Security) in Santa Tecla, El Salvador, Showing Interior Courtyard (left) and Classrooms (right)**



Source: GAO. | GAO-18-618

- **Continuing engagement.** Officials from various agencies told us that continuing engagement with participants helps sustain police training, whether through additional training, on-the-job mentorship, or service requirements for receiving training. For example, the ILEA academy in San Salvador provides a list of alumni to the U.S. Embassy San Salvador and encourages implementing partners to follow up with these alumni, according to officials. The San Salvador academy also plans to develop an online alumni portal for engaging with past participants in order to sustain training.
- **Building relationships.** Building relationships—both within and across countries—between partners' law enforcement agencies and rule of law institutions can help sustain police training,

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according to officials from multiple agencies. For example, in 2013, DOD's Defense Institute of International Legal Studies conducted border security training in El Salvador that included military, police, and civilian officials. The training focused on improving El Salvador's interagency cooperation and enhancing respect for human rights. To build and sustain relationships across countries, DOJ's Federal Bureau of Investigation holds an annual training conference that brings together vetted police units from various partner nations, according to officials.

- **Developing civil society.** Officials from both State and USAID told us that police reform efforts are more sustainable if there are parallel civil society organizations that can advocate for accountability from police and other law enforcement institutions. USAID works with civil society and community organizations to track police abuses, including human rights violations. Officials said that external monitoring can promote the transparency, accountability, and effectiveness of the police. For example, USAID's Justice, Human Rights, and Security Strengthening project in Honduras seeks to build the capacity of civil society organizations to advocate for vulnerable groups and victims of human rights abuses.

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## Conclusions

Civilian police forces that protect human rights are essential to functioning democracies, and U.S. agencies recognize that it is important to include respect for human rights in training provided to partner nation security forces, including police. The need to bolster respect for human rights among security forces is specifically emphasized in assistance strategies for El Salvador, Guatemala, and Honduras—three countries with notable histories of human rights violations by security forces, according to State and USAID. However, unlike DOD, which has written policies requiring the inclusion of human rights content in its training, State and USAID have few such formal mechanisms to ensure human rights content is appropriately included. Creating internal control mechanisms, such as objectives or directives to training implementing partners, would help ensure that State- and USAID-funded police training is consistent with U.S. government and agency priorities in including content related to respect for human rights as appropriate. Such control mechanisms would also enable the agencies to better account for implementing partners' related activities. In addition, State lacks a standardized process to readily compile reliable data on the total number of police trained through INL-funded programs in the Northern Triangle countries. Without such data, State cannot reliably report on progress toward the *U.S. Strategy for*

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*Central America* and thus cannot accurately assess the efficacy of such training. Addressing these two gaps—establishing internal control mechanisms related to human rights training content and improving police training data—would better position State to assess the outcomes of such training, the results of which could inform future funding and sustainment decisions.

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## Recommendations for Executive Action

We are making a total of three recommendations, including two to State and one to USAID:

The Secretary of State should ensure that the Bureau of International Narcotics and Law Enforcement Affairs (INL) designs internal control mechanisms to ensure human rights content is included in INL-funded police training for El Salvador, Guatemala, and Honduras as appropriate. (Recommendation 1)

The Secretary of State should ensure that the Bureau of International Narcotics and Law Enforcement Affairs (INL) develops and implements a process to collect more reliable data on the number of police trained through INL-funded efforts in El Salvador, Guatemala, and Honduras. (Recommendation 2)

The Administrator of USAID should design internal control mechanisms to ensure human rights content continues to be included in USAID-funded police training for El Salvador, Guatemala, and Honduras as appropriate. (Recommendation 3)

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## Agency Comments and Our Evaluation

We provided a draft of this product, which included three recommendations, to DHS, DOD, DOJ, State, and USAID for comment. State provided written comments, which we have reprinted in appendix II, concurring with our two recommendations to the agency. In response to the first recommendation, State noted that INL intends to amend templates for relevant implementing documents to address human rights as appropriate. In response to the second recommendation, State commented that, partly in response to our report, INL is developing specific indicators related to INL-funded police training. USAID also provided written comments, which we have reprinted in appendix III, concurring with our recommendation, and detailed two related policy revisions it intends to implement in response. State, DHS, and DOD provided technical comments, which we incorporated as appropriate. DOJ reviewed the report but did not provide comments.

