



May 2021

FOREIGN ASSISTANCE

State Department Should Better Assess Results of Efforts to Improve Financial and Some Program Data



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GAO@100 Highlights

Highlights of [GAO-21-373](#), a report to congressional requesters

Why GAO Did This Study

Members of Congress, the State Inspector General, and GAO have raised concerns about State's ability to adequately track and report its foreign assistance data. These concerns include State's ability to retrieve timely and accurate data necessary to provide central oversight, meet statutory and regulatory reporting requirements, manage resources strategically, and assess program performance. In response, State began an initiative in 2014 to improve the quality and availability of foreign assistance data. GAO was asked to review State's plan to improve the tracking and reporting of its foreign assistance data. This report assesses (1) the status of State's plan to improve the tracking and reporting of its foreign assistance data and (2) the extent to which State's plan adheres to sound planning practices.

GAO reviewed State documents on the plan to improve the tracking and reporting of its foreign assistance data. GAO reviewed implementation of the State plan against specific milestones in the plan. GAO also evaluated if the plan included key elements for sound management and strategic planning. In addition, GAO interviewed State officials in Washington, D.C.

What GAO Recommends

GAO recommends that the Secretary of State direct the Director of the Office of Foreign Assistance to improve the monitoring and evaluation of the FADR effort. State concurred with this recommendation.

View [GAO-21-373](#). For more information, contact Jason Bair at (202) 512-6881 or bairj@gao.gov.

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State Department Should Better Assess Results of Efforts to Improve Financial and Some Program Data

What GAO Found

The Department of State has implemented most of the Foreign Assistance Data Review (FADR) plan to improve the tracking and reporting of its foreign assistance data. According to State officials, they began developing the FADR plan in 2014 and focused on modifying State's existing agency-wide data systems to improve financial and related programmatic data for foreign assistance. As of December 2020, State had completed most of the activities detailed in the FADR plan, except for some FADR-related training initiatives that will continue in 2021. For example, State created the FADR Data Dictionary, which standardizes foreign assistance budget terminology and definitions across the agency, and added two data fields—benefitting country and program area—to its data systems. Other activities included updating system design; conducting integration testing between source systems and financial systems; and developing training materials.

State's FADR plan generally or partially addressed key elements of sound planning. GAO evaluated the FADR plan against nine key elements of sound planning it identified as relevant to implementation plans. GAO found that the plan generally addressed four elements and partially addressed five (see figure).

Evaluation of the Department of State's Foreign Assistance Data Review (FADR) Plan by Key Elements of Sound Planning Identified by GAO

Element	Did the FADR plan address the element?
Purpose and scope	●
Desired results	●
Hierarchy of goals and subordinate objectives	●
Activities to achieve results	●
Roles and responsibilities	◐
Intra-agency coordination mechanisms	◐
Resources to implement the plan	◐
Milestones and performance indicators	◐
Monitoring and evaluation	◐

Legend: ● Generally addressed ◐ Partially addressed ○ Did not address

Source: GAO analysis of Department of State documentation. | GAO-21-373

Since State has nearly completed implementation of its FADR plan, the monitoring and evaluation (M&E) component is the most critical remaining element of the partially addressed elements. GAO found that the M&E component of the plan was not well developed. The plan identifies some performance indicators and monitoring activities, but it does not clearly link those indicators to the desired results. The M&E component also does not identify how State plans to evaluate and use the monitoring data, such as better identification of benefitting country. Nor does it provide information on timeframes associated with the performance targets for the identified indicators. Identifying how the performance indicators link to desired results and the timeframes associated with performance targets, and periodically evaluating its monitoring data would help State assess the plan's effectiveness.

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Abbreviations

CGFS	Bureau of the Comptroller and Global Financial Services
DATA Act	Digital Accountability and Transparency Act of 2014
FADR	Foreign Assistance Data Review
FATAA	Foreign Aid Transparency and Accountability Act of 2016
GFMS	Global Financial Management System
IATI	International Aid Transparency Initiative
ILMS	Integrated Logistics Management System
RFMS	Regional Financial Management System
SAMS	State Assistance Management System
State	Department of State
State A	Bureau of Administration
State F	Office of Foreign Assistance
OMB	Office of Management and Budget
USAID	U.S. Agency for International Development

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May 10, 2021

The Honorable Gary C. Peters
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Jacky Rosen
United States Senate

Congress appropriates tens of billions of dollars of foreign assistance funding yearly to support U.S. policy objectives around the world.¹ For the Department of State, Congress generally appropriates this foreign assistance through the Department of State, Foreign Operations, and Related Programs legislation. State funds and implements foreign assistance activities related to security (such as counternarcotics, counterterrorism, and nonproliferation), public health, and migration and refugee assistance, among others.² For fiscal year 2020, State reported that it fully managed foreign assistance accounts totaling \$19.3 billion.³

Over the years both the amount of foreign assistance funding and the number of State entities (offices and bureaus) responsible for managing it

¹In OMB Bulletin 12-01, the Office of Management and Budget (OMB) defines foreign assistance as tangible or intangible resources (goods, services, or funds) provided by the U.S. government to a foreign country or an international organization for the purpose of assistance to foreign entities or populations as authorized under the Foreign Assistance Act of 1961, as amended, or any other Act.

²For the purposes of this review, we include only foreign assistance that State implements and its internal data systems track and report. This also includes foreign assistance that other agencies, primarily the U.S. Agency for International Development (USAID), allocate to State to implement. In addition, for this review “reporting” refers to the financial and programmatic foreign assistance data that State tracks for internal (management or policy decisions) and external (congressional request, legal or policy requirements, and international agreements) purposes. The external reporting of State’s foreign assistance data occurs on a State-managed website called [ForeignAssistance.gov](#) and a USAID-managed website called [Foreign Aid Explorer](#). According to State officials, State and USAID have started a process to consolidate these websites in response to provisions in the Foreign Aid Transparency and Accountability Act of 2016, Pub. L. No. 114-191, § 4(d) (July 15, 2016); the Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, § 7031(e) (Dec. 20, 2019); and the Joint Explanatory Statement accompanying the Further Consolidated Appropriations Act, 2020, 165 Cong. Rec. H11432-H11433 (Dec. 17, 2019).

³U.S. Department of State, *Fiscal Year 2020 Agency Financial Report* (Washington, D.C.: November 16, 2020).

have increased, but State did not design its agency-wide data systems to track and report the financial and programmatic details of this growing assistance, according to the State's Office of Inspector General (State IG).⁴ Members of Congress, the State IG, and GAO have raised concerns about State's ability to adequately track and report its foreign assistance data. Past GAO and State IG reviews have found inadequacies in how State tracks and reports its foreign assistance data.⁵ These concerns include State's ability to retrieve timely and accurate data necessary to provide central oversight, meet statutory and regulatory reporting requirements, manage resources strategically, and assess program performance. Due to these concerns, GAO and the State IG have recommended State improve the tracking and reporting of its financial and programmatic data to better manage its foreign assistance. In response, State began an initiative in 2014 to improve the quality and availability of foreign assistance data.

