



United States Government Accountability Office
Washington, DC 20548

October 20, 2011

Congressional Requesters

Subject: *Review of U.S. Response to the Honduran Political Crisis of 2009*

On June 28, 2009, Honduran President Manuel Zelaya was detained by his country's military and flown to Costa Rica. Zelaya's removal from Honduras followed several months of political polarization within Honduras in response to a number of controversial actions taken by Zelaya, including efforts to hold a national poll on June 28, 2009. Zelaya's stated purpose for the poll was to ask Hondurans if there should be a referendum on whether the country should convoke a national constituent assembly to approve a new constitution. However, Honduran officials from other government institutions stated that they believed Zelaya would use the results of the poll to suspend the Honduran constitution. Immediately following the removal of Zelaya, the Honduran National Congress voted in Roberto Micheletti, President of the National Congress at the time, to replace Zelaya as President of Honduras.

U.S. policy toward Honduras in the months preceding Zelaya's removal was to support the rule of law and the Honduran constitution, and to encourage Honduras' political actors to resolve their differences consensually and within Honduran law. In response to Zelaya's removal, U.S. officials characterized the events of June 28, 2009, as a coup. On the day of Zelaya's removal, President Barack Obama and Secretary of State Hillary Clinton released statements calling on Hondurans to respect democratic norms and the constitutional order, and to resolve their political disputes peacefully and through dialogue. The U.S. Ambassador to Honduras characterized Zelaya's removal as a breakdown of the constitutional order and noted that President Obama would only recognize Zelaya as the legitimate president of Honduras. U.S. policy after Zelaya's removal was to assist Honduras in reaching a legal, constitutional, and negotiated resolution to the political crisis, which would include allowing for Zelaya's return to the Honduran presidency. As the crisis persisted, U.S. policy also sought to ensure that the already scheduled November 2009 presidential election would be conducted in such a way that the international community could accept the results and recognize the winner as the legitimate president of Honduras.

In response to your request, this report provides unclassified information we obtained to describe U.S. actions in response to President Zelaya's removal,

including efforts to help Honduras resolve the political crisis. We are issuing a separate classified report that provides further details on U.S. actions in response to the Honduran political crisis and describes U.S. actions in response to events leading up to President Zelaya's removal from office. To conduct this review, we obtained documents from the Department of State (State), Department of Defense (DOD), U.S. Agency for International Development (USAID), and Millennium Challenge Corporation (MCC). We interviewed officials from these agencies; Honduran officials in Zelaya's government, the Micheletti-led government, and the current government; and other influential Hondurans who played a role during the political crisis. For further information on our scope and methodology, see enclosure I.

We conducted this performance audit from October 2010 through October 2011 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Summary

In response to Zelaya's removal from office, the United States took diplomatic and economic measures against the Micheletti-led government and played an influential role in negotiations to resolve the crisis between Zelaya and Micheletti. These measures included instituting a no-contact policy with Micheletti-led government officials; terminating several U.S. security, economic, and development assistance programs in Honduras totaling almost \$36 million of \$51 million of fiscal year 2009 and prior year U.S. funds; and imposing diplomatic measures, including revoking U.S. visas for selected Hondurans. At the same time, U.S. officials encouraged Zelaya and the Micheletti-led government to enter into negotiations to resolve the crisis and return to what the administration considered to be constitutional order in Honduras. When negotiations stalled, senior administration officials traveled to Honduras to urge Zelaya and Micheletti to reach agreement. After an accord was signed in October 2009, U.S. officials encouraged its implementation so the international community could accept the legitimacy of the Honduran presidential election taking place in November 2009. The United States then recognized the results of the presidential election as generally free and fair. Following the elections, State continued to urge Honduran officials to implement the remaining provisions of the accord. In addition, State revoked visas held by selected Hondurans in January 2010 to push the Micheletti-led government to accelerate the accord's implementation. In March 2010, Secretary Clinton determined that U.S. conditions for resuming aid to Honduras had been met and allowed U.S. assistance programs to resume.

