NATIONAL SECURITY

Interagency Collaboration Practices and Challenges at DOD’s Southern and Africa Commands

Statement of John H. Pendleton, Director
Defense Capabilities and Management
Interagency Collaboration Practices and Challenges at DOD’s Southern and Africa Commands

What GAO Found

GAO’s work has shown that developing overarching strategies, creating collaborative organizations, and building a workforce that understands how to fully engage partners are key areas where agencies can enhance interagency collaboration on national security issues. GAO found that DOD’s SOUTHCOM and AFRICOM have demonstrated some practices that will help enhance and sustain collaboration, but areas for improvement remain.

- **Overarching strategies**: SOUTHCOM and AFRICOM have sought input from several federal agencies in creating their theater campaign plans, which outline command priorities, and for other strategies and plans. However, AFRICOM has not completed plans that detail its activities by country and that align with embassy strategic plans to ensure U.S. government unity of effort in Africa. Also, GAO’s preliminary work indicates that a U.S. action plan provides a framework for interagency collaboration to counter piracy in the Horn of Africa region, but the plan does not assign agencies their roles or responsibilities for the majority of tasks in the plan.

- **Collaborative organizations**: Both commands have organizational structures that encourage interagency involvement in their missions. Each has a military deputy commander to oversee military operations and a civilian deputy to the commander from the State Department to oversee civil-military activities. Both commands also embed interagency officials within their organizations, but limited resources at other federal agencies have prevented interagency personnel from participating at the numbers desired. However, AFRICOM has struggled to fully leverage the expertise of embedded officials. Moreover, while SOUTHCOM’s organizational structure was designed to facilitate interagency collaboration, the 2010 Haiti earthquake response revealed weaknesses in this structure that initially hindered its efforts to conduct a large-scale military operation.

- **Well-trained workforce**: AFRICOM has emphasized the need to work closely with U.S. embassies to ensure that activities are consistent with U.S. foreign policy and to contribute to a unity of effort among interagency partners. In addition, the command has designated cultural awareness as a core competency for its staff. However, some AFRICOM staff have limited knowledge about working with U.S. embassies and about cultural issues in Africa, which has resulted in some cultural missteps. Further, limited training is available to enhance personnel expertise. While GAO’s work on SOUTHCOM did not focus on training, personnel from the command also expressed the need for more opportunities to improve their understanding of working in an interagency environment.

What GAO Recommends

GAO made recommendations to the commands aimed at improving their capabilities to perform their missions through the development of plans and training. DOD agreed with the recommendations.

View GAO-10-962T or key components. For more information, contact John H. Pendleton at (202) 512-3489 or pendletonj@gao.gov.
Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss some of the ways that the Department of Defense (DOD) is collaborating with other U.S. federal government agencies to carry out its missions around the world. Recent terrorist events and lessons learned from the ongoing wars in Iraq and Afghanistan illustrate that today's global security challenges have expanded beyond the traditional threats of the Cold War era. These new threats can be unconventional and ambiguous, requiring enhanced collaboration with interagency partners and other stakeholders. For its part, DOD recognizes the limits of traditional military power in today's security environment, which consists of a wide-range of challenges (e.g., terrorism, illicit trafficking, organized crime, piracy) that are often exacerbated by conditions of poverty and profound cultural and demographic tensions. The military's approach to these challenges requires increased collaboration with interagency partners such as the Department of State (State) and the U.S. Agency for International Development (USAID), with DOD often serving in a supporting role to other federal agencies.

Two of DOD's geographic combatant commands, U.S. Southern Command (SOUTHCOM) and U.S. Africa Command (AFRICOM), play key roles in this effort outside of the United States. Both SOUTHCOM and AFRICOM aim to build partner nation capacity and conduct humanitarian assistance projects, while standing ready to perform a variety of military operations, as directed. Among its missions, SOUTHCOM supports U.S. law enforcement and intelligence agencies in the Americas and the Caribbean in disrupting illicit trafficking and narco-terrorism. Having reorganized in 2008, in part to focus on interagency collaboration, SOUTHCOM has been viewed as having mature interagency processes and coordinating mechanisms. AFRICOM, as DOD’s newest combatant command, works with U.S. diplomacy and development agencies on activities ranging from maritime security to pandemic response efforts on the African continent.

