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July 2022

# FOREIGN ASSISTANCE

## State and USAID Are Taking Actions to Advance Equity Abroad and Mitigate Challenges

Accessible Version

# GAO Highlights

Highlights of [GAO-22-105112](#), a report to the Chairman, Committee on Foreign Relations, U.S. Senate

## Why GAO Did This Study

The President issued several executive orders and a memorandum (executive directives) that expressed policy commitments on behalf of the administration in 2021. These commitments include advancing racial equity and supporting underserved communities, preventing and combating discrimination based on gender identity and sexual orientation, and promoting and protecting the human rights of LGBTQI+ persons in the U.S. and abroad. In response to these directives, State and USAID have committed to better incorporating racial and ethnic equity into U.S. foreign assistance and to supporting historically marginalized or underserved groups abroad. GAO was asked to assess State and USAID efforts to advance equity and support for marginalized groups abroad, among other things.

This report examines: (1) how State and USAID incorporate support for marginalized groups abroad into their strategies and activities, (2) how State and USAID track progress toward achieving goals and objectives that support such groups, and (3) actions State and USAID have undertaken to respond to recent directives related to advancing equity and support for such groups.

GAO reviewed documents, interviewed agency officials, and selected three countries—Colombia, Jordan, and Uganda—to provide illustrative examples. GAO selected these countries based on a number of factors, including those receiving the highest amount of U.S. foreign assistance and those that focused on multiple marginalized groups.

View [GAO-22-105112](#). For more information, contact Latesha Love at (202) 512-4409 or [Lovel@gao.gov](mailto:Lovel@gao.gov).

July 2022

## FOREIGN ASSISTANCE

### State and USAID Are Taking Actions to Advance Equity Abroad and Mitigate Challenges

## What GAO Found

In 2021, the President issued several executive directives related to advancing racial equity and supporting historically marginalized groups at home and abroad. Most Department of State and U.S. Agency for International Development (USAID) joint strategies have goals and objectives that refer to marginalized groups abroad, including ethnic groups, women, and youth. However, strategies developed prior to recent equity-focused executive directives often lacked detail on these groups and their specific issues. In response to these directives on equity, the agencies' new strategies more directly incorporate advancing equity for marginalized groups. At the country level, State and USAID tailor their strategies and activities to incorporate the needs of communities they serve, recognizing that marginalized groups can vary by country.

#### State and USAID Activities Supporting Marginalized Groups



Source: Department of State, U.S. Agency for International Development/Jordan, and John Carlos Rojas, SportPower2. | GAO-22-105112

State and USAID track progress toward goals and objectives supporting marginalized groups using several tools, including performance indicators, and are working to mitigate data challenges. They use both standard indicators that are consistent across the two agencies and custom indicators specific to a country or activity. For example, for the goal of strengthening governance to meet citizen needs, USAID Colombia tracks the number of individuals from marginalized groups who received legal aid with U.S. support. Both agencies report annually on activities that support certain groups, such as women. They are also working to mitigate challenges, including difficulties in collecting data on people who could face harm if others learned of their identities, such as lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI+) persons.

In response to the executive directives, State and USAID have begun and are planning several actions to advance equity and support for marginalized groups abroad and to mitigate challenges in doing so. Both agencies established key issues and priority goals focused on advancing equity, conducted assessments to identify actions to advance equity, and issued guidance and updated policies to better integrate equity into strategies and activities. They are planning to develop new policy frameworks to emphasize equity, and are working to mitigate challenges in allocating sufficient resources to these efforts and applying equity requirements in a foreign context. If implemented effectively, these actions could help State and USAID expand and sustain efforts to achieve the objectives of the executive directives.

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**Abbreviations**

DRL	Bureau of Democracy, Human Rights, and Labor
E.O.	Executive order
JSP	Joint Strategic Plan
NGO	Nongovernmental organization
OMB	Office of Management and Budget
State	Department of State
USAID	U.S. Agency for International Development

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July 19, 2022

The Honorable Robert Menendez  
Chairman  
Committee on Foreign Relations  
United States Senate

Dear Mr. Chairman:

In 2021, the President issued several executive orders (E.O.) and a memorandum that expressed various policy commitments on behalf of the administration. These commitments include advancing racial equity and support for underserved communities, preventing and combating discrimination based on gender identity and sexual orientation, and promoting and protecting the human rights of lesbian, gay, bisexual, transgender, queer, and intersex (LGBTQI+) persons in the U.S. and abroad.<sup>1</sup> For example, in January 2021, the President issued E.O. 13985, *Advancing Racial Equity and Support for Underserved Communities through the Federal Government*. This executive order states that it is the policy of the administration that the federal government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.<sup>2</sup>

Certain executive orders and memoranda also focused on advancing equity among specific marginalized groups, including LGBTQI+ persons globally. As part of these efforts, the Department of State and the U.S. Agency for International Development (USAID) have committed to incorporating racial and ethnic equity into U.S. foreign assistance and to

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<sup>1</sup>Exec. Order No. 13985, *Advancing Racial Equity and Support for Underserved Communities through the Federal Government*, 86 Fed. Reg. 7009 (Jan. 20, 2021); Presidential Memorandum, *Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World* (Feb. 4, 2021); and Exec. Order No. 14020, *Establishment of the White House Gender Policy Council*, 86 Fed. Reg. 13797 (March 8, 2021).

<sup>2</sup>According to the Department of State and the U.S. Agency for International Development, they often use the term “marginalized groups” in the international context in place of “underserved communities.” For purposes of this report, we will use the term “marginalized groups” to include underserved communities. Many groups of people can be included in definitions of marginalized groups and underserved communities and thus definitions can vary for each country based on their unique circumstances. Where possible, we identify the specific groups that are the focus of the initiative.

supporting historically marginalized groups around the world. You asked us to review State and USAID efforts to advance equity and support for marginalized groups abroad, among other things.

This report examines: (1) how State and USAID incorporate support for marginalized groups abroad into their strategies and activities, (2) how State and USAID track progress toward achieving goals and objectives that support such groups, and (3) what actions State and USAID have undertaken to respond to recent directives to advance equity and support for such groups.

To examine how State and USAID incorporate support for marginalized groups abroad into strategies and activities, we reviewed their Joint Strategic Plan and all Joint Regional Strategies in place as of January 2022. We also selected and reviewed country level strategies and activities for three countries—Colombia, Jordan, and Uganda. We selected these countries based on a number of factors, including the amount of U.S. foreign assistance received and the country’s record on human rights. We also reviewed updated documents and guidance and interviewed relevant agency officials to determine any changes to how State and USAID incorporate support for marginalized groups in their strategies.

To examine how State and USAID track progress toward achieving goals and objectives that support marginalized groups abroad, we reviewed agency documents and interviewed relevant agency officials at both headquarters and in the three countries. These documents included performance management plans, evaluations, and activity reports, as well as agency guidance for performance management. We reviewed several activities more in-depth, based on factors such as size of the activity, groups served, and length of the activity.

To examine efforts State and USAID have undertaken to respond to recent directives to advance equity and support for marginalized groups abroad, we reviewed documents, including their equity assessments and action plans, and interviewed relevant agency officials. We also reviewed updated guidance issued by State and USAID and reviewed their reports on progress made in responding to the executive orders and memorandum, which we refer to collectively as executive directives. Appendix I provides additional details of our overall scope and methodology.

We conducted this performance audit from March 2021 to July 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Background

### The Administration Has Emphasized Advancing Equity and Support for Marginalized Groups

In 2021, the President signed an executive order and a presidential memorandum related to advancing equity and human rights and to combating discrimination of marginalized groups at home and abroad (see table 1).

**Table 1: Selected 2021 Executive Directives Related to Equity and Support for Marginalized Groups Abroad**

Executive Order 13985: <i>Advancing Racial Equity and Support for Underserved Communities Through the Federal Government</i> Issued January 20, 2021	Presidential Memorandum, <i>Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex [LGBTQI+] Persons Around the World</i> Issued February 4, 2021
<p>States that it is the policy of the administration that the U.S. government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.</p> <p>Further, it requires federal agencies to review certain selected programs and policies to assess whether underserved communities and their members face systemic barriers in accessing benefits and opportunities available under those policies and programs, specifically focusing on findings such as:</p> <ol style="list-style-type: none"><li>1. potential barriers that underserved communities and individuals may face to enrollment in and access to benefits and services in Federal programs as well as in taking advantage of agency procurement and contracting opportunities; and</li><li>2. whether new policies, regulations, or guidance documents may be necessary to advance equity in agency actions and programs.</li></ol>	<p>Requires all federal agencies involved with foreign aid, assistance, and development programs to expand their ongoing efforts to ensure regular federal government engagement with governments, citizens, civil society, and the private sector to promote respect for the human rights of LGBTQI+ persons and combat discrimination.</p> <p>Establishes that it shall be the policy of the U.S. to pursue an end to violence and discrimination on the basis of sexual orientation, gender identity or expression, or sex characteristics, and to lead by the power of our example in the cause of advancing the human rights of LGBTQI+ persons around the world.</p>

Legend: LGBTQI+ = lesbian, gay, bisexual, transgender, queer, and intersex persons.

Source: GAO analysis of Executive Order 13985 and the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World. | GAO-22-105112

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Note: Selected executive directives are those issued in 2021 that include substantial requirements for the Department of State and the U.S. Agency for International Development (USAID) related to equity and support for marginalized groups abroad. These directives relate to international programs and diplomatic efforts, unlike other recent directives in this area which focus internally on the workforce of U.S. government agencies and which could include language regarding diversity, equity, inclusion, and accessibility. Officials from State and USAID confirmed these were the relevant documents to consider. Requirements listed are not exhaustive.

Both E.O. 13985 and the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex [LGBTQI+] Persons Around the World direct federal agencies to undertake actions, such as assessing current efforts to address the needs of marginalized groups, identifying gaps, and developing action plans. These directives include some long-term actions or processes that will take several years to establish and implement. E.O. 13985 also rescinded a previous executive order, E.O. 13950, which stated that it was the policy of the U.S. not to promote race or sex stereotyping or scapegoating in the federal workforce or in the Uniformed Services, and not to allow grant funds to be used for these purposes.<sup>3</sup> E.O. 13950 also stated, among other things, that agencies must ensure that any trainings provided to agency employees do not teach, advocate, act upon, or promote any of the order's listed divisive concepts. These concepts include that an individual, by virtue of his or her race or sex, is inherently racist, sexist, or oppressive, whether consciously or unconsciously, and any individual should feel discomfort, guilt, anguish, or any other form of psychological distress on account of his or her race or sex. According to USAID officials, as a result of E.O. 13950, USAID's leadership paused all training and training-related activity that was deemed to be in any way related to diversity, equity, and inclusion until all trainings could be reviewed for compliance with E.O. 13950. The immediate impact was that multiple training, training development efforts, and non-training events and engagements were paused or canceled. Such trainings did not recommence until January 2021.

E.O. 13985 defines equity as the consistent, systematic, fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities denied such treatment. According to the E.O., such communities include Black, Latino, Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; LGBTQI+ persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. E.O. 13985 further

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<sup>3</sup>Exec. Order No. 13950, *Combating Race and Sex Stereotyping*, 85 Fed. Reg. 60683 (Sept. 22, 2020).



defines underserved communities as populations sharing a particular characteristic, as well as geographic communities that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list of communities above.

E.O. 14020, issued in 2021, focuses on advancing gender equity and equality, including in foreign policy. This order established a White House Gender Policy Council to coordinate federal government efforts to advance gender equity and equality. The order states that it is the policy of the administration to establish and pursue a comprehensive approach to ensure that the federal government is working to advance equal rights and opportunities, regardless of gender or gender identity, in advancing domestic and foreign policy. This approach includes promoting workplace diversity, fairness, and inclusion across the federal workforce and military. The council is required to carry out many of the actions required by the executive order and includes State and USAID as members.

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### Prior U.S. Government Actions Also Supported Some Marginalized Groups

Prior to 2021, acts of Congress, executive orders, and presidential memoranda supported specific marginalized groups abroad, including women, LGBTQI+ persons, and religious minorities. The U.S. government has enacted laws and issued directives related to global women's issues since 2010. For example,

- **Women's Entrepreneurship and Economic Empowerment Act of 2018.** Enacted in 2019, this act provides that it is to improve programs and activities relating to women's entrepreneurship and economic empowerment that are carried out by the U.S. Agency for International Development and for other purposes.<sup>4</sup> The act stipulates, among other things, that the Administrator of USAID shall ensure that strategies, projects, and activities of the agency are shaped by a gender analysis and standard indicators are used to assess such strategies, projects, and activities, if applicable. It also states that the Administrator shall ensure that gender equality and female empowerment are integrated throughout the agency's program cycle and related processes for purposes of strategic planning, project design and implementation, monitoring, and evaluation.

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<sup>4</sup>Pub. L. No. 115-428, 132 Stat. 5509 (Jan. 9, 2019).