Background

Honduras has been led by a civilian government under its current constitution since 1982. The Honduran government is composed of an executive (led by the President), a unicameral legislature (the National Congress), and a judiciary. The President of Honduras serves a 4-year term and is constitutionally prohibited from re-election. Members of the National Assembly also serve a 4-year term, but may stand for re-election. The highest judicial authority in Honduras is the Supreme Court, which the National Assembly elects every 7 years.

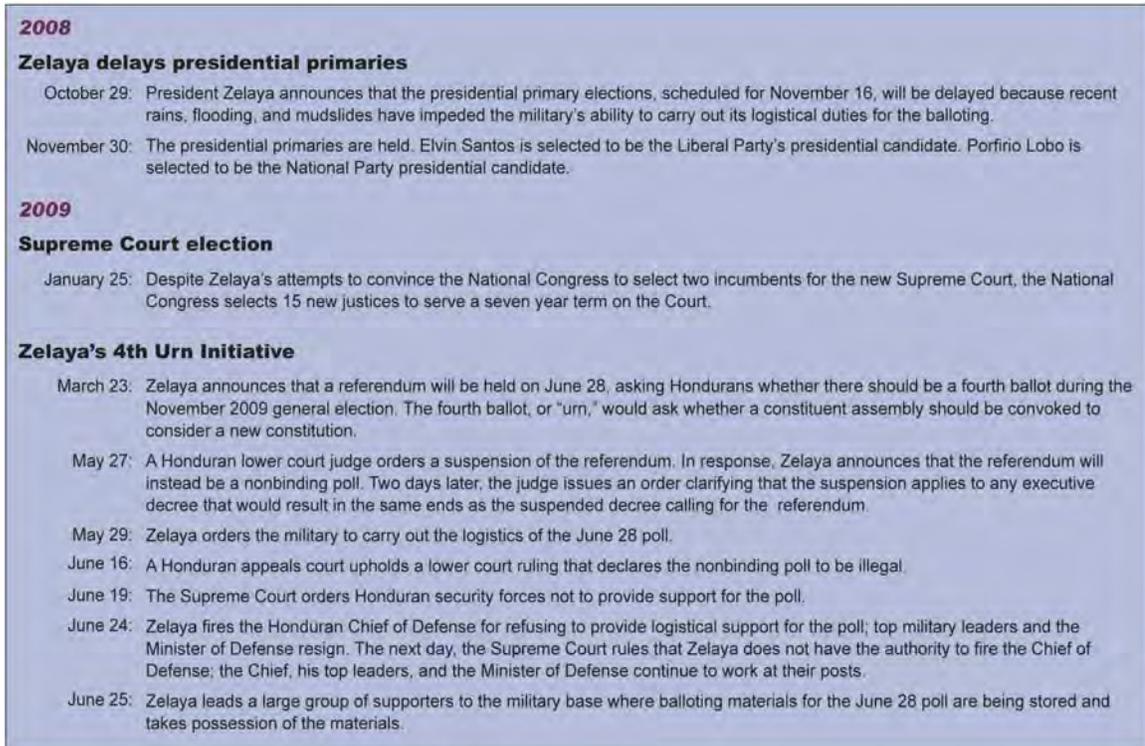
Broad U.S. policy goals in Honduras include a strengthened democracy with an effective justice system that protects human rights and promotes the rule of law, and the promotion of sustainable economic growth with a more open economy and improved living conditions. In addition to military and economic ties, the United States cooperates with Honduras on transnational issues such as immigration, crime, narcotics trafficking, trafficking in persons, and port security. For fiscal year 2010, the United States provided Honduras with approximately \$51 million in foreign assistance.

In November 2005, Manuel Zelaya of the Liberal Party was elected president of Honduras and inaugurated the following January.¹ The months leading up to his removal were a period of increasing political polarization within Honduras (see fig. 1). First, Zelaya proposed postponing the presidential primary elections scheduled for November 16, 2008, ostensibly due to the logistical challenges created by torrential rains and flooding. Second, in January 2009, Zelaya proposed that two sitting members of the Honduran Supreme Court be considered for the new court.² Both proposals were strongly opposed by the Honduran National Congress.

¹Honduras has two dominant political parties—the Liberal Party and the National Party. There are four additional parties that field presidential candidates—the Innovation and National Unity Party, the Christian Democratic Party, the Democratic Unification Party, and the Popular Bloc.