You asked us to review State's plan to improve the tracking and reporting of its foreign assistance data. This report assesses (1) the status of State's plan to improve the tracking and reporting of its foreign assistance data and (2) the extent to which State's plan adheres to sound planning practices.

To assess the status of State's plan to improve the tracking and reporting of its foreign assistance, we reviewed State documentation and the status of the implementation of State's plan against specific goals, milestones, and timeframes established in the plan. To determine if State's plan adheres to criteria for sound planning, we assessed the plan against nine key elements we developed from existing GAO criteria for sound

⁴Office of Inspector General, U.S. Department of State, *Management Assistance Report—Department Financial Systems are Insufficient to Track and Report on Foreign Assistance Funds*, February 26, 2015 (ISP-I-15-14); Office of Inspector General, U.S. Department of State, *Compliance Follow-up Review: Department of State is Still Unable to Accurately Track and Report on Foreign Assistance Funds*, June 2017 (ISP-C-17-27).

⁵For example, in previous GAO reports we have identified inadequacies in State tracking and reporting financial and programmatic data. See, [GAO-16-768](#), *Foreign Assistance: Actions Needed to Improve Transparency and Quality of Data on ForeignAssistance.gov*, August 24, 2016; and [GAO-18-136](#), *Democracy Assistance: State Should Improve Accountability Over Funding; USAID Should Assess Whether New Processes Have Improved Award Documentation*, December 14, 2017.

management and strategic planning.⁶ As part of our review, we assessed whether the key elements were “generally,” “partially,” or “not addressed” in the State plan. We also interviewed State officials in Washington, D.C., about the agency’s plan to improve tracking and reporting of its foreign assistance data. In addition, we assessed the reliability of expenditure data that State reported for its plan from fiscal years 2017 to 2021 by corroborating information against data reported to Congress annually, conducting a data consistency and logic tests, and interviewing State officials regarding their method for compiling the data and resolving any potential discrepancies. We determined that the data we used were sufficiently reliable for our purpose of identifying State’s expenditures to implement its plan. For more information on our scope and methodology, see appendix I.

We conducted this performance audit from February 2020 to May 2021 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.

Background

State is the lead agency responsible for implementing U.S. foreign policy and works to advance U.S. interests around the world. State’s Office of Foreign Assistance (State F), created in 2006, leads the coordination of U.S. foreign assistance. State F establishes standard program structures and definitions, as well as performance indicators, and collects and reports allocation data on State and USAID programs. State F, along with the bureaus of the Comptroller and Global Financial Services (CGFS) and Administration (State A), also oversees the tracking and reporting of foreign assistance that State funds and implements. CGFS and State A are the owners of agency-wide data systems used to record financial transactions of State’s foreign assistance.

State implements a wide range of foreign assistance. For example, it is the lead U.S. agency on security and refugee related assistance, and has

⁶Prior GAO work has applied versions of the criteria used in this report. They include the following: *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004); *Foreign Assistance: Better Guidance for Strategy Development Could Help Agencies Align Their Efforts*, [GAO-18-499](#) (Washington, D.C.: July 12 2018); and *Bureau of Prisons: Improved Planning Would Help BOP Evaluate and Manage Its Portfolio of Drug Education and Treatment Programs*, [GAO-20-423](#) (Washington, D.C.: May 26, 2020).

sole responsibility for implementing the International Narcotics Control and Law Enforcement and Nonproliferation, Anti-terrorism, Demining and Related Programs accounts, according to State officials. Table 1 shows a full list of foreign assistance accounts from which State uses funding to implement its programs.

Table 1: Foreign Assistance Accounts Implemented by the Department of State

Foreign Assistance Accounts

- Assistance for Europe, Eurasia, and Central Asia
- Contributions to International Organizations
- Contributions for International Peacekeeping Activities
- Democracy Fund
- Development Assistance
- Economic Support Fund
- Foreign Military Financing Program
- Global Health Programs
- International Military Education and Training
- International Narcotics Control and Law Enforcement
- International Organizations and Programs
- Migration and Refugee Assistance
- Nonproliferation, Anti-Terrorism, Demining and Related Programs
- Peacekeeping Operations
- United States Emergency Refugee and Migration Assistance Fund

Source: GAO analysis of State information. | GAO-21-373

Note: Other federal agencies may also implement programs using funding from some of these accounts.

State Foreign Assistance Data Tracking

State has multiple agency-wide data systems to track foreign assistance data from budget planning and allocations through obligations and disbursements. Different bureaus and offices within State maintain these data systems. State F manages data systems that capture budget formulation, allocation, operational planning, performance and evaluation data; State A manages data systems that capture procurement, contract, and award data; and CGFS manages data systems that capture obligations and disbursement data. Domestic and overseas State officials from regional and functional bureaus⁷ and overseas posts, which manage foreign assistance programs, also share responsibility for data entry into

⁷Examples of regional bureaus is The Office of African Affairs and Office of Western Hemisphere Affairs. Examples of functional bureaus are the International Narcotics and Law Enforcement and Democracy, Human Rights, and Labor.

the systems. Table 2 shows State's data systems and office or bureau that manages them.

Table 2: Department of State Data Systems to Track Its Foreign Assistance

State Data System	State Office/Bureau that Manages Data System	Description of State Data System
Foreign Assistance Coordination and Tracking System (FACTSInfo) Next Generation (NextGen)	Office of Foreign Assistance	Data system that captures budget formulation, allocation, and operational planning data. Retrievable data from this system include budget request, allocation and planned funding levels for programs, projects, and activities for State and U.S. Agency for International Development (USAID). The system also captures data on program management, and performance monitoring and evaluation, such as performance indicators and narrative and evaluation summary details at a high level for Operational Plans, and includes both State and USAID activities. Regional and functional bureaus and overseas posts enter data into this system.
Integrated Logistics Management System (ILMS)	Bureau of Administration/Office of Logistics Management (A/LM)	Originating system that captures procurement and contracts data at the time of award issuance. Retrievable data from this system are programmatic and fiscal information for overseas and domestic procurement requests, such as title, purpose, primary place of performance, start and end dates, and fiscal information for funding the award. State uses these data to create obligation documents for domestic and overseas procurement requests. Regional and functional bureaus and overseas posts enter data into this system.
State Assistance Management System (SAMS)	State A/LM	Originating system that captures federal assistance award data (such as grants and cooperative agreements) at the time of award issuance. Retrievable data from this system are programmatic and fiscal information for overseas and domestic federal assistance awards, such as title, purpose, primary place of performance, start and end dates, and fiscal information for funding the award. State uses these data to create obligation documents for domestic and overseas federal assistance awards. Regional and functional bureaus and overseas posts enter data into this system. This system is part of the ILMS system.
Global Financial Management System (GFMS) and Regional Financial Management System (RFMS)	Comptroller and Global Financial Services Bureau	Financial systems that capture obligations and disbursement data (financial records for contracts and assistance awards). GFMS captures domestic data and RFMS captures overseas data. Retrievable data from this system are programmatic and fiscal information for domestic and overseas awards, such as title, purpose, primary place of performance, start and end dates, and fiscal information for funding the award. These systems also include data fields for accounting data. Regional and functional bureaus and overseas posts enter data into this system.