- **Women, Peace, and Security Act of 2017.** Enacted in 2017, this act provided that it shall be the policy of the U.S. to promote the meaningful participation of women in all aspects of overseas conflict prevention, management, and resolution, and post-conflict relief.<sup>5</sup>
- **Executive Order 13623—Preventing and Responding to Violence against Women and Girls Globally.** In 2012, the President issued this order, which directed all departments and agencies to implement the U.S. Strategy to Prevent and Respond to Gender-based Violence Globally. The order also established an interagency working group to address gender-based violence, for which the Secretary of State and the Administrator of USAID were co-chairs.
- **Executive Order 13595—Instituting a National Action Plan on Women, Peace, and Security.** In 2011, the President issued this order, which directed agencies to develop a National Action Plan and to identify and develop activities and initiatives related to women’s roles in peace and security.

The U.S. government has also taken additional actions to support other populations including religious minorities and LGBTQI+ persons. For example,

- **Frank R. Wolf International Religious Freedom Act.** Enacted in 2016, this law’s stated purpose was to amend the International Religious Freedom Act of 1998<sup>6</sup> to improve the ability of the U.S. to advance religious freedom globally through enhanced diplomacy, training, counterterrorism, and foreign assistance efforts, among other things.<sup>7</sup>
- **Presidential Memorandum—International Initiatives to Advance the Human Rights of Lesbian, Gay, Bisexual, and Transgender Persons.** In 2011, the President issued this memorandum, which directed all federal agencies engaged abroad to ensure that U.S. diplomacy and foreign assistance promote and protect the human rights of LGBT persons.

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<sup>5</sup>Pub. L. No. 115-68, 131 Stat. 1202 (Oct. 6, 2017).

<sup>6</sup>Pub. L. No. 105-292, 112 Stat. 2787 (Oct. 27, 1998).

<sup>7</sup>Pub. L. No. 114-281, 130 Stat. 1426 (Dec. 16, 2016).

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## Some State and USAID Bureaus and Offices Focus on Specific Marginalized Groups

State and USAID bureaus and offices are responsible for ensuring their assistance activities incorporate support for marginalized groups, according to agency officials. However, some focus on issues specific to certain marginalized groups to help ensure the agencies are supporting these groups. Several State offices or bureaus focus on specific marginalized groups. For example:

- The Bureau of Democracy, Human Rights, and Labor (DRL) promotes human rights and focuses on several marginalized groups, including persons with disabilities; LGBTQI+ persons; Indigenous Peoples; and members of racial, ethnic, and religious minority groups. DRL leads State's implementation of the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World.
- The Secretary's Office of Global Women's Issues promotes the rights and empowerment of women and girls. The office coordinates implementation of E.O. 14020 on gender equity and equality.
- The U.S. Special Envoy to Advance the Human Rights of LGBTQI+ Persons, who was appointed in June 2021, ensures that U.S. foreign assistance promotes and protects human rights of LGBTQI+ persons around the world.
- The Special Advisor on International Disability Rights, who was appointed in October 2021, leads State's comprehensive strategy to promote and protect the rights of persons with disabilities internationally.
- The first Special Representative for Racial Equity and Justice was appointed in June 2022. According to State's announcement, this representative will lead the department's efforts to protect and advance the human rights of people belonging to marginalized racial and ethnic communities and combat systemic racism, discrimination, and xenophobia around the world.

Several USAID offices or bureaus also focus on specific marginalized groups. For example:

- USAID's Gender Equality and Women's Empowerment Hub provides strategic leadership, expertise, training, and technical assistance on the agency's foreign assistance for gender equality and women's empowerment worldwide, including gender-based violence and

women's economic empowerment. It also coordinates the implementation of E.O. 14020 on gender equity and equality across the agency.

- USAID's Inclusive Development Hub promotes the rights and inclusion of marginalized and under-represented groups in the development process, and leads the U.S. government's response to address the needs of children in adversity and youth. The hub provides support on agency programs for the following: children in adversity; Indigenous Peoples; persons with disabilities; LGBTQI+ persons; youth; and mental health, rehabilitation, and assistive health technologies. It also leads USAID's implementation of the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World.
- USAID's Office of Diversity, Equity, Inclusion and Accessibility, announced by USAID in March 2022, is to embed diversity, equity, inclusion, and accessibility in USAID's work at every level and assure that inclusion and equity are incorporated in all decisions, according to USAID officials. When engaging on issues related to foreign assistance, this office will liaise with the Inclusive Development Hub and the Office of Gender Equality and Women's Empowerment, among others.
- USAID has several coordinators focused on marginalized groups. They include a Senior LGBTQI+ Coordinator, Indigenous Peoples Coordinator, Disabilities Coordinator, and Youth Coordinator within the Bureau of Development, Democracy, and Innovation. USAID also has a Senior Gender Coordinator in the Office of the Administrator.

State and USAID both set up working groups, called agency equity teams, in response to E.O. 13985. The teams include members from across State and USAID's bureaus and offices in the U.S. and abroad. State's agency equity team has representation from 45 bureaus and offices and USAID's team includes representatives from 17 agency bureaus and offices.

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## State and USAID Are Updating Strategies That Affect Marginalized Groups Abroad to More Directly Advance Equity

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### State and USAID Are Updating Joint Strategies to More Directly Advance Equity

State and USAID have high-level strategies with goals and objectives that refer to support for some marginalized groups, and their updates to these strategies are more directly advancing equity and support for marginalized groups in response to the policy statement provided in E.O. 13985. The State and USAID Joint Strategic Plan (JSP) underpins all strategic planning within the agencies, helping to ensure alignment to higher-level policy priorities. The JSP informs the joint regional strategies, which articulate agency priorities within a region. The joint regional strategies are used to inform budget decisions, advise country-level strategies, and shape performance reviews within each agency. The JSP is updated every 4 years, after a presidential election, to align with high-level strategic documents, including presidential policy statements.

### State and USAID's Joint Strategies Developed Prior to E.O. 13985

State and USAID's 2018-2022 JSP and most joint regional strategies developed prior to the issuance of E.O. 13985 had goals or objectives that refer to support for 10 different marginalized groups (see table 2). However, these groups were often only mentioned in the narratives for the objectives and the level of detail about the groups was often minimal.<sup>8</sup> The groups identified in the joint strategies were racial and ethnic minorities; women; LGBTQI+ persons; children; refugees, migrants, and internally displaced persons; religious minorities; persons with disabilities; Indigenous Peoples; youth; and the economically disadvantaged.

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<sup>8</sup>We reviewed the 2018-2022 State and USAID JSP and all seven State and USAID joint regional strategies that were in place as of the end of 2021 for mentions of support for specific marginalized groups. We identified marginalized groups based on the definitions of marginalized and underserved groups from USAID and executive directives. These strategies were all developed prior to the issuance of E.O. 13985, and therefore when they were developed they did not need to incorporate any of the requirements or respond to the policy statement of that order.

**Table 2: State and USAID Joint Strategies, Developed Prior to Executive Order 13985, with Goals or Objectives That Refer to Marginalized Groups**

	Strategy	Racial or ethnic minorities	Women	LGBTQI+ persons	Children	Refugees, migrants, or IDPs	Religious minorities	Persons with disabilities	Indigenous Peoples	Youth	Economically disadvantaged
<b>State and USAID Joint Strategic Plan</b>	Joint Strategic Plan (2018-2022)	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes	Yes
<b>State and USAID joint regional strategies</b>	Africa (Approved: Aug. 2018)	No	Yes	No	Yes	No	No	No	No	Yes	Yes
	East Asia and the Pacific (Approved: Nov. 2018)	No	No	No	No	No	No	No	No	No	No
	Europe and Eurasia (Approved: Jan. 2019)	Yes	No	No	No	Yes	No	No	No	Yes	No
	Middle East and North Africa (Approved: Aug. 2018)	Yes	Yes	No	No	Yes	Yes	No	No	Yes	Yes
	South and Central Asia (Approved: Apr. 2019)	No	Yes	Yes	Yes	Yes	No	No	No	Yes	Yes
	Western Hemisphere (Approved: Jan. 2019)	No	No	No	No	No	No	No	No	Yes	No
	Bureau of International Organization Affairs (Approved: Mar. 2019)	No	Yes	No	No	No	Yes	Yes	Yes	Yes	No

Legend: LGBTQI+= lesbian, gay, bisexual, transgender, queer, and intersex persons, and all persons of diverse sexual orientations, gender identities, gender expressions, and sex characteristics; IDP=Internally Displaced Persons; — = group not mentioned in goals or objectives.

Source: GAO analysis of Department of State and U.S. Agency for International Development (USAID) documents. | GAO-22-105112

Note: These strategies were all developed prior to the issuance of E.O. 13985 and therefore when they were developed they did not need to incorporate any of the requirements or respond to the policy statement of that order.

State and USAID’s 2018-2022 JSP had six strategic objectives that refer to support for seven of the 10 marginalized groups, as shown in table 3.

**Table 3: Strategic Objectives in State and USAID’s 2018-2022 Joint Strategic Plan That Refer to Support for Marginalized Groups**

Strategic objective	Marginalized groups referred to in the strategy as receiving support under the strategic objective
Strategic Objective 1.2: Defeat ISIS, al-Qa’ida and other transnational terrorist organizations, and counter state-sponsored, regional, and local terrorist groups that threaten U.S. national security interests	Women, religious minorities, racial or ethnic groups, marginalized communities
Strategic Objective 1.3: Counter instability, transnational crime, and violence that threaten U.S. interests by strengthening citizen-responsive governance, security, democracy, human rights, and the rule of law	Women
Strategic Objective 1.5: Strengthen U.S. border security and protect U.S. citizens abroad	Refugees and migrants
Strategic Objective 2.2: Promote healthy, educated, and productive populations in partner countries to drive inclusive and sustainable development, open new markets, and support U.S. prosperity and security objectives	Women, children, youth, marginalized groups
Strategic Objective 3.3: Increase partnerships with the private sector and civil-society organizations to mobilize support and resources and shape foreign public opinion	Youth, racial or ethnic groups, religious minorities
Strategic Objective 3.4: Project American values and leadership by preventing the spread of disease and providing humanitarian relief	Women, children, refugees and migrants, economically disadvantaged, marginalized people, vulnerable people

Source: GAO analysis of Department of State and U.S. Agency for International Development’s (USAID) 2018-2022 Joint Strategic Plan. | GAO-22-105112

The amount of information provided in the strategic objectives for each group mentioned and how specifically to assist them varied, often with little detail given. For example, under the objective of “projecting American values and leadership by preventing the spread of disease and providing humanitarian relief,” the strategy says that State and USAID will give particular attention to mitigating gender-based violence in emergency contexts, with no additional detail. In addition, the strategies within the 2018-2022 JSP did not explicitly discuss advancing equity for any of these groups. The 2018-2022 JSP did not specifically name the marginalized groups in the objectives, but rather referred to them in strategies to achieve the objective. For example, under strategies to achieve the objective of “increasing partnerships with the private sector and civil-society organizations to mobilize support and resources and shape foreign public opinion” the document notes that “State and USAID will engage civil society and nongovernmental organizations (NGOs), along with the private sector, to maximize our ability to affect positive change, including protecting ethnic and religious minorities and other marginalized populations; and promoting religious and ethnic tolerance.”

The 2018-2022 JSP also contained eight performance goals that are related to support for marginalized groups, including women, children,

youth, and refugees and migrants. State and USAID identified two of these performance goals as Agency Priority Goals—one focused on resilience and food security and the other on maternal and child health. Agency Priority Goals are required to have ambitious targets that can be achieved within a 2-year period and clearly defined quarterly milestones, among other things.<sup>9</sup>

Six of the seven State and USAID joint regional strategies developed prior to E.O. 13985 also have at least one goal or objective that refers to support for marginalized groups, as shown in table 2. Similar to the JSP, the strategies refer to these groups only in the narrative sections describing the objectives and do not discuss advancing equity for these groups. The four groups most frequently referred to in the joint strategies are racial or ethnic groups, women, refugees and migrants, and youth. The groups least frequently referred to were LGBTQI+ persons, children in adversity, persons with disabilities, and Indigenous Peoples.

Only the 2018 Joint Regional Strategy for the East Asia and Pacific does not contain any goals or objectives that support specific marginalized groups. However, it does include a strategic objective referring to supporting systems and policies that provide inclusive services in countries. The 2019 Joint Regional Strategy for the Western Hemisphere has one objective that refers specifically to support for a marginalized group—youth. The strategy does, however, generally mention women, refugees and displaced persons, and marginalized groups. It also contains a strategic objective for inclusive development that refers more generally to underserved, marginalized, and vulnerable communities.