²Under the Honduran constitution, the National Congress elects the Supreme Court every 7 years. A nominating board reviews applications and submits a list of 45 candidates to the National Congress. In 2009, the board did not include any of the sitting justices of the Supreme Court on its nominating list. The National Congress had a deadline of January 25 to select the 15-member court.

Figure 1: Timeline of Key Events Leading up to Zelaya's Removal



Source: GAO analysis.

A third event was in March 2009 when Zelaya issued an executive decree instructing the executive branch of government to hold a referendum on June 28. Zelaya proposed that the referendum would ask Honduran voters whether there should be a subsequent referendum—a 4th Urn in the November 29, 2009, national election—on whether a constituent assembly should be convened to consider changes to the constitution.³ Zelaya subsequently rescinded the decree and issued a new decree, ordering a nonbinding poll to ask Hondurans whether they wanted the 4th Urn referendum on the November ballot. Honduran officials in the National Congress and the Supreme Court interpreted this initiative as Zelaya's attempt to suspend the Honduran constitution and remain in office beyond his 4-year term. These officials were particularly opposed to including the term "constituent assembly" in the wording of the poll's question.

The situation culminated with the Honduran military taking Zelaya into custody and removing him from Honduras on June 28, 2009 (see fig. 2). The Honduran Supreme Court asserted that an arrest warrant had been issued for Zelaya as a result of his noncompliance with judicial decisions that had declared the nonbinding poll unconstitutional. However, the military's actions halted the judicial process before a trial could be held. The Honduran National Congress quickly adopted a resolution to

³Honduran national elections have three ballots, or "urns": the first ballot is for the presidential election, the second is for the National Congress election, and the third is for local leaders. A referendum on whether to open a constituent assembly would have represented a fourth ballot during the November election, and therefore is referred to as a "4th Urn."

replace Zelaya with Roberto Micheletti, President of National Congress and a fellow Liberal Party member.

Figure 2: Timeline of Key Events Following Zelaya's Removal

<p>2009 (continued)</p> <p>Zelaya removed from office</p> <p>June 28: In the early morning, the Honduran military takes Zelaya into custody and flies him to Costa Rica. That afternoon, the National Assembly passes a resolution affirming Zelaya's removal and electing Roberto Micheletti as the new President of Honduras. Supreme Court officials later state that an arrest warrant had been signed and given to the military to execute.</p> <p>June 28: President Obama and Secretary Clinton issue public statements condemning the removal of Zelaya and call for the restoration of constitutional order and rule of law. The United States does not recognize the Micheletti-led government.</p> <p>July 1: The United Nations and Organization of American States (OAS) adopt resolutions condemning Zelaya's removal. Three days later, the OAS suspends Honduras' participation.</p> <p>Efforts to negotiate a resolution</p> <p>July 7: Secretary Clinton announces that Zelaya and Micheletti have agreed to negotiate a resolution to the crisis and that President Arias of Costa Rica will serve as mediator.</p> <p>July 9: The Arias-led negotiations commence.</p> <p>July 22: Arias proposes a 12-point plan, known as the San José Accord, for resolving the political crisis. Zelaya will later publicly agree to the plan but the Micheletti-led government will not.</p> <p>July 28: State announces that it has revoked the diplomatic visas of several members of the Micheletti-led government.</p> <p>August 25: State suspends nonimmigrant visa services at the U.S. Embassy in Tegucigalpa.</p> <p>September 3: State announces that it is terminating certain assistance programs to Honduras and revoking the visas of some Micheletti-led government members and supporters.</p> <p>September 21: President Zelaya surreptitiously enters Honduras and takes refuge at the Brazilian Embassy in Tegucigalpa.</p> <p>October 19: State revokes additional visas held by some members and supporters of the Micheletti-led government.</p> <p>October 28: Senior State and White House officials travel to Honduras to encourage Zelaya and Micheletti to resume negotiations for a resolution to the crisis.</p> <p>October 30: Zelaya and Micheletti sign the Tegucigalpa-San José Accord, which is designed to end the political crisis. Among its 12 provisions, the accord specifies that the National Congress shall vote on whether to restore Zelaya as President of Honduras.</p> <p>Presidential election</p> <p>November 25: Micheletti takes a leave of absence until December 2 to allow Hondurans to focus on the upcoming national elections.</p> <p>November 29: Porfirio Lobo is elected president of Honduras.</p> <p>December 2: The National Congress votes overwhelmingly against Zelaya's restitution to the presidency.</p> <p>2010</p> <p>Presidential inauguration</p> <p>January 18: State revokes additional visas held by some members and supporters of the Micheletti-led government.</p> <p>January 21: Micheletti takes a leave of absence to facilitate the recognition of the incoming administration by the international community.</p> <p>January 27: Porfirio Lobo is inaugurated President of Honduras. He signs an amnesty decree for Zelaya and those involved in his removal and escorts Zelaya from the Brazilian Embassy to the airport for a flight to the Dominican Republic.</p> <p>March 4: Secretary Clinton announces that the United States would resume assistance to Honduras.</p>
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Source: GAO analysis.

