



September 2014

COMBATING TERRORISM

Strategy to Counter Iran in the Western Hemisphere Has Gaps That State Department Should Address

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GAO Highlights

Highlights of [GAO-14-834](#), a report to congressional requesters

Why GAO Did This Study

The activities of Iranian government elements, such as a 2011 attempt to assassinate the Saudi Ambassador in the United States, could pose a threat to U.S. national security. Congress enacted the Countering Iran in the Western Hemisphere Act of 2012, requiring State to assess the threats posed to the United States by Iran's presence and activity in the Western Hemisphere and to develop a strategy to address those threats. This report examines (1) State's collaboration with other key U.S. agencies and foreign partners to address Iranian activities in the Western Hemisphere, (2) the extent to which the strategy addresses elements identified in the act, and (3) the extent to which the strategy includes desirable characteristics of national strategies.

GAO analyzed agency documents and interviewed agency officials in Washington, D.C.; Argentina; Brazil; Colombia; and Mexico. GAO chose these countries based on factors such as past instances of Iran-linked terrorist attacks and their bilateral relationships with the United States.

What GAO Recommends

GAO recommends that the Secretary of State provide the relevant congressional committees with additional information that would fully address the elements in the act. In the absence of such information, State should explain why it was not included in the strategy. State generally disagreed with our assessment of the extent to which the strategy addressed the elements in the act but agreed to continue to provide Congress with information regarding Iranian activities in the Western Hemisphere.

View [GAO-14-834](#). For more information, contact Charles Michael Johnson, Jr., at (202) 512-7331 or JohnsonCM@gao.gov

September 2014

COMBATING TERRORISM

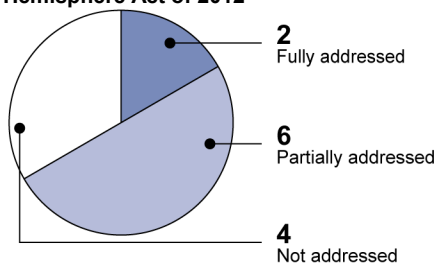
Strategy to Counter Iran in the Western Hemisphere Has Gaps That State Department Should Address

What GAO Found

The Department of State (State) uses a variety of mechanisms to collaborate with interagency partners and host governments to address activities of Iran in the Western Hemisphere. In developing the strategy, which includes an Intelligence Community Assessment developed by the Office of the Director of National Intelligence (ODNI), State's Bureau of Western Hemisphere Affairs worked with other U.S. agencies at the headquarters level and relied on cable reporting from posts. According to State officials, the strategy represents a consensus view of key agencies. While the Department of Defense (DOD) as a whole joined in this consensus, one part of DOD—the Southern Command—disagreed with the strategy's characterization of the Iranian threat at the time the strategy was prepared. State also uses venues such as country team meetings and law enforcement working groups to address Iranian activities.

While the strategy contains information on Iranian activities in the Western Hemisphere, it does not contain all the information that the Countering Iran in the Western Hemisphere Act of 2012 stated it should include. GAO identified 12 distinct elements that the act stated should be included in the strategy. As shown in the figure, the strategy fully addresses 2, partially addresses 6, and does not address 4 of 12 elements. For example, the strategy contains information describing the operations of Iran, but does not include a plan to address U.S. interests to ensure energy supplies from the Western Hemisphere are free from foreign manipulation. State and ODNI officials reported several reasons why the strategy may not fully address the information identified in the law. For example, State said it only included information in the strategy if it deemed the activity identified in the law to be a threat to the United States.

Extent to Which the Strategy Addressed Elements in the Countering Iran in the Western Hemisphere Act of 2012



Source: GAO analysis of Department of State and Office of the Director of National Intelligence (ODNI) documents and statements by ODNI officials. | [GAO-14-834](#)

Note: ODNI officials did not provide documentation for three of the elements that were fully or partially addressed in the Intelligence Community Assessment.

State is not legally required to address the six desirable characteristics of effective national strategies GAO has identified, but the strategy does include some of them. The strategy fully addresses problem definition and risk assessment. It partially addresses purpose, scope, and methodology; goals, subordinate objectives, activities, and performance measures; and organizational roles, responsibilities, and coordination. The strategy does not, however, address resources, investments, and risk management; and integration into other strategies and implementation by other levels of government.

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Abbreviations

DHS	Department of Homeland Security
DOD	Department of Defense
DOJ	Department of Justice
ODNI	Office of the Director of National Intelligence
State	Department of State
Treasury	Department of the Treasury
USTR	Office of the U.S. Trade Representative

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September 29, 2014

The Honorable Michael T. McCaul
Chairman
Committee on Homeland Security
House of Representatives

The Honorable Jeff Duncan
Chairman
Subcommittee on Oversight and Management Efficiency
Committee on Homeland Security
House of Representatives

Iranian government elements—including the Iranian Islamic Revolutionary Guard Corps and its Qods Force, and Iran’s close ally Lebanese Hizballah—have played a role in terrorist operations in the Western Hemisphere over the past two decades. This includes the 1994 bombing of the Jewish Community Center in Buenos Aires, Argentina, that killed 85 people. In October 2011, the United States announced charging two men with conspiracy to assassinate the Saudi Arabian Ambassador to the United States. The alleged plot was directed by elements of the Iranian government to murder the Ambassador with explosives while the Ambassador was in the United States, according to the announcement. In December 2012, Congress enacted the Countering Iran in the Western Hemisphere Act of 2012,¹ which stated that the policy of the United States is to use a comprehensive government-wide strategy to counter Iran’s growing hostile presence and activity in the Western Hemisphere by working together with U.S. allies and partners in the region to mutually deter threats to U.S. interests by Iran and its proxy actors. The act further required the Department of State (State) to assess the threats posed to the United States by Iran’s activities in the Western Hemisphere and submit to the relevant congressional committees the results of the assessment and a strategy to address these threats. The act directed the Secretary of State, in developing the strategy, to consult with the heads of other U.S. departments and agencies, including the Departments of Defense (DOD), Homeland Security (DHS), Justice (DOJ), and the

¹Pub. L. No. 112-220, 126 Stat. 1596 (Dec. 28, 2012).