Source: GAO analysis of State information. | GAO-21-373

State Foreign Assistance Data Reporting

State reports its foreign assistance data for both external and internal purposes. Several international agreements, laws, and policies include

requirements for State and other U.S. agencies on the external reporting of foreign assistance data.⁸ For example,

- *International Aid Transparency Initiative (IATI)*: The United States became a member of IATI agreement in 2011. IATI is a global campaign that seeks to provide timely, forward-looking, and comprehensive data on foreign assistance funding and activities in a standard electronic format.
- *The Office of Management and Budget (OMB) Open Government Directive (Memorandum M-10-06) and Guidance on Collection of U.S. Foreign Assistance Data (Bulletin No. 12-01)*: OMB M-10-06 requires federal agencies to make information available to the public online in open formats, including State's data on its foreign assistance activities. OMB Bulletin No. 12-01 provides guidance to U.S. agencies, including State, on how to report data on their foreign assistance activities publicly to ForeignAssistance.gov, which State became the coordinator for in 2012.⁹
- *Digital Accountability and Transparency Act of 2014 (DATA Act)*: Requires State to report financial and payment data to the Department of the Treasury for it to post on usaspending.gov, among other things.¹⁰
- *Foreign Aid Transparency and Accountability Act of 2016 (FATAA)*: In 2016, Congress passed FATAA, which codified the requirements for State to publish foreign assistance data on ForeignAssistance.gov or through a successor online publication, among other things.¹¹
- *Foundations for Evidence-Based Policymaking Act of 2018*: Requires federal agencies, including State, to designate a Chief Data Officer, who, among other things, must manage data assets of the agency, including the standardization of data format, sharing of data assets, and publication of data assets in accordance with applicable law.¹²

⁸The following are merely examples of external data reporting requirements. State's compliance with these various requirements was outside the scope of this engagement.

⁹ForeignAssistance.gov is a public website where 22 agencies, including State, report foreign assistance data quarterly.

¹⁰Pub. L. No. 113-101 (May 9, 2014).

¹¹Pub. L. No. 114-191 (July 15, 2016).

¹²Pub. L. No. 115-435 (Jan. 14, 2019).

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- *Grant Reporting Efficiency and Agreements Transparency Act of 2019*: Requires State to ensure that all of its awards use newly developed data standards for future information collection requests and amend existing information collection requests to comply with the standards.¹³

State also uses foreign assistance data as a key piece of information for internal management decisions, such as program management. For example, State created country dashboards to provide senior State officials (including the Secretary of State) with updated data on foreign assistance and other indicators to inform their decision-making on foreign policy matters. The newly created Center for Analytics within State leads the dashboard effort.¹⁴

State Developed and Mostly Implemented a Plan to Improve Tracking and Reporting of Its Foreign Assistance Financial and Program Data

In 2014, State began an initiative to understand the challenges related to its foreign assistance management and to improve the quality and availability of foreign assistance data. The initiative, known as the Foreign Assistance Data Review (FADR), grew out of internal demands for more accurate and timely data to respond to legal requirements, according to State.¹⁵

As part of the initiative, State established a FADR working group¹⁶ that developed a plan, as described in a series of documents, to address challenges related to the tracking and reporting of financial and

¹³Pub. L. No. 116-103 (Dec. 20, 2019).

¹⁴The Center of Analytics, launched in January 2020 and located within the Office of Management Strategy and Solutions, serves as State's official enterprise-level data and analytical hub.

¹⁵For example, recent legal requirements related to data management and publication include those found in the DATA Act, FATAA, and the Foundations of Evidence-Based Policymaking Act of 2018.

¹⁶The FADR includes representatives from agency-wide data system owners (e.g., CGFS, State A), State F bureau (business process owner), and other bureaus that generate foreign assistance data.

programmatic foreign assistance data.¹⁷ The FADR working group first set out to identify and document the challenges related to tracking financial and programmatic foreign assistance data across State and then to develop recommendations to guide future activities to address them.¹⁸ Some of the challenges identified by the FADR working group included gaps and inconsistencies in data related to overseas transactions, recipient country, sector, and award information.

As part of its review, the FADR working group concluded that State had not designed its agency-wide data systems to capture foreign assistance data at a level required by internal and external stakeholders.¹⁹ For example, the working group noted that the bureaus tasked with managing and implementing foreign assistance had to use multiple data systems to process various types of foreign assistance information. Responding to data requests in these bureaus, according to the working group, had become labor-intensive across bureaus and in the field, and some bureaus had created their own internal systems to satisfy reporting requirements. The working group also noted that much of the overall data needed to manage and report foreign assistance could be difficult to locate and to integrate.²⁰ In addition, the working group identified gaps and challenges in the data State reports to ForeignAssistance.gov. Those gaps and challenges included:

- Absence of program-related data fields, such as benefiting country and sector classifications
- Lack of definitions and standards for text fields to provide meaningful foreign assistance qualitative data

¹⁷The FADR documents include U.S. Department of State, Findings Report, December 2015; U.S. Department of State, Phase Two—Data Element Index, Winter 2016; FADR implementation plan for fiscal years 2017, 2018, 2019, and 2020; and a monitoring spreadsheet provided to GAO. For the purposes of this report, we will refer to this collection of documents as the “FADR plan” or “plan.”

¹⁸State officials noted that FADR focused on financial transaction data for foreign assistance implemented by State and to a limited extent on program description data.

¹⁹As a result, some bureaus had created bureau-specific systems to manage foreign assistance funds, making processing data requests from multiple systems more challenging.

²⁰For example, according to the FADR, a significant amount of foreign assistance financial data is located in GFMS and RFMS, while a significant amount of program data is located in SAMS and ILMS.