The Obama administration characterized the removal of Zelaya as a coup and called for Hondurans to respect democratic norms and the constitutional order. The administration also recognized Zelaya as the only legitimate president of Honduras and took actions against the Micheletti-led government. Similarly, the international community quickly condemned Zelaya's removal. On July 1, 2009, the United Nations General Assembly passed a resolution condemning Zelaya's removal, demanding his immediate restoration as President of Honduras, and calling on member states to recognize no other Honduran government. On July 1, the Organization of American States passed a similar resolution and suspended Honduras' participation on July 4. Most nations with diplomatic representation in Honduras recalled their ambassadors and refused contact with the Micheletti-led

government. However, the United States kept its ambassador in Honduras as part of its efforts to help find a resolution to the political crisis.

U.S. Actions in Response to Zelaya's Removal

In response to news of Zelaya's removal, the United States responded with diplomatic and economic measures and played an influential role in negotiations to resolve the crisis between Zelaya and Micheletti. According to State, the Ambassador exercised his Chief of Mission authority and instructed all Embassy officials to cease contact with their counterparts in the Honduran government on June 28, 2009. Officials at the U.S. Embassy in Tegucigalpa maintained the no-contact policy with the Micheletti-led government leadership until Porfirio Lobo, who had won the November 2009 presidential election, was inaugurated as the new President in January 2010. As a matter of policy, other U.S. agencies followed State's lead and ceased contact with counterparts in the Honduran government.

In addition, State and other U.S. agencies terminated almost \$36 million of \$51 million from fiscal year 2009 and prior year funds for assistance programs to Honduras⁴ (see table 1). U.S. agencies suspended certain U.S. assistance efforts to Honduras in July 2009 and then terminated them in September 2009 to influence the Micheletti-led government to negotiate in good-faith a resolution to the crisis. According to State officials, the Secretary of State made these decisions as a matter of policy. State officials asserted the need for strong measures in light of the administration's assessment that the Micheletti-led government was resisting adoption of the San José Accord⁵ and therefore failing to restore democratic, constitutional rule to Honduras. Consistent with State's policy, other U.S. agencies also suspended and then terminated their assistance programs. According to State officials, these programs had been funded from annual Department of State, Foreign Operations, and Related Programs appropriations acts.

⁴The terminated funds had not been expended.

⁵The San José Accord was a 12 point plan for reconciliation that President Arias of Costa Rica proposed in July 2009 during the course of negotiations between Zelaya and the Micheletti-led government.

Table 1: U.S. Assistance Programs to Honduras Terminated in September 2009

	Implementing agency	Program description	Terminated September 2009
Security assistance	State	Foreign Military Financing	\$6,521,000
	State	Military education and training	361,000
	State	Global Peace Operations Initiative	1,722,000
	DOD	Security programs	1,713,000
	Subtotal		\$10,317,000
	Economic and development assistance	State	CAFTA-DR Environment
USAID		Education	8,188,000
USAID		Private sector competitiveness	200,000
USAID		Environment	1,067,000
USAID		Family planning	3,645,000
Department of Labor		Strengthening labor inspectorates	273,000
Department of Labor		Labor law compliance	700,000
Department of Labor		Labor law compliance/agriculture	68,000
Department of Labor		Worker's rights centers	698,000
MCC		Transportation and rural development	10,000,000
Subtotal		\$25,203,000	
Total		\$35,520,000	

Source: State and MCC data.