Treasury (Treasury); the Office of the Director of National Intelligence (ODNI); and the Office of the U.S. Trade Representative (USTR).

Responding to the act, State submitted a document to Congress that included a seven-page classified strategy report, an unclassified summary of policy recommendations, and an Intelligence Community Assessment.² Some Members of Congress have raised concerns about the strategy and expressed continued concerns about Iranian activities in the Western Hemisphere. In response to these concerns, you requested that we review the strategy and its development. In this report, we examine (1) State's collaboration with other key U.S. agencies and foreign partners to address Iranian activities in the Western Hemisphere, (2) the extent to which the strategy on addressing Iranian activities in the Western Hemisphere included elements identified in the act, and (3) the extent to which the strategy on addressing Iranian activities in the Western Hemisphere included desirable characteristics of national strategies.

To analyze State's collaboration with key U.S. agencies and foreign partners to address Iranian activities in the Western Hemisphere, we reviewed agency documents and interviewed U.S. and foreign officials. We interviewed officials from State, DOD, DHS, Treasury, DOJ, ODNI, and USTR. We also interviewed officials at the U.S. embassies in Argentina, Brazil, Colombia, and Mexico, and host government officials in Colombia and Mexico regarding input they may have provided regarding the strategy.³ We chose these countries based on a number of factors, including whether they had experienced instances of Iran-linked terrorist attacks, their bilateral relationships with the United States, and our expected ability to engage with host government officials. The results of our interviews with officials at these four locations are not generalizable to all countries in the Western Hemisphere. To examine the extent to which

²When we refer to the strategy or State's submission of the strategy, we are referring to the entire set of documents submitted to Congress: the unclassified summary of policy recommendations, the classified strategy document, and the more highly classified Intelligence Community Assessment. State believes the three documents should be reviewed in conjunction since classification limitations prevent some relevant material in the Intelligence Community Assessment from being repeated in either of the other strategy documents.

³We also requested meetings with host government officials in Argentina and Brazil, but our requests were declined by those governments.

the strategy on addressing Iranian activities in the Western Hemisphere includes elements identified in the act, we analyzed State's submission to Congress, including State's classified strategy report, the unclassified summary of policy recommendations, and portions of the Intelligence Community Assessment. We analyzed documents and interviewed State and ODNI officials to determine how, if at all, the strategy addressed the elements in the act. For some instances in which we could not review portions of the documents that make up the strategy, we relied on the testimonial information provided by agency officials and noted such instances.⁴ We also examined the strategy to determine the extent to which the strategy incorporated desirable characteristics of national strategies that we have previously identified.⁵

We conducted this performance audit from January 2014 to September 2014 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 I provides a detailed explanation of our objectives, scope, and methodology.

Background

The Countering Iran in the Western Hemisphere Act of 2012 directed the Secretary of State to conduct an assessment of the threats posed to the United States by Iran's growing presence and activity in the Western Hemisphere, and to submit a strategy to address Iran's growing hostile presence and activity in the Western Hemisphere. We identified 12 broad elements in the act that should be included in the strategy, such as descriptions of the presence, activities, and operations of Iran and its proxy actors in the Western Hemisphere; a description of the federal law enforcement capability and military forces in the Western Hemisphere that may organize to counter the threat posed by Iran and its proxy

⁴In three instances, ODNI officials told us information that was included in the Intelligence Community Assessment, but they did not provide corroborating documentation. In those instances, we reflected the information provided by ODNI officials but noted that we were unable to independently verify their statements because ODNI did not make supporting documentation available.

⁵GAO, *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004).

actors; and a plan to address any efforts by foreign persons, entities, and governments in the region to assist Iran in evading United States and international sanctions.

In June 2013 State submitted a seven-page classified strategy report, an unclassified annex that summarizes policy recommendations, and an Intelligence Community Assessment at a higher security classification level, to fulfill the requirement in the act. State's seven-page classified strategy report is an overview of Iran's activities in the Western Hemisphere, its relationships with countries in the area, and U.S. efforts to address any concerns. It includes a summary of diplomatic and economic ties with the Western Hemisphere countries, noting that the key to Iran's activities in the region has been Venezuela.

The strategy report notes that the economic relationship between Iran and the Western Hemisphere is limited, with only 0.2 percent of Latin American exports going to Iran. It also describes the effect of U.S. economic sanctions and diplomatic pressure, which it says have been successful in preventing further Iranian involvement in the Western Hemisphere. In addition, the strategy broadly describes Iranian activities in the Western Hemisphere.

The strategy report also describes five areas of focus for continuing to address Iranian threats in the Western Hemisphere. The areas of focus are to (1) expand existing efforts to share intelligence and information; (2) identify, disrupt, and dismantle criminal networks to enhance border security and strengthen law enforcement; (3) continue to take actions on sanctions and implementation of the Iran Freedom and Counter-Proliferation Act of 2012; (4) improve rule of law capacity-building initiatives in the Western Hemisphere; and (5) continue diplomatic pressure, including at the multilateral level in the United Nations and the International Atomic Energy Agency.

In addition to the seven-page strategy report, State submitted two annexes. Annex A is an unclassified summary of policy recommendations and addresses a requirement in the act to submit an unclassified summary of policy recommendations. Annex A defines the desired end state of U.S. efforts in this area to be a decrease in Iranian presence and influence in the Western Hemisphere. It makes the assumption that Iran will continue its outreach to the Western Hemisphere but also concludes that Iranian influence in the Western Hemisphere is waning.