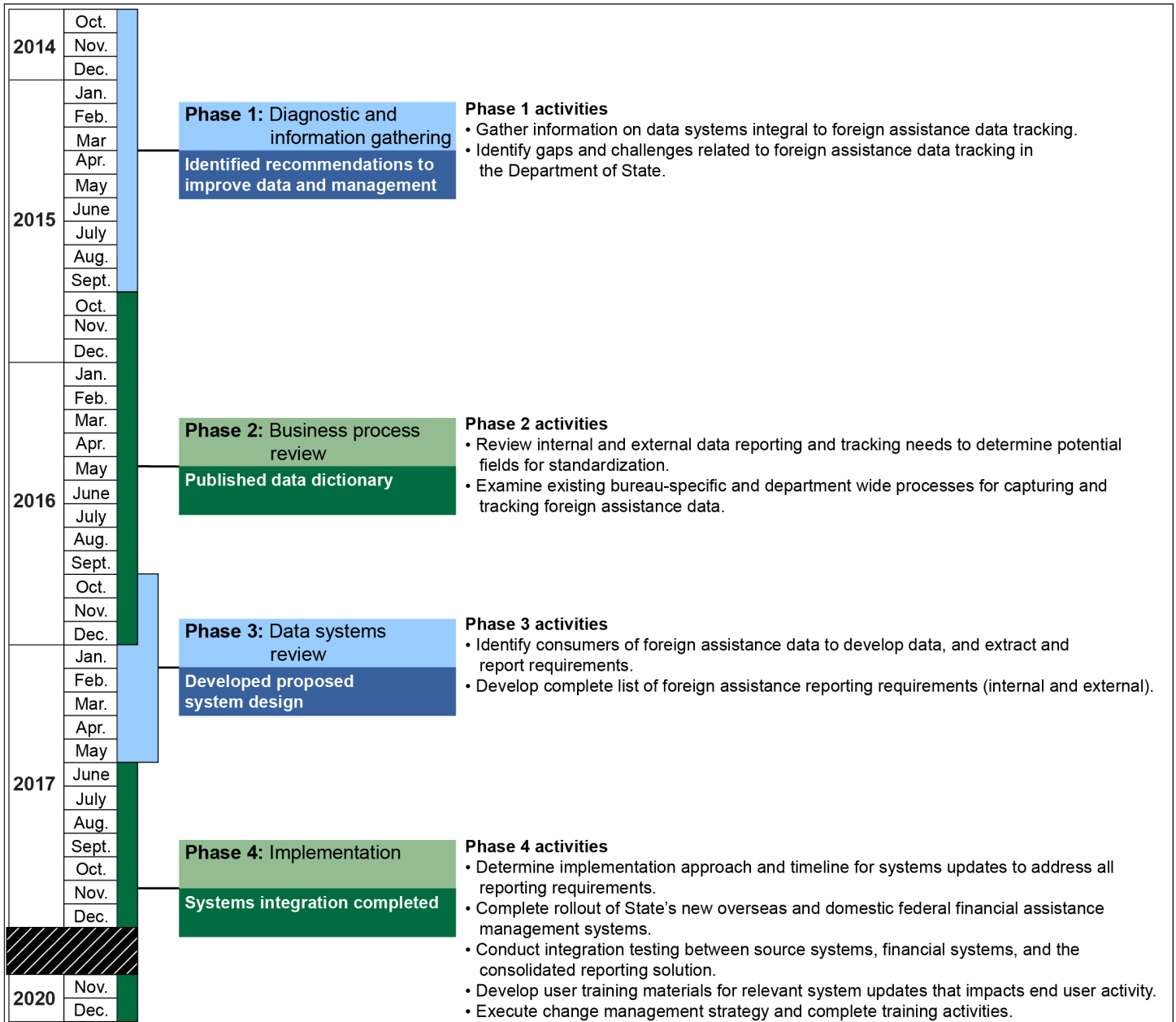
-
- The presence of personally identifiable information such as State employee names

Rather than develop a new agency-wide data system, the FADR plan recommended making changes to the existing multiple, agency-wide data systems (ILMS, SAMS, GFMS, and RFMS) to facilitate tracking and reporting of foreign assistance data. According to the plan, this approach avoided the significant time and financial investment needed to develop a new agency-wide data system. For example, State F worked with CGFS and State A to capture two data elements more effectively—benefiting country and program area.²¹ In addition, the FADR working group limited the scope of the plan to financial data in the obligation and disbursement phases of the budget process. According to State officials, FADR sought to improve the tracking and reporting of financial data before the agency can address challenges related to other types of data, such as performance data.

The FADR plan, which started in October 2014 and ended in December 2020, consisted of four phases, as shown in figure 1. The FADR plan sought to focus on changes to agency-wide data systems to improve financial data and related programmatic data for foreign assistance. According to State officials, it did not address foreign assistance performance data.

²¹According to State, more accurately capturing benefiting country would improve geographic precision in financial transactions, while more accurately capturing program area would improve categorization of foreign assistance according to the Standardized Program Structure used by State and USAID to classify foreign assistance programming. In addition to system changes, State F, CGFS, and State A worked to increase training and guidance on manual data entry fields, such as award titles and descriptions, to improve qualitative data.

Figure 1: Phases of Department of State’s Foreign Assistance Data Review (FADR) Plan



Source: GAO analysis of Department of State information. | GAO-21-373

Note: The FADR plan identified a transition period between Phases 1 and 2 that occurred in the fall and winter of 2015. The FADR plan did not identify titles for Phases 1 and 4. From our review of activities and our interviews with State officials, we developed titles for Phases 1 and 4.

The four phases were as follows:²²

Phase 1, Diagnostic and Information Gathering: The FADR working group conducted a department-wide analysis of foreign assistance data tracking and reporting practices. From this analysis, the plan made three recommendations for the subsequent phases of FADR to improve foreign assistance data and management. The recommendations were:

- Develop a standard business process for foreign assistance management
- Identify changes to existing systems and new system requirements to meet this business process
- Develop an integrated system solution, including standards and governance, to meet all requirements of the business process

Phase 2, Business Process Review: While implementing the Phase 1 recommendation to develop a standard business process, the FADR working group determined that developing such a process was not feasible. The group concluded that a “one-size-fits-all” business process would be costly and time-consuming. It also could negatively affect other existing processes that addressed bureau-specific requirements for foreign assistance management. Instead of a single business process, the FADR working group created a set of foreign assistance data elements, called the FADR Data Dictionary, which standardized budget terminology and definitions for foreign assistance across the agency. The data dictionary documented approximately 57 data elements and their related characteristics to allow the bureaus to respond more efficiently to stakeholder requests using the standardized terms and definitions. For example, the data dictionary standardized data fields that the bureaus had used inconsistently across agency-wide data systems, making responding to data requests from internal and external stakeholders more challenging. The adoption of the data dictionary also facilitated reporting to external sources such as ForeignAssistance.gov.

