

Highlights of GAO-25-107145, a report to the Committee on Armed Services, House of Representatives

Why GAO Did This Study

Foreign government employment of retired uniformed service members is authorized by Congress and subject to the approval of the secretaries of the military departments and the Secretary of State.

House Report 118-125 includes a provision for GAO to review FGE of retired officers of the U.S. Armed Forces. This report examines the extent to which the agencies have (1) identified employment types requiring approval and developed procedures for military retirees to submit FGE applications and (2) developed FGE approval processes and procedures, as well as the trends in FGE applications.

GAO reviewed agency documentation; interviewed officials from the five military services, State, and FGE stakeholders, including 14 employers of FGE applicants and 3 nonprofit veterans' organizations; and reviewed and analyzed over 200 FGE applications from 2019 to 2023.

What GAO Recommends

GAO is making five recommendations, including that DOD and the Coast Guard define the employment types requiring FGE approval and establish shared evaluation factors. Additionally, State should develop factors for evaluating requests. The agencies concurred with GAO's recommendations.

View GAO-25-107145. For more information, contact James A. Reynolds at reynoldsj@gao.gov.

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FOREIGN GOVERNMENT EMPLOYMENT

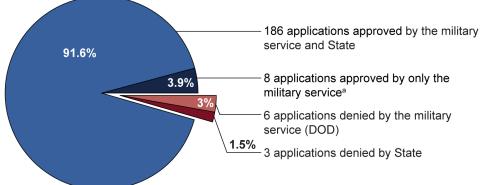
Actions Needed to Clarify and Improve Processes for Military Retirees

What GAO Found

The military services within the Department of Defense (DOD) and the Coast Guard define foreign government employment (FGE) of U.S. military retirees differently. According to some military retirees GAO interviewed, the differences have led to confusion about what employment requires approval. Each military service has created its own guidance and processes but does not clearly define the types of employment requiring approval. As a result, some employers of FGE applicants and military retirees GAO interviewed are unsure when to apply for FGE approval. DOD officials stated they are developing a policy that will define FGE and related standards and factors for the military services but could not provide an effective date for this policy. In addition, some companies and individuals questioned military retirees' awareness of the law. Although military services inform retiring service members about FGE requirements, many military retirees GAO interviewed do not remember the details.

Federal law requires that both the military services and the Department of State review and approve FGE applications. First, military services review applications from military retirees; then, State reviews approved applications for potential adverse impacts on U.S. foreign relations. However, the law does not specify evaluation factors for State and DOD to consider. As a result, each military service has independently developed factors for evaluating FGE applications, which has created uncertainty and potential inconsistencies in how the military services determine whether to approve or deny applications. Similarly, State's guidance does not specify factors to assess adverse effects on U.S. foreign relations. State officials responsible for reviewing FGE applications told GAO they are unsure of the specific factors they are supposed to consider. From 2019 through 2023, the military services and State reviewed 203 FGE applications, approving over 95 percent for authorization to work in over 40 countries and territories, according to agency data.

Approval and Disapproval Rates of Foreign Government Employment Applications, 2019–2023



Total applications = 203

Source: GAO analysis of Department of Defense (DOD), U.S. Coast Guard (USCG), and Department of State data. | GAO-25-107145 aAccording to federal law, FGE applicants requesting approval for payment for speeches, travel, meals, lodging, registration fees, or to accept a non-cash award only require review and approval by the Secretary of the military department. State does not review these applications for payments, but State reviews applications for employment.