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We are sending copies of this report to the appropriate congressional committees; the Secretaries of Defense, Homeland Security, Justice, and State; and the USAID Administrator. 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) 512-7141 or [GroverJ@gao.gov](mailto:GroverJ@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 IV.

A handwritten signature in black ink that reads "Jennifer Grover". The signature is written in a cursive, flowing style.

Jennifer Grover  
Director, International Affairs & Trade

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*List of Committees*

Chairman  
The Honorable Jack Reed  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Bob Corker  
Chairman  
The Honorable Bob Menendez  
Ranking Member  
Committee on Foreign Relations  
United States Senate

The Honorable Richard Shelby  
Chairman  
The Honorable Richard Durbin  
Ranking Member  
Subcommittee on Defense  
Committee on Appropriations  
United States Senate

The Honorable Lindsey Graham  
Chairman  
The Honorable Patrick Leahy  
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Subcommittee on State, Foreign Operations, and Related Programs  
Committee on Appropriations  
United States Senate

The Honorable Mac Thornberry  
Chairman  
The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

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The Honorable Edward Royce  
Chairman  
The Honorable Eliot Engel  
Ranking Member  
Committee on Foreign Affairs  
House of Representatives

The Honorable Kay Granger  
Chairwoman  
The Honorable Peter Visclosky  
Ranking Member  
Subcommittee on Defense  
Committee on Appropriations  
House of Representatives

The Honorable Hal Rogers  
Chairman  
The Honorable Nita Lowey  
Ranking Member  
Subcommittee on State, Foreign Operations, and Related Programs  
Committee on Appropriations  
House of Representatives

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# Appendix I: Scope and Methodology

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Senate Report 115-125 accompanying the National Defense Authorization Act for Fiscal Year 2018 includes a provision for us to report on various aspects of U.S. police training efforts in El Salvador, Honduras, and Guatemala. In this report, we examine, for the Northern Triangle, (1) the extent to which U.S. agencies have established objectives for and delivered training to professionalize police, including promoting respect for human rights; (2) the extent to which agencies have collected data related to police training indicators; and (3) the actions U.S. agencies have planned and undertaken to support the ability of partner nations to sustain police training.

To address these objectives, we reviewed government-wide and agency strategies, guidance documents, project documents such as work plans, and reports from the U.S. Departments of State (State) and Defense (DOD), and the U.S. Agency for International Development (USAID). We focused on State and USAID because officials identified them as the primary funders of police training in El Salvador, Guatemala, and Honduras. While DOD primarily provides assistance to military and other national security entities, we included DOD in our analysis because some of the training funded by the agency includes police participants. We included police training implemented by the Departments of Justice (DOJ) and Homeland Security (DHS) when their training efforts were funded by State, DOD, and USAID, but not separate efforts funded by DOJ and DHS. In addition to reviewing documents, we conducted fieldwork in El Salvador and interviewed agency officials in Honduras; Guatemala; and Washington, D.C., who oversee and conduct police training.

To determine the extent to which U.S. agencies have established objectives for and delivered training to professionalize police, including promoting respect for human rights, we reviewed agency documents and assessed them against federal standards for internal control, which state that management should set objectives or other control mechanisms to meet an entity's mission, strategic plan, and goals.<sup>1</sup> Our analysis included U.S. global, regional, and country-specific strategies such as government-wide Integrated Country Strategies and DOD country security assistance plans for El Salvador, Guatemala, and Honduras. Officials from DOD, State, and USAID told us that all agency-funded classroom training delivered to police in El Salvador, Guatemala, and Honduras is done to