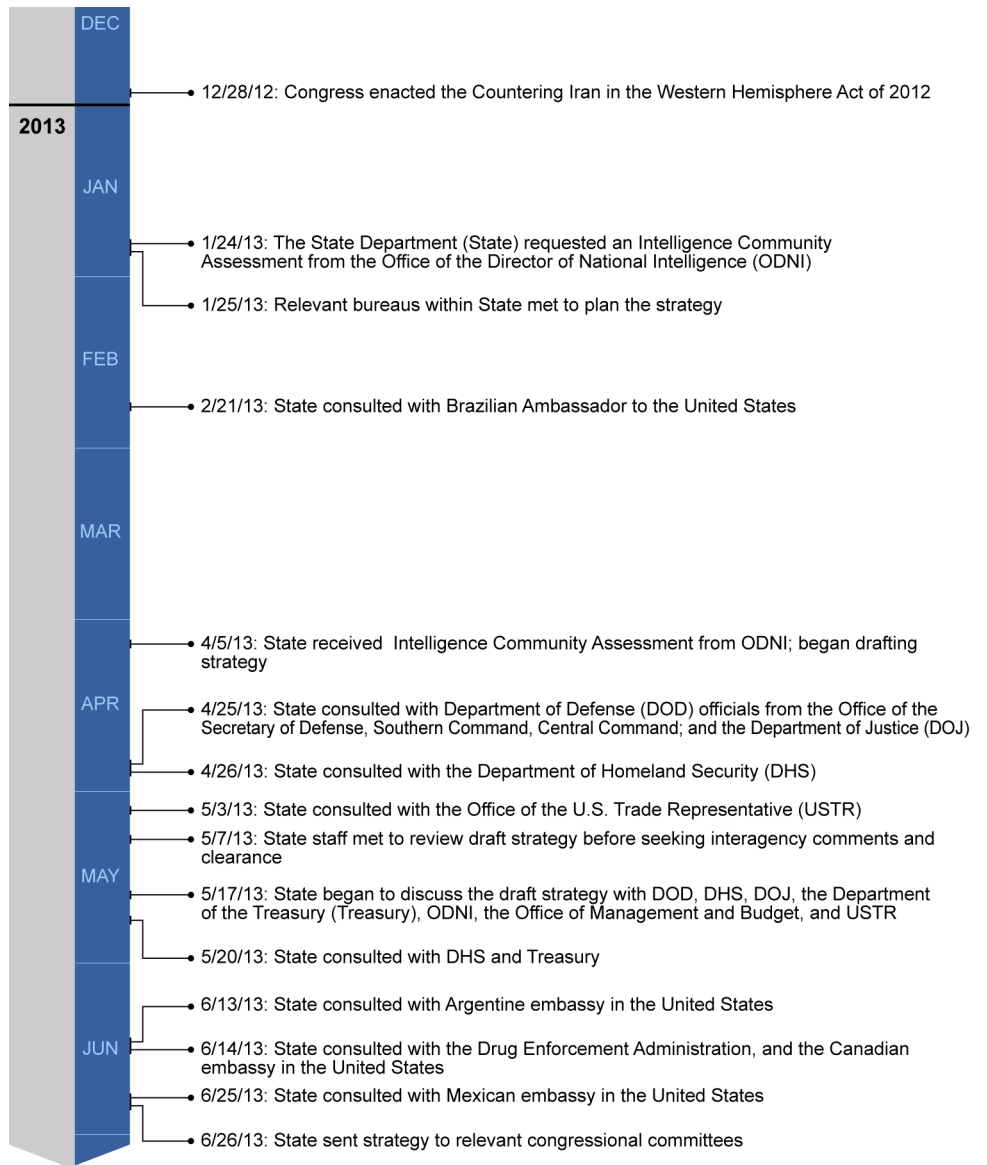
Annex B is an Intelligence Community Assessment that was developed by ODNI at the request of State. According to ODNI, the Intelligence Community Assessment includes, among other things, a discussion of Iran's presence in the Western Hemisphere, funding of cultural and religious centers, military-to-military activities, economic engagements, trade relationships, and diplomatic relations.

State Uses a Variety of Mechanisms to Collaborate with Other Stakeholders to Address Iranian Activities in the Western Hemisphere

In accordance with the act, officials in State's Bureau of Western Hemisphere Affairs developed the strategy based on consultations with officials representing DOD, DHS, DOJ, Treasury, ODNI, and USTR in headquarters and also conducted some outreach to overseas posts and partner governments. The Countering Iran in the Western Hemisphere Act of 2012 required the Secretary of State to consult with the heads of all appropriate U.S. departments and agencies, including the Secretaries of Defense, Homeland Security, and Treasury, and the Attorney General, the Director of National Intelligence, and the U.S. Trade Representative. Officials we interviewed at headquarters representing all of these agencies noted that State sought their input into the strategy and requested their review prior to issuing the strategy. State also consulted with components of the intelligence community.

According to an official at the Bureau of Western Hemisphere Affairs who helped draft the strategy, State did not conduct a specific data call to all of the U.S. posts in the Western Hemisphere to seek the posts' input into the strategy. Instead, the official said State alerted embassies through e-mails from State leadership informing them of the development of the strategy. In addition, State reviewed information in cable reports from posts in the Western Hemisphere. Embassy officials at the four posts we visited were generally aware of the U.S. strategy on addressing Iranian activities in the Western Hemisphere. However, most of the embassy officials we interviewed were not at the embassy when State was developing the strategy and did not know if their predecessors had contributed to the strategy's development. State officials reported meeting with officials from foreign embassies in Washington, D.C., including the embassies of Argentina, Canada, Mexico, and Brazil. Foreign government officials we met with during fieldwork in Mexico and Colombia said that they had not provided input into the U.S. strategy. Figure 1 provides a timeline of State's collaboration efforts.

Figure 1: Timeline of the Department of State's Development of the 2013 Strategy to Address Iranian Activities in the Western Hemisphere



Source: GAO analysis of data from the Department of State and interviews with U.S. officials. | GAO-14-834

According to State officials, the strategy represents a consensus view of key agencies, including DOD, DHS, DOJ, and the Intelligence Community.⁶ Of note, while DOD as a whole joined in this consensus, one part of DOD—the Southern Command—disagreed with the strategy’s characterization of the Iranian threat in the hemisphere at the time the strategy was prepared.

In addition to collaboration regarding its strategy, State also collaborates with other key agencies (DOD, DHS, DOJ, ODNI, and Treasury) in headquarters about issues related to Iranian activities in the Western Hemisphere through interagency working groups and informal mechanisms. Officials representing all four U.S. embassies we visited (Argentina, Brazil, Colombia, and Mexico) also reported effective formal and informal collaboration efforts were in place to share information that could include activities of Iran and its proxies; the following are examples.

