



October 2015

DRUG CONTROL

Additional Performance Information Is Needed to Oversee the National Guard's State Counterdrug Program

GAO Highlights

Highlights of [GAO-16-133](#), a report to the Committee on Armed Services, U.S. Senate

Why GAO Did This Study

Since 1989 the National Guard has received hundreds of millions of dollars to help enhance the effectiveness of state-level counterdrug efforts by providing military support to assist interagency partners with their counterdrug activities. The program funds the drug interdiction priorities of each state Governor; counterdrug-related training to interagency partners at five counterdrug schools; and state-level counterthreat finance investigations, all of which are part of DOD's broader counterdrug efforts.

Senate Report 113-176 included a provision for GAO to conduct an assessment of the state operations of the National Guard's counterdrug program. This report: (1) identifies the changes in funding for the program since fiscal year 2004, and (2) assesses the extent to which performance information is used to evaluate the program's activities. GAO analyzed the program's budgets and obligations data, performance measures, and program guidance, and interviewed knowledgeable officials.

What GAO Recommends

GAO recommends that DOD (1) identify additional information needed to evaluate the performance of state programs and oversee counterdrug schools' training; and (2) subsequently collect and use performance information to help inform funding distribution decisions to state programs and to conduct oversight of the training offered by the counterdrug schools. DOD concurred with GAO's recommendations.

View [GAO-16-133](#). For more information, contact John Pendleton at (202) 512-3489 or pendletonj@gao.gov.

October 2015

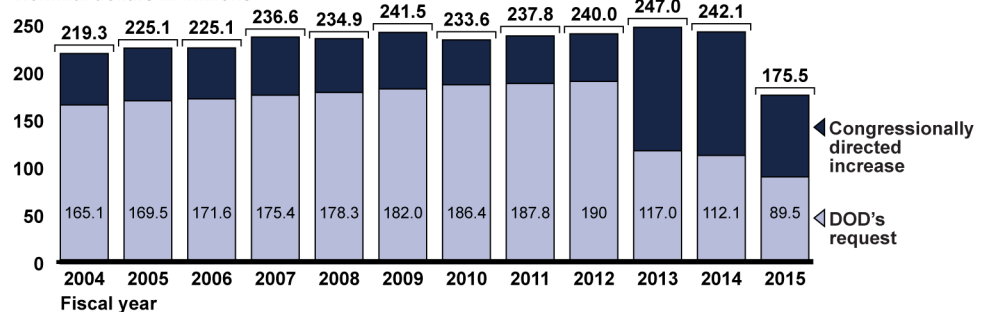
DRUG CONTROL

Additional Performance Information Is Needed to Oversee the National Guard's State Counterdrug Program

What GAO Found

The National Guard Bureau (NGB) counterdrug program's budget data show that funding has ranged from about \$219.3 million to \$242.1 million in fiscal years 2004 through 2014—with a peak of \$247 million in fiscal year 2013—but in fiscal year 2015 funding was reduced substantially. Based on Department of Defense (DOD) data, every year since 2004 Congress has directed funding above the requested amount, thus keeping program amounts steady through 2014. In fiscal year 2013, DOD reported requesting \$117 million for the program, about a 40 percent decrease from the prior year's request. While DOD reduced its request, however, Congress in fiscal years 2013 and 2014 directed funding at generally comparable amounts from prior years. In fiscal year 2015 Congress directed less of an increase above DOD's request, leaving the program with lower total funding of \$175.5 million.

Funding for National Guard's State Counterdrug Program, Fiscal Years 2004-2015
Nominal dollars in millions



Source: GAO analysis of Department of Defense (DOD) data. | GAO-16-133

The NGB has developed performance measures to report on its counterdrug program; however, the information collected is not used to evaluate and inform funding for state-level programs or oversee the counterdrug schools' training. GAO has previously reported that setting useful measures is important for oversight; without them, managers cannot monitor and evaluate the performance of programs' activities. NGB officials stated that they developed the current measures in response to DOD guidance to report on the program's aggregate performance and did not fully consider the types of measures or information that would be useful to evaluate individual state-level programs and oversee the counterdrug schools. Without collecting and using useful performance information to evaluate state-level programs and oversee the counterdrug schools, DOD and Congress cannot ensure that the counterdrug program is achieving its desired results and is distributing its funding most efficiently.

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Abbreviations

CBP	Customs and Border Protection
DEA	Drug Enforcement Administration
DOD	Department of Defense
HIDTA	High Intensity Drug Trafficking Areas
HSI	Homeland Security Investigations
NGB	National Guard Bureau
OMB	Office of Management and Budget
ONDCP	Office of National Drug Control Policy

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October 21, 2015

The Honorable John McCain
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

To assist state efforts to address illicit drug production, trade, and consumption, Congress has provided the Department of Defense (DOD) with hundreds of millions of dollars since 1989 to fund the National Guard's participation in domestic drug interdiction and counterdrug activities. The type of military support provided by the National Guard can range from reconnaissance to analytical support, but it generally reflects the drug interdiction priorities of the Governors of the 50 states, the District of Columbia, and three U.S. territories; the capabilities of each state's National Guard; and the needs of interagency partners. These interagency partners include state, local, and tribal law enforcement organizations, as well as several federal agencies—Department of Justice, Department of Homeland Security, and Department of Treasury—all of whom are involved in efforts to disrupt and dismantle the leadership and financial infrastructure of major drug-trafficking organizations. Given ongoing fiscal constraints within the federal government, the National Guard's counterdrug program, like all federal programs, must use resources efficiently and achieve results.

A Senate Armed Services Committee report accompanying a bill for the National Defense Authorization Act for Fiscal Year 2015 included a provision for GAO to conduct an independent assessment of the state-level activities of the National Guard's counterdrug program.¹ In this report, we (1) identify the changes in funding for the National Guard's counterdrug program since fiscal year 2004; and (2) assess the extent to which performance information is used to evaluate the counterdrug program's activities.

¹S. Rep. No. 113-176, at 177-78 (June 2, 2014).

To identify the changes in funding for the National Guard counterdrug program, we conducted an analysis of the relevant appropriations and program budget-related documents provided by DOD for fiscal years 2004 through 2015.² We began our analysis with fiscal year 2004 to ensure that our review included data covering at least a 10-year period. We also reviewed documentation on funding allocations and financial management policy and interviewed DOD and interagency partner officials regarding the changes in funding. To assess the extent to which performance information is used to evaluate the counterdrug program's activities, we reviewed documentation and interviewed counterdrug officials about program activities, types of performance information collected, and funding levels for individual state counterdrug programs. Specifically, first, we evaluated the counterdrug program's 26 fiscal year 2015 performance measures against nine key attributes of successful performance established by GAO.³ Next, we evaluated the counterdrug program's use of performance information against leading practices for results-oriented management that help agencies develop useful performance measures and use performance information for management decision making as identified by GAO.⁴ We selected 8 of the 53 participating states and territories for a nongeneralizable case study, identifying 2 states within each of the four counterdrug program regions by selecting 1 state with high and 1 state with low drug threat assessments that also had a counterdrug school or an international boundary. In each of the 8 states, we interviewed officials from the state's counterdrug program. We also selected and interviewed officials

²Obligation data included in the report are through fiscal year 2014.

³GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002). GAO developed nine attributes of performance goals and measures based on previously established GAO criteria, consideration of key legislation, and review of performance management literature. In [GAO-03-143](#), GAO applied the attributes to assess Internal Revenue Service performance measures. However, because the attributes are derived from sources generally applicable to performance measures, they are also relevant for assessing counterdrug program performance measures.

⁴GAO, *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2005). GAO developed a conceptual framework identifying four uses of performance information for management decision making and five practices that can contribute to greater use of performance information from a review of the literature and interviews with experts and staff from five agencies (the U.S. Departments of Commerce, Labor, Transportation, and Veterans Affairs, and the Small Business Administration).

from interagency partners who received support from the counterdrug program in order to obtain their perspectives on the program. We interviewed officials from the National Guard Bureau; Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats; Office of the Under Secretary of Defense (Comptroller); Office of National Drug Control Policy; nine High Intensity Drug Trafficking Areas⁵; Drug Enforcement Administration Office of Training and eight field divisions; three Customs and Border Protection field units; and three U.S. Immigration and Customs Enforcement's Homeland Security Investigations field offices. Additional details on our scope and methodology can be found in appendix I.

We conducted this performance audit from August 2014 to October 2015 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

DOD's counterdrug mission focuses on supporting local, state, federal, and foreign government agencies in addressing the illegal drug trade and narcotics-related terrorism. DOD conducts its mission in three primary areas: detecting and monitoring drug trafficking into the United States, sharing information on illegal drugs with U.S. and foreign government agencies, and building the counterdrug capacity of U.S. and foreign partners.⁶

The National Guard identifies three state-specific projects as comprising its counterdrug program—state plans, counterdrug schools, and counterthreat finance.⁷ The authority to provide funding for the first state

⁵The High Intensity Drug Trafficking Areas are a federally funded program that brings officials from federal, state, and local law enforcement agencies together into task forces to conduct investigations of drug trafficking organizations engaged in the production, manufacturing, importation, or distribution of illegal drugs. See, 21 U.S.C. § 1706.