#### State and USAID's Updated Joint Strategies Developed since the Issuance of E.O. 13985

State and USAID are developing and releasing new versions of their joint strategies and, according to agency officials, intend to have them more directly integrate advancing equity for marginalized groups as reflected in

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<sup>9</sup>Agency Priority Goals are a performance accountability structure of the GPRA Modernization Act of 2010 that provides agencies a mechanism to focus leadership priorities, set outcomes, and measure results, bringing focus to mission areas where agencies need to drive significant progress and change. Pub. L. No. 111-352, § 5, 124 Stat. 3866 (Jan. 4, 2011), codified as amended at 31 U.S.C. § 1120(b). Agencies are required to establish Agency Priority Goals every 2 years that reflect the highest priorities of the agency.



the policy statement in E.O. 13985.<sup>10</sup> State and USAID released their updated 2022-2026 JSP in March 2022, and the strategy more directly addresses promoting equity. For example, it has a strategic objective to “advance equity, accessibility, and rights for all.” The strategy reports that State and USAID will further equity, inclusion, accessibility, support for human rights, and resilience of marginalized peoples, including individuals from racial, ethnic, Indigenous, and religious communities, persons with disabilities, LGBTQI+ persons, women, and older persons. The strategy is intended to further these efforts by improving and adapting policy, public diplomacy, foreign assistance, and humanitarian aid. The strategy also identifies three equity-focused performance goals, two of which are Agency Priority Goals, for this objective:

- **Performance Goal Statement 3.2.2–Equity and Inclusion:** By September 30, 2026, increase U.S. government actions across diplomacy and foreign assistance to advance accessibility, equity, and inclusion of marginalized populations in decision-making spaces, government service delivery, and at multilateral and regional forums (Joint State and USAID Goal).
- **Performance Goal Statement 3.2.3–Equity across Foreign Affairs Work:** Advance equity and support for underserved communities in the development and conduct of foreign policy. By September 30, 2023, State will build an institution-wide equity infrastructure by developing assessment tools and establishing country-specific baselines, measurements, and reporting mechanisms for the department (State Agency Priority Goal).
- **Performance Goal Statement 3.2.4–Diversity, Equity, Inclusion, and Accessibility in USAID Programs:** Increase equitable outcomes with USAID partners globally. By September 2023, USAID will

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<sup>10</sup>State and USAID develop a new Joint Strategic Plan every 4 years, following a presidential election, to align with high-level strategic documents, including presidential policy statements. Once the JSP is published, bureaus and missions support the JSP and/or other higher-level strategic priorities by developing their supporting strategies in accordance with agency guidance and timeframes. State and USAID regional bureaus are required to jointly develop their joint regional strategies, according to State guidance. For this report, we reviewed the 2022-2026 JSP and all 2022 versions of the joint regional strategies released prior to May 2022.

conduct inclusive development analyses<sup>11</sup> and assessments in six additional missions, and 100 percent of USAID missions will have an Inclusive Development Champion to inform program design as USAID implements the five actions prioritized in USAID's Equity Action Plan (USAID Agency Priority Goal).<sup>12</sup>

The updated strategy also incorporates promoting equity and support for marginalized groups throughout additional objectives.

As of March 2022, State and USAID have also released updated versions of their Joint Regional Strategies for the Middle East and North Africa, Western Hemisphere, and for Africa. The updated documents incorporate support for marginalized groups in a fuller way, to include a more detailed discussion of how the agencies will support these groups, recognizing their differing needs. In some cases, the updated strategies include a direct mention of marginalized groups in the objective language. The changes include the following:

- **2022 Middle East and North Africa Joint Regional Strategy:** This updated strategy contains 11 objectives referencing support for marginalized groups, compared with six in the previous version. The strategy also includes direct mention of several groups in the objective language. For example, it has a strategic objective to “advance respect for human rights and promote access to justice, including for marginalized populations, women, and youth.” The strategy also mentions support for women, racial or ethnic groups, religious minorities, youth, economically disadvantaged persons, persons with disabilities, LGBTQI+ persons, and internally displaced persons and refugees. The previous strategy specifically identified women, racial or ethnic groups, religious minorities, youth, economically disadvantaged persons, and internally displaced persons and refugees.
- **2022 Africa Joint Regional Strategy:** This updated strategy contains 12 objectives that refer to support for marginalized groups, compared

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<sup>11</sup>Inclusive Development Analysis is an analytic tool that helps USAID map the context in which marginalized people exist. For example, the tool helps identify, understand, and explain gaps that exist between persons of marginalized groups and the general population, and make specific recommendations on how to include marginalized groups in development programs and reduce deprivations.

<sup>12</sup>USAID officials stated that USAID intends to designate an Inclusive Development Champion in each mission, or overseas office, meaning they will not necessarily be new positions. As of May 2022, the fiscal year 2023 congressional budget justification does not contain any references to requests for additional funding for new Inclusive Development Champions in the USAID missions.

with six in the previous version. It also mentions support for women, racial or ethnic groups, religious minorities, youth, the economically disadvantaged, persons with disabilities, LGBTQI+ persons, internally displaced persons and refugees, Indigenous Peoples, and children. The previous strategy specifically identified women, youth, children, and the economically disadvantaged.

- **2022 Western Hemisphere Strategy:** This updated strategy contains 12 objectives that refer to support for marginalized groups, including an objective to advance racial and gender equity, compared with two in the previous version. The strategy also refers to support for women, racial or ethnic groups, religious minorities, youth, the economically disadvantaged, persons with disabilities, LGBTQI+ persons, internally displaced persons and refugees, Indigenous Peoples, and children. The previous strategy specifically identified one marginalized group—youth.

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## Country-Level Strategies and Activities Support Marginalized Groups Specific to Their Country

Country-level strategies from State and USAID incorporate support for groups that have been identified as marginalized in those countries. State and USAID officials told us that they tailor their country-specific strategies and related activities to incorporate the unique needs of the various groups they serve. This approach is particularly important because who constitutes a marginalized group can vary by country.

U.S. officials in Colombia, Jordan, and Uganda reported that each country team conducts various assessments, analyses, and outreach to identify the marginalized groups in their country. These included social, political, and inclusive development analyses and youth assessments. In addition, USAID guidance requires a gender analysis for all country level strategies and some activities. Agency officials also reported relying on assessments done by other groups, including the United Nations, and the host government, in some cases.

State and USAID officials in Colombia, Jordan, and Uganda, told us that they identified groups that were considered marginalized in these countries. They identified several groups, including among others, women, Afro-Colombians, internally displaced persons, and Indigenous Peoples in Colombia; women, youth, persons with disabilities, and refugees in Jordan; and children, LGBTQI+ persons, and persons with disabilities in Uganda.

Country-Level Strategies

We found the country-level strategies for these three countries all incorporate support for marginalized groups and include goals and objectives that refer to specific marginalized groups as shown in table 4.<sup>13</sup> For example:

- USAID’s 2016 Uganda Country Development Cooperation Strategy includes an objective to increase community and household resilience in select areas and target groups that support LGBTQI+ persons, as well as women, children, and persons with disabilities.
- USAID’s 2020 Colombia Country Development Cooperation Strategy dedicates a special objective specifically focused on promoting stability in areas impacted by migration from Venezuela.
- State’s 2018 Integrated Country Strategy for Jordan contains an objective to “strengthen democratic accountability and effective governance” and states that programs under this objective will directly support initiatives to expand women and youth participation and empowerment as critical constituencies.

**Table 4: State and USAID Country-Level Strategies with Goals or Objectives That Refer to Marginalized Groups**

	Strategy (as of 1/1/2022)	Racial or ethnic minorities	Women	LGBTQI+ persons	Children	Refugees, migrants, or IDPs	Religious minorities	Persons with disabilities	Indigenous Peoples	Youth	Economically disadvantaged
<b>State and USAID Country Level Strategies</b>	Colombia country strategies	Yes	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes
	Jordan country strategies	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes
	Uganda country strategies	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes

Legend: LGBTQI+ = lesbian, gay, bisexual, transgender, queer, and intersex persons, and all persons of diverse sexual orientations, gender identities, gender expressions, and sex characteristics; IDP = internally displaced persons; — = group was not mentioned in goals or objectives.

Source: GAO analysis of Department of State and U.S. Agency for International Development (USAID) Integrated Country Strategies and Country Development Cooperation Strategies for Colombia, Jordan, and Uganda. | GAO-22-105112

<sup>13</sup>For each country, we reviewed both State’s integrated country strategy and USAID’s country development cooperation strategy. State’s integrated country strategy is a four-year strategy that articulates U.S. priorities in that country. USAID’s country development cooperation strategy sets forth high-level goals that the mission, in collaboration with its development partners, will address during the strategy period.

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Note: All the reviewed strategies were developed prior to E.O. 13985, and therefore when they were developed they did not need to incorporate any of the requirements or respond to policy statement of the order. Several additional groups were identified in a few objectives that may or may not be considered marginalized depending on country context, including rural populations, conflict-affected populations, and HIV/AIDs infected individuals, as well as general terms such as marginalized or vulnerable groups.

The strategies also incorporate support for marginalized groups more broadly. For example,

- The 2020 Colombia Country Development Cooperation Strategy states that it specifically targets vulnerable geographies and populations, although these are not always mentioned by name in each of the objectives and desired results. The strategy's target populations include youth, women, migrants, social leaders, ethnic minorities, and internally displaced persons and other conflict-affected populations.
- Similarly, the 2020 Jordan Country Development Cooperation Strategy states that it fully integrates women and youth across all development objectives, while also dedicating an objective specifically focused on strengthening the agency and leadership of these two groups. In all sectors, USAID will seek to improve dialogue and communication between the government of Jordan and its citizens to address the needs of vulnerable populations, and incorporate input from women and youth, among other things.

USAID reviewed 27 country development cooperation strategies in early 2021, in response to E.O. 13985, and found that these strategies mentioned the need to include marginalized groups such as women, youth, religious minorities, persons with disabilities, refugees, LGBTQI+ persons, Indigenous Peoples, and ethnic minorities in USAID programming.<sup>14</sup> However, many of the strategies provided a cursory mention of these groups without specific detail on the underlying issues or clear information on how the USAID country program would address those issues.

Both State and USAID issued guidance in 2021 to their embassies and missions on how to incorporate the policy of E.O. 13985 into their country strategies.

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<sup>14</sup>According to USAID officials, these country strategies most often specifically mentioned the inclusion of women and youth, though some, to a much lesser extent, specifically mentioned other groups such as Indigenous Peoples, persons with disabilities, or LGBTQI+ persons.

- State began the process of developing new integrated country strategies in November 2021. At that time, State issued a cable to all overseas posts on how to implement E.O. 13985 during their strategic planning processes. The cable included relevant goals and objectives from the 2022 JSP as a framework to drive the inclusion of racial equity and support for underserved communities in all strategic planning products, including integrated country strategies. For example, it lists several priorities under the draft goal of strengthening democratic institutions, upholding universal values, and promoting human dignity. These priorities include promoting democratic principles, fighting corruption, increasing equitable access to justice services through reform efforts, and raising awareness of the prevalence and effect of discrimination against members of marginalized racial, ethnic, and other underserved communities.
- Similarly, USAID issued new interim guidance in July 2021 that highlighted ways in which diversity, equity, and inclusion priorities should be integrated into USAID's planning for and delivery of assistance. The interim guidance identifies several tools the missions can use to assist in integrating these priorities into their Program Cycle. For example, it highlights and provides links to several analytic tools, including inclusive development, political, and gender analyses, and a civil society assessment tool. It also provides information on relevant training classes that are available.

State released its updated Integrated Country Strategy for Jordan in March 2022. That strategy includes objectives that reference E.O. 13985 and the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World, as well as other equity-focused strategies and directives. Similarly, State released its updated Integrated Country Strategy for Colombia in April 2022, which also includes an objective that references E.O. 13985 and the National Strategy on Gender Equity and Equality.

### Country-Level Activities

The goals and objectives of the country-level strategies help guide the activities that State and USAID implement to support marginalized

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groups, according to U.S. officials in Colombia, Jordan, and Uganda.<sup>15</sup> Figure 1 shows State and USAID activities supporting marginalized groups.

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<sup>15</sup>USAID's portfolio of assistance activities is much larger, in general, than State's in the three countries we reviewed, and according to agency officials USAID activities are typically larger and longer term than State activities. For example, USAID obligated approximately \$355 million in development assistance in fiscal year 2019 in Uganda, compared to approximately \$1.5 million for State.

**Figure 1: State and U.S. Agency for International Development (USAID) Activities Supporting Marginalized Groups**



USAID Colombia activity supporting persons with disabilities.  
Source: John Carlos Rojas, SportPower2. | GAO-22-105112



USAID Jordan education activity supporting girls.  
Source: U.S. Agency For International Development/Jordan. | GAO-22-105112



Embassy Uganda activity supporting women entrepreneurs.  
Source: Department of State. | GAO-22-105112



In each country, State and USAID has activities that are intended to address the needs of the marginalized groups identified. Examples of activities from each country that have goals or objectives that support marginalized groups include the following:

- **Colombia.** USAID Colombia has an activity that strengthens the advocacy, self-governance, and organizational and leadership capacities of Indigenous and African-descendant communities, and includes an objective to strengthen the governance and autonomy of ethnic territories. Embassy Bogota has an activity with an objective to expand the access of Afro-Colombian and Indigenous community youth to professional and academic opportunities by providing English language and leadership training.
- **Jordan.** USAID Jordan has an activity with the objective of improving opportunity, well-being, and civic engagement for youth. The activity aims to build key competencies in youth to identify assets; increase their confidence to design and manage solutions on the individual, peer, and community levels; and connect them to each other and to youth-serving organizations, community, and government leaders and resources to support their success. Embassy Amman has an activity with the objective of supporting youth to build conditions for peace and resilience in communities identified as vulnerable to violent extremism and its root causes.
- **Uganda.** USAID Uganda has activities supporting justice sector reform to remove barriers to racial and ethnic equity, including a goal that vulnerable populations who are victims of human rights abuses are supported through access to justice, protection, and referral services. Embassy Kampala has activities that assist LGBTQI+ persons who have faced violence or discrimination; provide legal support to LGBTQI+ persons who have been arrested because of their identity; and provide psychosocial support and resources to the LGBTQI+ persons.