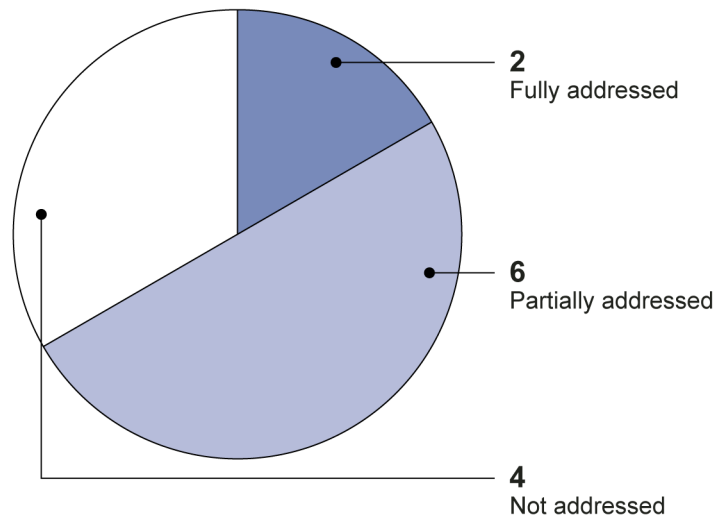
- *Country team meetings:* All four embassies we visited hold weekly country team meetings in which agencies and sections share information.
- *Working groups:* The Law Enforcement Working Group is the main venue for coordinating efforts to monitor and address potential Iranian activity in all four embassies we visited. The law enforcement working groups in all four locations included, at a minimum, all the relevant law enforcement and intelligence agencies (DOD, DHS, DOJ, and others in the Intelligence Community) at the embassy. At some embassies, these meetings also included components not traditionally associated with law enforcement, such as State’s Political and Economic sections. Other working groups also played important roles in addressing threats, sometimes including those emanating from Iran and its proxies.
- *Informal collaboration and communication:* Officials representing all different sections and agencies of all four embassies also reported that informal communications (e-mails, phone calls, in-person visits) or ad hoc meetings are sometimes the most important means to collaborate effectively and efficiently as issues arise.

⁶The Intelligence Community is a coalition of 17 federal agencies and organizations, including ODNI, that work both independently and collaboratively to gather and analyze the intelligence necessary to conduct foreign relations and national security activities.

Strategy on Iranian Activities Did Not Address All the Information Congress Requested

The three documents constituting the strategy contain information on Iranian activities in the Western Hemisphere; however, they do not contain all of the information identified in the act. We identified 12 distinct elements that the act states should be included in the strategy. Half of these elements request a description of specific Iranian activities and relationships, as well as foreign and U.S. capabilities to counter the threat posed by Iran in the Western Hemisphere. The other half request plans to address potential threats to the United States. As shown in figure 2, the strategy fully addresses 2 elements, partially addresses 6 elements, and does not address the remaining 4 elements.

Figure 2: Extent to Which the Strategy to Address Iranian Activities in the Western Hemisphere Addresses 12 Elements Requested by Congress in the Countering Iran in the Western Hemisphere Act of 2012



Source: GAO analysis of Department of State and Office of the Director of National Intelligence (ODNI) documents and statements by ODNI officials. | GAO-14-834

Note: ODNI officials did not provide documentation for three of the elements that were fully or partially addressed in the Intelligence Community Assessment. In these three instances, our assessment relies on interviews with State and ODNI officials. According to State officials, the strategy includes a description of ongoing initiatives that could address Iranian activities such as the Merida Initiative and the Proliferation Security Initiative. State officials also noted that the strategy addressed some elements which we assessed as “not addressed” based on our methodology. Per our methodology, the strategy “fully addresses” an element when it explicitly cites all characteristics of an element, even if it lacks further details. The strategy “partially addresses” an element when it explicitly cites some but not all characteristics of an element. The strategy “does not address” an element when it does not explicitly cite or discuss any characteristics of an element and/or when any implicit references are either too vague or general.

For the 12 strategy elements shown in table 1:

- of the 6 that the act states should include a description of Iranian activities or Latin American government capabilities to address Iranian activities, the strategy fully addresses 2 and partially addresses 4;
- of the 6 that the act states should include plans to address potential threats to U.S. interests, the strategy partially addresses 2 and does not address 4.

Table 1: Assessment of the Extent to Which the Strategy to Address Iranian Activities in the Western Hemisphere Addresses Elements Identified in the Countering Iran In the Western Hemisphere Act of 2012

Section of the act	Element that the act specified should be addressed in the strategy	GAO assessment
5(b)(1)	A description of the presence, activities, and operations of Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present in the Western Hemisphere, including information about their leaders, objectives, and areas of influence and information on their financial networks, trafficking activities, and safe havens.	● ^a
5(b)(2)	A description of the terrain, population, ports, foreign firms, airports, borders, media outlets, financial centers, foreign embassies, charities, religious and cultural centers, and income-generating activities in the Western Hemisphere utilized by Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present in the Western Hemisphere.	◐
5(b)(3)	A description of the relationship of Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, and Hezbollah with transnational criminal organizations linked to Iran and other terrorist organizations in the Western Hemisphere, including information on financial networks and trafficking activities.	◐ ^a
5(b)(4)	A description of the relationship of Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present in the Western Hemisphere with the governments in the Western Hemisphere, including military-to-military relations and diplomatic, economic, and security partnerships and agreements.	● ^a
5(b)(5)	A description of the federal law enforcement capabilities, military forces, state and local government institutions, and other critical elements, such as nongovernmental organizations, in the Western Hemisphere that may organize to counter the threat posed by Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present in the Western Hemisphere.	◐
5(b)(6)	A description of activity by Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present at the United States borders with Mexico and Canada and at other international borders within the Western Hemisphere, including operations related to drug, human, and arms trafficking, human support networks, financial support, narco-tunneling, and technological advancements.	◐
5(b)(6)(A)	With respect to United States borders, in coordination with the Governments of Mexico and Canada and the Secretary of Homeland Security, a plan to address resources, technology, and infrastructure to create a secure United States border and strengthen the ability of the United States and its allies to prevent operatives from Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, or any other terrorist organization from entering the United States.	○