⁶DOD is the lead federal agency for detection and monitoring of aerial and maritime transit of illegal drugs into the United States.

⁷The National Guard counterdrug program also includes several projects that support federal operations, which we did not examine as part of this review.

project—state plans—began in 1989 when DOD was authorized by Congress under section 112 of Title 32 of the United States Code to fund the National Guard’s drug interdiction and counterdrug activities.⁸ Each participating state counterdrug program must develop an annual plan of activities, in coordination with the state’s Governor and Attorney General. In developing their plans, states use annual guidance issued by DOD outlining the department’s domestic counterdrug program priorities. Once the state plans have been developed, they are reviewed by National Guard counterdrug program officials, and are then sent to DOD for approval. National Guard policy⁹ states that state counterdrug programs can provide assistance to interagency partners in 5 mission areas: reconnaissance, technical support, general support, civil operations, and counterdrug training.¹⁰ In 2006, Congress provided authority to the Chief of the National Guard Bureau (NGB) to operate up to five counterdrug schools.¹¹ These five schools, located in Florida, Iowa, Mississippi, Pennsylvania, and Washington, provide training in drug interdiction and counterdrug activities to personnel from federal agencies; state, local, and tribal law enforcement agencies; community-based organizations; and other non-federal governmental and private organizations. In 2011 the program added a third state project—counterthreat finance—to assist interagency partners with investigations of drug trafficking and transnational criminal organizations’ money laundering schemes. Appendix II provides funding information by project and appendix III provides details on the state plans’ activities and supported organizations.

The National Guard counterdrug program is part of DOD’s larger counterdrug effort. Congress appropriates funds to DOD’s Drug Interdiction and Counterdrug Activities, Defense account, and DOD is authorized to transfer Drug Interdiction account funds to other armed

⁸The National Guard, when acting under the control of the Governor, also known as Title 32 status, may participate in civilian law enforcement activities.

⁹Chief National Guard Bureau Instruction 3100.01, *National Guard Counterdrug Support* (Sep. 30, 2014).

¹⁰The National Guard has other state missions but they were excluded because they relate to managing the program and do not provide support to interagency partners’ counterdrug efforts.

¹¹The National Drug Control Policy Reauthorization Act of 2006, Pub. L. No. 109-469, § 901, as amended, authorizes the National Guard to establish and operate not more than 5 National Counterdrug schools.

services' and defense agencies' appropriation accounts. It is from this account that DOD funds the National Guard's participation in domestic interdiction and counterdrug activities.¹² In his fiscal year 2016 budget the President requested approximately \$850.6 million for this account to support DOD-wide drug interdiction efforts. Budget data provided by DOD identify \$87.9 million intended for the National Guard counterdrug program's state-specific projects—a little more than 10 percent of the overall fiscal year 2016 Drug Interdiction account request.

Funding Was Generally Steady for Past Decade but Decreased in Fiscal Year 2015

The National Guard counterdrug program budget data provided by DOD show that for fiscal years 2004 through 2014 the program's total directed funding ranged between \$219.3 million and \$242.1 million—with a peak of \$247 million in fiscal year 2013—but in fiscal year 2015 was reduced substantially. Congress appropriates funds into DOD's Drug Interdiction account but through its committee reports provides direction to DOD on the specific amounts to allocate for the counterdrug program.¹³ Based on DOD data, in every year since fiscal year 2004, Congress has directed funding above DOD's requested amount, keeping program amounts generally steady through 2014. In fiscal year 2013, when DOD began to reduce the amount of funding within the budget request for this program in order to prioritize funding for other DOD counterdrug programs, Congress directed program amounts generally comparable to those of prior years. Specifically, in fiscal year 2013, DOD requested \$117 million for the National Guard counterdrug program, about a 40 percent decrease from the prior year's request. From fiscal years 2013 to 2016, DOD reduced its budget request for counterdrug intelligence and technology support, as well as domestic efforts such as those supported by the National Guard more than international interdiction support activities. DOD officials stated that by decreasing requested funding for the counterdrug program they planned to address spending limits required by the Budget Control Act of 2011¹⁴ and to fund counternarcotics

¹²The Drug Interdiction and Counterdrug Activities account was established by the Fiscal Year 1989 Defense Appropriations Act in November 1989.

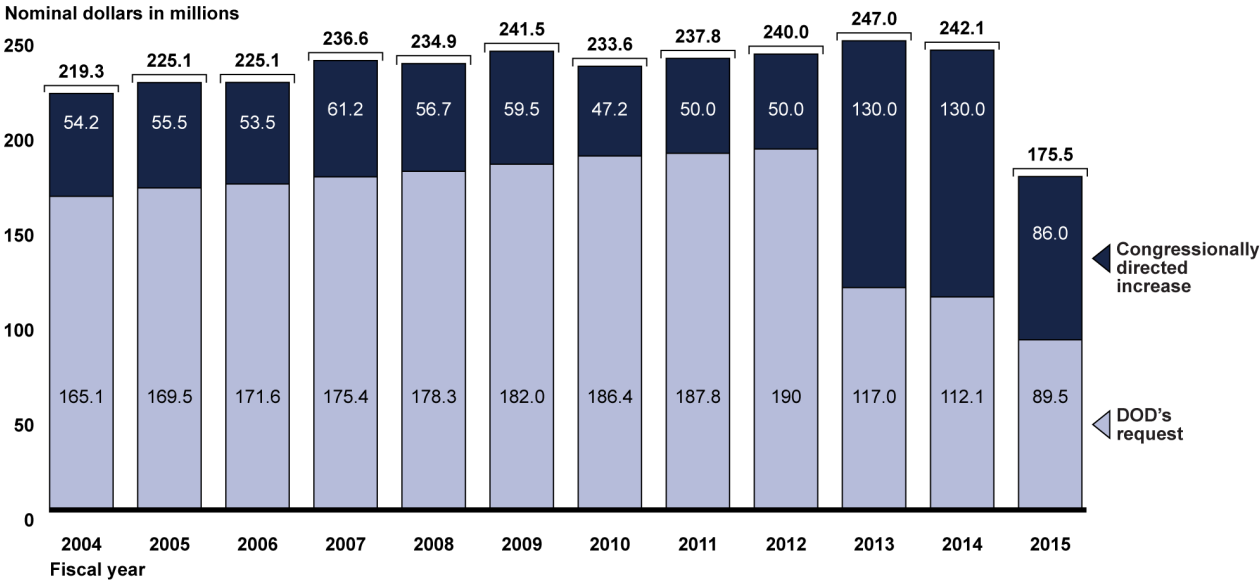
¹³In fiscal year 2015 DOD was directed to establish a separate budget activity for the National Guard's state counterdrug program to provide Congress with visibility into the specific funds for this program.

¹⁴The Budget Control Act of 2011 (Pub. L. No. 112-25), as amended, established limits on discretionary spending for fiscal years 2012 through 2021.

programs in locations deemed a priority, such as Central and South America. According to DOD's data, Congress directed \$130 million more than requested in fiscal years 2013 and 2014. These additions offset DOD's reduced request and kept overall counterdrug program funding generally steady. DOD's data show that DOD's budget request for the counterdrug program continued to decline from \$112.1 million in fiscal year 2014 to \$89.5 million in fiscal year 2015.¹⁵ In fiscal year 2015 Congress directed \$86 million more than DOD requested for the program, ultimately leaving the program with a lower total funding of \$175.5 million.

Figure 1 details DOD's budget data on the counterdrug program's congressionally directed funding, including the DOD's request and the increases above DOD's request.

Figure 1: Funding for the National Guard's State Counterdrug Program, Fiscal Years 2004 through 2015