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<sup>1</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

professionalize those forces, of which training to promote respect for human rights may be one element. We also reviewed documents from DOD, USAID, and State about police assistance efforts implemented during fiscal years 2014 through 2017 that agencies identified as projects that included assistance for police in El Salvador, Guatemala, and Honduras. Specifically, we reviewed 22 projects—14 funded by State and 8 funded by USAID—that the agencies identified as including assistance for police. The projects and documents we identified for each agency are as follows:

- We reviewed DOD strategic plans covering assistance for El Salvador, Guatemala, and Honduras during fiscal years 2014 through 2017 and found that they did not contain objectives to specifically train police. DOD officials confirmed that security assistance they provide is focused on military recipients and that they had no projects to specifically provide assistance to civilian police. Thus, we determined that no DOD projects would be included in our review of project documents to identify objectives related to training to professionalize police.
- USAID provided a list of USAID-funded efforts in El Salvador, Guatemala, and Honduras implemented during fiscal years 2014 through 2017. Among the projects were eight with funds used for police training, which we included in our review. USAID provided work plans for six of the eight projects. For the remaining two projects, USAID did not identify similar project work plans, so we identified alternative documents to use for our analysis. For one of them, we used a progress report submitted to USAID by the contractor that included a project work plan specifically for fiscal year 2016. For the other, we used a final evaluation report that included the objectives of the project.
- State identified efforts funded by its Bureau of International Narcotics and Law Enforcement Affairs (INL) in El Salvador, Guatemala, and Honduras implemented during fiscal years 2014 through 2017. Because INL assistance generally includes police among target recipients of assistance, we requested project documents for all of the efforts State identified. We worked with State officials to identify project documents that included work plans or other summaries that identified objectives for these State-funded efforts. Ultimately, State provided documents for 19 projects. Based on our review of those documents, we determined 5 of the projects should not be included in our review for one or more of the following reasons: They (a) were not implemented during fiscal years 2014 through 2017, (b) did not provide

assistance to police, or (c) did not have sufficient documentation provided by State to conduct our analysis. Among State efforts excluded from our scope due to insufficient documentation is State-funded training provided through the Colombian National Police. For the 14 projects that we included in our scope, we used documents such as work plans for our analysis of objectives.

For each of the 22 USAID and State police assistance projects we reviewed, we analyzed related project documents, such as work plans or reports, to identify objectives or other internal control mechanisms related to police professionalization, including promoting respect for human rights. To do so, we assessed these documents using definitions we developed based on our analysis and discussions with agency officials, as follows:

- We defined “police” as civilian—not military—police, as well as other civilian law, customs, and maritime forces.
- We defined “training” as classroom-style training and workshops, not including mentoring or technical assistance.
- We defined “objective” as any statement containing the words goal, objective, aim, intent, we will, or other statements with actionable items aimed at reaching an end state.
- We defined “professionalize” in line with agency officials’ descriptions of the term, using related words such as professionalism, professional competence, or capacity building.
- We defined “promotion of respect for human rights” to specifically include the phrase human rights or elements of human rights as defined in agency documents, such as the proper use of force and minority rights, and the United Nations Universal Declaration of Human Rights.

The project documents for the 22 projects in our scope were independently reviewed by two analysts. The analysts discussed and resolved any disagreements in their initial determinations about the extent to which project documents included relevant objectives or other internal control mechanisms.

With respect to our reporting on the extent to which training incorporated content to professionalize police, agencies lack a formal definition of what types of training constitute police professionalism. To better understand what types of training we should consider to be training to professionalize police, we interviewed officials at U.S. agencies that fund and execute

police training in El Salvador, Guatemala, and Honduras. Officials at agencies that fund and implement such training consistently described all training delivered to police to be training intended to professionalize recipients. Thus, for the purpose of this report, we defined training to professionalize police as all training provided to police and determined that all three agencies had delivered such training.