Section of the act	Element that the act specified should be addressed in the strategy	GAO assessment
5(b)(6)(B)	Within Latin American countries, a multiagency action plan , in coordination with United States allies and partners in the region, that includes development of strong rule-of-law institutions to provide security in such countries and a counterterrorism and counter-radicalization plan to isolate Iran, the Iranian Islamic Revolutionary Guard Corps, its Qods Force, Hezbollah, and other terrorist organizations linked to Iran that may be present in the Western Hemisphere from their sources of financial support and counter their facilitation of terrorist activity.	● ^b
5(b)(7)(A)	A plan to address any efforts by foreign persons, entities, and governments in the region to assist Iran in evading United States and international sanctions.	○
5(b)(7)(B)	A plan to protect United States interests and assets in the Western Hemisphere, including embassies, consulates, businesses, energy pipelines, and cultural organizations, including threats to United States allies.	○
5(b)(7)(C)	A plan to support United States efforts to designate persons and entities in the Western Hemisphere for proliferation activities and terrorist activities relating to Iran, including affiliates of the Iranian Islamic Revolutionary Guard Corps, its Qods Force, and Hezbollah, under applicable law including the International Emergency Economic Powers Act.	● ^b
5(b)(7)(D)	A plan to address the vital national security interests of the United States in ensuring energy supplies from the Western Hemisphere that are free from the influence of any foreign government that would attempt to manipulate or disrupt global energy markets.	○

Assessment legend

● Fully addressed ● Partially addressed ○ Not addressed

Source: Pub. L. No. 112-220, 126 Stat. 1596 (Dec. 28, 2012) and GAO analysis of Department of State (State) and Office of the Director of National Intelligence (ODNI) documents and statements by State and ODNI officials. | GAO-14-834

Notes: State officials believe that the strategy addressed some elements which we assessed as “not addressed” based on our methodology. For example, the strategy report referred to border security and sanctions efforts that relate to elements 5(b)(6)(A) and 5(b)(7)(A), respectively. However, the language in the act requested specific plans for these two elements that State did not include in its strategy report. Based on our methodology, the strategy “fully addresses” an element when it explicitly cites all characteristics of an element, even if it lacks further details. The strategy “partially addresses” an element when it explicitly cites some but not all characteristics of an element. The strategy “does not address” an element when it does not explicitly cite or discuss any characteristics of an element and/or when any implicit references are either too vague or general.

^aODNI officials did not provide documentation for these elements, and our assessment relies on interviews with ODNI and State officials.

^bState officials told us that the strategy mentions several ongoing initiatives that are relevant to addressing Iranian activities in the Western Hemisphere. Examples of these initiatives include the Merida Initiative, the Central America Regional Security Initiative, the Caribbean Basin Security Initiative, the Colombia Strategy Development Initiative, and the Proliferation Security Initiative.

State and ODNI officials reported four reasons why the strategy does not fully address the information that the act stated should have been included.

- First, State officials informed us that they only included information on threats posed by Iran and Hizballah to the United States, based on State’s interpretation of the act. According to State officials, State interpreted the law to mean that if the Secretary of State deemed the Iranian or Hizballah activity a threat to the United States, State would

be required to address it in its submission to the relevant congressional committees; if the Secretary of State did not deem it to be a threat to the United States, State would not be required to address it. ODNI officials also told us that they did not report on elements for which they had no information or for which the information available to them indicated there was no relevant Iranian activity. In the strategy, State and ODNI did not note elements for which they sought but did not find relevant information.

- Second, ODNI officials reported several reasons why the Intelligence Community Assessment only partially addressed some of the elements. The officials noted that Intelligence Community analysts regularly provide a range of products to policymakers on the topic, including more tactical information than is included in Intelligence Community Assessments, which have helped policymakers as they developed the broader strategy.
- Third, State officials informed us that State's February 2010 Executive Secretariat Memorandum⁷ requires all reports to Congress to be limited to five pages and that State therefore issued its classified strategy and unclassified summary of policy recommendations to meet this five-page reporting limitation. According to State officials, this requirement limited their ability to include information to comprehensively address all of the elements identified in the act.
- Fourth, ODNI officials informed us that the Intelligence Community Assessment did not respond to some of the elements identified in the law because these elements were related to policy matters and thus were not appropriate for the Intelligence Community Assessment to address.

⁷Department of State, Executive Secretariat Memorandum, "Congressional Report Reform and Managing Department Resources" (Washington, D.C.: Feb. 5, 2010).

Though Not Required to Do So, the Strategy on Iranian Activities Included Some of the Desirable Characteristics of National Strategies

While State was not required to include GAO’s six desirable characteristics for national strategies in its strategy to address Iran’s activity in the Western Hemisphere, it included some but not all of these characteristics. These desirable characteristics are (1) purpose, scope, and methodology; (2) problem definition and risk assessment; (3) goals, subordinate objectives, activities, and performance measures; (4) resources, investments, and risk management; (5) organizational roles, responsibilities, and coordination; and (6) integration and implementation.⁸ Ideally, a national strategy should contain all of these characteristics. Including these characteristics in a national strategy also enhances its usefulness as guidance for resource and policy decision makers to better ensure accountability.

As shown in table 2, we found that the strategy for addressing Iranian activities in the Western Hemisphere fully addresses one desirable characteristic of national strategies, partially addresses three more, and does not address the remaining two.

Table 2: Assessment of the Extent to Which the Strategy to Address Iranian Activities in the Western Hemisphere Addresses GAO’s Desirable Characteristics of a National Strategy

Desirable characteristic	Description	GAO assessment
Purpose, scope, and methodology	This characteristic addresses why the strategy was produced, the scope of its coverage, and the process by which it was developed. Furthermore, a strategy would enhance clarity by including definitions of key relevant terms (such as “combating terrorism” and “homeland security” in this context). In addition to describing what it is meant to do and the major functions, mission areas, or activities it covers, a national strategy would ideally address its methodology.	●
Problem definition and risk assessment	This characteristic addresses the particular national problems and threats the strategy is directed toward. Specifically, this means a detailed discussion or definition of the problems the strategy intends to address, their causes, and operating environment. In addition, this characteristic entails a risk assessment, including an analysis of the threats to, and vulnerabilities of, critical assets and operations. If the details of these analyses are classified or preliminary, an unclassified version of the strategy could at least include a broad description of the analyses and stress the importance of risk assessment to implementing parties.	●

⁸These desirable characteristics were developed in consultation with a variety of public and private sector sources and provide additional guidance to responsible parties for developing and implementing national strategies. See GAO, *Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism*, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004).