Phase 3, Data Systems Review: The FADR working group conducted an agency-wide data systems review to document internal and external foreign assistance data reporting needs to ensure compliance with OMB

²²The FADR plan did not identify a title for Phase 1 and Phase 4. From our review of activities and our interviews with State officials, we developed titles for Phase 1 and Phase 4.

guidance, as well as international commitments.²³ The working group also sought to identify what system changes State would need to make to support the capture, storage, or reporting of the data elements in the FADR Data Dictionary. From this review, the FADR working group developed a proposed system design to pull data from multiple systems (such as SAMS, RFMS, and GFMS) to a consolidated reporting system that would provide more comprehensive reporting.²⁴ State reported the following activities completed under Phase 3 included:

- Identifying consumers of foreign assistance data to develop data, and extract and report requirements
- Developing a complete list of foreign assistance reporting requirements (internal and external)

Phase 4, Implementation: From 2017 until December 2020, the FADR working group reported implementing changes to agency-wide data systems identified in earlier phases and while conducting other activities. The modifications to existing agency-wide data systems focused on adding two data fields—benefiting country and program area.²⁵ State identified the following other activities under Phase 4:

- Completing system analysis of all updated FADR Data Dictionary elements
- Reviewing, revising, and finalizing the FADR Data Dictionary to incorporate all data elements to meet foreign assistance reporting requirements
- Identifying non-system updates to serve as temporary solutions to meet some of the requirements
- Conducting system update design, development, testing of system changes for programs including federal financial assistance, procurement, and inter-agency agreements

²³International Aid Transparency Initiative (IATI): OMB M-10-06, Open Government Directive (Dec. 8, 2009) and OMB Bulletin 12-01, Guidance on Collection of U.S. Foreign Assistance Data (Sept. 25, 2012).

²⁴State called the consolidated reporting system the Global Business Intelligence.

²⁵Documentation from State we received in February 2021 identified primary place of performance as an additional data field added under FADR.

-
- Determining implementation approach and timeline for systems updates to address all reporting requirements
 - Completing rollout of State's new overseas and domestic federal financial assistance management systems
 - Conducting integration testing between source systems, financial systems, and the consolidated reporting solution
 - Developing user training materials for relevant system updates that impacts end user activity
 - Executing change management strategy and complete training activities

To date, State reported completing most activities noted in the 2017 FADR implementation plan and subsequent updates to Congress. According to State officials, State plans to continue change management activities, including training and communication initiatives, through calendar year 2021. According to State, specific system changes for GFMS and RFMS included the addition of data fields for benefiting country and program area. It also reported that ILMS incorporated FADR data fields and has features to assist users with selecting appropriate information in the new fields.

According to State, due to FADR-related changes, it has addressed some existing data gaps and changed the requirements for capturing foreign assistance data. For example, State reported that it has been able to publish updated foreign assistance financial data from fiscal years 2015 to 2017 on ForeignAssistance.gov. It has also released guidance and provided trainings to staff to improve foreign assistance programmatic information, such as title names, descriptions, and dates related to grants, contracts, and other foreign assistance information.

State Generally Incorporated Key Elements of Sound Planning in Its Plan, but Could Improve the Monitoring and Evaluation Component

State’s plan generally or partially met key elements of sound planning. We evaluated the FADR plan against nine key elements of sound planning we identified, and found that the plan generally addressed four elements and partially addressed five. For example, we found that State lacks a complete and well defined monitoring and evaluation (M&E) component to assess the impact of changes made as part of the FADR plan. The M&E component is the most critical for State to assess FADR’s effectiveness given that State has nearly completed implementation of its plan. Having a well-developed M&E component will also enable State to better assess the long-term effects of system changes implemented under FADR.

We reviewed prior GAO work on strategic and other types of plans to identify criteria to evaluate the FADR plan.²⁶ From that prior work, we identified nine key elements of a sound plan to evaluate the FADR plan. Table 3 shows the results of our analysis.

Table 3: Nine Key Elements of Sound Planning that GAO Identified and Extent to Which State Met Criteria

Key Element	Description	Did the FADR plan address the element?
Purpose and scope	Why the plan was produced, the scope of its coverage, and the process by which it was developed	●
Desired results	The end state the plan aims to achieve	●
Hierarchy of goals and subordinate objectives	The priorities and logical links among the plan’s goals and objectives	●
Activities to achieve results	Planned steps and activities to achieve the results	●
Offices’ roles and responsibilities	The offices that will be implementing the plan and their roles and responsibilities relative to other offices	◐
Intra-agency coordination mechanism	Mechanisms that offices have identified to coordinate their efforts with others	◐
Resources to implement the plan	What the plan will cost, the sources and types of resources needed, and where resources and investments should be targeted	◐
Milestones and performance indicators	Milestones and performance measures to gauge results	◐
Monitoring and evaluation	A mechanism to assess progress toward achieving goals	◐

Legend: ● Generally addressed ◐ Partially addressed ○ Did not address

Source: GAO analysis of Department of State documentation. | GAO-21-373

Note: We identified and developed the criteria based on our review of previous GAO work evaluating various plans and strategies.

²⁶See [GAO-04-408T](#), [GAO-18-499](#), and [GAO-20-423](#).

We found that the FADR plan generally addressed four elements:

Purpose and scope: The FADR plan identified the challenges it sought to address and its scope. For example, the plan described the purpose of the FADR working group, which was to document foreign assistance data tracking and reporting deficiencies and to provide solutions on how to address these challenges. Specifically, the plan identified the following purposes:

- To review the current foreign assistance business processes and identify process improvements in how and where to capture data
- To identify information gaps in State's reporting of foreign assistance data, to identify existing data sources and content (such as data entry fields), and to make recommendations that improve the quality of the content
- To develop foreign assistance data reporting parameters and processes that can be institutionalized and replicated for internal management, and current and future reporting as required for ForeignAssistance.gov, IATI, and the DATA Act
- To make recommendations for changes to existing systems or for the development of new ones to address remaining foreign assistance data gaps

In addition, the plan and our interviews with State officials indicated that FADR limited its scope of work to State's agency-wide data systems and foreign assistance programs for which State is both the funder and implementer.