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### State and USAID Have Guidance on Supporting Specific Marginalized Groups and Are Developing More to Advance Racial and Ethnic Equity

State and USAID use additional government-wide and agency-level strategies and policies specific to marginalized groups. These forms of guidance help ensure that broader agency strategies and programming consider support for such groups, among other things, according to USAID officials. The agencies reported they are currently updating

guidance to better advance equity. These guidance documents can focus on support for a specific marginalized group or on several groups.

State and USAID officials in Colombia, Jordan, and Uganda said they review and consider these strategies, policies, and other guidance documents specific to certain marginalized groups early on, as part of their strategic and programming efforts. This is done to help ensure they address issues related to these groups adequately. In addition:

- State's guidance on program design and development states that when initiating a program or project, all bureaus and offices must assess how it can best align with and advance existing strategies or other high-level directives, including all relevant national- and agency-level strategies and guidance.
- Similarly, USAID's guidance states that all missions when developing their country strategies must align them with administration-approved regional and sector strategies, and all relevant USAID development policies, strategies, and guidance.

There are strategy and policy documents specific to several different marginalized groups, including women, children, and youth (see table 5).

- Most of the existing guidance is specific to women and children. This guidance includes the U.S. Strategy to Support Women and Girls at Risk from Violent Extremism and Conflict, the U.S. Strategy to Prevent and Respond to Gender-based Violence Globally, Advancing Protection and Care for Children in Adversity: A U.S. Government Strategy for International Assistance, and the USAID Gender Equality and Women's Empowerment Policy.
- Other relevant guidance and policy documents include USAID's Youth in Development and Disability Policies, USAID's Policy on Promoting the Rights of Indigenous Peoples, and USAID's LGBT Vision for Action: Promoting and Supporting the Inclusion of Lesbian, Gay, Bisexual, and Transgender Individuals.

For a full list of guidance documents for marginalized groups identified by State and USAID, see Appendix II.

**Table 5: U.S. Government-wide, State, and USAID Guidance Documents Focused on Specific Marginalized Groups**

	Racial or ethnic minorities	Women	LGBTQI+ persons	Children	Refugees, migrants, or IDPs	Religious minorities	Persons with disabilities	Indigenous Peoples	Youth
<b>U.S. government-wide strategies</b>	—	4	1	4	—	1	—	—	—
<b>Agency strategies</b>	—	1	—	—	1	—	—	—	—
<b>Agency policies</b>	—	1	—	—	—	—	1	1	1
<b>Other agency guidance</b>	—	—	1	1	—	—	—	—	—
<b>Total</b>	—	<b>6</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>

Legend: Dash (-) = none; LGBTQI+ = lesbian, gay, bisexual, transgender, queer, and intersex persons, and all persons of diverse sexual orientations, gender identities, gender expressions, and sex characteristics; IDP = Internally Displaced Person.

Source: GAO analysis of U.S. Government-wide, Department of State, and U.S. Agency for International Development (USAID) documents identified by State and USAID. | GAO-22-105112

State and USAID also have relevant strategies and policies focused on incorporating support for marginalized groups not specific to just one population. For example,

- State’s 2022 functional bureau strategy for DRL addresses support for racial or ethnic groups, LGBTQI+ persons, religious minorities, and Indigenous Peoples, among others.
- USAID’s Democracy, Human Rights, and Governance Strategy addresses support for women, LGBTQI+ persons, religious minorities, and persons with disabilities, among others.
- USAID’s *Suggested Approaches for Integrating Inclusive Development across the Program Cycle and in Mission Operations* addresses support for all marginalized groups.

State and USAID officials recognize their agencies have not specifically prioritized advancing racial and ethnic equity in their current strategies, policies, and other guidance. In response to E.O. 13985, officials stated they are reviewing all and revising many of their strategies, policies, and other guidance to incorporate elements of racial and ethnic equity and to create additional guidance where needed.

## State and USAID Use Various Methods to Track Progress on Supporting Marginalized

## Groups and Are Working to Mitigate Data Challenges

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### State and USAID Use Indicators to Track Progress on Goals Supporting Marginalized Groups

State and USAID use a mix of standard and custom indicators to measure and track progress toward goals supporting marginalized groups around the world. The agencies use standard indicators, or measures, to collect information on support for marginalized groups. Standard indicators are measures that State and USAID jointly use worldwide to collect performance data that can be aggregated globally. These indicators measure what the agencies and foreign governments are accomplishing with U.S. government foreign assistance funds and allow the agencies to report externally on the results produced by their development investments. The agencies also use specific non-standard indicators, referred to as custom indicators, designed to measure progress specific to the marginalized groups they serve at the activity, country, or bureau level.

We found that 41 of State and USAID's 234 total fiscal year 2021 standard indicators collect information specific to marginalized groups.<sup>16</sup> These include marginalized groups in general, women, children in adversity, youth, the economically disadvantaged, and persons with disabilities (see table 6). For example, one standard indicator measures the number of youth trained in life skills through U.S. government-assisted programs. Nine of the 41 standard indicators relating to marginalized groups measure outcomes, such as the percentage of participants in an activity reporting increased agreement with the concept that males and females should have equal access to social, economic, and political resources and opportunities. Thirty-two of the 41 measure outputs, such as the number of service providers trained who serve vulnerable persons.<sup>17</sup>

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<sup>16</sup>Each indicator collects information on one specific marginalized group, except for one of the 41 that refers to three groups—marginalized groups, women, and youth.

<sup>17</sup>Outputs are the goods and services produced by an activity and provided to the public or others. For example, the number of journalists trained and supported is an output indicator. Outcomes describe the intended result or consequence that will occur from carrying out a program or activity. An example is the percent of individuals with improved reading skills following participation in U.S. government-assisted programs.

**Table 6: State and USAID Standard Indicators Measuring Support for Marginalized Groups**

<b>Marginalized group</b>	<b>Number of indicators</b>
<b>Marginalized groups in general</b>	10
<b>Women</b>	14
<b>Children in adversity</b>	9
<b>Youth</b>	6
<b>Economically disadvantaged</b>	3
<b>Persons with disabilities</b>	1

Source: GAO analysis of Department of State and U.S. Agency for International Development (USAID) documents. | GAO-22-105112

Note: Indicators total 43 because one of the 41 standard indicators refers to three groups—women, youth, and marginalized groups in general.

The agencies also break down many of these indicators by demographics to provide more detailed information on the marginalized groups they assist, including age, sex, location (urban and rural), and disabilities. In addition, many of the other 234 indicators that are not specific to marginalized groups are broken down to provide information on marginalized groups. For example, an indicator tracking the number of students in primary schools reached with U.S. government education assistance is broken down by sex, learners with disabilities, and learners affected by conflict. Other indicator breakdowns include those related to LGBTQI+ persons, women, religious groups, Indigenous Peoples, ethnic minorities, and people affected by conflict.<sup>18</sup>

State and USAID also use custom indicators to supplement standard indicators, either in combination with standard indicators for multidimensional results or when no standard indicator exists. For example, a State activity providing scholarships to Afro-Colombian and Indigenous undergraduate university students to learn English as a second language and receive leadership training in Colombia has a custom indicator measuring the academic level achieved by beneficiaries. Under this custom indicator, State collects information and can follow up on the competencies developed by the students attending English classes. The indicator also measures progress toward the activity’s goal to expand the access of Afro-Colombian and Indigenous community

<sup>18</sup>State and USAID include standard indicator data in their annual performance plan and report. According to the 2020 annual performance report, State and USAID implement planning and performance management policies and practices aligned with relevant legislation and industry best practices to ensure responsible and efficient use of funds. The agencies also coordinate initiatives in strategic planning and performance management to promote efficiency and effectiveness.

youth to professional and academic opportunities by providing English language and leadership training.

State and USAID use both standard and custom indicators to track progress in supporting marginalized groups at the agency, bureau, country, and activity levels.

**Agency Level.** At this level, State and USAID report standard indicator data in their annual performance report<sup>19</sup> to measure progress on performance goals in the JSP. For example, the 2020 annual performance report contains an indicator for the “percentage of female participants in U.S. government-assisted programs designed to increase access to productive economic resources.” This indicator tracks progress toward a goal to “achieve parity in participation between women and men in programs that are designed to increase access to economic resources.”

**Bureau (or Office) Level.** At this level, State and USAID collect data on standard and custom indicators to track progress toward goals and objectives supporting marginalized groups in their bureau strategies. For example:

- As part of the indicator data collected on their bureau goals and objectives, State’s DRL tracks a custom indicator on “the number of judicial decisions upholding the rights of marginalized persons” to measure progress toward the goal of improving access to justice for and protecting the social, political, and economic rights of marginalized persons.
- Officials from USAID’s Office of Gender Equality and Women’s Empowerment said they use eight standard indicators, which are gender-based and cross cutting, throughout the agency to track progress towards goals and objectives in USAID’s Gender Equality and Women’s Empowerment policy. These indicators include the number of legal instruments drafted, proposed, or adopted with U.S. government assistance designed to promote gender equality or non-discrimination against women or girls at the national or local level.

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<sup>19</sup>The annual performance report describes progress toward the achievement of long-term strategic goals and sets forth performance targets for future years. The report presents a detailed assessment of agency performance against annual targets for a representative set of foreign assistance indicators.

**Country Level.** At this level, embassies and missions use standard and custom indicators to track progress toward goals and objectives that support marginalized groups in their country level strategies. For example, USAID’s country-level strategy for Colombia has a goal of “strengthening governance to meet citizen needs and increase citizen confidence in the state” that uses a mix of standard and custom indicators to track progress.<sup>20</sup> USAID uses a standard indicator on the “number of individuals from low income or marginalized groups who received legal aid or victim’s assistance with U.S. government support” and a custom one on the “number of youth, women, Indigenous People, and Afro-Colombians with leadership roles in civil society organizations and government institutions,” among others.<sup>21</sup>

**Activity Level.** At this level, State and USAID use standard and custom indicators to track progress on support for marginalized groups, such as women, Indigenous Peoples, and ethnic minorities. Activity implementers track a standard indicator on the “number of youth trained” in life skills “through U.S. government-assisted programs,” which State and USAID report in the annual performance report. They also track a custom indicator on the number of avenues for positive youth engagement, which measures progress toward USAID Jordan’s country strategy to increase civil society advocacy and operational effectiveness. Implementers also report on a custom indicator, specific to activity goals, on the “number of youth-led initiatives that address gender, disability, and other issues.”

As shown in table 7, USAID tracks an indicator for a justice related activity in Uganda to support marginalized groups at multiple levels from the agency level to the activity level.

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<sup>20</sup>State’s integrated country strategy for Colombia has a similar goal to “Advance Colombia’s capacity to strengthen governance and transition to a sustainable peace” that incorporates USAID’s goal of “strengthening governance to meet citizen needs and increase citizen confidence in the state.”

<sup>21</sup>Both the standard and custom indicators have specific targets for youth, women, and ethnic minorities.

**Table 7: Example of How a USAID Indicator Tracks Progress at Multiple Levels**

**Indicator: Number of civil society organizations receiving U.S. government assistance engaged in advocacy interventions.**  
**Disaggregated by: Women, youth, persons with disabilities, and LGBTQI+ organizations**

Reporting level	Objective that the indicator is tracking progress toward	Reported in
Agency: USAID	<p>2018-2022 Joint Strategic Plan—Strategic Objective: Increase partnerships with the private sector and civil-society organizations to mobilize support and resources and shape foreign public opinion</p> <ul style="list-style-type: none"> <li>Under this objective, State and USAID will engage civil society and nongovernmental organizations, along with the private sector, to maximize their ability to affect positive change, including protecting ethnic and religious minorities and other marginalized populations, promoting religious and ethnic tolerance, and providing emergency assistance to human rights defenders and survivors of abuse.</li> </ul>	Collected from all relevant countries and reported at the agency level through the annual performance report.
Country: Uganda	<p>Intermediate result: Citizens actively participate in development</p> <ul style="list-style-type: none"> <li>Under this result, USAID will support the creation of spaces where women and other marginalized populations will be enabled to advocate on matters of policy and to participate meaningfully in every facet of civic and political life.</li> </ul>	Aggregated from all the relevant country level activities and reported through the Uganda Country Development Cooperation Strategy performance management plan. These data are also rolled up to the agency level to help measure progress towards the agency strategic objective.
Activity: Justice related activity In Uganda	<p>Objective 1: Individuals and organizations defend and maintain a legal enabling environment conducive for civic and political activism, and which ensures access to justice, particularly for children</p> <ul style="list-style-type: none"> <li>Under this objective, the activity will enhance access to justice for Ugandans by supporting legal awareness and legal aid for indigent children, women, youth, key populations, and persons with disabilities.</li> </ul>	Collected at the activity level and reported through the activity’s quarterly progress report. These data are also rolled up to the country level to help measure progress towards the country level Intermediate result.