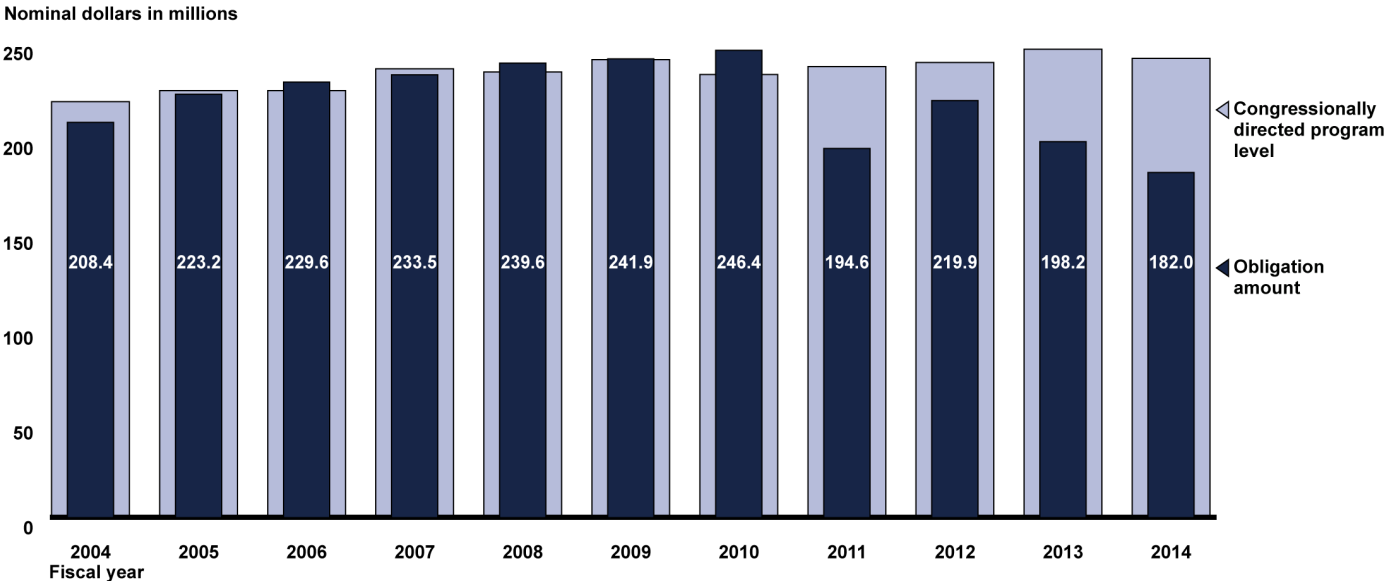
Source: GAO analysis of Department of Defense (DOD) data. | GAO-16-133

According to DOD's data, in recent years the program has not obligated all of the funding allocated to it from the Drug Interdiction account. In

¹⁵DOD requested \$87.9 million for the National Guard Counterdrug Program for fiscal year 2016.

fiscal years 2004 through 2010 the program obligated at least 95 percent of its allocation. However, from fiscal years 2011 through 2014 the program's obligations fluctuated between 83 percent and 96 percent of DOD's allocations, partly due to the timing and amount of allocations received by the program. Funds transferred or allocated from the Drug Interdiction account to various other DOD drug interdiction accounts or programs, including the National Guard program, can be transferred back to the account upon a determination that all or part of the funds are not necessary and remain unobligated. Once funds are returned to the Drug Interdiction account, they are available for reallocation to other DOD counterdrug programs for obligation. Figure 2 details the counterdrug program's obligations from fiscal years 2004 through 2014.

Figure 2: Obligation Amounts for the National Guard's Counterdrug Program, Fiscal Years 2004 through 2014



Source: GAO analysis of Department of Defense (DOD) data. | GAO-16-133

Note: DOD's obligations may be above or below the congressionally directed program level which does not equal total budget authority available for the National Guard's Counterdrug Program in a given year. In no year did programmatic obligations exceed actual budget authority available.

NGB and state counterdrug programs officials stated that DOD's internal transfer process for the Drug Interdiction account causes delays when funds become available for the program, thereby impacting the program's

ability to obligate funds for planned activities.¹⁶ For example, state program officials stated that in many cases the program cannot provide long-term analytical support, such as investigative and counterthreat finance analysts, throughout the year, and must wait for additional funding before assigning personnel. In some instances, the program can offer partial-year support, but some interagency partners may not accept support for only part of the year because it is difficult for them to provide the necessary training and access to appropriate databases necessary for investigative case work to be assigned before the fiscal year ends and the funding for the position is no longer available. DOD is examining whether it can improve upon the transfer process in order to reduce delays.

According to DOD's data, DOD has reallocated some of the National Guard counterdrug program's unobligated funds that were returned to the Drug Interdiction account to other DOD counterdrug programs. Specifically, in fiscal years 2013 and 2014, DOD reallocated a total of \$51.8 million of amounts returned to the Drug Interdiction account from the National Guard's counterdrug program to counternarcotic capacity building efforts in the U.S. Africa Command and U.S. Southern Command areas of responsibility.

NGB Has Performance Measures, but Does Not Use the Information Collected to Inform State-Level Programs or Oversee the Counterdrug Schools

The NGB has developed performance measures to report on its counterdrug program; however, we found that the information collected is not used to evaluate and inform funding for state-level programs or oversee the counterdrug schools' training. Without performance information to inform funding decisions for state-level programs and oversee the counterdrug schools, DOD and Congress cannot ensure that the counterdrug program achieves its desired results and uses its resources most efficiently.

¹⁶Further details on the internal transfer process are presented in appendix IV.

NGB Has Developed a Set of Performance Measures to Report on the Counterdrug Program's Activities

In 2012 the Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats issued the *Counternarcotics and Global Threats Performance Metrics System Standard Operating Procedures* to be used in the development and documentation of performance metrics for all DOD counternarcotics activities.¹⁷ In response to the guidance, National Guard counterdrug program officials stated that they developed a set of performance measures for use by their program. In fiscal year 2015 the counterdrug program included 26 performance measures that officials stated they used to evaluate the counterdrug program and report on its aggregate performance. These measures include indicators such as the number of cases supported, analytic products produced, students trained, mobile training courses delivered, and reconnaissance hours flown. Appendix V provides details on each of the 26 measures.

Our review of the counterdrug program's fiscal year 2015 performance measures against key attributes of successful performance measures identified by GAO¹⁸ found that the set of measures provided information across the program's broad goals,¹⁹ measured three of the program's five core activities, and had limited overlap with each other. We also found that the individual performance measures were linked to the overall objectives of the program and were focused on measurable goals. Some

¹⁷In December 2006 Congress directed the Office of National Drug Control Policy (ONDCP) to produce an annual report describing its national drug control performance measurement system and identifying the activities of national drug control program agencies, including DOD. In May 2007 ONDCP issued guidance requiring DOD and other national drug control program agencies to submit an annual performance summary report, including performance measures, targets, and results, to the Director of ONDCP.

¹⁸[GAO-03-143](#). GAO developed nine attributes of performance goals and measures based on previously established GAO criteria, consideration of key legislation, and review of performance management literature. In [GAO-03-143](#) GAO applied the attributes to assess Internal Revenue Service performance measures. However, because the attributes are derived from sources generally applicable to performance measures, they are also relevant for assessing counterdrug program performance measures.

¹⁹ONDCP is responsible for overseeing and coordinating national counterdrug policies and goals. In this role, ONDCP has issued a national strategy and supplemental strategies for geographic areas. See, Executive Office of the President of the United States, Office of National Drug Control Policy, *National Drug Control Strategy* 2014; *National Northern Border Counternarcotics Strategy* (August 2014); *National Southwest Border Counternarcotics Strategy* 2013; and *Caribbean Border Counternarcotics Strategy* (January 2015). Also, DOD has developed a supplemental strategy to guide the department's counternarcotics effort. See Deputy Assistant Secretary of Defense, Counternarcotics and Global Threats, *Department of Defense Counternarcotics and Global Threats Strategy* (April 27, 2011).

key attributes, such as a clarity, reliability, and objectivity, were reflected to varying degrees, but we found that the National Guard had actions underway to better define and document the program's individual performance measures to improve the clarity and reliability of those individual measures. In February 2015 the National Guard officials completed the *Fiscal Year 2015-2016 Counterdrug Analyst Performance Metrics Guide* and stated that they were drafting guides for other program activities.

NGB Does Not Use its Performance Information to Evaluate and Inform Funding for State-Level Programs and Oversee the Counterdrug Schools

We found that the NGB does not use the performance information it collects to help evaluate and inform funding for state-level programs and oversee the type of training offered by counterdrug schools. We have previously reported that setting useful performance measures can assist oversight; with them, program managers can monitor and evaluate the performance of the program's activities, track how the activities contribute to attaining the program's goals, or identify potential problems and the need for corrective measures.²⁰ According to leading practices for results-oriented management, to ensure that performance information will be both useful and used in decision making throughout the organization, agencies need to consider users' differing policy and management information needs. Performance measures should be selected specifically on the basis of their ability to inform the decisions made at each organizational level, and they should be appropriate to the responsibilities and control at each level.²¹

NGB officials stated that they are using performance information to report on the program's aggregate performance to DOD and to respond to other

²⁰For example, see GAO, *Managing for Results: Agencies' Trends in the Use of Performance Information to Make Decisions*, [GAO-14-747](#) (Washington, D.C.: September 26, 2014); *Special Education: Improved Performance Measures Could Enhance Oversight of Dispute Resolution*, [GAO-14-390](#) (Washington, D.C.: August 25, 2014); *Managing for Results: Executive Branch Should More Fully Implement the GPRA Modernization Act to Address Pressing Governance Challenges*, [GAO-13-518](#) (Washington, D.C.: June 26, 2013); and *Results-Oriented Government: Using GPRA to Address 21st Century Challenges*, [GAO-03-1166T](#) (Washington, D.C.: September 18, 2003).

