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Comptroller General
of the United States

Accessible Version

June 4, 2024

The Honorable Antony J. Blinken
Secretary of State
Kurt M. Campbell
Deputy Secretary of State
Richard R. Verma
Deputy Secretary of State for Management and Resources
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

Priority Open Recommendations: Department of State

Dear Secretary Blinken and Deputy Secretaries Campbell and Verma:

The purpose of this letter is to provide an update on the overall status of the Department of State’s implementation of GAO’s recommendations and to call your continued personal attention to areas where open recommendations should be given high priority.¹ In November 2023, we reported that, on a government-wide basis, 75 percent of our recommendations made 4 years ago were implemented.² State’s recommendation implementation rate was 92 percent. As of May 2024, State had 139 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our May 2023 letter, State has implemented five of our 12 open priority recommendations.

- State completed its efforts to appropriately categorize its positions performing information technology (IT), cybersecurity, or cyber-related functions, as we recommended in March 2019.³ Specifically, State assigned National Initiative for Cybersecurity Education framework work role codes to its 2210 IT management occupational series and improved the accuracy of relevant position descriptions. By

¹Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *Performance and Accountability Report: Fiscal Year 2023*, [GAO-24-900483](#) (Washington, D.C.: Nov. 15, 2023).

³GAO, *Cybersecurity Workforce: Agencies Need to Accurately Categorize Positions to Effectively Identify Critical Staffing Needs*, [GAO-19-144](#) (Washington, D.C.: Mar. 12, 2019).

taking these actions, State is better positioned to identify critical cybersecurity staffing needs.

- State established a process for coordination between its cybersecurity and enterprise risk management functions, as we recommended in July 2019.⁴ By establishing this process, State is better positioned to address cybersecurity risks and their potential impact on its mission.
- State established standard procedures to fully track and verify the President's Emergency Plan for AIDS Relief (PEPFAR) program-level budget data, as we recommended in May 2021.⁵ By establishing these procedures, State is better positioned to ensure the completeness and accuracy of PEPFAR program-level budget data and improve the reliability of the data used for congressional reporting.
- State developed mechanisms for (1) ensuring each overseas post completes required emergency preparedness drills and (2) systematically assessing overseas posts' preparedness to respond to crises, as we recommended in November 2021.⁶ By developing these mechanisms, State is better prepared for crises, such as the COVID-19 pandemic.

We ask your continued attention to the remaining seven priority recommendations. We are also adding six new recommendations related to cybersecurity, data quality, overseas real property, and foreign assistance strategies. This brings the total number of priority recommendations to 13. (See the Enclosure for the list of the recommendations.)

The 13 priority recommendations fall into the following six areas:

Improving cybersecurity. We first designated [information security](#) as a government-wide, high-risk area in 1997 and expanded the area to include protecting (1) cyber critical infrastructure in 2003 and (2) the privacy of personally identifiable information in 2015.⁷ In March 2021, we reported that the federal government needs to urgently address the nation's major cybersecurity challenges, including fully implementing a national cyber strategy and clearly defining a central role for leading the implementation of that strategy.⁸ High-profile cyberattacks targeting the public and private sectors further highlight the urgent need to address weaknesses in federal cybersecurity programs.

Our four priority recommendations call for (1) defining roles for agency privacy officials, (2) developing and maintaining a department-wide risk profile that prioritizes the most significant risks, (3) ensuring information systems have valid authorizations to operate, and (4)

⁴GAO, *Cybersecurity: Agencies Need to Fully Establish Risk Management Programs and Address Challenges*, [GAO-19-384](#) (Washington, D.C.: Jul. 25, 2019).

⁵GAO, *President's Emergency Plan for AIDS Relief: State Should Improve Data Quality and Assess Long-term Resource Needs*, [GAO-21-374](#) (Washington, D.C.: May 20, 2021).

⁶GAO, *COVID-19: State Carried Out Historic Repatriation Effort but Should Strengthen Its Preparedness for Future Crises*, [GAO-22-104354](#) (Washington, D.C.: Nov. 2, 2021).

⁷GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: April 20, 2023).

⁸GAO, *High-Risk Series: Federal Government Needs to Urgently Pursue Critical Actions to Address Major Cybersecurity Challenges*, [GAO-21-288](#) (Washington, D.C.: Mar. 24, 2021).

implementing all components of State's Information Security Continuous Monitoring program. By fully implementing these recommendations, State could better protect against cyber threats and secure the information and systems that support its mission.