Source: GAO analysis of U.S. Agency for International Development (USAID) documents. | GAO-22-105112

## State and USAID Use Reporting to Track Progress on Supporting Marginalized Groups

State and USAID use regular reporting mechanisms to track progress on support to marginalized groups. These mechanisms include the agencies’ use of “key issues” related to marginalized groups to collect information on activities and funding serving these groups, which officials said the agencies report through the annual performance plan and report.<sup>22</sup> Officials will use data collected from the key issue to understand how the

<sup>22</sup>According to State, key issues are essential tools used to track and report on high-priority issues that cut across many, if not all, foreign assistance sectors.



agency is investing in activities supporting marginalized groups so they can allocate resources equitably and support local organizations, according to agency officials. State and USAID have key issues related to the following marginalized groups: religious and ethnic minorities, Indigenous Peoples, persons with disabilities, women, LGBTQI+ persons, children in adversity, and youth.<sup>23</sup> In addition, State and USAID in 2021 added the key issue of racial and ethnic equity in response to the policy statement in E.O. 13985, according to agency officials.

State and USAID also track progress toward supporting marginalized groups through Agency Priority Goals. For example:

- State and USAID had two Agency Priority Goals in their 2018-2022 JSP that relate to support for marginalized groups—Resilience and Food Security and Child and Maternal Health. These two goals have indicators that track State and USAID’s combined progress for women, children, and economically disadvantaged people. For example, one indicator for Resilience and Food Security is the number of children under age 5 reached with nutrition-specific interventions through programs funded by the U.S. government.
- State and USAID will also begin collecting data on two newly developed equity-focused Agency Priority Goals contained in their 2022-2026 JSP. The first goal is entitled “Equity Across Foreign Affairs Work” and the second goal is entitled “Diversity, Equity, Inclusion, and Accessibility in USAID programs.”<sup>24</sup>

State and USAID also use other established performance management tools to track progress toward supporting marginalized groups, including evaluations and, for USAID, portfolio reviews.<sup>25</sup> For example, the performance management plan for USAID Colombia describes evaluations of USAID activities that focus on particular marginalized groups. Between 2016 and 2021, USAID Colombia completed

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<sup>23</sup>USAID officials stated that the key issue focused on LGBTQI+ persons was terminated in 2017 and then reinstated in 2021.

<sup>24</sup>The 2022-2026 JSP’s description of the first goal is, in part, to “advance equity and support for underserved communities in the development and conduct of foreign policy.” Additionally, the JSP indicates that the second goal, in part, is to “increase equitable outcomes with USAID partners globally.”

<sup>25</sup>Portfolio reviews are opportunities for USAID missions to periodically examine designated aspects of their strategy, projects, or activities. Reviews allow the missions to generate and apply new learning across a broad range of programmatic and operational approaches.

evaluations of its activities on Indigenous and Afro-Colombian groups, women, LGBTQI+ persons, and youth. A 2021 evaluation of a USAID peace activity showed favorable results in institutional strengthening, social and economic inclusion, and improved recognition and respect for the cultural identity and heritage of Afro-Colombian and Indigenous communities. In addition, USAID officials reported that issues related to support for marginalized groups are often examined during portfolio reviews.

At the activity level, State and USAID collect qualitative data through narratives contained in regular progress reports and activity evaluations. For example:

- A quarterly report from a State activity that uses youth engagement in sports to help prevent violent extremism describes building volunteer capacity, carrying out regional sports tournaments, and surveying participants about the activity's impact.
- An evaluation of a USAID activity to strengthen participation in elections in Jordan discussed progress made in increasing civic engagement for women, persons with disabilities, and youth.

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## State and USAID Face Challenges in Collecting Data on Marginalized Groups and Are Working to Mitigate Them

State and USAID face longstanding challenges in collecting information on marginalized groups. These challenges include the following:

- **Intersectionality.** USAID officials said that intersectionality, in which a person may belong to multiple marginalized groups, and the difficulties associated with recording multiple identities in data systems, is a longstanding challenge for data collection and reporting.<sup>26</sup> For example, a person may be marginalized based on ethnicity, gender, and LGBTQI+ identity, which can lead to double counting in data systems. In addition, officials in one country stated they have challenges selecting which data to report under the new racial and ethnic equity key issue because it intersects and overlaps with other key issues, such as those on Indigenous Peoples, women, and persons with disabilities. USAID officials said they expect to refine

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<sup>26</sup>USAID officials also noted that compounding the data collection challenges presented by intersectionality was the fact that the topic was considered sensitive from 2017 through 2021 and was often removed from documents and trainings.

the key issue as they begin to see the information the overseas posts report during the first year.

- **Disaggregation.** State and USAID reported that disaggregating some data to identify specific groups is a longstanding challenge. According to State and USAID officials, in some cases, they cannot disaggregate data because it is not available due to privacy laws, cultural sensitivity, or difficulties with self-reporting. For example, State's Bureau of European and Eurasian Affairs noted in State's equity assessment that strict privacy laws in many European countries preclude collecting race and ethnicity data. In addition, USAID Colombia officials said that collecting data on LGBTQI+ indicators is a challenge due to social and cultural sensitivities and the risk of harm that makes people reluctant to self-identify as LGBTQI+.<sup>27</sup>
- **Differing definitions.** State and USAID said that differences in definitions of marginalized groups between U.S. agencies and bureaus as well as countries<sup>28</sup> also create a challenge in comparing and tracking indicators in a standardized way. For example, State officials have examined how to incorporate questions about one's race and gender into public diplomacy surveys and determined that formulating these questions will vary among regions, countries, and programs. As a result, no global standard for collection of these data exists.

In addition to their current efforts to collect this data in several different ways, State and USAID are working on new methods to improve the data collected. For example, DRL officials said they are developing a social inclusion tool that will help measure progress in racial and ethnic equity. These officials also said the new Agency Priority Goal will help them develop a system for reporting equity issues agency-wide. Some missions also have made efforts to clarify definitions relating to marginalized groups. For example, USAID Colombia officials reported using toolkits that contain definitions, including a two-page guide for definitions relating to LGBTQI+ persons.

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<sup>27</sup>State's 2021 *Country Reports on Human Rights Practices* described societal abuse and discrimination, including physical, sexual, and psychological aggression, in addition to economic discrimination, against LGBTQI+ persons in Colombia.

<sup>28</sup>Marginalized groups differ in each country based on local conditions, such as social norms, existing ethnic minorities, and refugee inflow, and State posts and USAID missions perform assessments to determine who is marginalized in their host country.

State and USAID also work to collect better information by issuing guidance to staff and implementing partners that include equity issues. For example:

- State and USAID are supporting activities to increase awareness and tolerance of marginalized groups by host governments and societies to reduce discrimination associated with these groups, thereby increasing the likelihood that people may self-report.
- In 2021, State issued a data strategy that included ethical data collection principles. The guidance states, among other things, that data should be responsibly collected and used to provide accountability to taxpayers, implement leading industry standards in ethical data capabilities, and minimize bias.
- As of fall 2020, USAID’s Operational Policy for the Program Cycle includes guidance about ethical, security, and privacy concerns with data collection related to vulnerable and marginalized groups. Among other things, it states that “collecting and using information and data responsibly includes protecting participants and human subjects from harm, obtaining informed consent to collect and use data, safeguarding individual privacy and security, protecting the sensitive information of vulnerable and marginalized groups, and applying high ethical standards to decide what information to collect and how to use it.”<sup>29</sup>

Efforts such as these may increase people’s willingness to self-identify, which could increase the amount and accuracy of data collected on indicators tracking progress toward goals supporting marginalized groups.

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## State and USAID Are Responding to Directives to Advance Equity Abroad and Mitigating Challenges

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### State and USAID Are Taking Actions to Advance Racial Equity and Support for Other Marginalized Groups Abroad

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State and USAID have taken, or plan to take, several joint and individual actions to respond to E.O. 13985 and advance equity for all, including people of color and others who have been historically underserved,

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<sup>29</sup>USAID, Automated Directive System (ADS), ADS 201.3.5.2.

marginalized, and adversely affected by persistent poverty and inequality. These actions are intended to lay the foundation to integrate equity throughout the agencies and will take several years to complete. E.O. 13985 states that because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity. According to State's equity assessment, operationalizing E.O. 13985 represents a demonstrable shift for the agency. The document also says both State and USAID have long histories of providing foreign assistance to marginalized groups and underserved populations and while equity is not an entirely new concept for either, explicitly distinguishing it from equality is. State officials also said advancing equity is something that the entire agency, and not just a few offices, must undertake.

According to Office of Management and Budget (OMB) guidance on the implementation of E.O. 13985,<sup>30</sup> the order is designed to ensure that agencies move quickly towards tangible outcomes that increase investment of federal resources in underserved communities. The guidance notes that the establishment of agency equity teams and completion of an equity assessment within 200 days of the executive order are steps towards this end. Specifically, the OMB guidance states the following:

- These teams were to facilitate, inform, and advance agency progress on equity-related efforts, including the equity assessments, which served as an initial starting point for agency efforts.
- The equity assessment was intended to inform the first steps of a long-term agency action plan toward “a comprehensive approach to advancing equity for all,” as called for in E.O. 13985.
- Through the course of their initial assessment State and USAID were also expected, in coordination with OMB, as appropriate, to begin implementation of proactive, repeatable steps to advance equity and support for underserved communities informed by stakeholder engagement, consistent with applicable law, and subject to the availability of appropriations.

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<sup>30</sup>In March 2021, OMB, in collaboration with the Domestic Policy Council, prepared a document summarizing the near-term actions executive departments and agencies should take to implement E.O. 13985.

Selected completed actions, along with other in-progress and planned ones to advance equity, are shown in tables 8 to 10.

Joint State and USAID Actions

In response to E.O. 13985, State and USAID made several equity-related changes to their joint strategic planning, as shown in table 8.

**Table 8: Selected Joint State and USAID Completed, In-Progress, and Planned Actions in Response to Executive Order (E.O.) 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government**

Completed actions	In-progress actions	Planned actions
Developed a Racial Equity Key Issue for inclusion in fiscal year 2021 reporting, which included equity-related definitions. Developed a Joint Strategic Objective on advancing equity and support for underserved and underrepresented communities in the formulation and conduct of foreign policy for the fiscal years 2022-2026 State and USAID Joint Strategic Plan.	Ongoing coordination between State’s Bureau of Democracy, Human Rights, and Labor and USAID’s Inclusive Development Hub; as well as State’s Office of Global Women’s Issues and USAID’s Gender Equality and Women’s Empowerment Hub to advance gender equality and inclusion in programming. Annual collection of data related to Racial Equity Key Issue.	Complete an annual review of Racial Equity Key Issue.

Source: GAO review of Department of State and U.S. Agency for International Development (USAID) documents. | GAO-22-105112

State and USAID’s 2022-2026 JSP included a strategic objective to advance equity, accessibility, and rights for all. State and USAID also developed their own separate Agency Priority Goal that supports the JSP. An Agency Priority Goal is intended to drive significant institutional progress and change by setting outcomes and measuring results through quarterly reporting for 2 years. According to State’s action plan, the addition of an Agency Priority Goal enables the agencies to ensure racial equity and support for underserved communities is part of all strategic planning to guide foreign policy development and execution. In addition, the Agency Priority Goal aims to take diversity, equity, inclusion, and accessibility “to the next stage” by pulling all such issues together and laying a firm foundation for that period, according to State officials.

State and USAID also established the Advancing Racial Equity and Supporting Marginalized Communities Key Issue to capture programming efforts that address disparities experienced by beneficiaries based on race or ethnicity. The agencies added this key issue to the Fiscal Year 2021 Operational Plan and Performance Plan and Report, which will enable both agencies to regularly analyze foreign assistance equity data and to establish critical trend data.

The agencies also plan to undertake an annual review and analysis of this key issue. According to State's equity action plan, this review will provide data to help determine where equity programming gaps, challenges, and opportunities exist. In addition, the review will determine the following:

- Amount of planned funding to advance racial equity and support for underserved communities in fiscal year 2021
- Geographic configuration of racial equity programs across the globe
- Types of racial equity programming implemented through foreign assistance
- Breadth of performance indicators used to monitor and evaluate racial equity programs.

In addition, State reported that the key issue data are intended to reveal promising best practices to replicate and address programmatic gaps, and to enable the agency to view equity through its own "sector" lens, according to State's equity action plan. This action plan also noted that progress will be incremental and largely measured over years. Similarly, according to USAID's equity action plan, the agency will use the data collected from the key issue, along with other key issues on gender, youth, disability, LGBTQI+, and religious minorities, to better understand investments in inclusive programming, and have a more informed approach when allocating resources to advance racial equity.

