



February 2024

# INTERNATIONAL MILITARY STUDENTS

DOD and State  
Should Assess Vetting  
Implementation and  
Strengthen  
Information Sharing

## Why GAO Did This Study

DOD provides education and training to foreign military personnel at DOD sites. On December 6, 2019, an international military student killed three U.S. service members and injured eight others while attending training at Naval Air Station Pensacola, Florida. The attack raised questions about personnel safety at DOD sites hosting students for training.

The William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 includes a provision for GAO to review DOD's implementation of security vetting for international military students and accompanying family members. GAO's report assesses the extent to which (1) DOD has developed vetting procedures for international military students and addressed any implementation challenges; and (2) State and DOD have shared information related to students' training at DOD sites in the U.S.

GAO reviewed documentation; analyzed vetting result data for October 1, 2019, through March 31, 2023; and interviewed DOD and State officials and stakeholders from six unified combatant commands and three U.S. embassies.

## What GAO Recommends

GAO is making four recommendations, including for DOD to assess vetting implementation and take action to mitigate any factors affecting implementation as identified in its assessment, and for DOD and State to clarify roles and responsibilities for sharing information. DOD and State generally concurred with the recommendations.

View [GAO-24-106421](#). For more information, contact Diana Maurer at (202) 512-9627 or [MaurerD@gao.gov](mailto:MaurerD@gao.gov) or Chelsa Kenney at (202) 512-2964 or [KenneyC@gao.gov](mailto:KenneyC@gao.gov).

# INTERNATIONAL MILITARY STUDENTS

## DOD and State Should Assess Vetting Implementation and Strengthen Information Sharing

### What GAO Found

Starting in fiscal year 2020, DOD developed and phased in procedures to vet international military students attending training at Department of Defense (DOD) installations and facilities in the U.S. With few exceptions, DOD vets these students prior to travel to the U.S. for training and periodically during the students' stay. According to training management system data, from October 1, 2019, through March 31, 2023, DOD vetted over 29,000 cases, including students and any accompanying family members. DOD identified findings in 103 cases: four were classified as "high" risk, 18 were "moderate", and 81 were "low." DOD denied access to nine students for various security-related reasons.

**International Military Student Cases by Risk Level and Adjudication Result for October 1, 2019, through March 31, 2023**

Risk level	Cases	Approved for training	Denied	Pending	Adjudication not performed <sup>a</sup>
High risk	4	0	4	0	0
Moderate risk	18	7	3	4	4
Low risk	81	47	2	14	18
No findings	29,202	29,202	0	0	0
<b>Total</b>	<b>29,305</b>	<b>29,256</b>	<b>9</b>	<b>18</b>	<b>22</b>

Source: GAO analysis of data from the Defense Security Cooperation Agency. | [GAO-24-106421](#)

Note: Vetting of international military students began with basic screening in December 2019 and DOD continued to phase in initial security vetting through March 2022.

<sup>a</sup>Department of Defense (DOD) officials stated they did not adjudicate 22 of the moderate and low risk cases for reasons such as training cancellation or the student completed training during the establishment of vetting procedures and has since departed the U.S.

DOD has taken some steps to improve implementation of vetting procedures for international military students. However, DOD has not assessed implementation to identify opportunities for improvement. For example, stakeholders told GAO of factors in vetting implementation that could be improved, such as limitations with in-country data collection and a time-consuming process for sharing information between stakeholders. DOD circulated a draft progress report on program metrics, such as the number of students who underwent vetting for fiscal year 2022. However, DOD has not finalized the report, and it is unclear if it will include an assessment of any opportunities for improvement in the vetting procedures. Without an assessment, DOD will not have a full understanding of factors that hinder vetting implementation. DOD also cannot determine whether or how it should take action to improve vetting implementation.

The Department of State and DOD share information to support international military student vetting in a variety of ways, such as sharing database access and confirming vetting. However, State and DOD have not ensured that roles and responsibilities are fully clarified in guidance or written agreements. If DOD and State take actions to clarify roles and responsibilities for sharing information on issues related to international military students, the agencies can better coordinate on program management, including communicating relevant policy updates and sharing additional data and analysis regarding vetting.

---

# Contents

---

---

Letter		1
	Background	5
	DOD Developed Procedures to Vet International Military Students, but Has Not Assessed Implementation of the Procedures	10
	State and DOD Share Certain IMS Information, but Gaps Remain	23
	Conclusions	28
	Recommendations for Executive Action	29
	Agency Comments and Our Evaluation	30
Appendix I	Objectives, Scope, and Methodology	34
Appendix II	Comments from the Department of Defense	38
Appendix III	Comments from the Department of State	40
Appendix IV	GAO Contacts and Staff Acknowledgments	42
Tables		
	Table 1: International Military Student (IMS) Cases by Risk Level from October 1, 2019, through March 31, 2023	16
	Table 2: International Military Student (IMS) Cases by Risk Level and Adjudication Result, for October 1, 2019, through March 31, 2023	17
	Table 3: International Military Student (IMS) Post-Entry, Periodic Review Cases by Risk Level and Adjudication Result, for October 1, 2019, through March 31, 2023	18
Figures		
	Figure 1: International Military Students Training at Department of Defense Sites in the U.S., by Program Type, October 1, 2019, through March 31, 2023	7
	Figure 2: International Military Students (IMS) Training at Department of Defense Sites in the U.S., by Military	