The 2008 National Defense Strategy cites both SOUTHCOM and AFRICOM as pointing the way toward a whole-of-government approach to achieving common goals.

Today we issued the reports you requested on SOUTHCOM and AFRICOM, which in part evaluated how each command collaborates with other federal agencies.

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1 DOD designated AFRICOM fully operational on September 30, 2008.
interagency partners. In addition, last September we issued a report on key issues and actions needed to enhance interagency collaboration on national security for Congress and the administration to consider in their oversight and management agendas. My statement today discusses findings from our SOUTHCOM and AFRICOM reviews in three areas essential for interagency collaboration. In addition, the statement provides some preliminary information from our ongoing review of counterpiracy efforts in the Horn of Africa region that was also requested by the subcommittee and will be completed later this year.

This statement is based largely on completed GAO work, which was performed in accordance with generally accepted government auditing standards. To conduct our work, we reviewed relevant documents, analyzed data, traveled to the regions, and interviewed officials from various agencies including the Departments of Defense, Homeland Security, Justice, State, Transportation, the Treasury, and the U.S. Agency for International Development. Additional information about our scope and methodology for our AFRICOM and SOUTHCOM work can be found within the full reports.

Our body of work on interagency collaboration has identified several key areas that are essential for collaboration among U.S. federal agencies in addressing security challenges. Three are particularly important for SOUTHCOM and AFRICOM: (1) developing and implementing overarching strategies, (2) creating collaborative organizations, and (3) building a well-trained workforce. Underlying the success of these key areas is committed and effective leadership.

- Developing and implementing overarching strategies: Our prior work, as well as that by national security experts, has found that strategic direction is required as a foundation for collaboration on national security goals. The means to operate across multiple agencies

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and organizations—such as compatible policies and procedures that facilitate collaboration across agencies and mechanisms to share information frequently—enhances and sustains collaboration among federal agencies. Strategies can help agencies develop mutually reinforcing plans and determine activities, resources, processes, and performance measures for implementing those strategies. Moreover, a strategy defining organizational roles and responsibilities can help agencies clarify who will lead or participate in activities, help organize their joint and individual efforts, facilitate decision making, and address how conflicts would be resolved.

- **Creating collaborative organizations:** Given the differences among U.S. government agencies—such as differences in structure, planning processes, and funding sources—developing adequate coordination mechanisms is critical to achieving integrated approaches. U.S. government agencies, such as DOD, State, and USAID, among others, spend billions of dollars annually on various defense, diplomatic, and development missions in support of national security. Without coordination mechanisms, the results can be a patchwork of activities that waste scarce funds and limit the overall effectiveness of federal efforts.

- **Developing a well-trained workforce:** Collaborative approaches to national security require a well-trained workforce with the skills and experience to integrate the government’s diverse capabilities and resources. A lack of understanding of other agencies’ cultures, processes, and core capabilities can hamper U.S. national security partners’ ability to work together effectively. However, training can help personnel develop the skills and understanding of other agencies’ capabilities needed to facilitate interagency collaboration.

Effective leadership is essential to achieving success in each of these areas. The 2010 *Quadrennial Defense Review* states that by integrating U.S. defense capabilities with other elements of national security—including diplomacy, development, law enforcement, trade, and intelligence—the nation can ensure that the right mix of expertise is at hand to take advantage of emerging opportunities and to thwart potential threats. In addition, the 2010 *National Security Strategy* calls for a renewed emphasis on building a stronger leadership foundation for the long term to more effectively advance U.S. interests.
Our work on SOUTHCOM and AFRICOM found that both commands have demonstrated some practices that will help enhance and sustain interagency collaboration, but areas for improvement remain. Moreover, our preliminary work on counterpiracy efforts in the Horn of Africa region suggests that U.S. agencies have made progress in leading and supporting international efforts to counter piracy, but implementation challenges exist.

SOUTHCOM and AFRICOM have sought input from several federal agencies in developing overarching strategies and plans, but AFRICOM has not yet completed many specific plans to guide activities and ensure a U.S. government unity of effort in Africa. In addition, our preliminary work shows that a U.S. action plan has been developed which provides a framework for interagency collaboration, but the roles and responsibilities of the multiples agencies involved in countering piracy in the Horn of Africa region are not clearly assigned.