Desired results: The FADR plan identified the following desired results upon the completion of activities identified in the plan:

- Manage foreign assistance activities at the level needed for recent administration, congressional, and international requirements
- Respond to demands for more and better data to manage activities, coordinate with others, make data-driven decisions, and meet transparency commitments
- Institutionalize processes to improve quality, efficiency, and reliability of foreign assistance information

Hierarchy of goals and subordinate objectives: The FADR plan presented a logical hierarchy of goals that the FADR working group pursued under each phase of the plan. For example, the plan identified goals such as a review of the foreign assistance business process; a standardization of foreign assistance data terminology; a review of agency-wide data systems; and an implementation of system changes. Although it did not identify subordinate objectives, the plan identified activities that the FADR working group conducted to achieve these respective goals.

Activities to achieve results: The FADR plan described the activities the working group would conduct under each phase of the FADR process. For early phases, the plan described activities such as sharing documentation, mapping processes, and reviewing data systems. For later phases, the plan identified a list of activities, such as identifying consumers of foreign assistance data, developing a conceptual design model for changes to the existing data systems, conducting integration testing between systems, and developing user and training materials.

The FADR plan partially addressed five elements:

Roles and responsibilities: The FADR plan identified the offices that participated in FADR-related activities. However, it did not clearly specify what their respective roles and responsibilities were over the four phases of FADR activities. For example, the plan listed the various bureaus and offices involved in developing a management business process for foreign assistance and the FADR data dictionary, but did not provide any additional detail on what their respective duties were in that effort. In another example, the plan described weekly meetings between State F, CGFS, and State A to adhere to the implementation timeline and alleviate any potential inhibiting factors without identifying the roles and responsibilities of those offices related to those activities. Similarly, in December 2020, a State IG report described a lack of clarity related to roles and responsibilities of FADR participants.²⁷ For example, the report found that the core members of the FADR working group did not sufficiently communicate the proposed FADR-related changes to bureaus

²⁷Office of Inspector General, United States Department of State, *Review of Department of State Foreign Assistance Tracking Capabilities*, December 2020 (ISP-I-21-09).

and offices that manage foreign assistance.²⁸ As a result, the State IG issued a recommendation to address these issues.²⁹

Intra-agency coordination mechanisms: The FADR plan described how coordination occurred with various offices in State, but did not identify the frequency or mechanisms of coordination across the four phases. For example, the plan noted that close coordination would be required across system owners in Phase 4 without describing how that coordination would work. In another example, the plan noted that State F worked with CGFS on a weekly basis to improve foreign assistance data quality and that both engaged with all foreign assistance bureaus at State. However, the plan did not clearly identify the mechanism for how these bureaus coordinated with one another and resolved any problems, if they occurred.

State IG in its December 2020 report also found challenges related to coordination.³⁰ For example, the report found the FADR working group did not sufficiently consult with the bureaus to identify the modifications to the agency-wide data systems. As a result, many bureaus that manage foreign assistance were unaware of planned changes to agency-wide data systems and concerned these changes would create challenges for program and financial staff, and possibly affect their ability to execute foreign assistance funds before they expired. State IG issued a recommendation to improve such coordination.

Resources: The FADR plan did not consistently identify the financial and personnel resources needed to implement the plan. For instance, the resource categories changed and there was less detail about the use of resources over time. In fiscal year 2017, State identified the following categories for FADR funds: Systems, Development, Modernization, and

²⁸State IG found that core leadership of the FADR group did not have a common understanding of roles and responsibilities related to communicating the FADR-related changes to department staff. As a result, multiple bureaus that manage foreign assistance that were not part of the FADR working group were unaware of the FADR-related changes. Although the State F issued monthly newsletters to communicate FADR-related changes, State IG noted that the core leadership group did not sufficiently communicate these changes to senior officials in the affected bureaus.

²⁹State IG recommended that the State F, in coordination with the State A Bureau and CGFS, should clearly communicate foreign assistance tracking requirements for bureaus that manage foreign assistance and provide the training necessary to implement these changes. See, State IG ISP-I-21-09.

³⁰See, State IG ISP-I-21-09.

Enhancements and System Operations and Maintenance. For fiscal years 2018 and 2019, the plan modified the categories: Process Improvement and Policy Implementation; Systems Development, Modernization, and Enhancements; and Systems Operations and Maintenance. For fiscal year 2020, the plan provided only a lump sum for FADR activities for previous and future years, even though the plan’s fiscal year 2020 expenditure estimate showed a significant increase over previous years. In addition, the plan did not discuss what personnel resources from other State bureaus or offices, if any, would be required in pursuit of FADR goals.

Between fiscal years 2017 and 2020, State expended approximately \$8.5 million on FADR activities. While the FADR plan indicated that the initial estimated expenditures for fiscal year 2020 were \$3.8 million, they increased, without explanation, to \$6.4 million in a fiscal year 2020 update to the plan. Subsequently State officials told us that this increase in the estimated expenditures for fiscal year 2020 was due to financial investments related to changes to and integration between data systems. As of February 2021, State provided actual expenditure amounts for fiscal year 2020 that were lower than the estimate identified in the fiscal year 2020 FADR plan update. According to State officials, this decrease was due to postponing implementing some activities originally planned for fiscal year 2020 to fiscal year 2021. For fiscal year 2021, State estimates it will expend \$4.8 million for FADR-related activities, according to State officials. Table 4 includes detailed funding data for FADR totaling more than \$13 million.

Table 4: Department of State’s Reported Foreign Assistance Data Review (FADR) Expenditures Fiscal Years (FY) 2017 to 2020

(In dollars)

Expenditures	FY 2017	FY 2018	FY 2019	FY 2020	FY2021 Estimate	Total
Process Improvement and Policy Implementation	810,060	190,630	506,524	919,046	1,000,000	3,426,260 (26 percent)
System Development, Modernization, and Enhancements	1,042,000	215,267	1,136,679	2,384,869	2,855,328	7,634,143 (57 percent)
System Operations and Maintenance	0	37,988	846,846	422,845	1,005,000	2,312,679 (17 percent)
Total	1,852,060	443,885	2,490,049	3,726,760	4,860,328	13,373,082

Source: GAO analysis of State information. | GAO-21-373

Milestones and performance indicators: The FADR plan identified performance indicators and milestones associated with FADR efforts, such as the completion of Phases 1 to 4. However, the plan did not provide a methodology for how the performance indicators related to the desired results of the FADR effort. For example, the plan identified indicators such as the volume and amount of personally identifiable information (PII), number of training and awareness events, and use of the term “worldwide” in a data field, but did not explain their connection to desired results.

Monitoring and evaluation: State did not initially include an M&E component as part of the FADR plan because it did not have a requirement to include one early in the FADR effort. In October 2020, State developed a monitoring and evaluation component following discussions with us regarding sound planning criteria used to assess the FADR plan, according to State officials.