State and USAID also added equity-related definitions to this key issue to create a shared understanding of the terminology. According to State officials, because people interpret equity differently they have to discuss what equity means in a foreign affairs context. Establishing common language also enables funding in specific areas, allows posts and missions to establish indicators for measuring performance, and develops a comprehensive body of knowledge regarding program effectiveness, according to a State equity assessment. To enhance that common language, State and USAID added definitions to the key issue, as shown in the following text box.

**State and USAID Definitions Related to Advancing Racial Equity and Supporting Underserved Communities**

“**Underserved communities**” is defined by Executive Order 13985 as populations sharing a particular characteristic, as well as geographic communities, which have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. In the international context, the term “marginalized populations” is often used.

“**Race**” is defined as a social construct that is often related to perceived physical traits (such as skin color), though group identification may change as personal, political, economic, or historical contexts change.

“**Ethnicity**” is defined as the state of identifying a social group that has a common national or cultural tradition, such as ancestry, language, culture, or nationality. It is often based on religion, beliefs, migration, or history of colonization.

“**Race equity**” is defined as the condition where one’s race identity has no influence on how one fares in society. Race equity is one part of racial justice and must be addressed at the root causes and not just the manifestations. This includes the elimination of policies, practices, attitudes, and cultural messages that reinforce differential outcomes by race.

Source: GAO review of Department of State and U.S. Agency for International Development (USAID) documents. | GAO-22-105112

State’s equity assessment also states that over time, both agencies will further hone the key issue definitions, establishing critical trend data, such as how bureaus and posts distinguish equality from equity and articulating this distinction in program design.

State Actions

State also formed an agency equity team, conducted an equity assessment, issued guidance and an action plan, and is planning several other actions to respond to E.O. 13985, as shown in table 9.



**Table 9: Selected State Completed, In-Progress, and Planned Actions in Response to Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government**

Completed actions	In-progress actions	Planned actions
<p>Established an agency equity team and completed and submitted their 200-day equity assessment.</p> <p>Developed an agency-specific Agency Priority Goal on advancing equity and support for underserved communities.</p> <p>Developed equity-related definitions.</p> <p>Issued guidance to all overseas posts to explain foreign policy priorities and integrating equity into foreign policy and strategic planning.</p> <p>The Bureau for Democracy, Human Rights, and Labor dedicated funding to establish programming specifically for individuals from marginalized racial and ethnic groups.</p>	<p>Developing a department-wide learning agenda, which includes embedding equity into strategic planning.</p> <p>Developing an action plan to guide the implementation of the Gender Equity and Equality Strategy into U.S. foreign affairs.</p> <p>Collecting quarterly data on Agency Priority Goal on advancing equity and support for underserved communities.</p> <p>Including analysis and goals to advance racial equity and support for underserved communities in the State Department's strategic planning documents beginning with the 2022-2026 planning cycle.</p>	<p>Develop a three-part equity strategic impact framework to evaluate global progress toward reducing barriers to equity by September 2023.</p> <p>Develop analytic tools for integrating equity into the development and implementation of foreign policy. Implement guidance and requirements for applying such analyses to U.S. foreign policy and programs.</p> <p>Add equity reporting requirements as an element of all the State Department's public reports by 2024.</p> <p>Embed intersectional equity principles into diversifying public diplomacy and communications strategies.</p>

Source: GAO review of Department of State documents. | GAO-22-105112

State established an agency equity team with representation from 39 bureaus to assess how it advances racial equity and support for marginalized communities. To prepare this equity assessment, the team sent a survey to 275 overseas posts, held listening sessions with State bureaus and offices, and hosted external meetings with civil society. The assessment identified challenges and highlighted several areas where State could further address or influence racial equity and support for underserved communities abroad. As an example, it noted that to advance equity fully within U.S. foreign assistance, State should determine current efforts and create a common language around equity that U.S. posts can use to break down funding and data analysis. State also added additional clarifying language in its equity assessment to distinguish equity from equality. According to the assessment, equity addresses the specific and proportionate needs of certain persons or populations to attain fair and just treatment and outcomes, while equality emphasizes the same or equal treatment for all persons or groups regardless of specific circumstances or needs.

State also developed an action plan based on the assessment that outlines specific actions, metrics, and accountability efforts to integrate equity into all aspects of its foreign affairs mission, according to the plan. The action plan also provides a roadmap for the agency to generate better-informed policies, programs, and processes to address barriers to equity worldwide, such as establishing key reporting requirements and equity analysis tools to align priorities and operations around advancing

racial equity and supporting underserved communities through international aid.

**USAID Actions**

USAID also formed an agency equity team, conducted an equity assessment, issued guidance and an action plan, and is planning several other actions to respond to E.O. 13985, as shown in table 10.

**Table 10: Selected USAID Completed, In-Progress, and Planned Actions in Response to Executive Order (E.O.) 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government**

Completed actions	In-progress actions	Planned actions
<p>Established an agency equity team and completed and submitted its 200-day equity assessment.</p> <p>Developed an agency-specific Agency Priority Goal on advancing equity and support for underserved communities.</p> <p>Developed equity-related policy updates to better align agency policy and operations with policy of E.O. 13985.</p> <p>Integrated E.O. 13985 policy into New Partner Initiative Action Plans that outline plans for enhancing equity and inclusion through acquisition and assistance practices and activity implementation abroad.</p> <p>Launched WorkwithUSAID.org, a free resource hub that provides the knowledge and networks for organizations to navigate how to partner with USAID.</p>	<p>Developing a new policy framework for release in summer or fall 2022 that will reflect the emphasis on integrating racial equity and support for marginalized communities.</p> <p>Revising internal agency guidance on development policies and strategies to ensure that both process and content embrace diversity, equity, inclusion, and accessibility.</p> <p>Integrating equity into agency policy formulation by updating or releasing new policies, such as Youth, Disability, Gender Equality and Women’s Empowerment, and LGBTQI+.</p> <p>Collecting quarterly data on Agency Priority Goal on advancing equity and support for underserved communities.</p>	<p>Update strategic planning, such as country strategies, with information about advancing racial and ethnic equity.</p> <p>Improve implementation of the nondiscrimination for beneficiaries’ policy and implement an accountability mechanism to receive discrimination complaints.</p> <p>Designate an Inclusive Development Advisor at each mission.</p> <p>Implement a consistent approach to incorporate racial and ethnic equity and diversity into policy, planning, and learning.</p> <p>Review internal policy, statutory and regulatory requirements to identify high impact actions to reduce administrative burden to those seeking to do business with USAID.</p>

Legend: LGBTQI+ = Lesbian, gay, bisexual, transgender, queer, and intersex persons, and all persons of diverse sexual orientations, gender identities, gender expressions, and sex characteristics.

Source: GAO review of U.S. Agency for International Development (USAID) documents. | GAO-22-105112

USAID established its agency equity team with representation from 20 agency bureaus and offices to assess how it advances racial equity and support for marginalized communities. To complete their equity assessment, the USAID agency equity team engaged with internal and external stakeholders, such as representatives from the agency’s 17 employee resource groups and implementing partners at home and abroad, reviewed documents, and held focus groups with civil-society organizations to collect information. As a result,

- The assessment contained over 60 recommendations and identified key tasks the agency could undertake to support the administration’s

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goals of advancing racial and ethnic equity, such as updating country strategies, performance tracking and reporting, and guidance on policy formulation.

- The team also developed an action plan prioritizing five of the recommendations, including enhancing implementation of USAID's nondiscrimination policy for beneficiaries; designating an Inclusive Development Advisor at each mission; and implementing a consistent approach to incorporate racial and ethnic equity and diversity into policy, planning, and learning. According to USAID's action plan, these actions will also serve as the basis by which USAID measures its success in the equity-related Agency Priority Goal.

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## State and USAID Are Taking Additional Actions to Advance the Human Rights of LGBTQI+ Persons Abroad

Since the issuance of the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World, State and USAID have coordinated to build upon previous U.S. efforts to promote and protect the human rights of LGBTQI+ persons abroad. According to State officials, recent efforts respond to the presidential memorandum's directives to protect such persons from violence and abuse, criminalization, discrimination, and stigma, and also serve to support the empowerment of LGBTQI+ movements and persons around the world. According to State and USAID officials, both agencies have identified and updated inconsistent policies and guidance, completed implementation reports, and are conducting or planning other actions to respond to the presidential memorandum, as shown in table 11.

**Table 11: Selected State and USAID Completed, In-Progress, and Planned Actions in Response to the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World**

Agency	Completed actions	In-progress actions	Planned actions
<b>Joint State and USAID actions</b>	Reinstated the LGBTQI+ Key Issue indicator, which uses annual budgeting processes to track LGBTQI+-specific or LGBTQI+-inclusive foreign assistance.	Ongoing coordination between State and USAID on programming to advance protections, rights, and inclusion of LGBTQI+ persons.	Complete an annual review of LGBTQI+ Inclusion Key Issue.
<b>State actions</b>	<p>Completed a 1-year report on the implementation of the presidential memorandum and two reviews of directives, orders, regulations, policies or guidance and updated those that were inconsistent with the presidential memorandum.</p> <p>Refined LGBTQI+ definitions.</p> <p>Launched an agency-wide task force for functional and regional offices to collaborate, share strategies, and increase focus on delivery of LGBTQI+ priorities.</p> <p>Acknowledged violence against LGBTQI+ persons within the drafting of the new U.S. Strategy to Prevent and Respond to Gender-Based Violence Globally and the U.S. National Action Plan to End Gender-Based Violence.</p>	<p>Working with embassies and regional bureaus to create and implement action plans geared toward reducing stigma, violence, discrimination, abuse, and harassment targeting LGBTQI+ persons.</p> <p>Advocating for the repeal of laws in countries that criminalize individuals based on sexual orientation or gender identity or expression and is developing country-specific approaches to support decriminalization.</p> <p>Bureau of Democracy, Human Rights, and Labor plans to begin new programs to support the human rights of LGBTQI+ persons.</p>	<p>Complete an annual report on the implementation of the presidential memorandum.</p> <p>Provide up to \$5 million to launch the Global LGBTQI+ Inclusive Democracy and Empowerment Fund, a new program under the Global Equality Fund that will facilitate the participation and leadership of LGBTQI+ community members in democratic institutions.</p>
<b>USAID actions</b>	<p>Completed a 1-year report on the implementation of the presidential memorandum and two reviews of directives, orders, regulations, policies or guidance and updated those that USAID found to be inconsistent with the presidential memorandum.</p> <p>Released guidance on strategies to integrate LGBTQI+ considerations into education programs and in resilience and food security programs.</p> <p>Produced new external communications materials, including a Fact Sheet describing programs.</p>	<p>Updating the USAID LGBT Vision for Action (2014) to be a full LGBTQI+ policy.</p> <p>Updating the agency's official guidance, the Automated Directive System Operational Policy Chapters, with gender inclusive language.</p> <p>Revising the 2020 Gender Equality and Women's Empowerment Policy to be inclusive of gender and sexual minorities.</p> <p>Developing two sectoral guidance documents on meaningful integration of LGBTQI+ persons into programming.</p>	<p>Complete an annual report on the implementation of the presidential memorandum.</p> <p>Develop a new public private partnership initiative (with anticipated rollout in late fiscal year 2022) that will support LGBTQI+ civil society organizations in their efforts to, among other things, advance decriminalization of homosexuality.</p>

Legend: LGBTQI+ = lesbian, gay, bisexual, transgender, queer, and intersex persons, and all persons of diverse sexual orientations, gender identities, gender expressions, and sex characteristics.

Source: GAO analysis of Department of State and U.S. Agency for International Development (USAID) documents. | GAO-22-105112

In response to the presidential memorandum, State and USAID reinstated the joint LGBTQI+ Key Issue indicator, which will use annual budgeting processes to track LGBTQI+-specific or inclusive programming across the foreign assistance programming of the agencies. This information will

allow both agencies to assess where and to what level they are allocating foreign assistance resources toward programming that addresses the needs and priorities of LGBTQI+ persons and communities. They will also use the information from this key issue for a required annual report submitted to the White House on efforts taken to advance the goals in the presidential memorandum.

State also reinstated its LGBTQI+ Working Group, which prioritizes issues involving violence and the equal treatment and social inclusion of LGBTQI+ communities abroad. The group also supports the mainstreaming of LGBTQI+ issues into policy priorities across the agency, including with the Offices of Global Women's Issues, International Religious Freedom, and the U.S. Global AIDS Coordinator. State officials said the memorandum also helped bring attention to what type of LGBTQI+-related support is possible for local communities through State's Global Equality Fund.<sup>31</sup> According to a State report, the agency is working with organizations implementing Global Equality Fund grants to ensure flexibility in adjusting programming to address critical, evolving needs of the LGBTQI+ community and working to expand membership and financial contributions to the Global Equity Fund.