²¹[GAO-05-927](#). GAO developed a conceptual framework identifying four uses of performance information for management decision making and five practices that can contribute to greater use of performance information from a review of the literature and interviews with experts and staff from five agencies (the U.S. Departments of Commerce, Labor, Transportation, and Veterans Affairs, and the Small Business Administration).

requests for information, such as regarding whom the program supports. DOD officials further stated that they use performance information on an ad hoc basis to inform the funding request for the Drug Interdiction transfer account, but that they do not collect information that could be used to evaluate the effectiveness of individual state-level programs or could be used in decision making about funding distributions to states. Such information could include a measure of the quality of the support provided by the National Guard to interagency partners, among other things. Instead, NGB officials were making funding distribution decisions for individual state programs based solely on assessments of threat. According to NGB officials, in 2012 they began using a model to determine the severity of the drug threat in each state and using the assessments of threat to determine funding levels for state counterdrug programs to implement their plans.²² NGB officials stated that to employ the threat-based resourcing model, NGB uses statistics from national-level databases to develop a distribution percentage for each state that reflects its relative drug threat. This percentage is then applied to the funding provided to the National Guard's counterdrug program. In fiscal year 2015 the amount distributed to the states was \$146.1 million. Table 1 shows the distribution percentage to the states and territories, and table 8 in appendix VI provides a detailed breakout by state.

²²We did not assess the validity of the threat-based resource model because it was beyond the scope of this review.

Table 1: Distribution Percentages of National Guard State Plans' Funding to States and Territories Based on Assessment of Drug Threats, Fiscal Year 2015

Distribution Percentage	States and Territories
5 percent or more	California, Texas, Florida, and Arizona
Between 2 and 5 percent	New York, Illinois, Puerto Rico, Tennessee, Georgia, Missouri, Ohio, Pennsylvania, and Kentucky
Between 1 and 2 percent	North Carolina, New Jersey, Michigan, Indiana, Virginia, Washington, Maryland, Louisiana, Massachusetts, Oklahoma, South Carolina, Alabama, Kansas, and Oregon
Less than 1 percent	New Mexico, Mississippi, Colorado, Nevada, Iowa, Arkansas, and Wisconsin Minnesota, Vermont, District of Columbia, Nebraska, Connecticut, Delaware, Guam, Hawaii, Idaho, Maine, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, U.S. Virgin Islands, Utah, West Virginia, Wyoming

Source: GAO analysis of National Guard Bureau data. | GAO-16-133

Moreover, during the course of our review, we found that the performance information collected did not assist the DOD Counternarcotic Program to oversee the type of training offered by the counterdrug schools. Specifically, the performance measures employed by the NGB focused on the number of students trained and the number of courses available, among other aspects. The officials stated these measures were not useful in the evaluation of the counterdrug school's training activities because they did not provide information on the type of training being offered, such as whether it had a counterdrug focus. In addition, DOD Counternarcotics Program officials acknowledged that they did not have a full understanding of the counterdrug schools' activities. To improve their oversight of the schools, DOD Counternarcotics Program officials began a review in December 2014 of the counterdrug schools' activities to assess their training efforts. In May 2015, based on the preliminary findings of the review, the DOD Counternarcotics Program included guidance in its memorandum, *Preparation of the Fiscal Year 2016 National Guard State Drug Interdiction and Counterdrug Activities Plan*, that clarified the mission of the counterdrug schools and the department's priorities for their training, including that all training offered be explicitly linked to counterdrug efforts. As a result, the counterdrug schools are required to submit annual training plans that detail course offerings for review by the NGB and DOD to ensure that the training is focused on DOD's priorities. However, the guidance did not include any changes to the performance information that would be collected by the NGB on the counterdrug schools. We continue to believe that collecting additional

performance information, such as on the type of training offered, could help inform evaluations and identify any need for corrective actions in the future for the counterdrug schools.

According to NGB officials, their current performance measures were developed in response to DOD guidance to report on the program's aggregate performance to support DOD's annual performance summary report to ONDCP. NGB officials stated that the guidance did not specifically require them to assess the performance of state-level programs; therefore, they did not fully consider the types of measures or information that would be useful to evaluate the effectiveness of individual state-level programs and oversee the counterdrug schools. NGB officials stated that their performance measures were evolving and they believed incorporating performance information in future funding distribution decisions for state programs would be helpful. Officials stated that they were working to develop an approach that uses performance information to inform future funding decisions. Without performance information to evaluate state-level programs and oversee the counterdrug schools, DOD and Congress cannot ensure that the counterdrug program achieves its desired results and uses its resources most efficiently.

Conclusions

The National Guard's counterdrug program was established more than 25 years ago to assist efforts of the Governors of 50 states, the District of Columbia, and three U.S. territories in addressing illicit drug production, trade, and consumption. In recent years DOD has sought to focus its counterdrug efforts on international interdiction support activities with less emphasis on other activities including supporting domestic efforts like the National Guard's counterdrug program. Congress has resisted the reductions to domestic efforts, and has directed increased funding to the program.

Given the resources that the program offers to individual states and the interagency partners it supports, it is important to ensure that the program uses these resources efficiently and effectively. While threat is an important factor to consider in funding distributions, performance information can also be used to better inform such decisions. DOD and NGB have taken steps to develop performance measures, but DOD has used performance information only in an ad hoc basis to inform the funding request for the Drug Interdiction transfer account, and has not used performance information to evaluate the effectiveness of individual state programs or to oversee training

offered by the counterdrug schools. Therefore, the effectiveness of state efforts is not being considered in DOD's funding distribution decisions, and useful information is not being collected to support oversight of the counterdrug schools' training. Without an approach that enables decision makers to objectively judge the performance of all elements of the program, neither DOD nor Congress will have assurance that the counterdrug program is achieving its goals in an effective manner.

Recommendation for Executive Action

To ensure that resources are being efficiently applied to meet the National Guard counterdrug program's objectives, we recommend that the Secretary of Defense direct the National Guard Bureau in consultation with the Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats to take the following two actions:

- Identify additional information needed to evaluate the performance of the state programs and oversee counterdrug schools' training; and
- Subsequently collect and use performance information to help inform funding distribution decisions to state programs and to conduct oversight of the training offered by the counterdrug schools.

Agency Comments and Our Evaluation

In the written comments on a draft of this report, DOD concurred with our two recommendations and identified specific steps it planned to take to address them. With respect to the first recommendation to identify additional information needed to evaluate the performance of state programs and to oversee the counterdrug schools' training, DOD stated that it will hold discussions with the counterdrug program's stakeholders to reassess the current performance criteria and to identify new performance criteria to allow it to assess the support the program provides. DOD then will evaluate the criteria to ensure it is reflective of the current information needs of the program both internally and externally and meets national objectives. These steps, once implemented, should help DOD obtain useful information to better inform decision making and to conduct oversight of the program and would satisfy the intent of our recommendation. With respect to the second recommendation to collect and use performance information to help inform funding-distribution decisions to state programs and to conduct oversight of the training offered by the counterdrug schools, DOD stated that it will apply the criteria it

identifies to evaluate the effectiveness of each state program to provide support and to meet its objectives. Furthermore, DOD stated that it would take steps to assist states with any needed corrective-action plans. These steps, once implemented, should help to ensure that the program uses resources efficiently and effectively and would satisfy the intent of our recommendation. DOD's comments are printed in their entirety in appendix VII. DOD also provided technical comments, which we incorporated into the report as appropriate.

We also provided a draft of this report to DOJ, DHS, and ONDCP for review and comment. DOJ, DHS, and ONDCP officials provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Secretary of Homeland Security, the Attorney General of the United States, and the Director of National Drug Control Policy. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3489 or pendletonj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VIII.



John H. Pendleton
Director, Defense Capabilities and Management

Appendix I: Scope and Methodology

To address our objectives, we reviewed documentation and interviewed officials from the Department of Defense (DOD) who oversee and manage the National Guard's counterdrug program, select state counterdrug programs, and select interagency partners that receive support from state counterdrug programs. Our analysis focused on the state-level operations of the National Guard's counterdrug program, which includes three state-specific projects: 1) state plans, 2) counterdrug schools, and 3) counterthreat finance. We excluded any counterdrug program projects that were specific to federal operations. Also, we used a nongeneralizable case study approach to obtain the perspectives of state counterdrug program officials and interagency partners receiving support from the program. Specifically, we selected 8 of the 53 participating states and territories identifying 2 states within each of the four counterdrug program regions (selecting 1 state with high and 1 state with low drug threat assessments) that also had a counterdrug school or an international boundary. The 8 states that we included in our review were: Connecticut, Florida, Iowa, Mississippi, Pennsylvania, Texas, Utah, and Washington. In the states selected for case study, we interviewed state counterdrug program officials and officials from the following interagency partners, where applicable: High Intensity Drug Trafficking Areas (HIDTA)¹, Drug Enforcement Administration, Customs and Border Protection, and U.S. Immigration and Customs Enforcement's Homeland Security Investigations. We selected interagency partners based on their receiving support from the counterdrug program and on logistics associated with travel. In addition, we obtained and analyzed information fiscal years 2011 through 2014 from a National Guard counterdrug program database² that included descriptive statistics of the number of staff days by mission category, support activities, and supported organization. To ensure the accuracy and reliability of the information from the database, we took steps to review the data fields for consistency and

¹The High Intensity Drug Trafficking Areas program is federally funded and brings together federal, state, and local law enforcement agencies in task forces that conduct investigations of drug trafficking organizations engaged in illegal drug production, manufacturing, importation, or distribution.