With respect to reporting on the extent to which training incorporated content related to human rights, we spoke with implementing partner officials and analyzed documents on police training, such as training agendas and course catalogs. To determine the extent to which training delivered by State's International Law Enforcement Academies program (hereafter referred to as ILEA) incorporated content related to human rights, we requested data from the program on the courses it provided to participants from El Salvador, Guatemala, and Honduras during fiscal years 2014 through 2017. We then analyzed the descriptions in fiscal years 2015, 2016, and 2017 course catalogs and embassy cables related to 189 training courses the ILEA program reported to have delivered to participants from El Salvador, Guatemala, and Honduras during fiscal years 2015 through 2017. For our analysis, we defined training to promote respect for human rights as training specifically addressing human rights or elements of human rights as defined in agency documents, such as the proper use of force and minority rights, and the United Nations Universal Declaration of Human Rights. If such human rights content was specified in the title or description of the course, we determined that the course included content related to human rights.

To determine the extent to which agencies have collected data on police training indicators, we analyzed agency documents to identify indicators related to police training and assessed related data against federal internal control standards, which call for agencies to have readily available, reliable data to track progress toward goals.<sup>2</sup> Specifically, we analyzed regional and country-specific strategies and the project documents described above to identify indicators directly related to objectives to provide police training. We identified, and agency officials confirmed, one key indicator in the *U.S. Strategy for Central America* for which State is responsible for collecting police training data. Specifically, objective 3.1 of the strategy is to "Professionalize Civilian Police," and a related indicator is the "number and percentage of civilian police trained

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<sup>2</sup>[GAO-14-704G](#).

by INL.” That national strategy assigns State responsibility for tracking that indicator. We asked State to provide us with fiscal year 2014 through 2017 information related to the indicator.

To assess the reliability of the data on participants of ILEA training events, we reviewed documents and interviewed cognizant officials about the ILEA Global Network, the program’s online system used to record all courses and participants receiving training provided by ILEA. For example, we determined that the ILEA program has (1) established and documented a process—described with clear steps in a user guide—to input accurate data and (2) periodically reviews the quality of that data. We determined that the data on ILEA training participation are sufficiently reliable for reporting on the number of police trained.

Beyond the ILEA data, INL initially responded to our data request by explaining the difficulties in providing the requested information and suggesting they could provide a more limited set of data. We modified our request to include only fiscal year 2017 data, which were compiled separately for El Salvador, Guatemala, and Honduras by the responsible INL staff at the U.S. embassy in each country. We then interviewed cognizant officials and compared the data State provided in April 2018 with information that (a) we received from implementing partners, including U.S. agencies, and (b) was reported in State’s May 2018 progress report on results of the *U.S. Strategy for Central America*. We determined that State does not have readily available, reliable data on the total number of police trained, which we report as a finding.

To determine actions U.S. agencies have planned and undertaken to support the ability of partner nations to sustain police training, including training to promote respect for human rights, we spoke with agency officials about related activities and analyzed project planning documents and reporting related to police assistance. Using this information, we determined the types of actions U.S. agencies had planned or undertaken and discussed these categories with agency officials to confirm that the categories accurately reflected agency actions.

We conducted this performance audit from October 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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

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United States Department of State  
*Comptroller*  
Washington, DC 20520

July 26, 2018

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

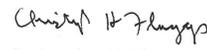
Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "CENTRAL AMERICAN POLICE TRAINING: State and USAID Should Ensure Human Rights Content is Included as Appropriate, and State Should Improve Data", GAO Job Code 102392.

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 Manuel Leon, Program Officer, Office of Western Hemisphere Programs, Bureau of International Narcotics and Law Enforcement Affairs at (202) 663-1363.

Sincerely,

  
Christopher H. Flagg

Enclosure:  
As stated

cc: GAO – Jenny Grover  
INL – Erin Barclay  
OIG - Norman Brown

State Department Response to GAO Draft Report

**CENTRAL AMERICAN POLICE TRAINING: State and USAID Should Ensure  
Human Rights Content is Included as Appropriate,  
and State Should Improve Data**  
(GAO 18-618, GAO Code 102392)

Thank you for the opportunity to comment on your draft report, *Central American Police Training: State and USAID Should Ensure Human Rights Content is Included as Appropriate, and State Should Improve Data*.