Note: All figures estimated by State and include estimates for fiscal year 2009.

The criterion used to determine whether an assistance program would be suspended, and then terminated, was whether Section 7008, which appears in the Omnibus Appropriations Act of 2009 as well as prior year appropriation acts, would have applied, if the Department of State had determined that a *military* coup had occurred.⁶ The MCC Board of Directors terminated assistance after determining that the manner of Zelaya's removal and the failure to re-establish the democratic order in Honduras were contrary to the criteria used to determine eligibility for assistance.

⁶Although State officials referred to the events of June 28, 2009, as a coup, State did not make an official determination of whether a *military* coup had occurred. The Omnibus Appropriation Act of 2009 states: "None of the funds appropriated or otherwise made available" under headings in the Act, including bilateral economic assistance, and international security assistance "shall be obligated or expended to finance directly any assistance to the government of any country whose duly elected head of government is deposed by military coup or decree." (Pub.L. No.111-8, DIV. H, §7008, Mar. 11, 2009).

Foreign Military Financing, Department of Defense security programs, USAID projects to improve education, and MCC transportation projects were among the affected assistance programs. Assistance programs that did not directly benefit the government of Honduras were not suspended. Some programs funded under “notwithstanding authority,” which allows for funds to be provided despite other legal restrictions that may exist, also were not suspended. Other programs funded under “notwithstanding authority,” such as counter-narcotics assistance, were nevertheless suspended as part of the no-contact policy. According to State officials, State did not make a determination of whether the events of June 28, 2009, were a military coup because having already terminated the potentially-affected assistance programs as a matter of policy, the issue was moot.

To apply further diplomatic pressure to the Micheletti-led government to reach a resolution and communicate that the United States did not recognize it as the legitimate government of Honduras, State revoked visas of selected Hondurans on four different occasions during the political crisis. The first set of visa revocations, in July 2009, included diplomatic visas of Honduran officials who had received the visas because of their position in the Zelaya government but had chosen to serve in the Micheletti-led government. The subsequent visa revocations occurred in September 2009, October 2009, and January 2010. During these sets of visa revocations, the tourist and business visas of several members of the Micheletti-led government and its supporters were revoked. In addition, Embassy Tegucigalpa closed its Consular Section in August 2009 to Hondurans seeking visas for business or tourist travel to the United States. Honduran citizens and third country nationals residing in Honduras could continue to apply for such visas to the United States, but they had to do so through a U.S. embassy in another country.

U.S. officials also played an influential role in efforts to negotiate a resolution to the political crisis and implement the resulting agreement. During deliberations to find a negotiated solution to the political crisis, U.S. officials sought to encourage a return to what administration officials considered to be constitutional order in Honduras, including a mechanism for Zelaya’s return to the presidency. For example, U.S. officials took steps to support President Oscar Arias of Costa Rica and his efforts to facilitate negotiations between Zelaya and the Micheletti-led government in July and August 2009.

Similarly, when negotiations in Tegucigalpa stalled in October 2009, senior State and White House officials traveled to Honduras to urge Zelaya and Micheletti to reach an agreement. The Tegucigalpa-San José Accord was signed on October 30, 2009, and U.S. officials encouraged its implementation to ensure that the international community could accept the results of the presidential election. Among the accord’s provisions were that a unity government would be established, the national Congress would vote on whether Zelaya was to be restored to the presidency, and a verification commission would be created to ensure the accord’s implementation, and a truth commission would be formed. In November 2009, the United States recognized the results of the general presidential election as generally free and fair and called it an important step to resolving to the Honduran crisis. Following the elections, State continued to urge Hondurans officials to implement the

remaining provisions of the accord, including the vote on Zelaya's return to office to complete his term, the creation of a national unity government, and the formation of a truth commission.⁷ According to some Honduran officials, the United States pressured Micheletti to step down prior to Porfirio Lobo's January 2010 inauguration. Six days prior to the inauguration, Micheletti announced that he was taking a leave of absence, allowing greater recognition of the new administration by the international community.