In its *Guidance for Employment of the Force*, DOD required both SOUTHCOM and AFRICOM, as prototype test cases, to seek broader involvement from other departments in drafting their theater campaign and contingency plans. To meet this requirement, SOUTHCOM held a series of meetings with interagency officials that focused on involving and gathering input from interagency partners. In developing its 2009 theater campaign plan, which lays out command priorities and guides its resource allocations, SOUTHCOM coordinated with over 10 U.S. government departments and offices, including the Departments of State, Homeland Security, Justice, the Treasury, Commerce, and Transportation and the Office of the Director of National Intelligence (see fig. 1). According to both SOUTHCOM and interagency partners, this coordination helped SOUTHCOM understand the diverse missions of its interagency partners and better align activities and resources in the Americas and the Caribbean. As a result of this effort, SOUTHCOM’s 2009 theater campaign plan includes 30 theater objectives, of which 22 are led by interagency partners with SOUTHCOM serving in a supporting role. SOUTHCOM also provides input into State’s regional strategic plans. Both SOUTHCOM and interagency partners told us that this coordination has helped ensure that SOUTHCOM and interagency partner strategic goals were mutually

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reinforcing and has helped align activities and resources in achieving broad U.S. objectives.

Figure 1: Partners from which SOUTHCOM Received Input during Development of the 2009 Theater Campaign Plan

![Diagram showing partners from which SOUTHCOM received input](image)

Source: Joint Operational War Plans Division, Joint Staff.

Similarly, AFRICOM met with representatives from many agencies to gain interagency input into its theater campaign plan. We spoke with officials from State, USAID, and the U.S. Coast Guard who stated that they provided input into several additional strategy documents, including DOD’s Guidance for Employment of the Force and AFRICOM’s posture statement, and participated in activity planning meetings. Federal agency officials also noted progress in AFRICOM’s interagency coordination since its establishment. State officials said that AFRICOM had made improvements in taking their feedback and creating an environment that is conducive to cooperation across agencies. Similarly, USAID officials said that AFRICOM had improved its coordination with their agency at the USAID headquarters level. Notwithstanding this collaboration, AFRICOM officials told us that aligning strategies among partners can be difficult because of different planning horizons among agencies. For example, AFRICOM’s theater campaign plan covers fiscal years 2010 through 2014,
Some AFRICOM Plans Remain Unfinished, Which Hinders Unity of Effort

Whereas the State/USAID strategic plan spans fiscal years 2007 through 2012.

While AFRICOM has collaborated with partners on overarching strategies, it has not yet completed some plans, which hinders planning and implementation efforts with partners. AFRICOM currently lacks regional engagement and country work plans for Africa, which are called for in its theater campaign plan and would provide specific information on conducting activities. One key requirement for the country work plans, for example, is to align them with embassy strategic plans to ensure unity of effort. Figure 2 shows AFRICOM’s plans in the context of national strategies, guidance, and other federal agencies’ planning efforts.
AFRICOM’s Army component stated that perhaps the greatest challenge to creating positive conditions in Africa is ensuring that U.S. defense efforts remain synchronized; if plans are not coordinated, their efforts could have unintended consequences, such as the potential for Africans to perceive the U.S. military as trying to influence public opinion in a region sensitive to the military’s presence. At the time we completed our audit work, AFRICOM’s regional plans had not been approved by the command, and the country plans were still in the process of being developed. Therefore, we recommended that the Secretary of Defense direct AFRICOM to expedite the completion of its plans and to develop a process whereby plans are reviewed on a recurring basis to ensure that efforts across the command are complementary, comprehensive, and supportive of AFRICOM’s mission.\(^5\) DOD agreed with our recommendation, stating that some of the plans are in the final stages of review and approval by AFRICOM’s leadership.

Our preliminary work on U.S. counterpiracy efforts off the Horn of Africa shows that the United States has an action plan that serves as an overarching strategy and provides a framework for interagency collaboration, but roles and responsibilities have not been clearly assigned. The action plan establishes three main lines of action for interagency stakeholders, in collaboration with industry and international partners, to take in countering piracy. These actions are (1) prevent pirate attacks by reducing the vulnerability of the maritime domain to piracy; (2) interrupt and terminate acts of piracy, consistent with international law and the rights and responsibilities of coastal and flag states; and (3) ensure that those who commit acts of piracy are held accountable for their actions by facilitating the prosecution of suspected pirates by flag, victim, and coastal states and, in appropriate cases, the United States.