Desirable characteristic	Description	GAO assessment
Goals, subordinate objectives, activities, and performance measures	This characteristic addresses what the national strategy strives to achieve and the steps needed to garner those results, as well as the priorities, milestones, and performance measures to gauge results. At the highest level, this could be a description of an ideal “end-state,” followed by a logical hierarchy of major goals, subordinate objectives, and specific activities to achieve results.	●
Resources, investments, and risk management	This characteristic addresses what the strategy will cost, the sources and types of resources and investments associated with the strategy, and where those resources and investments should be targeted. Furthermore, a national strategy would ideally elaborate on the risk assessment mentioned earlier and give guidance to implementing parties to manage their resources and investments accordingly—and begin to address the difficult but critical issues about who pays, and how such efforts will be funded and sustained in the future.	○
Organizational roles, responsibilities, and coordination	This characteristic addresses which organizations will implement the strategy, their roles and responsibilities, and mechanisms for coordinating their efforts. It helps answer the fundamental question about who is in charge, not only during times of crisis, but also during all phases of homeland security and combating terrorism efforts: prevention, vulnerability reduction, and response and recovery. This characteristic entails identifying the specific federal departments, agencies, or offices involved and, where appropriate, the different sectors, such as state, local, private, or international sectors.	●
Integration and implementation	This characteristic addresses both how a national strategy relates to other strategies’ goals, objectives, and activities, and to subordinate levels of government and their plans to implement the strategy.	○

Assessment legend

● Fully addressed ● Partially addressed ○ Not addressed

Source: GAO analysis. | GAO-14-834

Note: The strategy “fully addresses” an element when it explicitly cites all characteristics of an element, even if it lacks further details. The strategy “partially addresses” an element when it explicitly cites some but not all characteristics of an element. The strategy “does not address” an element when it does not explicitly cite or discuss any characteristics of an element and/or when any implicit references are either too vague or general.

The strategy fully addresses *problem definition and risk assessment*. According to ODNI officials, the Intelligence Community Assessment goes into significant detail describing Iranian activities and assessing the risks to U.S. interests.

The strategy partially addresses three other desirable characteristics of national strategies: *purpose, scope, and methodology*; *goals, subordinate objectives, activities, and performance measures*; and *organizational roles, responsibilities, and coordination*. The classified strategy report discusses the purpose of the strategy as a response to the act and a multiagency effort to address Iranian activities in Latin America, and the

strategy also briefly discusses the various agencies consulted in its development. However, the information contained in the strategy is too general to be considered to fully address its methodology.⁹ The strategy discusses an ideal “end-state,” major goals, subordinate objectives, and specific activities to address Iranian activities in the Western Hemisphere. However, it does not set clear desired results and priorities, specific milestones, and outcome-related performance measures. It also does not discuss any limitations on performance measures that may exist, nor does it address plans to obtain better data or measurements. The strategy identifies organizations involved with achieving the desirable result and mechanisms for coordinating their efforts to address Iranian activities in the Western Hemisphere, but it does not clarify organizations’ specific roles and responsibilities to address Iranian activities in the Western Hemisphere.

The strategy does not address two desirable characteristics of national strategies: *resources, investments, and risk management; and integration and implementation*. When asked, State officials said that the strategy outlines ongoing initiatives and programs that address Iranian activities and does not require any additional investments or plans to implement these initiatives.

Conclusions

The United States continues to face a range of threats to its national security, among them threats emanating overseas from terrorist organizations and their state sponsors—including Iran. Congress has expressed serious concerns about Iranian activities in the Western Hemisphere, including reported involvement in the attempt to assassinate the Saudi Ambassador to the United States. To more fully understand the nature and extent of Iranian activities in the Western Hemisphere, Congress required State to assess and report on the threat posed to the United States by Iran’s presence and activity in the Western Hemisphere, and to develop a strategy for addressing Iran’s hostile presence and activity. While State’s strategy report and the accompanying Intelligence Community Assessment include information about Iranian activities in the Western Hemisphere, some information that Congress stated should be included was either partially addressed or not addressed. State and ODNI

⁹According to State officials, the Intelligence Community Assessment fully addresses the methodology.

officials provided to us reasons why they did not fully address some of the information Congress called for in the strategy. However, the strategy did not include State's explanation, which may have contributed to some of the concerns expressed by Members of Congress. Providing additional information that addresses the topics not covered by the strategy—including the plans outlining interagency and multilateral coordination of targeted security efforts—could help Congress understand the basis for State's conclusions and better inform policymakers as they continue to monitor the potential threats posed by Iranian activities in the Western Hemisphere.

Recommendation for Executive Action

For elements identified in the Countering Iran in the Western Hemisphere Act of 2012 that were not fully addressed in the strategy, we recommend that the Secretary of State provide the relevant congressional committees with information that would fully address these elements. In the absence of such information, State should explain to the congressional committees why it was not included in the strategy.

Agency Comments and Our Evaluation

We provided a draft of this report to State, DOD, DHS, DOJ, ODNI, Treasury, and USTR for comment. DOD, DOJ, ODNI, Treasury, and USTR had no comments. DHS provided a technical comment, which we addressed as appropriate. In its written comments, reproduced in appendix II along with our responses to specific points, State generally disagreed with our assessment of the extent to which the strategy addressed the elements in the act. State indicated that it has provided information and briefed Congress on these matters on a regular basis and agreed to continue to do so.

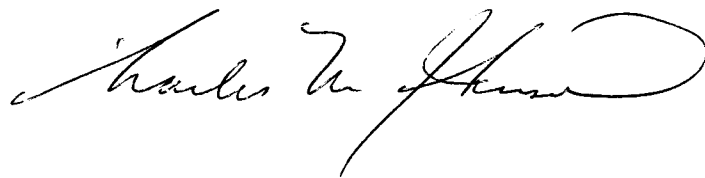
In support of its position, State noted that our report catalogued matters that Congress stated should be included in the strategy but that these were not specific reporting requirements. In addition, State explained that it did not address matters where the consensus of the intelligence community was that there was not an identifiable threat to counter. According to State, most of the elements we identified as not being adequately addressed in the strategy fell into this category.