Improving data quality. Federal decision-makers need sufficient quality data to assess whether federal programs achieve intended results. Our prior work has found that the federal government has made mixed progress in developing relevant, high-quality evidence and using it in decision-making, among other things.⁹ We identified three priority recommendations in this area to improve the quality of data for analysis, reporting, and oversight purposes. The first recommendation calls for systematically tracking foreign assistance funds provided specifically in response to the crisis in Ukraine, including funds for such efforts in other countries. Tracking these funds would improve State's ability to provide key information about the U.S. response and help ensure the accountability of funds. The second calls for analyzing available data to identify overseas posts at risk of improper payments for hardship pay. Analyzing these data would help State identify improper payments and take steps to recover and prevent them. The third recommendation calls for developing a plan to assess what fee amounts, statutory changes, supplemental and annual funding, or other actions would be sufficient to cover future consular costs. Doing so would help ensure that future revenue and expenditures align and could inform policy decisions.

Improving overseas real property planning. Since 2003, our high-risk reports have consistently highlighted long-standing challenges that federal agencies face in managing federal real property.¹⁰ State operates and maintains nearly 8,500 owned and 280 capital-leased properties—including buildings and other structures—at more than 270 U.S. embassies, consulates, and other posts overseas. These properties may face risks related to deferred maintenance and repair or natural hazards. Our two priority recommendations call for (1) developing a plan to address State's deferred maintenance and repair backlog and (2) aligning its natural hazard resilience plans with program staffing levels as appropriate. By fully implementing these recommendations, State could improve how it maintains and supports its overseas properties.

Complying with congressional reporting requirements. Tens of billions of dollars are appropriated for foreign assistance annually. The President is statutorily required to notify Congress of each foreign country and international organization intended to receive any portion of funds appropriated to carry out any provision of the Foreign Assistance Act of 1961 or the Arms Export Control Act.¹¹ These reports are to be submitted to Congress no later than 30 days after the enactment of any law appropriating such funds. Our priority recommendation calls for State to review its reporting process, determine the amount of time needed to address this reporting requirement, and submit a legislative proposal to extend the mandated time frame if 30 days is insufficient. By taking these actions, State could ensure that it meets congressional reporting requirements regarding the allocation of U.S. foreign assistance funds to foreign countries and international organizations.

⁹GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

¹⁰GAO-23-106203.

¹¹22 U.S.C. § 2413. This requirement does not apply to funds appropriated to carry out sections 2261 or 2397 of Title 22 of the U.S. Code.

Strengthening foreign assistance strategies. Since 2008, the U.S. has provided over \$3 billion in assistance to Mexico, chiefly guided by the Mérida Initiative and its replacement, the Bicentennial Framework. State develops strategies, including cooperative arrangements, to guide its foreign assistance efforts and reports to Congress on the performance of these strategies. Our priority recommendation calls for developing monitoring and evaluation plans to measure progress toward the goals of the Bicentennial Framework. By fully implementing this priority recommendation, State could better assess the effectiveness of U.S. assistance in Mexico.

Enhancing training efforts. Supporting U.S. global competitiveness is a long-standing U.S. government priority. Increased globalization and recent economic and financial crises have heightened concerns that U.S. businesses may be at a disadvantage in foreign markets. Our two priority recommendations in this area call for (1) conducting periodic assessments of State’s economic and commercial diplomacy training needs and (2) establishing a mechanism to consult with external stakeholders about whether the training is achieving desired results. By fully implementing these recommendations, State could enhance its training related to economic and commercial diplomacy.

In April 2023, we issued our biennial update to our [High-Risk List](#). This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges.¹²

Several government-wide, high-risk areas also have direct implications for State and its operations. These areas include (1) [improving the management of IT acquisitions and operations](#), (2) [strategic human capital management](#), (3) [managing federal real property](#), (4) [ensuring the cybersecurity of the nation](#), and (5) [government-wide personnel security clearance process](#).

We urge your attention to these government-wide, high-risk issues as they relate to State. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget (OMB), and the leadership and staff in agencies, including within State. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹³

In addition to your attention on these issues, we recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 included a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.¹⁴

¹²[GAO-23-106203](#).

¹³GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

¹⁴James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on State's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress could follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress could pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

Copies of this report are being sent to the Director of OMB and the appropriate congressional committees. In addition, the report will be available on the GAO website at [Priority Open Recommendation Letters | U.S. GAO](#).