The current version of the M&E component for FADR identifies some performance indicators and monitoring activities, as described above. However, it does not include an explanation of the methodology that State used to select the indicators or identify how State plans to evaluate and use the data gathered through monitoring activities, as noted in the Milestones and Performance section. Nor does it provide information on timeframes associated with the performance targets for the indicators identified. Additionally, as noted previously, the FADR plan did not explain the connection of selected indicators to the desired results of the plan. Identifying how the performance indicators relate to desired results, describing how it will periodically evaluate progress using the monitoring data, and providing timeframes associated with performance targets could help State to assess the effectiveness of the FADR plan and identify and address any potential problems in a timely and comprehensive manner.³¹

State IG in its December 2020 report also highlighted challenges related to monitoring and evaluation. The report noted that State had no M&E component to ensure bureau compliance with FADR-related changes and

³¹In addition to the criteria GAO used to evaluate the FADR plan along with its monitoring and evaluation component, Standards for Internal Control in the Federal Government note that management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

recommended that State F develop one.³² Although the State IG recommendation addresses the issue of bureau compliance with FADR-related changes, it does not address if those changes resulted in the desired outcomes identified in the FADR plan.

Conclusions

State manages and implements billions of dollars of foreign assistance annually. However, members of Congress, the State IG, and GAO have raised concerns about State's ability to report complete and reliable data on its foreign assistance. Through its FADR plan, State has tried to address gaps in the availability and quality of financial and programmatic data for its foreign assistance activities. We found that State's plan included several key elements of sound planning. However, State lacks a fully developed plan for monitoring and evaluating results. The M&E component becomes more important given that State has nearly completed implementation of its FADR plan. Having a well-developed M&E component is critical to assess whether the fully implemented FADR plan is helping State achieve desired results and correct previously identified data-tracking and reporting deficiencies. A well-developed M&E component will also enable State to regularly assess progress and ensure the changes it has made are improving data availability and quality.

Recommendation for Executive Action

The Secretary of State should direct the Director of the Office of Foreign Assistance to improve the monitoring and evaluation of the FADR effort by, for example, identifying how the performance indicators link to desired results, timeframes associated with performance targets, and a plan to periodically assess its monitoring data. (Recommendation 1)

Agency Comments

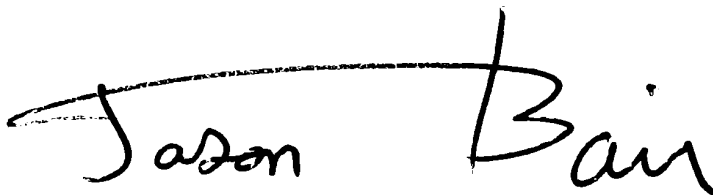
We provided a draft of this product to State for review and comment. State provided written comments, which we have reproduced in appendix II. In its comments, State agreed with our recommendation and described the actions it is taking to improve the monitoring and evaluation of the FADR effort. For example, State noted that it updated the M&E component to link performance indicators with performance goals.

We are sending copies of this report to the appropriate congressional committees, the Secretary of State, and other interested parties. In

³²State IG found that bureaus involved in managing foreign assistance were unaware they were required to adopt FADR-related changes to agency-wide data systems. In some cases, the bureaus planned to continue to use data stored in bureau-specific, not agency-wide, systems, inhibiting State's ability to track such data centrally. State IG recommended, that State F should develop and communicate a plan and process to monitor bureaus that manage foreign assistance to ensure compliance with any new foreign assistance tracking requirements. See, State IG ISP-I-21-09.

addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6881 or bairj@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 III.

A handwritten signature in black ink that reads "Jason Bair". The signature is written in a cursive style with a long horizontal stroke above the name.

Jason Bair
Director, International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

This report assesses (1) the status of the Department of State’s plan to improve the tracking and reporting of its foreign assistance data, and (2) the extent to which State’s plan adheres to criteria for sound planning practices.¹

To assess the status of State’s plan to improve the tracking and reporting of its foreign assistance data, we describe the Foreign Assistance Data Review (FADR) effort and associated plan. This report assesses the FADR plan implemented by State to address challenges related to State’s management of foreign assistance data. From our discussions with State officials, we determined that FADR was the primary current effort to improve foreign assistance data accuracy and tracking within the Department. State provided a series of documents that made up the FADR plan and related updates to the plan provided to Congress.² In our discussions with State officials, we learned that the FADR plan was limited to the obligations and disbursement phase of the budget process. We analyzed the FADR plan to identify the phases of the plan, and the goals and activities completed under each phase. To determine if State had completed the activities, we obtained State documentation to support activities completed, such as screenshots of system changes, internal State communication on FADR implementation, and training materials. For those activities noted as not completed in the FADR documentation available at the time of our review, we received testimonial verification from State on their status.

¹For the purposes of this review, we include only foreign assistance that State implements and its internal data systems track and report. This also includes foreign assistance that other agencies, primarily the U.S. Agency for International Development (USAID), allocate to State to implement. In addition, for this review “reporting” refers to the financial and programmatic foreign assistance data State tracks for internal (management or policy decisions) and external (congressional request, legal or policy requirements, and international agreements) purposes. The external reporting of State’s foreign assistance data occurs on a State-managed website called [ForeignAssistance.gov](https://www.foreignassistance.gov) and a USAID-managed website called [Foreign Aid Explorer](https://www.usaid.gov/foreign-aid-explorer). According to State officials, State and USAID have started a process to consolidate these websites in response to provisions in the Foreign Aid Transparency and Accountability Act of 2016, Pub. L. No. 114-191, § 4(d) (July 15, 2016); the Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, § 7031(e) (Dec. 20, 2019); and the Joint Explanatory Statement accompanying the Further Consolidated Appropriations Act, 2020, 165 Cong. Rec. H11432-H11433 (Dec. 17, 2019).

²The FADR documents include U.S. Department of State, Findings Report, December 2015; U.S. Department of State, Phase Two—Data Element Index, Winter 2016; FADR implementation plan for fiscal years 2017, 2018, 2019, and 2020; and a monitoring spreadsheet provided to GAO. For the purposes of this report, we will refer to this collection of documents as the “FADR plan” or “plan.”

To determine if State’s FADR plan adheres to criteria for sound planning, we assessed the plan against nine key elements we developed from existing GAO criteria for sound management and strategic planning. To develop the key elements to assess the plan, we reviewed prior GAO work on assessing plans and strategies and consulted with internal GAO methodologists.³ See table 5.