²The National Guard began using the program database in fiscal year 2009. We selected fiscal years with full-year data for all the programs participating in the counterdrug program.

missing data; we found that these data were sufficiently reliable for the purposes of the audit.

To identify the changes in funding for the National Guard counterdrug program, we conducted an analysis of relevant appropriations and program budget-related documents provided by DOD for fiscal years 2004 through 2015.³ We began our analysis with fiscal year 2004 data to ensure that our review included data covering at least a 10-year period. To ensure the reliability of our data, we reviewed documentation on funding distributions and financial management policy and interviewed knowledgeable officials about DOD's Drug Interdiction and Counterdrug Activities account, and about how counterdrug program funds are transferred from the account. We also reviewed financial documentation and interviewed DOD, counterdrug program, and interagency partner officials to obtain information on obligations of available funding. We determined that the data were sufficiently reliable for the purposes of this audit.

To assess the extent to which the performance information is used to evaluate the counterdrug program's activities, we reviewed documentation and interviewed counterdrug officials about program activities, types of performance information collected, and funding levels for individual state counterdrug programs. First, we evaluated the counterdrug program's 26 fiscal year 2015 performance measures against nine key attributes of successful performance established by GAO.⁴ Next, we evaluated the counterdrug program's use of performance information against leading practices for results-oriented management that help agencies develop useful performance measures and use performance information for management decision

³Obligation data included in the report are through fiscal year 2014.

⁴GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002). GAO developed nine attributes of performance goals and measures based on previously established GAO criteria, consideration of key legislation, and review of performance management literature. In [GAO-03-143](#), GAO applied the attributes to assess Internal Revenue Service performance measures. However, because the attributes are derived from sources generally applicable to performance measures, they are also relevant for assessing counterdrug program performance measures.

making as identified by GAO through a review of literature and interviews with experts and staff from five U.S. agencies.⁵

Specifically, we interviewed officials from:

Department of Defense:

- National Guard Bureau Counterdrug Program
 - Connecticut Counterdrug Program
 - Florida Counterdrug Program
 - Multijurisdictional Task Force Training Center
 - Iowa Counterdrug Program
 - Midwest Counterdrug Training Center
 - Mississippi Counterdrug Program
 - Regional Counterdrug Training Academy
 - Pennsylvania Counterdrug Program
 - Northeast Counterdrug Training Center
 - Texas Counterdrug Program
 - Utah Counterdrug Program
 - Washington Counterdrug Program
 - Western Region Counterdrug Training Center
- National Guard Bureau Budget Execution Office
- Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats
- Office of the Undersecretary of Defense, Comptroller
- Army Budget Office

Department of Justice:

- Drug Enforcement Administration (DEA)
 - DEA Miami Division
 - DEA Houston Division

⁵GAO, *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, [GAO-05-927](#) (Washington, D.C.: Sept. 9, 2005). GAO developed a conceptual framework identifying four uses of performance information for management decision making and five practices that can contribute to greater use of performance information from a review of the literature and interviews with experts and staff from five agencies (the U.S. Departments of Commerce, Labor, Transportation, and Veterans Affairs, and the Small Business Administration).

- DEA Philadelphia Division
 - DEA Denver Division
 - DEA New Orleans Division
 - DEA Seattle Division
 - DEA St. Louis Division
 - DEA New England Division
 - DEA Office of Training
- Federal Bureau of Investigation
- United States Marshals Service
- Executive Office for United States Attorneys

Department of Homeland Security:

- Federal Law Enforcement Training Centers
- Homeland Security Investigations (HSI)
 - HSI Special Agent in Charge, Miami, Florida
 - HSI Special Agent in Charge, Seattle, Washington
 - HSI Special Agent in Charge, Houston, Texas
- Customs and Border Protection (CBP)
 - CBP, Miami, Florida – Sector Intelligence Unit
 - CBP, Spokane, Washington – Oroville Station
 - CBP, Spokane, Washington – Sector Intelligence Unit
 - CBP, Laredo, Texas – Special Operation Detachment
- United States Coast Guard

High Intensity Drug Trafficking Areas:

- North Florida HIDTA
- South Florida HIDTA
- Rocky Mountain HIDTA
- Houston HIDTA
- Philadelphia/Camden HIDTA
- New England HIDTA
- Gulf Coast HIDTA
- Northwest HIDTA
- Midwest HIDTA

Office of National Drug Control Policy

We conducted this performance audit from August 2014 to October 2015 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: Obligations by State Project

The National Guard identifies three state-specific projects as comprising its counterdrug program—state plans, counterdrug schools, and counterthreat finance. Table 2 provides the obligations by each state project.

Table 2: Obligation Amounts of the National Guard Counterdrug Program by State Project, Fiscal Years 2004 through 2014

(Nominal dollars in millions)

Project Code	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
7403 – State Plans	\$190.3	\$206.6	\$213.4	\$211.6	\$216.8	\$218.8	\$219.1	\$174.6	\$196.1	\$176.5	\$172.8
7415 – Counterdrug Schools	18.2	16.6	16.2	21.9	22.7	23.1	27.3	20.0	22.3	19.5	7.0
9301 –Counterthreat Finance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	1.5	2.3	2.2
Total	\$208.4	\$223.2	\$229.6	\$233.5	\$239.6	\$241.9	\$246.4	\$194.6	\$219.9	\$198.2	\$182.0

Source: GAO analysis of Department of Defense (DOD) data. | GAO-16-133

Appendix III: Overview of National Guard State Plans’ Counterdrug Activities and Supported Organizations, Fiscal Years 2011 through 2014

The National Guard’s state plans include 15 support activities, which are grouped into five broad mission categories, as shown in table 3.

Table 3: State Plans’ Mission Categories and Support Activities
Technical support
a. Linguist and translator
b. Investigative case analysis
c. Drug detection ^a
d. Communications
e. Engineer
f. Subsurface and diver
g. Counterthreat finance analysis
h. Imagery and mapping analysis
General support
a. Domestic cannabis suppression and eradication
b. Transportation
Reconnaissance and observation
a. Ground reconnaissance
b. Aerial reconnaissance
Civil operations
a. Educational programs to community organizations
b. Support to community organizations
c. Support to coalitions
Counterdrug-related training

Source: GAO analysis of National Guard counterdrug missions and activities. | GAO-16-133

Note: The program also includes mission categories for internal program management. Since these missions do not provide support to interagency partners, we did not include the missions in the table.

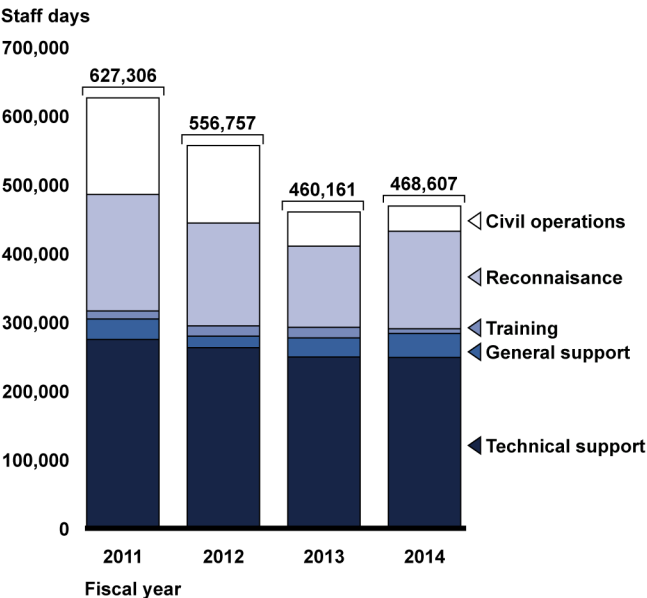
^a Drug detection includes the use of military equipment to assist supported organizations in detecting illegal drugs.

The National Guard counterdrug program collects information on the activities and supported organizations and uses staff days to measure its resource investment. Our analysis of this information found that from fiscal years 2011 through 2014 the state plans invested most of their staff days in the mission categories of technical support and reconnaissance. ¹

¹The National Guard began using its program database in fiscal year 2010. We selected fiscal years with full year data.

During this period, the number of staff days invested in civil operations decreased, as shown in figure 3.

Figure 3: State Plans' Staff Days by Mission Category, Fiscal Years 2011 through 2014



Source: GAO analysis of counterdrug program data. | GAO-16-133

Of the 15 support activities, investigative case and analyst support was the support activity most frequently provided from fiscal years 2011 through 2014, as shown in table 4.