---

---

Department Sponsor, October 1, 2019, through March 31, 2023	8
Figure 3: International Military Students (IMS) Training at Department of Defense Sites in the U.S., by Training Duration, October 1, 2019, through March 31, 2023	8
Figure 4: Timeline for Establishment of Vetting Protocols for International Military Students	12

---

### Abbreviations

AWOL	Absent Without Leave
DOD	Department of Defense
DRL	State Bureau of Democracy, Human Rights, and Labor
IMS	International Military Students
SCO	Security Cooperation Organizations
screening center	Expedited Screening Center

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



February 29, 2024

### Congressional Committees

The Department of Defense (DOD) provides education and training to international military students (IMS) at sites such as DOD installations and facilities and DOD contractor facilities. IMS and accompanying family members attend these programs as part of U.S. security assistance or security cooperation efforts.<sup>1</sup> On December 6, 2019, a Saudi Arabian IMS who was attending DOD-provided training at Naval Air Station Pensacola, Florida, killed three U.S. service members and injured eight others. This attack raised questions about the safety and security of personnel assigned to DOD installations and U.S. facilities hosting such training.

The Department of State is responsible for adjudicating nonimmigrant visas, which are issued to foreign nationals—such as IMS—seeking temporary admission into the U.S. Prior to the December 2019 attack, DOD was overly reliant on State’s processes to determine IMS eligibility to travel to the U.S. for training, according to March 2020 testimony by DOD officials.<sup>2</sup>

Section 1090 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (hereafter section 1090) includes a provision for DOD to establish vetting procedures and monitoring requirements for certain IMS and accompanying family members seeking

---

<sup>1</sup>An international military student (IMS) is a national of a foreign government, with military or civilian status of that government, who is receiving education or training or is touring U.S. government activities under the sponsorship of the security assistance training program. Defense Security Cooperation Agency (DSCA) Manual 5105.38-M, *Electronic Security Assistance Management Manual* (as of December 2023). Accompanying family members are any family members authorized to accompany those students to the U.S. during such training.

<sup>2</sup>*Hearing to Receive Testimony on the Department of Defense Review of Vetting Policies for International Military Students Following the Attack on Naval Air Station Pensacola*, 116<sup>th</sup> Cong. 11-12 (2020) (statement of Garry Reid, Director for Defense Intelligence, Counterintelligence, Law Enforcement, and Security, Office of the Under Secretary of Defense for Intelligence and Security).

---

access to DOD installations and facilities in the U.S. to attend military education and training programs.<sup>3</sup>

The act also includes a provision for us to report on the safety and security of U.S. personnel and IMS assigned to U.S. military installations and DOD facilities (hereafter referred to as DOD sites) participating in international military education and training programs.<sup>4</sup> In this report, we examine the extent to which (1) DOD has developed vetting procedures for IMS and addressed any implementation challenges; and (2) State and DOD have shared information related to IMS training at DOD sites in the U.S.

Both of our objectives focus on IMS attending military education and training programs at DOD sites in the U.S. from October 1, 2019, through March 31, 2023.<sup>5</sup> We included individuals attending military education and training programs funded through U.S. security assistance or security cooperation programs, such as the International Military Education and Training program, as well as IMS who attend training that is partner-

---

<sup>3</sup>Pub. L. No. 116-283, § 1090(a), (c) (2021). Specifically, the statute stated that the vetting procedures would apply to any foreign national who is seeking physical access to a DOD installation or facility within the U.S. and is either (a) selected, nominated, or accepted for training or education for a period of more than 14 days occurring on a DOD installation or facility in the U.S. or (b) an immediate family member accompanying any foreign national who has been selected, nominated, or accepted for such training or education. Under the statute, an immediate family member, with respect to any individual, means the individual's parent, stepparent, spouse, sibling, step-sibling, half-sibling, child, or stepchild. The statute stated the procedures would not apply for foreign nationals of Australia, Canada, New Zealand, and the United Kingdom who have been granted a security clearance that is reciprocally accepted by the U.S. for access to classified information. Pub. L. No. 116-283, § 1090(e)(2) (2021). During final processing of this report, section 1046 of the National Defense Authorization Act for Fiscal Year 2024, Pub. L. No. 118-31 (2023), amended section 1090, authorizing waivers in certain circumstances and changing "physical access" to "*unescorted* physical access," among other changes. For purposes of this report, we refer to the version of section 1090 that was in effect from enactment on January 1, 2021 through March 31, 2023, the end of our review period of IMS attending military education and training programs at DOD sites in the U.S.

<sup>4</sup>Pub. L. No. 116-283, § 1090(d)(2) (2021).

<sup>5</sup>In this report, we use section 1090's definition of the U.S., meaning the several states, the District of Columbia, the commonwealth of Puerto Rico, and Guam. Pub. L. No. 116-283, § 1090(e)(3) (2021).