Table 5: Nine Key Elements of Sound Planning that GAO Identified

Key Element	Description
Purpose and scope	Why the plan was produced, the scope of its coverage, and the process by which it was developed
Desired results	The end state the plan aims to achieve
Hierarchy of goals and subordinate objectives	The priorities and logical links among the plan’s goals and objectives
Activities to achieve results	Planned steps and activities to achieve the results
Offices’ roles and responsibilities	The offices that will be implementing the plan and their roles and responsibilities relative to other offices
Intra-agency coordination mechanism	Mechanisms that offices have identified to coordinate their efforts with others
Resources to implement plan	What the plan will cost, the sources and types of resources needed, and where resources and investments should be targeted
Milestones and performance indicators	Milestones and performance measures to gauge results
Monitoring and evaluation	A mechanism to assess progress toward achieving goals

Source: GAO. | GAO-21-373

Note: We identified and developed the criteria based on our review of previous GAO work evaluating various plans and strategies.

³Prior GAO work has applied versions of the criteria used in this report. They include the following: *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004); *Foreign Assistance: Better Guidance for Strategy Development Could Help Agencies Align Their Efforts*, [GAO-18-499](#) (Washington, D.C.: July 12 2018); and *Bureau of Prisons: Improved Planning Would Help BOP Evaluate and Manage Its Portfolio of Drug Education and Treatment Programs*, [GAO-20-423](#) (Washington, D.C.: May 26, 2020). In addition to the criteria GAO used to evaluate the FADR plan along with its monitoring and evaluation component, Standards for Internal Controls in the Federal Government note that management should establish and operate monitoring activities to monitor the internal control system and evaluate the results. See, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

To evaluate the FADR plan, two GAO analysts reviewed the content of the plan to determine the extent to which it addressed the nine elements. Specifically, the two analysts conducted independent assessments of the plan using a three-point scale to rate the inclusion of the characteristics of the element in the FADR plan. The plan “generally addresses” an element when it included all of its characteristics; “partially addresses” when it included some but not all of its characteristics; and “does not address” when it did not include any of its characteristics. Following their independent assessments, the two analysts met to discuss the rankings of each element. A third analyst then independently reviewed the assessments and then all three analysts met to reach a consensus on the evaluation of each element. We also shared our framework for assessing the FADR plan with State during the course of the audit. Finally, we collected data on actual expenditures of the FADR effort from fiscal years 2017 to 2020, and planned expenditures for fiscal year 2021.

We also interviewed State officials in Washington, D.C., from the Office of Foreign Assistance, and the bureaus of the Comptroller and Global Financial Services and Administration about the agency’s plan to improve the tracking and reporting of its foreign assistance data.

In addition, we assessed the reliability of the data that State reported on annual expenditures for the FADR effort for fiscal years 2017 to 2021. We reviewed funding information reported across different categories. To the extent cost data varied, we obtained clarification and additional information from State. For example, when we identified incomplete actual expenditure data in documentation, we contacted State officials to obtain actual expenditure data for fiscal years 2019 and 2020, and budget estimates for fiscal year 2021. We also requested and reviewed information from State officials regarding the underlying data systems and methods used to generate the data and ensure the data’s accuracy and reliability. As a result of these steps, we determined that the data were sufficiently reliable for the purposes of reporting State resources expended for the FADR effort.

We conducted this performance audit from February 2020 to May 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of State



United States Department of State
Comptroller
Washington, DC 20520

APR 27 2021

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, "FOREIGN ASSISTANCE: State Department Should Better Assess Results of Efforts to Improve Financial and Some Program Data" GAO Job Code 104089.

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

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey C. Mounts".

Jeffrey C. Mounts

Enclosure:
As stated

cc: GAO – Jason Bair
F – Tracy M. Carson (Acting)
OIG - Norman Brown

Department of State Comments on Draft GAO Report

**FOREIGN ASSISTANCE: State Department Should Better Assess Results of
Efforts to Improve Financial and Some Program Data**
(GAO-21-373, GAO Code 104089)

Thank you for the opportunity to comment on the GAO draft report, “*FOREIGN ASSISTANCE: State Department Should Better Assess Results of Efforts to Improve Financial and Some Program Data.*”

Recommendation 1: The Secretary of State should direct the Director of the Office of Foreign Assistance to improve the monitoring and evaluation of the FADR effort, for example, by identifying how the performance indicators link to desired results, timeframes associated with performance targets, and a plan to periodically assess its monitoring data.

The Department accepts this recommendation. The Foreign Assistance Data Review (FADR) was established to ensure that federally mandated requirements for managing Department foreign assistance transaction data are satisfied (See Foreign Aid Transparency & Accountability Act of 2016 (FATAA); Data Accountability & Transparency Act of 2014 (DATA); OMB Bulletin No. 12-01; OIG Review of Department of State Foreign Assistance Tracking Capabilities 2014, 2017, and 2020 reports; FY2020 Passback Guidance). The FADR initiative is designed to track and optimize data in accordance with the following goals:

Goal 1: Data should be detailed

- Titles and descriptions should be informative, clean, and clear (e.g., free from jargon)
- Transaction data should include Standardized Program Structure & Definitions (SPSD) program area

Goal 2: Data should be secure

- Titles and descriptions should be free of Personally Identifiable Information (PII)
- Data that could endanger implementers and/or U.S. national interest must be redacted

Goal 3: Data should be available and timely

- Financial transaction data should be available to the public within 45 days of the end of the previous quarter

In response to GAO's recommendation, the Office of Foreign Assistance (F) has updated the monitoring plan for FADR to reflect how each of the performance indicators links to these goals, which represent F's desired results. F has also included timeframes associated with the performance targets and, where applicable, noted that an indicator has been *completed*, or *completed but not achieved*. This latter designation applies exclusively to performance indicators in use prior to the implementation of FADR fields in the enterprise systems. In those cases, although progress was made, targets for pre-FADR field implementation were not achieved.

The monitoring plan includes details on frequency of data collection. F plans to review quarterly transaction data, in collaboration with other implicated offices, to identify challenges faced by bureaus, determine which enterprise system and funding mechanism is the source of the limitation, where possible, and undertake focused interventions designed to address those challenges. The Department views FADR as one process, with specific goals, that is a part of a broader foreign assistance data landscape. After the FADR process is complete, F plans to ensure the progress made through FADR is maintained by streamlining quality control into regular ongoing processes such as the quarterly data calls for foreignassistance.gov.

Thank you for your work in producing this report.

Appendix III: GAO Staff Acknowledgments

GAO Contact

Jason Bair, Director, (202) 512-6881 or bairj@gao.gov

Staff Acknowledgments

In addition to the contact named above, Mona Sehgal (Assistant Director), Marisela Perez (Analyst-in-Charge), Bolko Skorupski, Neil Doherty, Justin Fisher, Aldo Salerno, and Alex Welsh, made key contributions to this report. Additionally, Tammi N. Kalugdan, Michael LaForge, Benjamin Licht, and Gergana Danailova-Trainor provided technical assistance.

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