I appreciate State's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Kimberly Gianopoulos, Managing Director, International Affairs and Trade, at (202) 512-8612 or gianopoulosk@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all the 139 open recommendations. Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a large, stylized "D" at the end.

Gene L. Dodaro
Comptroller General
of the United States
Enclosure

cc: The Honorable Shalanda Young, Director, Office of Management and Budget
Dr. Kelly Fletcher, Chief Information Officer for the Department of State
James A. Walsh, Comptroller for the Department of State and Chief Financial Officer
Dr. Tracy M. Carson, Director, Office of Foreign Assistance
Ambassador William H. Moser, Director, Bureau of Overseas Buildings Operations
Ambassador Joan Polaschik, Director, Foreign Service Institute
Ambassador Rena Bitter, Assistant Secretary, Bureau of Consular Affairs

Ambassador Todd D. Robinson, Assistant Secretary, Bureau of International Narcotics and Law Enforcement Affairs

Enclosure

Priority Open Recommendations to the Department of State

Improving cybersecurity

Privacy: Dedicated Leadership Can Improve Programs and Address Challenges. [GAO-22-105065](#). Washington, D.C.: September 22, 2022.

Year Recommendation Made: 2022

Recommendation: The Secretary of State should establish a time frame for fully defining the role of the senior agency official for privacy or other designated privacy official in reviewing and approving system categorizations, overseeing privacy control assessments, and reviewing authorization packages, and document these roles.

Actions Needed: State agreed with this recommendation. To fully implement our recommendation, State needs to develop and document policies and procedures specifying the roles that its senior agency official or other designated privacy officials are to play when authorizing systems with personally identifiable information. As of April 2024, State noted that it was finalizing updates to its policies that would fully define and document these roles. Taking these actions would help State ensure that privacy protections are adequately incorporated into the relevant systems.

High-Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Jennifer R. Franks

Contact Information: franksj@gao.gov or (404) 679-1831

Cybersecurity: State Needs to Expediently Implement Risk Management and Other Key Practices. [GAO-23-107012](#). Washington, D.C.: September 28, 2023.

Year Recommendations Made: 2023

Recommendations:

The Secretary of State should direct the Chief Information Officer (CIO) to develop and maintain a department-wide risk profile that prioritizes the department's most significant risks, including the areas of exposure and threats that State identified, consistent with federal requirements.

The Secretary of State should direct the CIO to ensure that State's information systems have valid authorizations to operate in accordance with department policies and federal guidance.

The Secretary of State should direct the CIO to implement all components of State's Information Security Continuous Monitoring program across the department, including the continuous diagnostic and mitigation capabilities, in accordance with department policies and federal guidance.

Actions Needed: State agreed with these recommendations. According to State, it is working toward completing six additional risk profiles and integrating all areas of exposure and threats with its enterprise risk profile as of February 2024. In addition, State has made progress on

ensuring its information systems have valid authorizations. Further, State noted that it has implemented a continuous diagnostic and mitigation dashboard that provides updated threat and vulnerability information.

To fully implement our recommendations, State should (1) complete its development of a department-wide risk profile, (2) ensure that all of State's information systems have valid authorizations to operate, and (3) implement all components of its Information Security Continuous Monitoring program. Implementing these priority recommendations would strengthen State's ability to effectively manage its cybersecurity risks.

High-Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Jennifer R. Franks

Contact Information: franksj@gao.gov or (404) 679-1831

Improving data quality

Ukraine: Status of Foreign Assistance. [GAO-24-106884](#). Washington, D.C.: March 28, 2024.

Year Recommendation Made: 2024

Recommendation: The Secretary of State should ensure that the Director of the Office of Foreign Assistance and the Comptroller implement improvements to financial systems of record to separately, more systematically and comprehensively track the allocation, obligation, and disbursement of foreign assistance funding provided in response to the crisis in Ukraine, to include base funds allocated to areas outside of Ukraine and exclude supplemental funds that were not allocated in response to the Ukraine crisis.

Actions Needed: State agreed with this recommendation. As of March 2024, State said it is considering ways to automate and improve its tracking of foreign assistance funding provided in response to the crisis in Ukraine. To fully implement our recommendation, State should develop improvements to financial systems of record for tracking this foreign assistance. Implementing this priority recommendation would improve State's ability to provide essential information on how U.S. agencies have responded to the crisis in Ukraine, ensure the accountability of related funding, and make informed decisions about future resource needs.