---

nation funded, such as training provided in conjunction with the Foreign Military Sales program.<sup>6</sup>

To address our objectives, we reviewed DOD and State policies, guidance, and other publications for vetting requirements that apply to IMS, including guidance for State's visa screening<sup>7</sup> and Leahy (i.e., human rights) vetting.<sup>8</sup> We obtained data from DOD's Security Cooperation-Training Management System on IMS demographics and vetting results. We analyzed these data to determine patterns in reported vetting outcomes, such as number of alerts found and adjudication results. We assessed the reliability of these data by reviewing the data for obvious errors in accuracy and completeness. We also met with agency officials who report, maintain, and use the data to understand how the information is used and to help us assess its reliability and completeness. Overall, we determined the data were sufficiently reliable for the purposes of identifying general patterns in vetting results.<sup>9</sup> We also obtained data from State's Consular Consolidated Database and International Vetting

---

<sup>6</sup>Authorized by the Foreign Assistance Act, International Military Education and Training, or IMET, is a U.S. security assistance program that provides training to selected foreign military and defense associated civilian personnel on a grant basis. See 22 U.S.C. § 2347 et seq. Foreign Military Sales, or FMS, is a process, authorized by the Arms Export Control Act, through which eligible foreign governments and international organizations may purchase defense articles, services, and training from the U.S. government. See 22 U.S.C. §§ 2761-2762.

<sup>7</sup>For the purposes of this report, "visa screening" refers to State's adjudication of nonimmigrant visas, which are visas issued to foreign nationals seeking temporary admission into the U.S. under a specific nonimmigrant category (8 U.S.C. § 1101(a)(15); 8 C.F.R. § 214.1(a)(1)-(2)), for an authorized period of stay delineated by a particular time frame, or duration of status (i.e., admission for the time span of a specific program or activity, which may be variable). Immigrant visas, which are not addressed in this report, are issued to eligible foreign nationals who do not fall within one of the classes of nonimmigrants and are seeking lawful permanent resident status in the U.S. with a path to citizenship. See 8 U.S.C. § 1101(a)(16).

<sup>8</sup>For the purposes of this report, we use the term "vetting" to include both screening and vetting processes used by DOD and State for IMS, unless we are referring to a specific type, such as State's visa screening processes. Screening involves reviewing information for matches to derogatory information in relevant databases. Vetting involves researching and investigating screened individuals with possible matches in those databases or based on other criteria. For more specific information about State's visa screening and vetting processes, see GAO, *Nonimmigrant Visas: Outcomes of Applications and Changes in Response to 2017 Executive Actions*, [GAO-18-608](#) (Washington, D.C.: Aug. 7, 2018) and GAO, *Security Assistance: U.S. Government Should Strengthen End-Use Monitoring and Human Rights Vetting for Egypt*, [GAO-16-435](#) (Washington, D.C.: Apr. 12, 2016).

<sup>9</sup>For the purposes of this report, we use the term "patterns" to refer to the number and characteristics of vetting results for the period covered by our review.

---

and Security Tracking-cloud system and assessed State and DOD's ability to share data related to international military students.

In addition, we assessed DOD's efforts to identify and address implementation challenges against relevant DOD guidance, program evaluation guidance, federal internal control standards, and provisions in section 1090.<sup>10</sup> We assessed the extent to which State and DOD coordinate their efforts related to IMS against relevant State and DOD guidance, selected leading practices for interagency collaboration from our prior work, and federal internal control standards.<sup>11</sup> We interviewed DOD and State officials responsible for vetting implementation and oversight, including officials from the Defense Security Cooperation Agency, Defense Counterintelligence and Security Agency, and the military departments. We also interviewed officials from three U.S. embassies that adjudicate visas for large numbers of IMS and were geographically dispersed (Colombia, Italy, and Saudi Arabia), and training managers who oversee IMS program management from six unified combatant commands with geographic areas of responsibilities.<sup>12</sup> Our observations from the three embassies are illustrative and provide

---

<sup>10</sup>Secretary of Defense Memorandum, *Implementation of Section 1090 of the National Defense Authorization Act for Fiscal Year 2021* (Nov. 18, 2021); Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021); Director, DSCA Memorandum, *International Military Students (IMS) Security Vetting Requirements Update, DSCA Policy 21-60 [SAMM E-Change 541]* (Oct. 15, 2021); GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: March 2021). These key practices updated an earlier version in fiscal year 2011. See [GAO-11-646SP](#); GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>11</sup>U.S. Department of State, Foreign Affairs Manual, 9 FAM 402.3 *Officials and Employees of Foreign Governments and International Organizations—A, C-2, C-3, G, NATO Visas, and Diplomatic Type and Official Type Visas* (Sept. 8, 2022); State, *2017 Leahy Vetting Guide: A Guide to Implementation and Best Practices* (2017); GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023); GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014). We selected leading collaboration practices of clarifying roles and responsibilities, leveraging resources and information, and developing and updating written guidance and agreements since they were most relevant to our assessment on collaboration around information sharing.