Appendix III: Overview of National Guard State Plans' Counterdrug Activities and Supported Organizations, Fiscal Years 2011 through 2014

Table 4: State Plans' Staff Days by Type of Support Activity, Fiscal Years 2011 through 2014

Activity	Fiscal Year				Total
	2011	2012	2013	2014	
Technical support					
Linguist and translator	4,329	3,589	5,498	3,548	16,964
Investigative case and analyst	235,387	225,660	209,238	215,305	885,590
Prosecution case	6,621	n/a	n/a	n/a	6,621
Drug detection	n/a	3,671	2,940	5,695	12,306
Communications	17,457	10,809	10,527	4,750	43,543
Engineer	5,368	8,770	5,656	4,664	24,458
Subsurface and diver	77	0	119	0	196
Counterthreat finance	n/a	8,785	11,437	11,164	31,386
Imagery and mapping analysis	n/a	n/a	n/a	433	433
Training or administrative	5,321	1,431	3,650	2,878	13,281
General support					
Cannabis eradication	23,679	16,087	20,685	25,336	85,787
Transportation	433	623	1145	755	2,956
Training or administrative	5,723	0	5,956	8,920	20,599
Counterdrug-related training					
Training	11,630	14,880	15,506	6,718	48,734
Reconnaissance					
Ground reconnaissance	64,155	58,867	43,539	58,983	225,544
Aerial reconnaissance	97,680	82,121	70,907	74,870	325,577
Training or administrative	7,544	8,737	3,693	7,961	27,935
Civil Operations					
Demand reduction	116,162	n/a	n/a	n/a	116,162
Support to coalitions and community organizations	14,300	25,426	28,379	25,747	93,852
Blank	1,325	0	0	0	1,325
Total	627,306	556,757	460,161	468,607	2,112,831

Source: GAO analysis of National Guard activities data. | GAO-16-133

Notes: "Not applicable" signifies that in the fiscal year, the activity was discontinued or was not an approved activity. "Training or administrative" signifies the staff days that personnel assigned to a specific mission category spent in training or completing required administrative tasks. Numbers may not total, due to rounding.

Among the various categories of supported organizations, law enforcement received the most support from the state plans, as shown in table 5.

Table 5: State Plans' Staff Days by Supported Organizations, Fiscal Years 2011 through 2014

Organization category	2011	2012	2013	2014
Government	497,427	445,2015	397,687	409,770
Law enforcement	220,980	207,849	181,323	199,116
Military	172,284	139,681	121,908	103,242
High Intensity Drug Trafficking Areas	36,407	30,625	35,690	34,943
Task force	35,452	35,402	28,541	33,196
Other government	29,063	26,934	26,568	34,850
Fusion center ^a	3,241	4,710	3,656	4,384
Not assigned to a specific organization ^b	82,748	78,410	41,255	42,886
Schools	27,984	13,532	803	812
Community-based organizations	14,285	12,399	5,681	1,841
Coalitions	2,085	7,210	14,743	12,004
Other ^c	2,772	4	0	1,333
TOTAL	627,306	556,757	460,161	468,607

Source: GAO analysis of National Guard activities data. | GAO-16-133

^aFusion centers gather and analyze threat information and share it among all levels of government and the private sector. Federal agencies support these centers by providing personnel, funding, and other assistance.

^b"Not assigned to a specific organization" signifies the hours when personnel are not assigned to support a specific organization but are completing training and required administrative tasks.

^cOther includes the categories of "unknown" and "vendor".

Lastly, the federal agencies to which state plans provided the most support were the Department of Justice and Department of Homeland Security. The specific components that received the most support included the Drug Enforcement Administration, Customs and Border Protection, and Immigration and Customs Enforcement, as shown in table 6.

Appendix III: Overview of National Guard State
Plans' Counterdrug Activities and Supported
Organizations, Fiscal Years 2011 through 2014

Table 6: State Plans' Staff Days by Support Federal Agencies, Fiscal Years 2011 through 2014

Federal Agency	Component	Fiscal Year			
		2011	2012	2013	2014
Department of Agriculture		1,799	1,553	1,516	1,053
	Forest Service	1,799	1,553	1,507	1,038
Department of Health and Human Services		282	326	171	344
	Food and Drug Administration	282	319	171	344
Department of Homeland Security		46,835	49,695	40,353	38,224
	Coast Guard	1,206	1,278	1,614	1,082
	Customs and Border Protection	32,079	32,842	20,810	18,317
	Immigration and Customs Enforcement	12,686	12,915	15,996	14,587
	Secret Service	420	511	--	--
Department of Interior		458	297	152	143
	Bureau of Land Management	164	55	54	101
	National Park Service	294	242	31	42
Department of Justice		78,117	76,195	70,452	68,633
	Alcohol, Tobacco, Firearms and Explosives	982	1,205	658	629
	Drug Enforcement Administration	62,880	62,223	56,851	57,693
	Federal Bureau of Investigations	7,868	6,527	7,255	6,237
	U.S. Marshals Service	5,510	5,351	4,940	3,189
Department of Transportation		1,137	137	466	900
	Federal Aviation Administration	1,137	137	466	900
Department of Treasury		724	1,925	1,578	2,926
	Internal Revenue Service	724	1,618	1,249	2,926
U. S. Courts		172	11	--	--
U.S. Postal Service		2,306	2,900	3,350	3,017
Other ^a		2	--	363	--
TOTAL		130,382	133,038	118,399	115,330

Source: GAO analysis of National Guard counterdrug missions and activities. | GAO-16-133

^aOther includes Veterans Affairs and the Office of National Drug Control Policy.

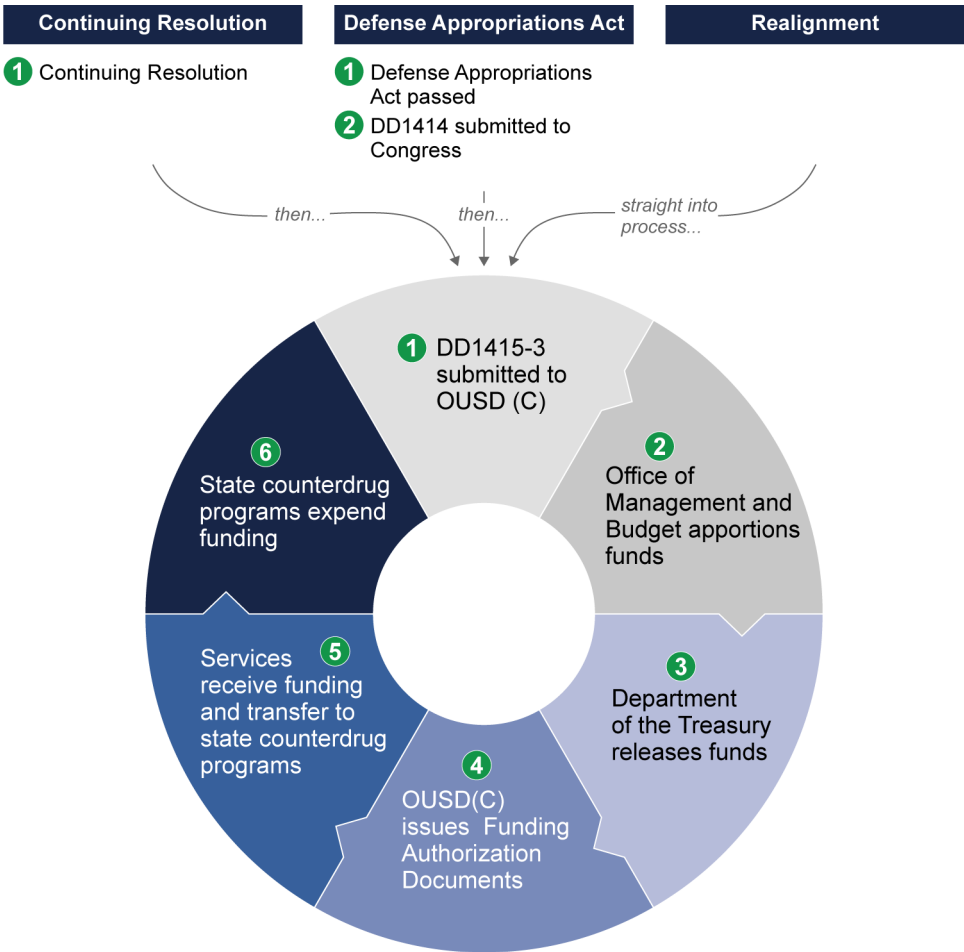
Appendix IV: Overview of DOD's Drug Interdiction and Counterdrug Activities Account Fund Transfer Process

After Congress appropriates amounts to the Drug Interdiction account, there are multiple steps by various organizations before the funds are received by each individual state counterdrug program. To begin each transfer process, DOD Counternarcotic Program officials prepare and submit to the Office of the Under Secretary of Defense (Comptroller) a DD1415-3, which details the allocation of funds by appropriation or budget activity account for each program. If no defense appropriations act has been passed and DOD is operating under a continuing resolution, amounts transferred are based on a rate-per-day formula developed by DOD. Once a defense appropriation act is enacted, the Comptroller is required to submit to Congress the department's intended budget execution based on the appropriation act and congressional directions as expressed in House and Senate Appropriation committee reports.¹ This report, which DOD calls the base for reprogramming and transfer authorities (DD1414), is to be submitted no later than 60 days from the enactment of an appropriation. After this baseline is submitted, Comptroller officials review and approve the DD1415-3 and forward it to the Office of Management and Budget.² Once approved by the Office of Management and Budget, the Comptroller issues a funding authorization document to transfer funds to the military services appropriation accounts (such as military personnel or operation and maintenance). The military services then transfer funds to appropriation accounts managed by Army National Guard and Air National Guard, which, in turn, distribute the funds onto each state National Guard participating in the program. Figure 4 outlines the fund transfer process to the counterdrug program.