In addition, State's Office of the Special Envoy for the Human Rights of LGBTQI+ Persons relaunched a department task force as a central hub for increased action, sharing strategies, and focus on addressing the priorities laid out in the presidential memorandum, according to State officials. The envoy is also developing country-specific approaches using agency, interagency, and intergovernmental tools and resources to support decriminalization of LGBTQI+ status or conduct, such as supporting civil society efforts to repeal laws and prevent passage of proposed legislation aimed at criminalization. Additionally, the envoy is working to provide emergency assistance to LGBTQI+ activists through programming, according to State officials.

Similarly, USAID will continue its programs, partnerships, and development of additional sector guidance to ensure that LGBTQI+ issues are integrated across development and humanitarian

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<sup>31</sup>The DRL's Office of Global Programming leads and administers the Global Equality Fund, a public private partnership which supports emergency assistance to LGBTQI+ organizations and persons under threat; small grants to grassroots LGBTQI+ organizations; and long-term human rights programming.

programming, according to a USAID report on its implementation of the presidential memorandum. In addition, according to the report:

- USAID established the LGBTQI+ Rights in Foreign Assistance Interagency Working Group to improve the effectiveness and responsiveness of U.S. foreign assistance addressing the needs and barriers faced by LGBTQI+ persons.
- USAID revised the Policy on Counter-Trafficking in Persons to include LGBTQI+ issues which had been removed or significantly reduced in 2020, according to USAID reports. USAID also produced a new guidance document on integrating LGBTQI+ considerations into education programming. USAID is also revising the 2020 Gender Equality and Women's Empowerment Policy.
- USAID's LGBTQI+ portfolio reestablished communications and resource sharing across every mission, country office, and operating unit and produced new external communications materials, including a two-page description and fact sheet describing LGBTQI+ programs.
- The presidential memorandum, along with E.O. 13985, also helped raise the profile for LGBTQI+ persons and start conversations with implementing partners to ensure that population is included in activities, according to USAID Colombia officials.

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## State and USAID Are Working to Mitigate Challenges in Responding to Executive Directives on Support for Marginalized Groups

State and USAID identified several challenges to promoting equity and support for marginalized groups, including LGBTQI+ persons, such as limited resources and the difficulty of applying racial and ethnic equity in a foreign context, and are working to mitigate those challenges. For example, State and USAID officials cited the following challenges:

- **A lack of dedicated resources.** State and USAID officials cited a lack of dedicated resources for carrying out the policy of E.O. 13985 as a challenge. State officials said they would require additional staffing resources to meet the priorities in the executive order and the agency does not currently have dedicated staff to advance equity. Instead, it relies on personnel who volunteer to participate on the agency equity team. These volunteers have to be responsive to E.O. 13985 requirements and draft reports, in addition to completing their existing full-time duties, according to State officials.

Furthermore, according to State's action plan, integrating a new equity structure across the agency requires a robust resource commitment to advance equity globally and appropriate staffing and funding resource allocations are paramount to operationalizing E.O. 13985 over the long term. According to State's action plan, State will mandate each bureau or office identify at least one Deputy Assistant Secretary responsible for coordinating E.O. 13985 implementation and ensuring the bureau or office consistently applies an equity analysis when developing and implementing U.S. foreign policies. Additionally, the action plan states the agency may add dedicated positions or units to track progress and implementation.

Similarly, USAID's action plan states overseas missions often lack the specific expertise and resources required to develop inclusive development programs. Most missions do not have dedicated advisors with the technical knowledge and expertise related to the challenges and barriers faced by numerous marginalized groups in the local context. To help alleviate this challenge, USAID aims for all overseas missions to have Inclusive Development Advisors or other points of contact responsible for overseeing inclusive development in program design by 2023.<sup>32</sup> As of May 2022, USAID reported that an estimated 25 percent of missions have an Inclusive Development Champion. USAID's Inclusive Development Hub also aims to continue developing and facilitating training sessions on inclusive development topics to ensure advisors can perform this function, and providing inclusive development support mechanisms. According to USAID's action plan, these advisors are necessary to advance an inclusive and equitable approach to global development, but missions must be provided with additional resources.

According to USAID, the President's Budget for fiscal year 2023 includes \$2.6 billion for State and USAID to advance gender equity and equality and to support underserved communities across a range of sectors. In addition, the funding request aims to further implement E.O. 13985 by better integrating equity through more inclusive policies, strategies, and practices, including new efforts to identify places to support and advance underserved populations appropriate to the country context. The fiscal year 2023 budget request includes

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<sup>32</sup>Inclusive Development Advisors serve as subject-matter experts on USAID's inclusive development framework. They launch Inclusive Development Analyses and other approaches to gathering data and understanding local contexts, guide staff in developing programming designed to integrate the needs of marginalized and underrepresented groups, and spearhead the integration of inclusive development considerations in relevant policies, among other things, according to USAID.

\$200 million for the Gender Equity and Equality Action Fund to advance the economic security of women and girls. According to State officials, the budget request also includes \$47.3 million in diplomatic engagement funding for State's DRL, \$10.2 million in funding for the Office of Global Women's issues, and \$2.0 million to support the rights of LGBTQI+ persons and persons with disabilities, promote gender equality, and advance racial equity of historically underserved communities. However, the request does not mention funding for additional positions to be placed abroad, such as Inclusive Development Advisors.

USAID officials stated that, in some cases, existing staff could be designated as Inclusive Development Advisors. USAID officials stated the agency does not have new resources for these advisors, and is currently considering various funding options, including using existing resources. Similarly, State's action plan notes that integrating a new equity structure across the agency requires a robust resource commitment to advance equity globally, including appropriate staffing.

- **Adapting domestic requirements to foreign assistance.** State and USAID officials cited challenges in adapting equity to foreign assistance. The executive order is clear on how to advance institutional change on equity domestically, but unclear on how to do so internationally, according to State's equity assessment. The equity assessment notes that the concepts of race, ethnicity, and equity have well-established cultural significance and understanding within the U.S., but can have different interpretations and implications, depending on location and context, when State and USAID apply them to foreign assistance programs overseas. For example, an African post in State's equity assessment survey said that the U.S. definition of race does not work in an African context since some societies are divided along ethnic and regional lines.
- **Cultural barriers and norms.** According to State's action plan, societal norms may prevent individuals of underserved communities from participating in programs or from self-identification, such as cultural barriers against LGBTQI+ persons and other marginalized groups in certain countries.<sup>33</sup> The State agency equity team's survey

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<sup>33</sup>State's 2021 *Country Reports on Human Rights Practices* described significant human rights issues including credible reports of violence or threats of violence against LGBTQI+ persons in Colombia, Jordan, and Uganda. The reports also describe child labor in Colombia and Uganda; violence against and forced displacement of Afro-Colombian and Indigenous Peoples in Colombia; rape and abuse of women and children in Colombia; and lack of investigation of and accountability for gender-based violence, including domestic or intimate partner violence, and sexual violence in Jordan and Uganda.



found that 70 percent of overseas posts indicated that host country norms are the primary challenges to integrating racial equity into policy and programming. In addition, a USAID official said country norms can limit their ability to openly provide foreign assistance and limits some people's willingness to openly identify as LGBTQI+. Identifying LGBTQI+ beneficiaries is also a concern when self-identifying could cause physical harm, a person's membership in a group is unclear, or the program is not specifically designed for them. For example, implementing partners might say they have no LGBTQI+ beneficiaries in rural areas since armed groups could harm LGBTQI+ leaders if they knew their identity, according to USAID Colombia officials.

Moreover, State and USAID officials said they use the "Do No Harm" principle to guide their work on LGBTQI+ issues, which informs the approaches agencies take in a particular country. According to USAID guidance, "Do No Harm" means taking measures to ensure that USAID's efforts do not put LGBTQI+ persons or groups at increased risk of harm or raise their public profile in a way that could lead to backlash. For example, USAID considers this principle when working in contexts in which LGBTQI+ persons are subjected to violence, discrimination, stigma, or criminalization. The Jordanian government would not support including LGBTQI+ persons in embassy strategies, according to embassy officials in Jordan. Embassy officials said that engaging in such issues is highly challenging, and if State were to do so publicly, it would be harmful for those involved because they could be harassed and beaten. To help mitigate this challenge, an embassy official in Jordan reported that they address LGBTQI+ diversity through broad programming that is inclusive of all people, such as offering a safe place for youth to gather.

- **Inclusion of Diverse or Underserved Communities.** According to State's action plan, several barriers exist for embedding equity into State's work, such as including more diverse participants in programming. The action plan also says the agency has not provided guidance to posts and bureaus to establish goals for participation from diverse or underserved communities in programming. However, the Under Secretary for Public Diplomacy and Public Affairs' Office of Policy, Planning, and Resources plans on establishing this guidance and aims to plan and execute activities that incorporate intersectional equity principles. In addition, the action plan states individuals of underserved communities around the world may not meet the criteria for participation in some programming, such as English language ability. In response to this challenge, State will consider broadening criteria for program participation or developing new program options

to target communities that may not meet the criteria for existing programs.

USAID also reported challenges when seeking to directly partner with local organizations representing marginalized and underrepresented groups and topics. According to USAID's action plan, challenges faced by such local organizations may include safety and security considerations, time sensitivity, the need for discretion, and complicated relationships with local governments. Combined, these factors often hinder a USAID mission's ability to develop programming that addresses the needs of marginalized and underrepresented groups. USAID aims to address this challenge by designating Inclusive Development Advisors at each mission, and increasing the capacity of local organizations serving marginalized and underrepresented groups to support their needs.

In addition, USAID reported bureaucratic hurdles have prevented USAID from partnering with small or local organizations, many of which represent underserved and historically marginalized groups around the world. For example, organizations can struggle to navigate the complex requirements for funding eligibility or understand USAID's government terminology, according to USAID's action plan. The plan also states this challenge represents a missed opportunity for USAID to engage with partners that have the local experience, knowledge, and networks to ensure the best and most sustainable development outcomes in host countries. Aiming to make it easier for potential USAID partners, the agency launched [WorkwithUSAID.org](https://www.workwithusaid.org). According to the action plan, this new platform offers tools and resources to help organizations better understand regulations and provides access to capacity-strengthening tools for organizations that might otherwise be deterred from pursuing a partnership with USAID.

- **Lack of tools to measure agency success.** According to State's action plan, establishing baselines and measuring progress and success for the agency's overall work on equity is challenging. In addition, according to State's equity assessment, overseas posts often lack the tools to measure success in equity and the State agency equity team's survey of overseas posts found that fewer than half of responding posts have defined measures for success to advance racial equity and support for underserved communities in the host country. The lack of tools to identify and quantify cross-cutting foreign assistance work, limits the U.S. government's ability to identify best practices and remedy deficiencies, according to State's action plan. To address this challenge, State plans to undertake an annual comprehensive review and analysis of the Advancing Racial Equity

and Support for Underserved Communities Key Issue to reveal a formal baseline of data to determine where there are equity programming gaps, challenges, and opportunities.

Similarly, data collected as part of USAID's equity assessment suggest that broad variations and inconsistencies exist in how USAID policies, planning, and evaluations incorporate diversity, equity, inclusion, and accessibility. For example, neither USAID's strategic planning nor project or activity design guidance requires missions to address equity issues, according to USAID's equity action plan. As a result, the agency has begun to take the actions identified in table 10, such as revising internal guidance and incorporating diversity, equity, inclusion, and accessibility as a major pillar of USAID's Policy Framework.

While both agencies are identifying and prioritizing actions to integrate equity throughout their work, they are in the early stages of this effort. They have taken steps to identify, and in some cases, mitigate challenges. However, some challenges, such as collecting the data needed to effectively measure progress or increasing the capacity of local organizations serving marginalized and underrepresented groups, may take longer to address or are intended to be addressed in future actions. As previously discussed, both agencies are planning to develop a framework that will guide their global efforts at the highest levels and begin to define what success in promoting equity looks like. Both agencies also have a joint Equity and Inclusion Performance Goal in their JSP to increase, by September 2026, U.S. government actions in diplomacy and foreign assistance to advance accessibility, equity, and inclusion of marginalized populations in decision-making, government services, and at multilateral and regional forums.

As mentioned above, State and USAID have reported they plan to take actions that will help to institutionalize their efforts to focus on equity. Our prior work has shown that a critical part of institutionalizing any new change management initiative is identifying long-term resources, plans, and related metrics, in line with best practices for organizational change.<sup>34</sup> Having sufficient resources to implement the desired changes and metrics to track progress are areas that both agencies have identified as challenges that they are working to address. While it is too early to tell

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<sup>34</sup>See GAO, *Government Reorganization: Key Questions to Assess Agency Reform Efforts*, [GAO-18-427](#) (Washington, D.C.: June 13, 2018) and GAO, *Government Performance Management: Key Considerations for Implementing Cross-Agency Priority Goals and Progress Addressing GAO Recommendations*, [GAO-21-104704](#) (Washington, D.C.: Sept. 28, 2021).

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how effective their efforts to mitigate these challenges will be, the outcome will play an important role in whether State and USAID are successful in their plans to expand and sustain the implementation of a comprehensive approach to achieving the objectives of the equity-related executive directives.