\(^5\)GAO-10-794.
While piracy in the Horn of Africa region emanates primarily from Somalia, a country located within AFRICOM's area of responsibility, most attacks are carried out in waters within U.S. Central Command's jurisdiction. Outside DOD, many other stakeholders are involved in counterpiracy efforts. Specifically, the action plan states that, subject to the availability of resources, the Departments of State, Defense, Homeland Security, Justice, Transportation, and the Treasury and the Office of the Director of National Intelligence shall also contribute to, coordinate, and undertake initiatives. Our preliminary work indicates that the National Security Council, which authored the plan, has not assigned the majority of tasks outlined in the plan to specific agencies. As of July 2010, only one task, providing an interdiction-capable presence, had been assigned to the Navy and Coast Guard. Roles and responsibilities for other tasks—such as strategic communications, disrupting pirate revenue, and facilitating prosecution of suspected pirates—have not been clearly assigned. Without specific roles and responsibilities for essential tasks outlined in the action plan, the U.S. government cannot ensure that agencies' approaches are comprehensive, complementary, and effectively coordinated.
SOUTHCOM and AFRICOM have developed organizational structures to facilitate interagency collaboration, but challenges include fully leveraging interagency personnel and maintaining the ability to organize quickly for large-scale military operations when necessary.

Both commands have established key leadership positions for interagency officials within their organizational structures. In addition to a deputy military commander who oversees military operations, each command has a civilian deputy to the commander from State who oversees civil-military activities. At SOUTHCOM, the civilian deputy to the commander—a senior foreign service officer with the rank of Minister Counselor at State—advises SOUTHCOM’s commander on foreign policy issues and serves as the primary liaison with State and with U.S. embassies located in SOUTHCOM’s area of responsibility. At AFRICOM, the civilian deputy to the commander directs AFRICOM’s activities related to areas such as health, humanitarian assistance, disaster response, and peace support operations.

Both commands have also embedded interagency officials throughout their organizations. As of June 2010, AFRICOM reported that it had embedded 27 interagency partners into its headquarters staff from several federal agencies (see table 1), and according to officials at AFRICOM and State, it plans to integrate five foreign policy advisors from State later this year. Moreover, DOD has signed memorandums of understanding with nine federal agencies to outline conditions for sending interagency partners to AFRICOM. As of July 2010, SOUTHCOM reported that it had 20 embedded interagency officials (see table 1), with several placed directly into key senior leadership positions. SOUTHCOM has also created a partnering directorate, which among its responsibilities, has the role of embedding interagency personnel into the command. Decisions to embed interagency officials at SOUTHCOM are made on a case-by-case basis, with most agencies sending a representative to SOUTHCOM on a short-term basis to discuss needs, roles, and responsibilities and to assess whether a full-time embedded official would be mutually beneficial.
Both AFRICOM and SOUTHCOM have indicated that they currently do not have a specific requirement for the number of embedded interagency personnel at their commands but would benefit from additional personnel. However, limited resources at other federal agencies have prevented interagency personnel from participating in the numbers desired. In February 2009, we reported that AFRICOM initially expected to fill 52 positions with personnel from other government agencies. However, State officials told us that they would not likely be able to provide employees to fill the positions requested by AFRICOM because they were already facing a 25 percent shortfall in midlevel personnel. Similarly, SOUTHCOM has identified the need for around 40 interagency personnel, but had only filled 20 of those positions as of July 2010. According to SOUTHCOM officials, it has taken about 3 years to fill its interagency positions because of lack of funding at the command or the inability of partners to provide personnel. Because many agencies have limited personnel and resources, SOUTHCOM and its interagency partners have, on occasion, developed other means to gain stakeholder input and perspectives. For example, in lieu of embedding a Department of the

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Treasury (Treasury) official at the command, SOUTHCOM and Treasury decided that providing a local Treasury representative with access to the command and establishing a memorandum of understanding would serve to improve communication and coordination among the organizations.