On March 1, 2010, Secretary Clinton wrote to Congress certifying that a democratically elected government had taken office and that democratic constitutional governance had been restored to Honduras. These conditions, together with President Lobo's actions after taking office, such as establishing a unity government and signing an amnesty decree for political crimes committed during the crisis, met U.S. requirements for restoring terminated foreign assistance to Honduras. The Secretary publicly stated on March 4 that U.S. conditions for resuming aid to Honduras had been met, and that the United States would therefore resume its assistance.

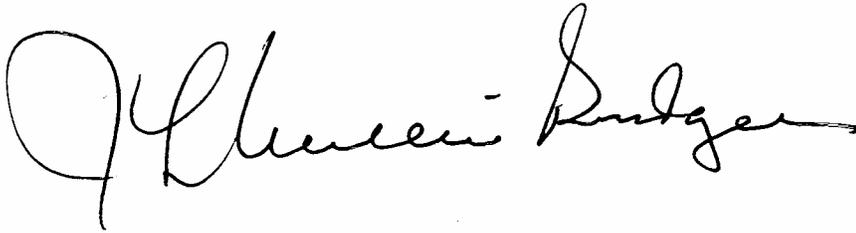
⁷On December 2, 2009, 111 of the 128 deputies in the Honduran National Congress voted against restoring Zelaya to the Honduran presidency.

Agency Comments

We provided the Department of State, U.S. Agency for International Development, Department of Defense, and the Millennium Challenge Corporation a draft of this report for their review and comment. The Department of State provided technical comments, which we have incorporated as appropriate.

As arranged with your offices, we plan no further distribution of this report until 30 days after the issue date. At that time, we will send copies of this report to appropriate congressional committees, the Secretary of State, Secretary of Defense, Administrator of USAID, and relevant agency heads. The report will also be 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) 512-3101 or williamsbridgersj@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 major contributions to this report are listed in enclosure II.



Jacquelyn L. Williams-Bridgers
Managing Director
International Affairs and Trade

Enclosures – 2

List of Requesters

The Honorable John Boehner
Speaker
House of Representatives

The Honorable Eric Cantor
Majority Leader
House of Representatives

The Honorable Ileana Ros-Lehtinen
Chairman
Committee on Foreign Affairs
House of Representatives

The Honorable Darrell Issa
Chairman
Committee on Oversight and Government Reform
House of Representatives

The Honorable Michele Bachmann
House of Representatives

The Honorable Brian Bilbray
House of Representatives

The Honorable Paul Broun
House of Representatives

The Honorable Dan Burton
House of Representatives

The Honorable Ken Calvert
House of Representatives

The Honorable Mario Diaz-Balart
House of Representatives

The Honorable Elton Gallegly
House of Representatives

The Honorable Doug Lamborn
House of Representatives

The Honorable Connie Mack
House of Representatives

The Honorable Donald Manzullo
House of Representatives

The Honorable Michael McCaul
House of Representatives

The Honorable Thaddeus McCotter
House of Representatives

The Honorable Howard P. "Buck" McKeon
House of Representatives

The Honorable Mike Pence
House of Representatives

The Honorable Ted Poe
House of Representatives

The Honorable Dana Rohrabacher
House of Representatives

The Honorable Peter Roskam
House of Representatives

The Honorable Jean Schmidt
House of Representatives

The Honorable Aaron Schock
House of Representatives

Enclosure I: Scope and Methodology

This report describes the U.S. response to events surrounding the Honduran political crisis that culminated with the arrest and removal from office of Honduran President Manuel Zelaya. It covers a time frame of November 2008 through March 2010. To describe U.S. actions in response to Zelaya's removal, including efforts to help Honduras resolve the crisis, we reviewed relevant documentation and interviewed cognizant officials from the Department of State (State), the Department of Defense (DOD), the U.S. Agency for International Development (USAID), and the Millennium Challenge Corporation (MCC). We also obtained publicly available documents from the Organization of American States, the United Nations, and la Comisión de la Verdad y la Reconciliación (the Honduran Truth and Reconciliation Commission) established under the Tegucigalpa-San José Accord. We are issuing a separate classified report that provides further details on U.S. actions in response to the Honduran political crisis, and describes U.S. actions in response to events leading up to President Zelaya's removal from office.