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## Agency Comments

We provided a draft of this report to the Department of State and USAID for review and comment. We received written comments from USAID that are reprinted in Appendix III. In its comments, USAID said our draft report highlights the efforts that both USAID and State have taken to advance equity for underserved communities through their programs and partnerships. State and USAID provided technical comments, which we incorporated as appropriate.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of State, and the Administrator of USAID. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4409 or at [Lovel@gao.gov](mailto:Lovel@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in Appendix IV.

Sincerely yours,

A handwritten signature in black ink that reads "Latesha Love". The signature is written in a cursive style with a large, looping initial "L".

Latesha Love  
Director, International Affairs and Trade

## Appendix I: Objectives, Scope, and Methodology

This report examines: (1) how the Department of State and the U.S. Agency for International Development (USAID) incorporate support for marginalized groups abroad into their strategies and activities, (2) how State and USAID track progress toward achieving goals and objectives that support such groups, and (3) what actions State and USAID have undertaken to respond to recent directives to advance equity and support for such groups.

To examine how State and USAID incorporate support for marginalized groups abroad into their strategies and activities, we reviewed their Joint Strategic Plan and all joint regional strategies in place as of January 2022. We reviewed these documents to determine which goals and objectives referred to support for marginalized groups, either in the goal or objective language, or in the narrative accompanying the goal or objective. We did not review any levels below objectives, such as sub-objectives. We used the definitions of underserved communities contained in executive orders, as well as the definition of marginalized groups in State and USAID documents to guide our work.<sup>1</sup> We also reviewed updated versions of the Joint Strategic Plan, and the joint regional strategies for Africa and the Middle East and North Africa that State and USAID released in the first quarter of 2022.

We reviewed country level strategies and selected activities for three countries—Colombia, Jordan, and Uganda—to provide illustrative examples, but they are not representative of other countries or activities. We selected these countries based on the following factors (1) highest level of U.S. development assistance received in the region in 2019, excluding cash transfers; (2) geographic diversity; (3) having at least five marginalized groups represented in their country development cooperation strategy; and (4) having a rating of “partly free” or “not free” on the Freedom House Global Freedom Index, which measures access to

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<sup>1</sup>According to State and USAID, they often use the term “marginalized groups” in the international context in place of “underserved communities.” For purposes of this report, we will use the term “marginalized groups” to include underserved communities. Many groups of people can be included in definitions of marginalized groups and underserved communities and thus definitions can vary for each country based on their unique circumstances. Where possible, we will identify specific groups.

political rights and civil liberties, including the right to vote, freedom of expression, and equality before the law. We reviewed the integrated country strategy and USAID country development cooperation strategy for each of the three countries to determine which goals and objectives incorporated support for marginalized groups. For the integrated country strategies we reviewed mission goals and objectives and for the country development cooperation strategies we reviewed development objectives and intermediate results. We reviewed activity level documents from both State and USAID to provide examples of relevant activities. We also spoke with both State and USAID officials in all three countries about how their strategies and activities incorporate support for marginalized groups.

To identify other strategies and policies specific to marginalized groups that State and USAID use in their planning and programing processes, we reviewed the websites for both State and USAID and interviewed relevant agency officials. We then compiled a list of relevant strategies and policies and verified these lists with appropriate State and USAID officials to ensure our lists were complete. We also interviewed State and USAID officials on how these strategies and policies are used to inform broader strategic and activity planning.

To examine how State and USAID track progress toward achieving goals and objectives that support marginalized groups abroad, we reviewed agency documents and interviewed relevant State and USAID officials at their Washington headquarters and in Colombia, Jordan, and Uganda. These documents included performance management plans, evaluations, and activity reports, as well as agency guidance for performance management. The officials we spoke with in Washington included members of State's and USAID's agency equity teams, as well as bureaus with a focus on marginalized groups including State's Democracy, Human Rights, and Labor and Office of Global Women's Issues, and USAID's Inclusive Development Hub and Office of Gender Equality and Women's Empowerment.

We selected eight activities, across three countries, Colombia, Jordan, and Uganda, to provide a more in depth illustration of how State and USAID track progress toward advancing equity and support for marginalized groups in their activities. We selected these activities from a list of all current State and USAID activities that directly or indirectly support marginalized groups from each of the three countries. We selected activities with higher funding amounts that had been in place long enough to have progress reports, and which collectively covered as many marginalized groups as possible. For the selected activities, we

reviewed the activity agreements, progress reports, and evaluations to determine how the agencies tracked progress towards the activities' goals and objectives supporting marginalized groups. The activities are not generalizable to all activities in these countries, but rather provide illustrative examples of how the agencies use different methods to track progress.

We also reviewed State and USAID's list of standard foreign assistance terms to identify those related to marginalized groups, for both primary and disaggregated indicators. We also reviewed agency documents, including annual performance reports, and interviewed knowledgeable officials about State and USAID's reporting to track progress on goals and objectives in support of marginalized groups and to discuss any challenges associated with measuring progress.

To examine actions State and USAID have undertaken to respond to Executive Order (E.O.) 13985 and the Presidential Memorandum on Advancing the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Persons Around the World, we collected and reviewed documents and interviewed relevant agency officials. In regards to E.O. 13985 and advancing equity and support for marginalized groups abroad, we identified agency efforts by interviewing officials from State and USAID's agency equity teams, State's Bureau of Democracy, Human Rights, and Labor, USAID's Inclusive Development Hub, and embassies and missions in Colombia, Jordan, and Uganda, as well as other officials. We also reviewed Office of Management and Budget guidance on the implementation of E.O. 13985 and the agencies' equity assessments and action plans. To examine the actions State and USAID have undertaken to respond to the presidential memorandum, we reviewed State and USAID's 180-day and 100-day reports on their implementation of the memorandum. We also interviewed State and USAID officials and obtained written responses from the State's U.S. Special Envoy to Advance the Human Rights of Lesbian, Gay, Bisexual, Transgender, Queer and Intersex (LGBTQI+) Persons Office.

To describe the challenges that State and USAID identified to promoting equity and support for marginalized groups, including LGBTQI+ persons, and the actions the agencies are taking to mitigate them, we reviewed the agencies' action plans and equity assessments, which identified challenges and highlighted actions the agencies are taking to mitigate them. We also reviewed the Fiscal Year 2023 Budget of the U.S. Government to determine whether the agencies' proposed actions to advance equity align with the budget request. We interviewed State and

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USAID officials based in headquarters and in Colombia, Jordan, and Uganda.

We conducted this performance audit from March 2021 to July 2022 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: Guidance Documents Focused on Specific Marginalized Groups

The Department of State (State) and the U.S. Agency for International Development (USAID) use various government-wide and agency-level strategies, policies, and other forms of guidance that focus on specific marginalized groups to ensure that their broader agency strategies and programming consider support for such groups. The list below includes U.S. government-wide, State, and USAID guidance documents that focus on support for specific marginalized groups, as identified by GAO and confirmed by State and USAID.

### **Strategies, Policies, and Guidance Used by State and USAID which Focus on Marginalized Groups by Population Group, as of January 2022**

(S) = Strategy; (P) = Policy; (G) = Other Guidance; (Cross-Cutting) = Focused on several marginalized populations

#### **All Populations:**

- Promoting Nondiscrimination and Inclusive Development in USAID-Funded Programs (Cross-cutting) (P)
- USAID Suggested Approaches for Integrating Inclusive Development Across the Program Cycle and in Mission Operations (Cross-cutting) (G)

#### **Racial or Ethnic Groups:**

- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

#### **Women:**

- National Strategy on Gender Equity and Equality (S)

- U.S. Strategy to Support Women and Girls at Risk from Violent Extremism and Conflict (S)
- U.S. Strategy on Women, Peace, and Security 2019 (S)
- U.S. Strategy to Prevent and Respond to Gender-Based Violence Globally (S)
- 2020 Gender Equality and Women’s Empowerment Policy (P)
- Functional Bureau Strategy: Secretary’s Office of Global Women’s Issues (S)
- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

**LGBTQI+ Persons:**

- 2021 National Strategy on Gender Equity and Equality (S)
- LGBT Vision for Action: Promoting and Supporting the Inclusion of Lesbian, Gay, Bisexual, and Transgender Individuals (USAID) (G)
- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

**Children:**

- 2021 National Strategy on Gender Equity and Equality (S)
- U.S. Strategy to Support Women and Girls at Risk from Violent Extremism and Conflict (S)
- U.S. Global Strategy to Empower Adolescent Girls (S)
- Advancing Protection and Care for Children in Adversity: A U.S. Government Strategy for International Assistance-2019–2023 (S)
- USAID Ending Child Marriage & Meeting the Needs of Married Children: The USAID Vision for Action (G)

**Refugees, Migrants, or Internally Displaced Persons:**

- Functional Bureau Strategy: Bureau of Population, Refugees, and Migration (S)

- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)

**Religious Minorities:**

- U.S. Strategy on Religious Leader and Faith Community Engagement (S)
- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: State's Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

**Persons with Disabilities:**

- USAID Disability Policy Paper (P)
- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: State's Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

**Indigenous Peoples:**

- USAID Policy on Promoting the Rights of Indigenous Peoples (P)
- USAID Strategy on Democracy, Human Rights and Governance (Cross-cutting) (S)
- Functional Bureau Strategy: State's Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

**Youth:**

- USAID's Youth in Development Policy (P)
- Functional Bureau Strategy: Bureau of Democracy, Human Rights, and Labor (Cross-cutting) (S)

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



June 29, 2022

Latesha Love  
Director  
International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20226

Re: FOREIGN ASSISTANCE: STATE AND USAID ARE TAKING ACTION TO  
ADVANCE EQUITY ABROAD and MITIGATE CHALLENGE (GAO-22-105112)

Dear Ms. Love:

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, "*Foreign Assistance: State and USAID Are Taking Actions to Advance Equity Abroad and Mitigate Challenge (GAO-22-105112).*"

We thank you for the draft report, which highlights the efforts that both USAID and the State Department have taken to advance equity for underserved communities through our programs and partnerships. USAID is proud of its efforts to promote equity with historically marginalized populations where we serve, and we note the findings that many of our corporate efforts related to racial and ethnic equity, while in their nascent stages, are part of our efforts to both better achieve more sustainable development outcomes and implement Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities.

The GAO engagement is relevant to USAID given its linkages to the Agency's localization and inclusive development efforts. Both are key priorities expressed by USAID's Administrator Power in her new vision for global development highlighted at the time of USAID's 60th anniversary in November 2021. USAID has already completed or has in progress several efforts to prioritize equity and inclusion, establish sufficient oversight, ensure capacity through resources and training, and integrate it across policies, practices, programs, and partnerships. To support these efforts, the Agency now has senior leadership to coordinate the Agency's efforts with the appointment of a Chief Diversity (CDO) Officer. The CDO oversees the newly established Office of Diversity, Equity, Inclusion and Accessibility (DEIA) located within the Administrator's Office, which serves as the Agency's focal point to advance, coordinate, and provide technical expertise in support of DEIA programming across the Agency. Additionally, there is now a Deputy Assistant Administrator in the Bureau for Development, Democracy, and Innovation responsible for the Inclusive Development and Gender Equality and Women's Empowerment Hubs, and two Senior coordinators focused on LGBTQI+ rights/inclusion and gender equality and women's empowerment. Finally, the Bureau for Policy, Planning and Learning (PPL) now includes a full time analyst and a senior FSO Program Officer responsible for ensuring that diversity, equity and inclusion principles are fully incorporated into

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

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program cycle policy, guidance and tools related to strategic planning, activity design and learning.

Our Agency Equity Action Plan highlights our intention to designate an Inclusive Development Advisor in every Mission, and our FY 2022 budget reinforces that we intend to integrate equity into our policies and strategies, and remove administrative barriers to local and U.S.-based partners from historically marginalized communities. There are also training modules currently under development to build awareness and skills in inclusive development. To diversify and build equitable partnerships, since USAID's Minority Serving Institutions (MSIs) Initiative was relocated to the DEIA Office, six memoranda of understanding were signed with MSIs. From a policy and practice perspective, the Agency will prominently feature diversity, equity, and inclusion in its new policy framework to advance U.S. foreign policy.

I am transmitting this letter for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the evaluation of efforts to advance equity and inclusion in USAID programs.

Sincerely,

*Colleen R. Allen*

Colleen R. Allen  
Assistant Administrator  
Bureau for Management

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

June 29, 2022

Latesha Love Director

International Affairs and Trade

U.S. Government Accountability Office 441 G Street, N.W.

Washington, D.C. 20226

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Colleen R. Allen

Assistant Administrator Bureau for Management

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## Appendix IV: GAO Contacts and Staff Acknowledgments

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### GAO Contact

Latesha Love, Director at (202) 512-4409 or [Lovel@gao.gov](mailto:Lovel@gao.gov)

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### Staff Acknowledgments

In addition to the contact named above, Cheryl Goodman (Assistant Director), Michael Maslowski (Analyst-in-Charge), Andrew Kincare, Michelle Bird, Aldo Salerno, and Larissa Barrett made key contributions to this report. In addition, Alexander Welsh, Terry Richardson, Christopher Keblitis, and Elizabeth Marin provided technical assistance.



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