While embedding interagency personnel into a DOD command can be an effective means of coordination, interagency personnel serving at AFRICOM may not be fully leveraged for their expertise within the organization. AFRICOM officials told us that it is a challenge to determine where in the command to include interagency personnel. For example, an embedded interagency staff member stated that AFRICOM initially placed him in a directorate unrelated to his skill set, and he initiated a transfer to another directorate that would better enable him to share his expertise. Moreover, several embedded interagency officials said that there is little incentive to take a position at AFRICOM because it will not enhance one’s career position upon return to the original agency after the rotation.

Difficulties with leveraging interagency personnel are not unique to AFRICOM. We have previously reported that personnel systems often do not recognize or reward interagency collaboration, which could diminish interest in serving in interagency efforts. AFRICOM officials said that it would be helpful to have additional interagency personnel at the command, but they understand that staffing limitations, resource imbalances, and lack of career progression incentives for embedded staff from other federal agencies may limit the number of personnel who can be brought in from these agencies. Despite challenges, AFRICOM has made some efforts that could improve interagency collaboration within the command, such as expanding its interagency orientation process. Last fall, the command conducted an assessment of the embedded interagency process to analyze successes and identify lessons learned, including recommendations on how to integrate interagency personnel into command planning and operations. In July 2010, AFRICOM stated that it had established an interagency collaborative forum to assess, prioritize, and implement the recommendations from the assessment.

SOUTHCOM’s recent experience in responding to the Haiti earthquake serves as a reminder that while interagency collaboration is important in addressing security challenges, DOD’s commands must also be prepared to respond to a wide range of contingencies, including large-scale disaster.

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7GAO-09-904SP.
relief operations. While our work found that SOUTHCOM has taken significant steps in building partnerships to enhance and sustain collaboration, the command faces challenges preparing for the divergent needs of its potential missions. SOUTHCOM must have an organizational structure that is prepared for military contingencies and that is also effective in supporting interagency partners in meeting challenges such as corruption, crime, and poverty.

In 2008, SOUTHCOM developed an organizational structure to improve collaboration with interagency stakeholders, which included a civilian deputy to the commander, interagency partners embedded into key leadership positions, and a directorate focused on sustaining partnerships. While SOUTHCOM’s organizational structure was designed to facilitate interagency collaboration, the 2010 Haiti earthquake response revealed weaknesses in this structure that initially hindered its efforts to conduct a large-scale military operation. For example, the command’s structure lacked a division to address planning for military operations occurring over 30 days to 1 year in duration. In addition, SOUTHCOM had suboptimized some core functions that were necessary to respond to large-scale contingencies. For example, SOUTHCOM’s logistics function was suboptimized because it was placed under another directorate in the organizational structure rather than being its own core function. As a result, the command had difficulty planning for the required logistics support—including supply, maintenance, deployment distribution, health support, and engineering—during the large-scale Haiti relief effort, which SOUTHCOM reported peaked at more than 20,000 deployed military personnel, about 2 weeks after the earthquake occurred (see fig. 4).
According to command officials, SOUTHCOM was able to integrate additional interagency and international partners into its headquarters as Haiti relief operations grew in scale; however, the command had not identified the military personnel augmentation required for a large contingency nor had it developed a plan to integrate military personnel into its headquarters structure. Ultimately, SOUTHCOM received 500 military augmentees to provide additional capabilities to its existing command staff of about 800, including an entire staff office from U.S. Northern Command, filling vital gaps in SOUTHCOM’s ability to support operations in Haiti. However, augmented military personnel were not familiar with SOUTHCOM’s organizational structure and did not initially understand where they could best contribute because many of the traditional joint staff functions were divided among SOUTHCOM’s directorates. To address these challenges, SOUTHCOM’s commander returned the command to a traditional joint staff structure while retaining
elements from its 2008 reorganization and plans to retain this structure for the foreseeable future.\textsuperscript{8}

Our report made recommendations aimed at improving SOUTHCOM’s ability to conduct the full range of military missions that may be required in the region, while balancing its efforts to support interagency partners in enhancing regional security and cooperation.\textsuperscript{9} DOD acknowledged the challenges it had faced and agreed with our recommendations. In its response, the department noted that SOUTHCOM’s ability to respond to the Haiti crisis quickly was in part a by-product of close, collaborative relationships developed with a range of U.S. government interagency partners over many years.