<sup>12</sup>We interviewed or received written responses from the combatant command training managers for U.S. Africa Command, Central Command, European Command, Indo-Pacific Command, Northern Command and Southern Command.



---

insights about the adjudication of visas for IMS, but are not generalizable to all posts. Appendix I provides details on our scope and methodology.

We conducted this performance audit from November 2022 to February 2024 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

---

### International Military Students

An IMS is a foreign national, with military or civilian status of their foreign government, who is receiving education or training or is touring U.S. government activities under the sponsorship of the security assistance training program.<sup>13</sup> DOD provides education and training to IMS through formal or informal periods of instruction in a classroom or field training environment, or via correspondence or other forms of distance learning and computer-aided instruction taught in the U.S. or overseas. For example, IMS can attend DOD training courses on disaster response, flying aircraft, and explosive ordnance disposal.

Nearly 38,000 IMS representing 177 countries participated in training courses hosted on DOD sites in the U.S. from October 1, 2019, through March 31, 2023, according to training management data from the Defense Security Cooperation Agency's Security Cooperation-Training Management System.<sup>14</sup> Eight countries had over 1,000 IMS participate in training courses at DOD sites in the U.S.: Colombia, Saudi Arabia, Canada, Jordan, United Kingdom, United Arab Emirates; Singapore; and

---

<sup>13</sup>DSCA Manual 5105.38-M, *Electronic Security Assistance Management Manual* (as of December 2023). An IMS could also hold dual U.S. citizenship with another country.

<sup>14</sup>Under the data, the same individual may have represented their country as an IMS more than once during this period. That is, the IMS may have entered the U.S. more than one time to participate in a training course or unique set of training courses. In addition, these data are DOD training management data, not admissions data from the Department of Homeland Security. A visa holder must present himself or herself for inspection at a U.S. port of entry by an officer with DHS's U.S. Customs and Border Protection to determine admissibility. See 8 U.S.C. §§ 1185 (U.S. travel controls), 1225 (immigration inspections of applicants for admission); 19 U.S.C. §§ 1461, 1467 (customs inspections of persons, merchandise and baggage)."

---

Italy. Together, these countries accounted for nearly 32 percent of total IMS during this period (12,079 of 37,802).

Eligible foreign governments or international organizations obtain training for IMS in three ways:

- participating in security cooperation programs authorized in title 10 of the U.S. Code and funded through DOD appropriations, such as the Regional Defense Fellowship Program or other Building Partner Capacity programs;<sup>15</sup>
- participating in security assistance programs authorized in title 22 of the U.S. Code and funded through State appropriations, such as the International Military Education and Training program, Foreign Military Financing, and Peacekeeping Operations;<sup>16</sup> and
- purchasing training with their national funds through the Foreign Military Sales program.<sup>17</sup>

Over two-thirds (68 percent) of IMS participated in training associated with Foreign Military Sales programs from October 1, 2019, through March 31, 2023. International Military Education Training programs accounted for an additional 19 percent of IMS training during this period, while three other security cooperation and security assistance programs—Regional Centers for Security Studies, Regional Defense

---

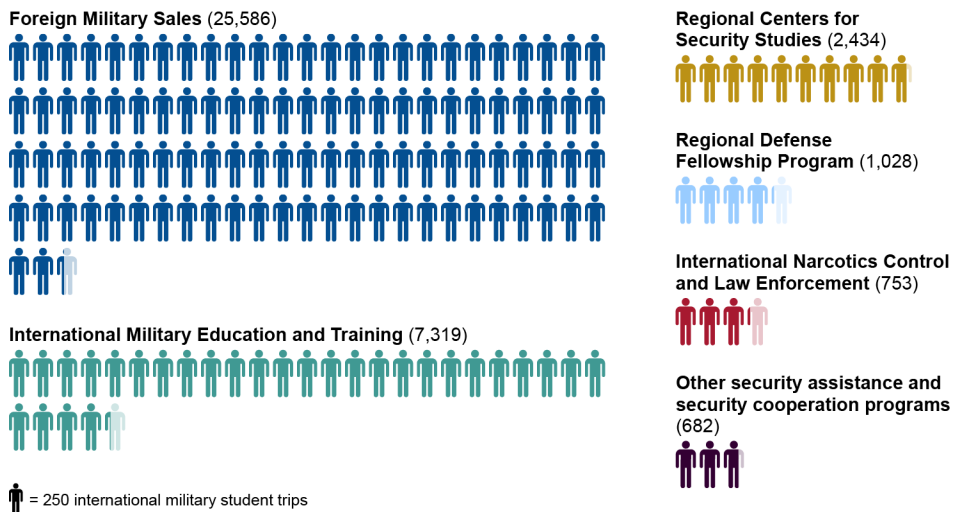
<sup>15</sup>The Regional Defense Fellowship Program was established to provide for the education and training of certain foreign personnel at military or civilian educational institutions, the Irregular Warfare Center, regional centers, conferences, seminars, or other training programs conducted for purposes of regional defense in connection with irregular warfare or combating terrorism. 10 U.S.C. § 345. Other security cooperation programs are authorized in 10 U.S.C. § 301 et seq.