The Department strives to ensure foreign assistance supports U.S. national security goals and programs are accountable to the purposes for which Congress appropriated the funds. The Department concurs with Recommendations 1 and 2.

**Recommendation 1:** The Secretary of State should ensure that the Bureau of International Narcotics and Law Enforcement Affairs (INL) designs internal control mechanisms to ensure human rights content is included in INL-funded police training for El Salvador, Guatemala, and Honduras, as appropriate.

**Department Response:** INL training at the International Law Enforcement Academy (ILEA) in San Salvador for police from the Northern Triangle countries of El Salvador, Guatemala, and Honduras emphasizes police professionalization and respect for human rights. ILEA offers a stand-alone human rights course and includes human rights modules in a number of police training courses.

As noted in the draft report, while there is no requirement for all Department-funded police training to include human rights content and the Department includes human rights in existing training, the Department concurs specific objectives in government-wide strategies or project-specific work plans would help ensure police training incorporates human rights, as appropriate. To further address Recommendation 1, INL intends to amend templates for interagency agreements and other implementing documents involving police training specifically to address human rights, as appropriate. INL will also review new strategic documents to address the inclusion of human rights training, as appropriate.

**Recommendation 2:** The Secretary of State should ensure that the Bureau of International Narcotics and Law Enforcement Affairs (INL) develops and implements a process to collect more reliable data on the number of police trained through INL-funded efforts in El Salvador, Guatemala, and Honduras.

**Department Response:** INL has a well-defined process for collecting data on the number of criminal justice officials trained at ILEA facilities. ILEA course participants self-register using a secure registration portal known as the ILEA Global Network (IGN), view training curriculum, and complete course evaluations.

To further address Recommendation 2, INL awarded a Monitoring and Evaluation (M&E) contract to develop comprehensive metrics and collect more reliable data across its programs in

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the Western Hemisphere. This contract includes placing M&E specialists in the hemisphere, including in each of the Northern Triangle embassies. As part of this effort, INL is developing specific indicators related to INL-funded police training, partly in response to this GAO report. INL is also working with U.S. government implementing partners to improve and streamline quarterly reporting, including policetraining data.

**Conclusion:** The Department appreciates the opportunity to comment on the draft report and is committed to implementing the two recommendations as a part of our continued efforts to improve accountability of U.S. foreign assistance programs. We look forward to receiving the final report and updating you on our progress.

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



July 27, 2018

Jenny Grover  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, D.C. 20548

Re: CENTRAL AMERICAN POLICE TRAINING: State and USAID Should Ensure Human Rights Content Is Included as Appropriate, and State Should Improve Data (GAO-18-618)

Dear Ms. Grover:

I am pleased to provide the formal response of the United States Agency for International Development (USAID) to the draft report of the U.S. Government Accountability Office (GAO) entitled, "*CENTRAL AMERICAN POLICE TRAINING: State and USAID Should Ensure Human Rights Content Is Included as Appropriate, and State Should Improve Data*" (GAO-18-618).

The report contains one recommendation for USAID to design internal-control mechanisms to ensure the continued inclusion of human-rights content in USAID-funded training of police forces in El Salvador, Guatemala, and Honduras. We fully agree with this recommendation, and will address it through the policy revisions described in the attached enclosure. Professionalization of police is a cornerstone of USAID's assistance to the region, and a critical element in repairing police-community relations to reduce violence, one of the primary drivers of illegal migration to the United States.

I am transmitting this letter and the enclosed USAID comments for incorporation as an appendix to the GAO's final report. Thank you for the opportunity to respond to your draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of this program. The GAO's evaluations provide a valuable opportunity to assess and improve upon our policies, procedures, and programs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angelique M. Crumbly".