Director: Latesha Love-Grayer

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Overseas Allowances: State Should Assess the Cost-Effectiveness of Its Hardship Pay Policies. [GAO-17-715](#). Washington, D.C.: September 13, 2017.

Year Recommendation Made: 2017

Recommendation: The department's Comptroller should analyze available diplomatic cable data from overseas posts to identify posts at risk of improper payments for hardship pay, identify any improper payments, and take steps to recover and prevent them.

Actions Needed: State agreed with this recommendation. According to State, it continues to identify and seek repayment of improper payments and communicate the importance of timely actions to regional bureaus and posts to ensure improper payments do not occur. In addition, the Bureau of the Comptroller and Global Financial Services (CGFS) has rolled out the Overseas Personnel System, which centralizes the collection of arrival and departure data for calculating improper payment notification and risk analysis. It also plans to roll out a new self-service portal in 2024, which would eliminate the cables required for starting and stopping hardship pay.

Moreover, officials believe that changes State implemented in 2021 to streamline the department's hardship policy have significantly reduced the risk of improper payments. However, as of February 2024, CGFS had not provided us with the analysis to verify this assertion. Without implementing this priority recommendation, State may be missing an opportunity to identify, recover, and prevent improper payments that could produce cost savings for the U.S. government.

Director: Nagla'a El-Hodiri

Contact Information: elhodirin@gao.gov or (202) 512-4128

Consular Affairs: State May Be Unable to Cover Projected Costs if Revenues Do Not Quickly Rebound to Pre-Pandemic Levels. [GAO-22-104424](#). Washington, D.C.: April 18, 2022.

Year Recommendation Made: 2022

Recommendation: The Secretary of State should ensure the Bureau of Consular Affairs develops a plan to assess and document what fee amounts, statutory changes, supplemental and annual funding, or other actions would allow State to cover future consular costs.

Actions Needed: State did not agree with this recommendation. State noted that its cost model presents unrecovered costs by service. State officials said recent short-term surges in fee revenue, combined with a continuation of broader expenditure authorities first enacted during the COVID-19 pandemic, are allowing the Bureau of Consular Affairs to maintain its fee-funded structure that supports the consular mission in the near term. This trend is expected to cover projected consular costs through at least fiscal year 2026, according to State.

We maintain it is important for State to develop a plan to assess and document which measures would be sufficient to cover future consular costs. In January 2024, State officials said they are taking steps to develop such a plan but had not provided it to us as of March 2024. Implementing this priority recommendation would help ensure that future revenue and expenditures align, could help policymakers understand the relative advantages and drawbacks of the various measures, and may inform legislative and policy decisions.

Director: Nagla'a El-Hodiri

Contact Information: elhodirin@gao.gov or (202) 512-4128

Improving overseas real property planning

Overseas Real Property: Prioritizing Key Assets and Developing a Plan Could Help State Manage Its Estimated \$3 Billion Maintenance Backlog. [GAO-21-497](#). Washington, D.C.: September 15, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of State should ensure that the Director of the Bureau of Overseas Buildings Operations (OBO) develops a plan to address State's deferred maintenance and repair backlog, and specifically identifies the funding and time frames needed to reduce it in congressional budget requests, related reports to decision-makers, or both.

Actions Needed: State agreed with this recommendation. State officials said OBO's plan to address the backlog relies on a two-pronged approach related to (1) replacing and renovating facilities and (2) executing routine maintenance and repair and disposing of underutilized assets. However, State has not provided us with OBO's plan as of March 2024. To fully implement our recommendation, State needs to provide us with its plan and share the funding and time frames needed to address it with key decision-makers, including Congress. Implementing this priority recommendation would help decision-makers better understand how funding levels affect backlog reduction.

Director: Nagla'a El-Hodiri

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Overseas Real Property: State Has Not Aligned Natural Hazard Resilience Plans to Staffing Levels. [GAO-23-105887](#). Washington, D.C.: June 22, 2023.

Year Recommendation Made: 2023

Recommendation: The Secretary of State should ensure that the Director of OBO, following the final staffing and resource decisions based on the agency's fiscal year 2024 appropriations, revisits the Climate Security and Resilience Program plans, including goals and time frames, and adjusts the plans as appropriate.

Actions Needed: State agreed with this recommendation. State said that it is committed to providing resources for the Climate Security and Resilience Program. For example, in fiscal year 2023, OBO reprogrammed three existing positions to dedicate staff to this program. When State receives its fiscal year 2024 appropriations, OBO will review its Climate Security and Resilience Program plans, according to State officials. In March 2024, State received its fiscal year 2024 appropriations.