<sup>16</sup>The International Military Education and Training Program provides military education and training to military and related civilian personnel of foreign countries through (1) attendance at military educational and training facilities in the U.S. (other than service academies) and abroad; (2) attendance in special courses of instruction at schools and institutions of learning or research in the U.S. and abroad; and (3) observation and orientation visits to military facilities and related activities in the U.S. and abroad. 22 U.S.C. § 2347. Under the Foreign Military Financing program, the U.S. government may finance the procurement of defense services by friendly foreign countries, subject to certain conditions. 22 U.S.C. § 2763. Under the Peacekeeping Operations program, friendly countries and international organizations receive U.S. assistance for peacekeeping operations and other programs carried out in furtherance of the national security interests of the U.S., 22 U.S.C. § 2348.

<sup>17</sup>Under the Foreign Military Sales program, the U.S. government sells defense articles and defense services to eligible countries or international organizations, subject to certain conditions. See 22 U.S.C. § 2761 et seq.

Fellowship Program, and International Narcotics Control and Law Enforcement—accounted for an additional 11 percent of IMS training.<sup>18</sup> Several other security assistance and security cooperation programs account for the remaining 2 percent. For more details, see figure 2.

**Figure 1: International Military Students Training at Department of Defense Sites in the U.S., by Program Type, October 1, 2019, through March 31, 2023**



Source: GAO analysis of Defense Security Cooperation Agency data. | GAO-24-106421

Note: Foreign Military Sales data includes Foreign Military Financing acquisitions. Foreign Military Financing supports the acquisition of U.S. defense articles, services, and training by friendly foreign countries through grants. The Defense Security Cooperation Agency's Security Cooperation-Training Management System groups these programs under Foreign Military Sales.

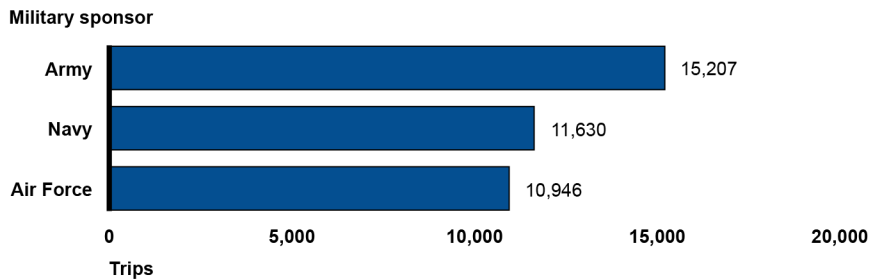
The Departments of the Army, Navy, and Air Force sponsor IMS to attend training at DOD sites.<sup>19</sup> The Army sponsored the most IMS for training (40 percent), followed by the Navy (31 percent) and the Air Force

<sup>18</sup>DOD Regional Centers for Security Studies, authorized under title 10 of the U.S. Code, are forums for bilateral and multilateral research, communication, and exchange of ideas involving military and civilian participants. 10 U.S.C. § 342. The Regional Defense Fellowship Program, also authorized under title 10, is designed to address key challenges in irregular warfare globally, regionally, and in specific countries through tailored education and training programs. 10 U.S.C. § 345. International Narcotics Control and Law Enforcement are counterdrug programs, authorized in the Foreign Assistance Act and managed by Department of State, that can have materiel, services, and training support provided and managed by DOD using security cooperation assets and procedures. 22 U.S.C. § 2291 et seq.

<sup>19</sup>Under certain circumstances, the U.S. Coast Guard can also sponsor IMS.

(29 percent), from October 1, 2019, through March 31, 2023. For more details, see figure 3.

**Figure 2: International Military Students (IMS) Training at Department of Defense Sites in the U.S., by Military Department Sponsor, October 1, 2019, through March 31, 2023**

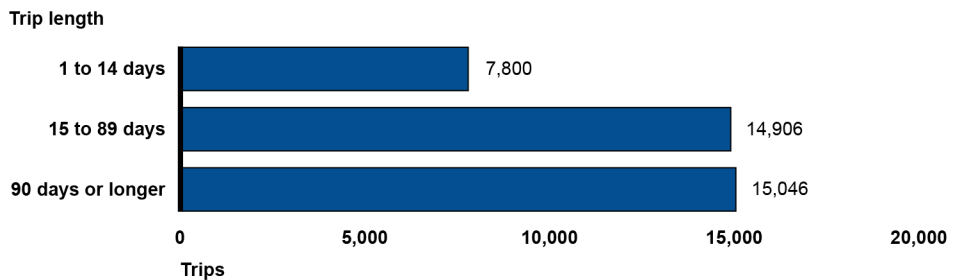


Source: GAO analysis of Defense Security Cooperation Agency data. | GAO-24-106421

Note: An additional 19 of the 37,802 IMS attended training under sponsorship from the U.S. Coast Guard during this period.

International military training can last from less than 2 weeks to a year or more. Forty percent of IMS training lasted longer than 90 days. IMS training for more than 2 weeks, but less than 90 days comprised 39 percent of all training, with the remaining 21 percent of training lasting 2 weeks or less. For more details, see figure 4.