- We reviewed more than 240 State official cables describing U.S. diplomatic efforts related to the 2008 Honduran presidential primary, the Supreme Court election, President Zelaya's 4th Urn initiative, and efforts to resolve the political crisis that ensued after Zelaya's removal up to the inauguration of President Porfirio Lobo. State officials provided the cables based on our request for cable traffic from January 2009 through January 2010 that discussed the U.S. response to events in Honduras during this time period. State officials identified cables that were relevant to our reporting objectives and time frames and were transmitted among Embassy Tegucigalpa officials; State management; and senior leadership in Washington, D.C., the U.S. Mission to the United Nations, and the U.S. Mission to the Organization for American States. State officials redacted information in the cables that they determined to describe internal State deliberations or relate to matters that were irrelevant to the scope of this review. Because we do not have access to State's cabling system, we were not able to independently verify that the set of cables we obtained included all State cables that were relevant to our reporting objectives and timeframes. However, to the extent possible, we corroborated information in the cables that we received with the accounts of U.S. and Honduran officials that we interviewed who had first-hand knowledge of the events that occurred and U.S. actions taken during our reporting timeframe. In the few instances where contradictory information was provided, we have noted this. Many of the cables that State provided were classified. Our analysis of the information in these cables is presented in our classified report. This report includes information from cables that were unclassified. State also provided unclassified data on the amount of assistance terminated as a response to the removal of Zelaya.
- We reviewed documents from the DOD, USAID, and MCC. We reviewed DOD guidance that U.S. Southern Command sent to U.S. forces stationed in Honduras after Zelaya's removal. We also reviewed documents that showed communication between DOD officials concerning key U.S. policy decisions.

We reviewed USAID and MCC documentation that outlined both agencies actions in response to the removal of Zelaya, such as, agency guidance on termination of assistance.

- We interviewed officials from State, DOD, USAID, and MCC in Washington, D.C. and Honduras. Among the U.S. officials we interviewed were individuals who held the following positions at some point between November 2008 through January 2010: the U.S. Ambassador to Honduras, the Assistant Secretary for Western Hemisphere Affairs, the Principal Deputy Assistant Secretary for Western Hemisphere Affairs, the Deputy Commander for the Military Assistance Group in Honduras, the USAID Mission Director for Honduras, the Country Director for MCC Honduras, and other key Embassy Tegucigalpa officials. In addition, we interviewed Honduran officials directly involved in the key political events that transpired from November 2008 through January 2010. These include high level officials from the Zelaya government, the Micheletti-led government, and the current Honduran government; negotiators who represented Zelaya and the Micheletti-led government during the San José and the Tegucigalpa negotiations; the Honduran Supreme Court; and the Honduran Chief of Defense. We also interviewed officials from the Organization of American States.
- To obtain information on State's revocation of visas held by Micheletti-led government officials and supporters, we reviewed State documents and interviewed officials in the Bureau of Consular Affairs. These officials provided us with information on the number and types of visas that were revoked. Due to laws that prohibit State from sharing documentation on individual visa applications (except under certain circumstances), we were unable to independently verify the reliability of these data. Nevertheless, we interviewed some Honduran officials who asserted that their visas had been revoked. We are not presenting the number of visas revoked in this report due to the sensitive nature of that information.
- We did not attempt to analyze or interpret Honduran laws. All statements in this report concerning Honduran law, including its constitution, are based on other sources.
- We traveled to Tegucigalpa, Honduras in April 2011 to meet with the U.S. officials at Embassy Tegucigalpa and with Honduran officials previously mentioned.

We conducted this performance audit from October 2010 through October 2011 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Enclosure II: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Michael Courts, Assistant Director; Ashley Alley; Lynn Cothorn; Etana Finkler; Jess Ford; Valérie Nowak; Marisela Perez; Jena Y. Sinkfield; Ellery Scott; and Adam Vogt made key contributions to this report.

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