Angelique M. Crumbly  
Acting Assistant Administrator  
Bureau for Management

Enclosure: a/s

**COMMENTS BY THE UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT ON THE DRAFT REPORT PRODUCED BY THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO) ENTITLED, –“CENTRAL AMERICAN POLICE TRAINING: State and USAID Should Ensure Human Rights Content Is Included as Appropriate, and State Should Improve Data” (GAO-18-618)**

The draft report has one recommendation for the United States Agency for International Development (USAID), as shown on page 23:

**Recommendation:** The USAID Administrator should design internal control mechanisms to ensure human rights content continues to be included in USAID-funded police training in El Salvador, Guatemala, and Honduras, as appropriate.

**Action Plan:** USAID concurs with the GAO’s recommendation to design internal- control mechanisms to ensure the continued inclusion of human-rights content in USAID-funded training, in El Salvador, Guatemala, and Honduras.

As the GAO rightly notes, the *U.S. Strategy for Central America*, under which all USAID-funded training in the region falls, emphasizes that the U.S. Government’s security assistance should address corruption, promote government transparency, and protect human rights. A significant portion of USAID police-training assistance promotes community policing, and is consistent with the Agency’s *Field Guide for USAID Democracy and Governance Officers: Assistance to Civilian Law Enforcement in Developing Countries*, which treats human rights as a core component of any community-policing curriculum. The professionalization of police is a cornerstone of USAID’s assistance to the region, and a critical element in repairing police-community relations to reduce violence, one of the primary drivers of illegal migration to the United States.

Because of the particular sensitivities regarding police assistance, USAID’s use of “notwithstanding” authority to permit assistance to police is already subject to two internal controls. The first is a checklist of statutory requirements, which, according to Automated Directives System (ADS) Chapter 201mad, Legal Requirements Summary Checklist, is a mandatory, annual pre-obligation requirement to ensure the compliance of our implementing partners with prohibitions and restrictions at the country and activity level. The second is the annual concurrence process for police assistance managed by USAID’s Bureau for Latin America and Caribbean (LAC). According to Chapter Two of LAC’s Operating Procedures, any assistance to police must obtain approval through the Bureau’s Assistant Administrator on an annual basis.

To implement GAO’s recommendation, USAID will carry out two policy revisions—including one to the controls of our process to exercise notwithstanding authority—at key stages of our Program Cycle, to codify a human-rights focus in ongoing and activities in the region related to the training of police.

First, USAID will amend Project and Activity Design Mission Orders to ensure the consideration of human-rights objectives and content in the design of any activity that features police assistance in El Salvador, Guatemala, and Honduras. If none is included, a written justification will be required to document the Operating Unit’s (OU) rationale for excluding it.

Second, USAID will incorporate the mandatory consideration of human-rights content, in both our

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

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checklists of statutory requirements and annual approval process for all USAID-funded training of police in El Salvador, Guatemala, and Honduras. This will apply specifically to investments in police assistance for which the Agency invokes notwithstanding authority under Section 7049 of the Department of State, Foreign Operations, and Related Programs Appropriations Act (SFOAA), which authorizes the use of funds to, “enhance the effectiveness and accountability of civilian police authority through *human rights training* and through the promotion of civilian police roles that support democratic governance...” (emphasis added). For both of these processes, Operating Units that fund police assistance in El Salvador, Guatemala, and Honduras must formally document whether our programs include human-rights content.

**Target Completion Date:** USAID will complete the two above-mentioned policy revisions by October 1, 2018.

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Jennifer Grover, (202) 512-7141 or [GroverJ@gao.gov](mailto:GroverJ@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Biza Repko (Assistant Director), Drew Lindsey (Assistant Director), Kathryn Bolduc (Analyst-in-Charge), Ashley Alley, David Dayton, Martin de Alteriis, Gretta Goodwin, Dawn Locke, Stevenson Ramsey, James Reynolds, Cary Russell, and Brian Wanlass made key contributions to this report. Neil Doherty also provided technical assistance.

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