**Figure 3: International Military Students (IMS) Training at Department of Defense Sites in the U.S., by Training Duration, October 1, 2019, through March 31, 2023**



Source: GAO analysis of Defense Security Cooperation Agency data. | GAO-24-106421

Note: An additional 50 IMS we identified as attending training during this period did not have a start date logged into the Defense Security Cooperation Agency's Security Cooperation-Training Management System.

## State Role in Vetting IMS

IMS who are invited to participate in DOD training are generally subject to State vetting prior to obtaining a U.S. visa and DOD invitational travel

---

orders.<sup>20</sup> State vetting may include consular visa screening and “Leahy vetting,” the process to determine whether potential assistance recipients have committed gross violations of human rights that would make them ineligible for assistance.

- **Visa screening.** IMS (and their accompanying family members) generally seek A-2 nonimmigrant visas, which are granted to foreign government officials travelling to the U.S. to engage solely in official activities on behalf of their national government.<sup>21</sup> However, there are exceptions; for example, IMS who travel to the U.S. for training on NATO orders do not require an A-2 visa for entry.<sup>22</sup> State’s consular officers stationed at overseas posts adjudicate visa applications for IMS. According to State officials, consular officers are to incorporate biographic and biometric security checks (i.e., State may collect facial recognition data) as part of the adjudication process.<sup>23</sup> A-2 visas are different from other nonimmigrant visas in that applicants generally do not pay an application fee and interviews may not be required.<sup>24</sup> While consular officers may call an A-2 Visa applicant in for an interview, this requirement is often waived.
- **Leahy vetting.** Two statutes, commonly known as Leahy laws, prohibit assistance to units of foreign security forces if the secretaries of State or Defense have credible information that the unit has

---

<sup>20</sup>The Security Cooperation-Training Management System generates the Invitational Travel Order that is the written authorization issued by DOD for international military students to travel to, from, and between U.S. DOD sites for the purpose of training under an approved and funded program. For the purposes of this report, we will refer to these system-generated Invitational Travel Orders, as “travel orders.”

<sup>21</sup>8 U.S.C. § 1101(a)(15)(A)(ii); 22 C.F.R. § 41.22.

<sup>22</sup>Diplomats and other foreign government officials traveling to the U.S. to engage solely in official duties or activities on behalf of their national government must obtain A-1 or A-2 visas prior to entering the U.S. However, some IMS do not receive A-2 visas. For example, IMS may travel to the U.S. for training on NATO orders or Status of Forces Agreement and do not require an A-2 visa for entry. 22 C.F.R. § 41.1. A student that is a U.S. citizen (or holds dual U.S. citizenship with another country) also does not require an A-2 visa.

<sup>23</sup>We have previously reported on State’s visa screening process. See [GAO-18-608](#).

<sup>24</sup>See 22 C.F.R. § 41.102(b) for the nonimmigrant visa categories for which consular officers may waive the personal appearance requirement. See 22 C.F.R. § 41.107(c)(1) for the nonimmigrant visa categories for which, on the basis of reciprocity, visa fees are not collected.

---

committed gross violations of human rights.<sup>25</sup> State and DOD have developed a process for vetting recipients of security assistance to ensure compliance with these laws. This vetting applies to any assistance for units of foreign security forces, including IMS, funded by DOD or furnished under the Foreign Assistance Act or Arms Export Control Act. Leahy vetting is not required for an IMS whose training is funded with partner nation funds (e.g., Foreign Military Sales training), or if the student is a U.S. citizen (or holds dual U.S. citizenship with another country).

---

## DOD Developed Procedures to Vet International Military Students, but Has Not Assessed Implementation of the Procedures

Starting in fiscal year 2020, DOD developed and began to implement procedures to vet IMS and accompanying family members planning to attend training at DOD sites in the U.S. Under the procedures, DOD and the military departments (Departments of the Army, Navy, and Air Force) have vetted tens of thousands of IMS and family members. However, neither the DOD nor the military departments have fully assessed the implementation of the procedures to identify opportunities for improvement. In particular, stakeholders responsible for implementing IMS vetting procedures, including the Defense Security Cooperation Agency, Defense Counterintelligence and Security Agency, military departments, training managers, and selected embassy officials, told us of factors in the vetting implementation that could be improved. These

---

<sup>25</sup>The “State Leahy law” generally prohibits assistance furnished under the Foreign Assistance Act of 1961, as amended, or the Arms Export Control Act, to a unit of the security forces of a foreign country if the Secretary of State has credible information that such unit has committed a gross violation of human rights. 22 U.S.C. § 2378d. The “DOD Leahy law” generally prohibits DOD funds from being used for any training, equipment, or other assistance for a unit of a foreign security force if the Secretary of Defense has credible information that the unit has committed a gross violation of human rights. 10 U.S.C. § 362. State guidance defines a “security force” as, generally speaking, any organization or entity (including an individual) authorized by a state [or political subdivision] to use force (including but not limited to the power to search, detain, and arrest) to accomplish its mission. The guidance states that “security forces” could be units of law enforcement or the military, among other things. State, *2017 Leahy Vetting Guide: A Guide to Implementation and Best Practices* (2017). According to a DOD official, DOD follows State’s *Leahy Vetting Guide* but DOD’s definition of national security forces differs from State. Specifically, for DOD, national security forces are national military and national-level security forces of the foreign country that have the functional responsibilities for which training is authorized by a certain security cooperation statute and, in certain instances, military and civilian first responders of the foreign country at the national or local level. See 10 U.S.C. §§ 301, 333. According to the official, this allows for training with law enforcement entities, but if DOD trains with non-military forces, it requires State Department concurrence before the training.