We acknowledge that State did not report on elements for which they had no information or for which available information indicated there was no relevant Iranian threat, and that providing all relevant existing guidance, plans, and initiatives in its strategy would have made the report longer than the five pages allowed under State's guidance for reports to

Congress. However, we maintain that the strategy does not include all of the elements that the law stated should be included. Specifically, it does not discuss nor provide Congress with an explanation for the exclusion of elements called for by the act for which State and ODNI did not find relevant threat information. It also does not include summaries of existing agency documents that State officials mentioned would address some elements in the act. Providing such information could have more fully informed Congress regarding State's assessment of the threat posed by Iranian activities in the Western Hemisphere and U.S. government efforts to address the threat.

We are sending copies of this report to the appropriate congressional committees, the Secretaries of State, Defense, Homeland Security, and Treasury; the Attorney General; the U.S. Trade Representative; and the Director of National Intelligence. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at (202) 512-7331 or johnsoncm@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, appearing to read "Charles M. Johnson, Jr.", with a large, stylized flourish at the end.

Charles Michael Johnson, Jr.
Director, International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

In December 2012, Congress enacted the Countering Iran in the Western Hemisphere Act of 2012, which, among other things, required the Department of State (State) to assess the threats posed to the United States by Iran's activities in the Western Hemisphere and submit to the relevant congressional committees the results of the assessment and a strategy to address these threats. In this report, we examine (1) State's collaboration with other key U.S. agencies and foreign partners to address Iranian activities in the Western Hemisphere, (2) the extent to which the strategy on addressing Iranian activities in the Western Hemisphere included elements identified in the act, and (3) the extent to which the strategy on addressing Iranian activities in the Western Hemisphere included desirable characteristics of national strategies.

To analyze State's collaboration with key U.S. agencies and foreign partners to address Iranian activities in the Western Hemisphere, we reviewed agency documents and interviewed U.S. and foreign officials. We interviewed officials from the Departments of State (State), Defense (DOD), Homeland Security (DHS), Justice (DOJ), and the Treasury (Treasury); the Office for the Director of National Intelligence (ODNI); and the Office of the U.S. Trade Representative (USTR). We also interviewed officials at the U.S. embassies in Argentina, Brazil, Colombia, and Mexico and host government officials in Colombia and Mexico regarding input they may have provided regarding the strategy.¹ We chose these countries based on a number of factors including whether they had experienced instances of Iran-linked terrorist attacks, their bilateral relationship with the United States, and our ability to meet with host governments. The results of our interviews with officials at these four locations are not generalizable to all countries in the Western Hemisphere.

To examine the extent to which the strategy to address Iranian activities in the Western Hemisphere included elements identified in the Countering Iran in the Western Hemisphere Act of 2012, we analyzed State's submission of the strategy document, including the classified strategy report, the unclassified summary of policy recommendations, and the Intelligence Community Assessment. We identified 12 elements that Congress requested in the act, as the act had noted specific matters that

¹We also requested meetings with host government officials in Argentina and Brazil but our requests were declined by those governments.

should be included in the strategy. We analyzed documents and interviewed State and ODNI officials to determine how, if at all, the strategy addressed the elements in the act. To do so, two analysts conducted separate assessments of all three strategy documents against the 12 elements we identified in the act. They reached agreement on the extent to which the measures fully addressed, partially addressed, or did not address the attributes. A manager reviewed the analysis, and the three individuals reached a final consensus. A senior methodologist reviewed the analysis for completeness and balance. Coding worked as follows: the strategy “fully addresses” an element when it explicitly cites all characteristics of an element, even if it lacks further details. The strategy “partially addresses” an element when it explicitly cites some but not all characteristics of an element. Within our designation of “partially addresses,” there is a wide variation between addressing most of the characteristics of an element and addressing few of the characteristics of an element. The strategy “does not address” an element when it does not explicitly cite or discuss any characteristics of an element and/or when any implicit references are either too vague or general. For some instances in which we could not review portions of the documents that make up the strategy, we used the testimonial information provided by agency officials; we noted such instances. We asked to review the entire Intelligence Community Assessment but were unable to do so because of concerns over its security classification. We reviewed some excerpts and interviewed the ODNI officials who prepared the assessment regarding its contents. In three instances, ODNI officials told us information addressing an element included in the act was included in the Intelligence Community Assessment, but they did not provide supporting documentation. In those instances, we have reflected the information provided by ODNI officials but noted that we were not able to independently verify their statements because of a lack of documentation.

We also examined the strategy to determine the extent to which the strategy incorporated desirable characteristics of national strategies previously identified by GAO.² Similar to our analysis of the extent to which the strategy addressed elements identified in the act, we analyzed all three documents that make up the strategy and assessed how, if at all, the strategy addressed the elements in the act. Two analysts conducted

²GAO, Combating Terrorism: Evaluation of Selected Characteristics in National Strategies Related to Terrorism, [GAO-04-408T](#) (Washington, D.C.: Feb. 3, 2004).

separate assessments of all three strategy documents against the six desirable characteristics of national strategies. They reached agreement on the extent to which the measures fully addressed, partially addressed, or did not address the attributes. A manager reviewed the analysis and the three individuals came together to reach a final consensus. A senior methodologist reviewed the analysis for completeness and balance. Coding worked as follows: the strategy “fully addresses” a desirable characteristic of a national strategy when it explicitly cites all aspects of a characteristic, even if it lacks further details. The strategy “partially addresses” a desirable characteristic when it explicitly cites some but not all aspects of a characteristic. Within our designation of “partially addresses,” there is a wide variation between addressing most of the elements of a characteristic and addressing few of the elements of a characteristic. The strategy “does not address” an element when it does not explicitly cite or discuss any aspect of a characteristic, and/or when any implicit references are either too vague or general. As discussed above, for some instances in which we could not review portions of the documents that make up the strategy, we used the testimonial information provided by agency officials; we noted such instances.

We conducted this performance audit from January 2014 to September 2014 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

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



United States Department of State
Comptroller
P.O. Box 150008
Charleston, SC 29415-5008

SEP 19 2014

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

Dear Dr. Yager:

We appreciate the opportunity to review your draft report, "COMBATING TERRORISM: Strategy to Counter Iran in the Western Hemisphere Has Gaps That State Department Should Address" GAO Job Code 321012.