To fully implement our recommendation, State should revisit and adjust the Climate and Security Resilience Program plans as appropriate following final staffing and resource decisions. Implementing this priority recommendation would allow State to leverage the program to support State's climate resilience goals for its overseas properties.

High-Risk Area: [Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks](#)

Director: Nagla'a El-Hodiri

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Complying with congressional reporting requirements

Foreign Assistance: State Department Should Take Steps to Improve Timeliness of Required Budgetary Reporting. [GAO-19-600](#). Washington, D.C.: September 9, 2019.

Year Recommendation Made: 2019

Recommendation: The Secretary of State should ensure that the Director of State's Office of U.S. Foreign Assistance Resources conducts a review of the Section 653(a) process to identify process steps that can be streamlined or eliminated and determine the time frame needed to prepare the annual Section 653(a) report. If State determines that the time frame exceeds 30 days, the office should coordinate with other appropriate officials to submit a legislative proposal to Congress to extend the mandated time frame for submitting Section 653(a) reports.

Actions Needed: State agreed with this recommendation. State has provided documentation showing that it reviewed the Section 653(a) process and determined that the time frame needed to prepare the report exceeded 30 days. However, to fully implement this recommendation, State should provide documentation that it submitted a legislative proposal to Congress to extend the mandated time frame for submitting Section 653(a) reports. As of February 2024, we have not received such documentation. By fully implementing this priority recommendation, State could ensure that it meets congressional reporting requirements regarding the allocation of U.S. foreign assistance funds to foreign countries and international organizations.

Director: Nagla'a El-Hodiri

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Strengthening foreign assistance strategies

U.S. Assistance to Mexico: State Department Should Take Steps to Assess Overall Progress. [GAO-23-103795](#). Washington, D.C.: September 12, 2023.

Year Recommendation Made: 2023

Recommendation: The Secretary of State, in consultation with the Administrator of the U.S. Agency for International Development (USAID), should ensure the Assistant Secretary for the Bureau of International Narcotics and Law Enforcement Affairs develops monitoring and evaluation plans critical to assess progress toward the goals and objectives of the Bicentennial Framework.

Actions Needed: State agreed with this recommendation. As of March 2024, State said it was developing a monitoring and evaluation plan, in consultation with USAID, to assess assistance to Mexico. To fully implement our recommendation, State should complete developing its monitoring and evaluation plan. Implementing this priority recommendation would help State systematically assess progress toward achieving the Bicentennial Framework's goals.

Director: Chelsa Kenney

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Enhancing training efforts

Economic and Commercial Diplomacy: State and Commerce Implement a Range of Activities, but State Should Enhance Its Training Efforts. [GAO-22-104181](#). Washington, D.C.: December 13, 2021.

Year Recommendations Made: 2022

Recommendations:

- The Secretary of State should ensure that the Foreign Service Institute develops and implements a process to conduct periodic, comprehensive assessments of training needs across the economic and commercial diplomacy issue area.
- The Secretary of State should ensure that the Foreign Service Institute establishes a mechanism to periodically consult with external stakeholders, including the Department of Commerce, private sector entities, and industry groups, about whether State's training programs in economic and commercial diplomacy are achieving the desired impact.

Actions Needed: State agreed with these recommendations. State said that, among other things, it had taken steps to initiate a regular process to assess its economic and commercial diplomacy training needs. Specifically, State completed an assessment of these needs in September 2022. In addition, State's Foreign Service Institute and Commerce's International Trade Administration signed a memorandum of understanding that outlines commitments to meet quarterly to discuss relevant training and outreach to external stakeholders, among others. State officials said they have held two such meetings in October 2023 and January 2024. However, the memorandum does not describe a mechanism through which external stakeholders can consult with State about whether its economic and commercial training programs are achieving the desired impact.

To fully implement our recommendations, State needs to provide documentation showing that it (1) conducts a comprehensive assessment of economic and commercial diplomacy training needs on a periodic basis, and (2) has established a mechanism for periodic consultation with external stakeholders that includes a means of assessing whether its training is achieving the desired impact.

Implementing these priority recommendations would provide State reasonable assurance that it has (1) an adequate strategic approach for prioritizing training across economic and commercial diplomacy issues, and (2) obtained appropriate stakeholder perspectives and feedback on whether it is providing staff the necessary training and competencies to support U.S. businesses overseas.

Director: Nagla'a El-Hodiri

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