---

include limited in-country data collection equipment and staff and a time-consuming process for sharing information between stakeholders.

---

## DOD and the Military Departments Have Developed Vetting Procedures for International Military Students

Following the 2019 attack in Pensacola, DOD started developing vetting procedures for IMS. In December 2019, the Defense Counterintelligence and Security Agency's Expedited Screening Center began with a basic screening focused primarily on terrorism-related risks for all IMS already training in the U.S. at that time, officials stated. In December 2020, the Under Secretary of Defense for Intelligence and Security published the first set of vetting protocols following the attack.<sup>26</sup>

In January 2021, section 1090 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 included a provision for DOD to establish vetting procedures and monitoring requirements for certain individuals seeking access to DOD sites in the U.S. to attend military education and training programs.<sup>27</sup> Specifically, section 1090 required the vetting procedures to include biographic and biometric screening of the individuals, continuous review of whether the individuals should continue to be authorized for physical access, biographic checks of the immediate family members of the individuals, and any other measures that the Secretary of Defense determined appropriate.

The statute provided that, with certain exceptions, the vetting procedures would apply to any foreign national who is seeking physical access to a DOD installation or facility within the U.S. and is either (a) selected, nominated, or accepted for training or education for a period of more than 14 days occurring on a DOD installation or facility in the U.S. or (b) an immediate family member accompanying any foreign national who has been selected, nominated, or accepted for such training or education.<sup>28</sup>

In November 2021, a Secretary of Defense memorandum established the vetting procedures required by section 1090 and the Under Secretary of

---

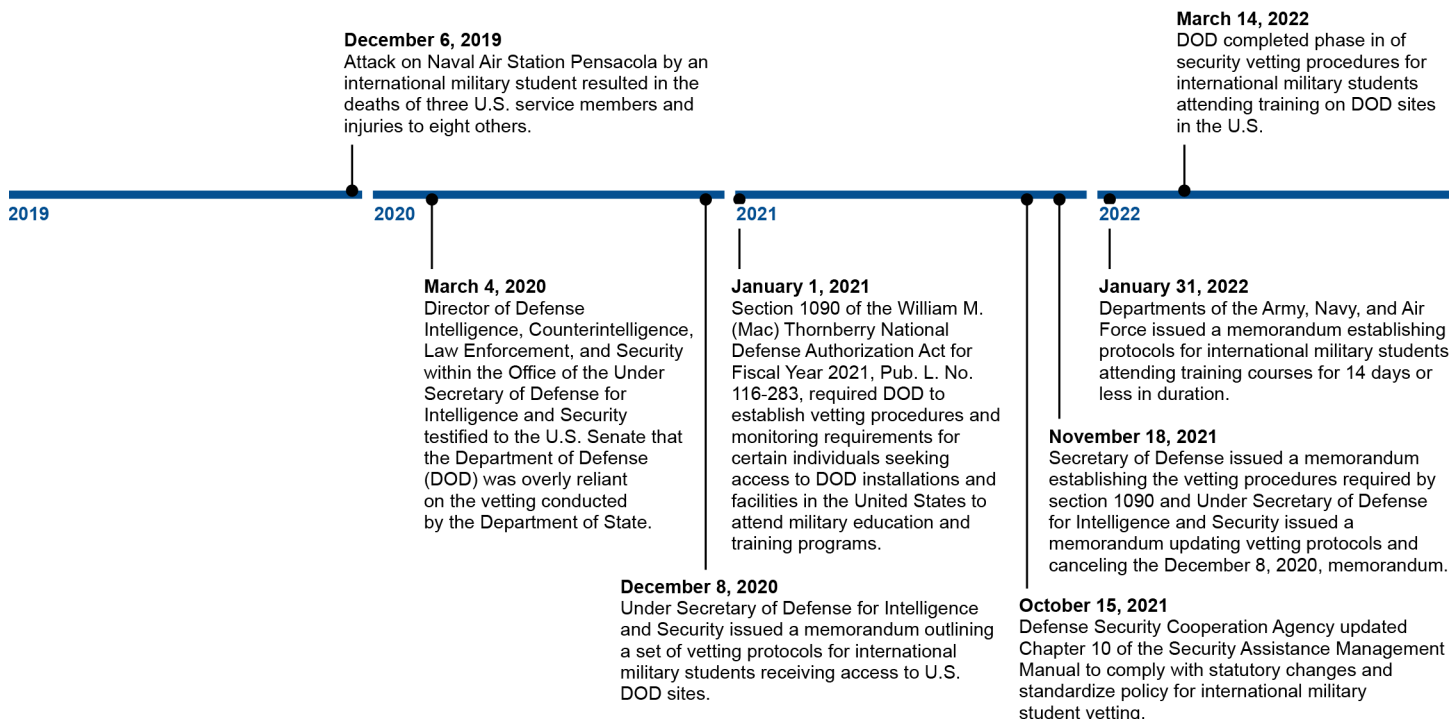
<sup>26</sup>Under Secretary of Defense for Intelligence and Security Memorandum, *Fitness Determinations for Credentialed Recurring Access for International Military Students and Their Accompanying Family Members* (Dec. 8, 2020).