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

If you have any questions concerning this response, please contact Patrick Reilly, Foreign Affairs Officer, Bureau of Western Hemisphere Affairs, Office of Policy Planning and Coordination at (202) 647-3749.

Sincerely,

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

Christopher H. Flaggs, Acting

Enclosure:
As stated.

cc: GAO – Charles Michael Johnson, Jr.
WHA– Roberta S. Jacobson
State/OIG – Norman Brown

Department of State Comments on GAO Draft Report

**COMBATING TERRORISM: Strategy to Counter Iran in the Western
Hemisphere Has Gaps That State Department Should Address**
(GAO-14-834, GAO Code 321012)

Thank you for the opportunity to comment on your draft report entitled *Combating Terrorism: Strategy to Counter Iran in the Western Hemisphere Has Gaps That State Department Should Address*.

The draft GAO report focuses on cataloguing specific matters that Congress stated in the Countering Iran in the Western Hemisphere Act of 2012 “should be included.” They were not made requirements. Moreover, as the draft GAO report noted¹, Office of the Director of National Intelligence (ODNI) “...did not report on elements for which they had no information or for which the information available to them indicated there was no relevant Iranian activity.” Similarly, the State Department did not address matters where the consensus of the intelligence community was that there is not an identifiable threat to counter. We believe that most of the elements identified in the GAO draft report as not being adequately addressed fall into this category.

With respect to the specific matters listed in the Act that the GAO draft report identified as not being adequately addressed by the Department of State, we provide the following comments:

- 5(b)(6)(A): *The National Strategy to Combat Terrorism* provides the United States Government’s strategic guidance for securing our borders from terrorist threats. It is lengthy and did not need to be repeated in the strategy. In addition, other published United States strategies and plans, such as the *Northern Border Security Strategy* (Department of Homeland Security) and the combined United States and Mexico *Declaration on 21st Century Border Management* outline efforts to secure our nation’s borders and were not included in the Department’s submission for the same reasons.
- 5(b)(7)(A): While we provided no specific plan for preventing foreign person, companies, or governments from evading sanctions on assisting Iran, preventing sanctions evasion is a core mission of Sanctions coordination

¹ Page 11, first paragraph.

See comment 1.

See comment 2.

See comment 3.

policy at the Department of State and Department of Treasury. We made full details of our success against those who attempt to avoid sanctions available to the GAO for its draft report.

- 5(b)(7)(B): Plans to protect United States government installations in the region are held at each installation. It is not practicable to include those individual plans in the Department submission. As for “plans to protect the “businesses, energy pipelines, and cultural organizations including threats to United States Allies,” it is noted in the draft report that our Citizen Security initiatives in the region and bilateral assistance programs specifically target building partner country capacity to achieve those objectives by enhancing citizen security and extending the rule of law.

See comment 4.

- 5(b)(7)(D): Due to a lack of a clear threat from foreign governments to manipulate or disrupt energy markets, the Department submission did not address U.S. government efforts to counter such a threat.

With respect to the specific matters that the GAO draft report identified as not fully addressed:

See comment 5.

- It is the Department’s view that the matters dealing with facilities used by Iranian organizations and Hezbollah (5(b)(2)), the relationships between those organizations and organized crime, and the threat they pose to the United States border are fully addressed in the classified report by the Office the Director of National Intelligence.

See comment 6

- It is the Department’s view that references to the Citizen Security initiatives noted in footnote b of the draft report² address the matter dealing with a multiagency plan to strengthen rule of law institutions (5(b)(6)(B)).

See comment 7.

- It is the Department’s view that the plan to enforce sanctions (5(b)(7)(C)) is publicly available on the Department of State and Department of Treasury websites, and was not included in the report due to the length of those plans and descriptions of ongoing activities.

As for the recommendation, we have provided information and briefed Congress on these matters on a regular basis and agree to continue to do so.

² Page 10 of the draft

The following are GAO comments on the Department of State's (State) letter dated September 19, 2014.

GAO Comments

1. Our report notes that Congress requested that the strategy include “a plan to address resources, technology, and infrastructure to create a secure United States border.” Therefore, we evaluated the extent to which the information sought by Congress was included in the strategy. While other documents may contain the information sought by Congress, it was not included or summarized in State's strategy report.
2. We agree with State that its report does not contain a plan, as sought by Congress, to address any efforts by foreign persons, entities, and governments in the region to assist Iran in evading U.S. and international sanctions. While State provided information regarding past activities to enforce sanctions, a plan was not included in the strategy.
3. While we have included some information on security initiatives and assistance programs in our report based on meetings with State officials, State's original strategy report to Congress did not contain the plan sought by Congress.
4. As we discuss in our report, State and the Office of the Director of National Intelligence (ODNI) did not address elements for which State and ODNI sought but did not find relevant information. However, State's original strategy report did not indicate that the plan sought by Congress was not provided because there was a lack of a clear threat. Explicitly indicating why the plan sought by Congress was not included could have helped better inform Congress.
5. ODNI—which was responsible for drafting the Intelligence Community Assessment referred to by State—informed us that the Intelligence Community Assessment included only some but not all of the various descriptions identified in the act. As such, our finding is based in part on the views of ODNI.
6. We maintain that the strategy only partially addresses 5(b)(6)(B) of the act, acknowledging it includes a reference to some citizen security initiatives. The act stated that the strategy should include a plan, but State did not provide the citizen security initiatives' documents or a summary of its plan in the strategy.
7. Our report states that the language in the act requested “a plan to support United States efforts to designate persons and entities in the Western Hemisphere for proliferation activities and terrorist activities

relating to Iran.” Therefore, we evaluated the extent to which the information sought by Congress was included in the strategy report submitted to Congress, not whether it was publicly available on State’s or Treasury’s web site. While other documents may contain the information sought by Congress, it was not included in the strategy.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Charles Michael Johnson, Jr., (202) 512-7331, or johnsoncm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Jason Bair (Assistant Director), Victoria Lin (Analyst-in-Charge), Brian Hackney, Ashley Alley, David Dayton, and David Dornisch made key contributions to this report. Oziel Trevino and Sarah Veale provided technical assistance.

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