AFRICOM Staff Could Benefit from More Comprehensive Training or Guidance on Working with Interagency Officials in Africa

AFRICOM, as a relatively new command engaged in capacity-building efforts, has emphasized the need to work closely with U.S. embassies to ensure that activities are consistent with U.S. foreign policy and to contribute to a unity of effort among interagency partners (see fig. 5). In addition, the command has designated cultural awareness as a core competency for its staff. However, we found that some AFRICOM staff have limited knowledge about working with U.S. embassies and about cultural issues in Africa, and the training or guidance available to augment personnel expertise in these areas is limited. While AFRICOM has efforts under way to strengthen staff expertise in these areas, the limited knowledge among some staff puts AFRICOM at risk of being unable to fully leverage resources with U.S. embassy personnel, build relationships with African nations, and effectively carry out activities.

\textsuperscript{8}The traditional joint staff headquarters organization generally includes directorates for manpower and personnel (J1), intelligence (J2), operations (J3), logistics (J4), plans (J5), communications system (J6), as well as additional directorates as deemed necessary.

\textsuperscript{9}GAO-10-801.
AFRICOM emphasizes the importance of collaborating with its interagency partners, but some personnel’s limited knowledge of working with U.S. embassies can impose burdens on embassies’ staff who may be taken away from their assigned duties to help AFRICOM. For example, a U.S. embassy official in Uganda stated that AFRICOM personnel arrived in country with the expectations that the embassy would take care of basic cultural and logistical issues for them. Also, AFRICOM’s Horn of Africa task force personnel have, at times, approached the Djiboutian government ministries directly with concepts for activities rather than following the established procedure of having the U.S. embassy in Djibouti initiate the contact. Additionally, while cultural awareness is a core competency for AFRICOM, the limited knowledge of some personnel in the command and its military service components regarding Africa cultural issues has occasionally led to difficulties in building relationships with African nations—such as when AFRICOM’s task force distributed used clothing to local Djibouti villagers during Ramadan, which offended the Muslim population, or proposed drilling a well without considering how its placement could affect local clan relationships.
While AFRICOM personnel and forces deploying for activities receive some training on working with interagency partners and on African cultural awareness—and efforts are under way to increase training for some personnel—our review of training presentations indicated that they were insufficient to adequately build the skills of its staff. AFRICOM officials told us that training includes Web courses and seminars, and that there are other training requirements for personnel deploying to Africa such as medical and cultural awareness training. Officials said, however, that while training is encouraged, it is not required, and that the command does not currently monitor the completion of training courses. Furthermore, officials from several AFRICOM components voiced a preference for more cultural training and capabilities.

In our prior work on AFRICOM’s Horn of Africa task force, we similarly reported that the task force’s training on working with U.S. embassies was not shared with all staff, and cultural awareness training was limited. We recommended, and DOD agreed, that the Secretary of Defense direct AFRICOM to develop comprehensive training guidance or a program that augments assigned personnel’s understanding of African cultural awareness and working with interagency partners. In addition, in our report on AFRICOM released today, we recommended that the Secretary of Defense direct AFRICOM, in consultation with State and USAID, to develop a comprehensive training program for staff and forces involved in AFRICOM activities that focuses on working with interagency partners and on cultural issues related to Africa. DOD agreed with the recommendation, describing some efforts that AFRICOM was taking and stating that the command will continue to develop and conduct training to improve its ability to work with embassies and other agencies. While our work on SOUTHCOM did not focus on workforce training, command personnel have expressed the need for more opportunities to improve their understanding of working in an interagency environment.

Mr. Chairman, this concludes my prepared remarks. I would be pleased to respond to any questions you or other Members of the Subcommittee may have at this time.


11GAO-10-794.
For future information regarding this statement, please contact John H. Pendleton at (202) 512-3489 or pendletonj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Key contributors to this statement are listed in appendix I.
Appendix I: GAO Contact and Staff

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In addition to the contact named above, Directors Stephen Caldwell and Jess Ford; Assistant Directors Patricia Lentini, Marie Mak, and Suzanne Wren; and Alissa Czyz, Richard Geiger, Dawn Hoff, Brandon Hunt, Farhanaz Kermalli, Arthur Lord, Tobin McMurdie, Jennifer Neer, Jodie Sandel, Leslie Sarapu, and Erin Smith made key contributions to this statement.
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