¹The DD1414 is the report that DOD submits to Congress to establish the baseline from which it will make reprogramming and transfer proposals.

²The Office of Management and Budget (OMB) manages and approves apportionments at the Treasury appropriation fund level. Apportionment is part of the government-wide system for the administrative control of funds. Unless exempted by statute or automatically apportioned, all DOD appropriated resources require OMB approval through the apportionment process before they are available for distribution and legal obligation.

Figure 4: Drug Interdiction Account Fund Transfer Process



OUSD(C): Office of the Under Secretary of Defense (Comptroller)

Source: GAO analysis of Department of Defense (DOD) funding allocation process. | GAO-16-133

The National Guard Bureau's Counterdrug Program office coordinates the process involving the DOD Counternarcotic Program, the Army and Air National Guard budget and financial management offices, and the individual state counterdrug programs.

Appendix V: National Guard Counterdrug Program's Fiscal Year 2015 Performance Measures

In fiscal year 2015 the counterdrug program officials used 26 performance measures to report on the program's aggregate performance to DOD and respond to requests for information, as shown in table 7.

Table 7: Performance Measures of National Guard Counterdrug Program, Fiscal Year 2015

Mission Category: Technical Support	
Project Code	Performance Measure
State Plans	Percentage of criminal analyst mission request supports
State Plans	Number of cases supported per 321 staff days
State Plans	Number of deconflictions
State Plans	Number of analytical products produced
State Plans	Number of cases closed per 321 staff days
State Plans	Number of drug trafficking organizations disrupted
State Plans	Number of drug trafficking organizations dismantled
Counterthreat Finance	Number of laundering cases supported
Counterthreat Finance	Number of laundering targets identified
Counterthreat Finance	Number of laundering methods identified
Counterthreat Finance	Number of analytical reports produced
Counterthreat Finance	Number of targets dismantled laundering greater than \$5 million per year
Counterthreat Finance	Number of targets dismantled laundering less than \$5 million per year
State Plans and Counterthreat Finance	Total value in U.S. dollars interdicted through Department of Defense counternarcotics funded National Guard programs (western hemisphere)
Mission Category: General Support	
Project code	Performance Measure
State Plans	Percentage of requests supported
Mission Category: Counterdrug Related Training	
Project code	Performance Measure
Counterdrug Training	Number of students trained
Counterdrug Training	Percentage of fulfilled continental United States training requests
Counterdrug Training	Total number of courses (by events) available at counterdrug schools
Counterdrug Training	Number of mobile training team courses delivered
Counterdrug Training	Percentage of Joint Task Force - North mobile training team requests supported by the National Guard
Mission Category: Reconnaissance and Observation	
Project code	Performance Measure
State Plans	Number of reconnaissance hours flown in support of law enforcement

Appendix V: National Guard Counterdrug
Program's Fiscal Year 2015 Performance
Measures

Mission Category: Technical Support	
Mission Category: Civil Operations	
Project code	Performance Measure
State Plans	Total mission events conducted that employ military skills in building community strategies
State Plans	Total population served by implementing comprehensive community strategies
State Plans	Total civil operations personnel capable of supporting combatant commands
State Plans	Total coalition strategic prevention framework surveys conducted
State Plans	Increase in sector and law enforcement agency representation in supported coalitions

Source: National Guard Bureau. | GAO-16-133

Appendix VI: Overview of the Threat-Based Resource Model and Funding Amounts by State and Territory

Each state within the counterdrug program develops an annual plan of activities, in coordination with the state's Governor and Attorney General, that identifies its counterdrug priorities and how it intends to obligate its available funds. To develop these plans, states use annual guidance from DOD that identifies approved activities for the counterdrug program. For instance, investigative case support, ground and aerial reconnaissance, and counterthreat finance analysis are approved activities.

The threat-based resource model uses 22 variables to assess the drug threat across the 53 counterdrug programs. Almost half of the variables are based on information from the National Seizure System database.¹ Other variables are based on information from federal agencies such as the Substance Abuse and Mental Health Services Administration and the Federal Bureau of Investigation.

To ensure that every state has a viable counterdrug program, the Chief of the National Guard Bureau established \$500,000 as the minimum level of funding for each state. According to counterdrug program officials, this amount enables all the states to maintain some capability to address drug threats while limiting the impact on states with higher threats. Table 8 provides details on the state plans distribution percentages by state and territories for fiscal year 2015.

¹The National Seizure System is a DEA database of drug seizures made by U.S. law enforcement agencies, which are reported to the El Paso Intelligence Center.

**Appendix VI: Overview of the Threat-Based
Resource Model and Funding Amounts by
State and Territory**

Table 8: Fiscal Year 2015 Threat-Based Resource Model Threat Percentages by State or Territory Program

Program	Percentage	Program	Percentage
California	13.17%	New Mexico	0.97%
Texas	12.98%	Mississippi	0.94%
Florida	5.54%	Colorado	0.93%
Arizona	5.02%	Nevada	0.92%
New York	4.33%	Iowa	0.91%
Illinois	3.20%	Arkansas	0.88%
Puerto Rico	2.71%	Wisconsin	0.87%
Tennessee	2.46%	Minnesota	0.87%
Georgia	2.26%	Vermont	0.75%
Missouri	2.18%	District of Columbia	0.74%
Ohio	2.14%	Nebraska	0.73%
Pennsylvania	2.12%	Connecticut	0.70%
Kentucky	2.07%	Delaware	0.70%
North Carolina	1.94%	Guam	0.70%
New Jersey	1.90%	Hawaii	0.70%
Michigan	1.82%	Idaho	0.70%
Indiana	1.53%	Maine	0.70%
Virginia	1.49%	Montana	0.70%
Washington	1.43%	New Hampshire	0.70%
Maryland	1.42%	North Dakota	0.70%
Louisiana	1.36%	Rhode Island	0.70%
Massachusetts	1.26%	South Dakota	0.70%
Oklahoma	1.17%	U.S. Virgin Islands	0.70%
South Carolina	1.15%	Utah	0.70%
Alabama	1.12%	West Virginia	0.70%
Kansas	1.11%	Wyoming	0.70%
Oregon	1.05%	Alaska ^a	0.00%

Source: National Guard counterdrug program data. | GAO-16-133

^aAlaska has not participated in counterdrug program since fiscal year 2014.

The amount of funding each state receives depends on that state's distribution percentage and available funds for the state plans project. Table 9 details the funding distributed to each state and territory in fiscal years 2014 and 2015.

Table 9: State Plans' Funding by State and Territories, Fiscal Years 2014 and 2015

State or Territory	Fiscal Year	
	2014	2015
Alabama	\$2,110,367	\$2,130,546
Alaska	0	0
Arizona	1,786,639	6,643,038
Arkansas	14,116,892	1,783,881
California	23,308,294	22,639,065
Colorado	1,247,416	1,403,185
Connecticut	1,205,451	1,311,015
Delaware	938,827	998,640
District of Columbia	1,131,791	1,166,180
Florida	6,320,926	6,347,694
Georgia	3,889,948	3,312,889
Guam	563,306	632,498
Hawaii	1,140,145	790,244
Idaho	702,119	602,127
Illinois	3,135,672	2,951,287
Indiana	3,886,980	4,207,991
Iowa	1,591,581	1,514,021
Kansas	1,178,746	884,441
Kentucky	8,034,316	5,289,403
Louisiana	2,396,025	1,291,725
Maine	1,008,600	799,520
Maryland	2,763,234	2,304,829
Massachusetts	1,383,039	1,065,624
Michigan	1,947,976	2,013,786
Minnesota	1,312,450	1,387,742
Mississippi	1,865,560	2,242,773
Missouri	2,382,271	2,992,862
Montana	936,077	754,400
Nebraska	1,010,916	771,621
Nevada	1,478,681	1,262,081
New Hampshire	660,572	650,535
New Jersey	2,443,663	2,123,567
New Mexico	3,683,913	2,524,656
New York	6,531,500	7,163,473

**Appendix VI: Overview of the Threat-Based
Resource Model and Funding Amounts by
State and Territory**

	Fiscal Year	
North Carolina	2,064,791	1,996,380
North Dakota	911,218	793,178
Ohio	2,443,352	2,468,261
Oklahoma	1,497,793	1,777,016
Oregon	1,668,232	2,089,292
Pennsylvania	2,914,034	2,868,961
Puerto Rico	3,468,617	4,563,715
Rhode Island	750,104	944,095
South Carolina	1,819,307	1,387,388
South Dakota	1,591,833	896,192
Tennessee	3,595,708	3,837,808
Texas	18,096,454	17,478,733
U.S. Virgin Islands	1,256,055	841,297
Utah	1,875,157	2,104,681
Vermont	708,446	718,257
Virginia	1,667,424	1,433,987
Washington	2,126,321	1,843,313
West Virginia	2,998,851	2,310,368
Wisconsin	1,367,539	1,144,083
Wyoming	577,971	596,005
Total	\$161,493,100	\$146,050,349

Source: National Guard counterdrug program data. | GAO-16-133

Appendix VII: Comments from the Department of Defense

DOD's comments refer to GAO report number, GAO-15-533. Given that GAO is issuing its final report in fiscal year 2016, it has changed the report number to GAO-16-133.



NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE, AHS
ARLINGTON, VA 22204-1373

September 30, 2015

Mr. John Pendleton
Director, Defense Capabilities Management
U.S. Government Accountability Office
441 G Street, NW
Washington DC 20548

Dear Mr. Pendleton:

The National Guard Bureau Counterdrug Division appreciates the opportunity to review and respond to the Government Accountability Office (GAO) Draft Report GAO-15-533, "DRUG CONTROL. Additional Performance Information is Needed to Oversee the National Guard's State Counterdrug Program," dated July 30, 2015, (GAO Code 351961). We are encouraged by the GAO's findings that acknowledge the National Guard Counterdrug Program's progress towards measuring impact to law enforcement and community coalitions' counterdrug efforts.

The converging illicit activity landscape; state laws toward licit and illicit drugs; and public perception have evolved substantially in recent years. Illicit drug trafficking is now a transnational threat that has no borders. Trafficking destinations for illicit drugs span the entire United States, including the territories of Guam, Puerto Rico and the U.S. Virgin Islands. Criminal networks, from street level to the global market, are not only expanding, but also diversifying their activities. They insinuate themselves into a number of wider illegal enterprises with narcotics related revenue, such as human and weapons trafficking and cyber crime. Terrorist and insurgent groups increasingly rely on networks of drug traffickers and money launderers for funding and logistical support.

The National Guard Counterdrug Program (NG CDP) has taken many strides in the areas of mission alignment and resource distribution to meet the growing threat and increased demand for support to Federal, state, local and tribal law enforcement agencies (LEA) while faced with increased budget challenges.

What originally began as a marijuana eradication mission is now a critical force-multiplier for LEAs combating the convergent threats of drug trafficking organizations (DTO) and transnational criminal organizations (TCO) through the application of military-unique capabilities. Due to our unique authorities,

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the relationship between the NG CDP and LEAs at all levels of the government has become critical to an effective response to these converging threats. Not only do activities performed by the NG CDP benefit LEAs and national security, but they contribute to improved individual personnel readiness. Intelligence support has increased considerably, comprising over 50% of mission support to LEAs program wide. Counter Threat Finance (CTF) support has doubled and has also been institutionalized within the NG being the Office of Coordinating Responsibility for DoD CTF training, as directed by Joint Oversight Council Memorandum (JROCM) 091-14. Civil Operations has successfully transitioned to meet DoD core mission requirements that provide a nexus to future deployments in support of Combatant Commanders. Training Centers are improving alignment of curriculums with core DoD missions and Training Center specializations. Additionally, with the expansion of countering transnational organized crime (CTOC) authorities provided in the Fiscal Year 2015 National Defense Authorization Act (FY15 NDAA), Training Centers are working with proponent agencies and developing relevant and realistic training for DoD and LEA personnel.

As transnational threats continued to grow, historical funding methodologies created vulnerabilities and shortfalls across the nation. In a widely-recognized step forward, the NG CDP developed a more objective and systematic approach to the process of aligning threats with resources. Endorsed by Congress, the Office of the National Drug Control Policy (ONDCP), and the Departments of Defense, Homeland Security and Justice, the Threat Based Resource Model (TBRM) distributes NG CDP funds proportional to the threat for the purpose of achieving clear outcomes that support national security and counterdrug strategies.

Additionally, the NG CDP has charged forward with developing performance metrics. In 2010, the NG CDP formed a committee to develop performance metrics to capture results of NG CDP support to LEAs and community-based organizations (CBO) and have added some since. NG CDP performance metrics have been reported quarterly to the Office of the Deputy Assistant Secretary of Defense for Counternarcotics and Global Threats (DASD CN>) since FY11. As a pilot, the NG CDP developed an Analyst Performance Metrics Guide that outlines and defines performance measures for the Criminal Analyst program, which represents over half of our support efforts. This product is currently being used by other NG CDP program managers to develop guidance for their functional areas. The development of these products will define and improve clarity and reliability of our support activity results..

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The NG CDP continues to prove themselves to be a critical support entity through documented results, national recognition and countless letters of appreciation. These are just a few highlights of the NG CDP achievements.

- FY14 NG CTF efforts supported LEAs in 469 counternarcotics-related money laundering investigations with links to narco-terrorism, precursor chemical diversion, and drug trafficking. NG CTF Analysts contributed to the identification of over 713 suspects and 430 previously unknown money laundering methods, as well as the dismantlement of eight DTOs, disruption of 29 DTOs and seizure of over \$9 million worth of currency, narcotics, and property.
- The NG CDP supports all 32 High-Intensity Drug Trafficking Area (HIDTA) Intelligence Support Centers and hundreds of HIDTA-funded task forces with analysts, reconnaissance, transportation and training.
- FY14 Civil Operations efforts supported the World Health Organization in translation of 400 community anti-drug strategy products used by 230 countries.
- Eight NG CDP members were recognized at the HIDTA National Awards Banquet, one of which received an award for “Outstanding Investigative Effort” as part of a team that dismantled a DTO with ties to the La Familia Cartel that had been trafficking cocaine in Chester County, PA for 20 years.
- We’ve received numerous letters of appreciation detailing the immeasurable value the NG CDP brings to federal and local agencies, to include, ONDCP, the HIDTA Director’s Association, the Department of Homeland Security, the District Attorney for the County of New York and state and local LEAs.

The NG recognizes that current performance information may not fully articulate the value of our program or its effectiveness. The NG also recognizes that there are still opportunities for continued success as the NG CDP continues to improve mission alignment, resource allocation and evaluating performance information. The NG concurs with all of GAO’s recommendations and can report that it is taking significant steps toward addressing them. NG’s response to those recommendations is as follows:

Recommendation 1: The GAO recommends that the Department of Defense identify additional information needed to evaluate the performance of state programs and oversee counterdrug schools’ training.

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Response: NG concurs with this recommendation. Through discussion with Office of the DASD CN>, NGB leadership, our interagency partners and supported LEAs and CBOs, the NG CDP will reassess current and identify new performance criteria that will allow us to assess how well State CDPs and Training Centers are providing support to LEAs, CBOs and other support entities. NG-J32 will evaluate that criteria to ensure it is reflective of the current information needs of the program both internally and externally and meets national objectives.

Recommendation 2: The GAO recommends that the Department of Defense subsequently collect and use performance information to help inform funding distribution decisions to state programs and to conduct oversight of the training offered by the counterdrug schools.

Response: NG concurs with this recommendation. The NG-J32 Counterdrug Division will develop a systematic approach that applies the criteria identified in recommendation #1 to State CDP and Training Center activities. This will allow NG-J32 to evaluate how effectively each program is providing support and meeting objectives. Additionally, NG-J32 will put controls in place to assist states with any needed corrective action plans.

The National Guard appreciates the opportunity to comment on the draft report. Point of contact for this action is the undersigned at 703-601-2630 or email Charles.l.weaver4.mil@mail.mil.

Sincerely,

 COL, AV
Charles L. Weaver, Jr.
Colonel, U.S. Army
Chief, Counterdrug Division

Appendix VIII: GAO Contact and Staff Acknowledgments

GAO Contact

John H. Pendleton, (202) 512-3489 or pendletonj@gao.gov

Staff Acknowledgments

In addition to the contact named above, Rich Geiger (Assistant Director), Tom Jessor, Linda S. Keefer, Susan C. Langley, Amie Steele Lesser, Felicia M. Lopez, Tobin J. McMurdie, Carol D. Petersen, Richard Powelson, Caitlin N. Rice, Michael D. Silver, Sabrina C. Streagle, and Cheryl A. Weissman made key contributions to this report.

Related GAO Products

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Drug Control: Initial Review of the National Strategy and Drug Abuse Prevention and Treatment Programs. [GAO-12-744R](#). Washington D.C.: July 6, 2012.

Office of National Drug Control Policy: Agencies View the Budget Process as Useful for Identifying Priorities, but Challenges Exist. [GAO-11-261R](#). Washington D.C.: May 2, 2011.

Drug Control: DOD Needs to Improve Its Performance Measurement System to Better Manage and Oversee Its Counternarcotics Activities. [GAO-10-835](#). Washington D.C.: July 21, 2010.

Preliminary Observations on the Department of Defense's Counternarcotics Performance Measurement System. [GAO-10-594R](#). Washington D.C.: April 30, 2010.

Continuing Resolutions: Uncertainty Limited Management Options and Increased Workload in Selected Agencies. [GAO-09-879](#). Washington D.C.: September 24, 2009.

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