<sup>27</sup>Pub. L. No. 116-283, § 1090(a), (c) (2021).

<sup>28</sup>The definition of covered individuals under the statute excludes foreign nationals of Australia, Canada, New Zealand, and the United Kingdom who have been granted a security clearance that is reciprocally accepted by the U.S. for access to classified information. § 1090(e)(2).

Defense for Intelligence and Security updated its vetting protocols.<sup>29</sup> From December 2020 through March 2022, DOD continued to develop and to phase in procedures to vet IMS attending training on DOD sites in the U.S. (see fig. 5).

**Figure 4: Timeline for Establishment of Vetting Protocols for International Military Students**



Source: GAO analysis of congressional and DOD information. | GAO-24-106421

In January 2022, the Departments of the Army, Navy, and Air Force issued a memorandum requiring vetting for IMS attending training courses that last 14 days or less.<sup>30</sup> The memorandum provided notification of DOD security vetting required by the military departments

<sup>29</sup>Secretary of Defense Memorandum, *Implementation of Section 1090 of the National Defense Authorization Act for Fiscal Year 2021* (Nov. 18, 2021); Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>30</sup>Department of the Navy, Department of the Army, and Department of the Air Force Memorandum, *Required Screening for International Military Student (IMS) Attending Training Courses 14 Days or Less in Duration Prior to Credential Issuance* (Jan. 31, 2022).



---

**Key Organization Roles and Responsibilities****Security Cooperation Organizations (SCO):**

A SCO, is a DOD organization located in a foreign country and responsible for security assistance and cooperation management functions such as administrative support, including issuing IMS travel orders, and liaison duties.

**Defense Security Cooperation Agency (DSCA):**

The DSCA mission is to advance U.S. defense and foreign policy interests by building the capacity of foreign partners to respond to shared defense challenges. Among DSCA's responsibilities is jointly managing the IMET training program with State. DSCA maintains the Security Cooperation-Training Management System, which is an internet-based computer system used for the day-to-day management of IMS training.

**Defense Counterintelligence and Security Agency (DCSA):**

The Defense Counterintelligence and Security Agency (DCSA) mission includes performing background vetting for more than 100 federal entities and 12,500 cleared facilities. It conducts around 2 million background investigations each year. DSCA tasked a subordinate division, its Expedited Screening Center, to execute IMS vetting requirements.

**The military departments:** The Departments of the Army, Navy, and Air Force sponsor IMS to attend training at DOD sites.

Source: GAO analysis of DOD information. | GAO-24-106421

for courses scheduled to last 14 days or less and exempted from DOD security vetting required by section 1090. It also states that this vetting would ensure that IMS provided credentialed recurring access (i.e., unescorted physical access) to a DOD site for any duration had undergone an appropriate level of vetting. The memorandum noted that section 1090 exempted IMS attending courses of 14 days or less from DOD's expanded biographic and biometric security vetting, but that prior

DOD guidance stated that the military departments could require security vetting for courses scheduled to last 14 days or less.<sup>31</sup>

Since the December 2020 memorandum, DOD's security vetting has aimed to determine an IMS and accompanying family members' eligibility for credentialed recurring access (i.e., unescorted physical access) to DOD sites in the U.S. Exceptions to the vetting requirements include:

- A national of Australia, Canada, New Zealand, or the United Kingdom who has been granted a security clearance that is reciprocally accepted by the U.S.,<sup>32</sup> or
- Students or family members who hold U.S. citizenship (including a dual citizen of the U.S. and another country).

---

<sup>31</sup>Specifically, chapter 10 of DSCA Manual 5105.38-M, *Electronic Security Assistance Management Manual*, states that the installation-owning military department may require vetting for courses or classes lasting 14 days or less.

<sup>32</sup>See Pub. L. No. 116-283, § 1090(e)(2) (2021). The non-political intelligence oversight, review, and security entities of the U.S., Australia, Canada, New Zealand, and the United Kingdom comprise the "Five Eyes Intelligence Oversight and Review Council," which among other things allows members to compare best practices in review and oversight methodology and maintain contact with political offices, oversight and review committees, and countries as appropriate. This exemption would not apply to an accompanying family member unless the family member is also a citizen of one of these countries and has also been granted a clearance that is reciprocally accepted by the U.S.

---

Vetting generally takes place before IMS travel to the U.S. for training as well as periodically during the students' stay.<sup>33</sup> For the purposes of this report, we refer to these points in time for vetting as initial security vetting and post-entry, periodic reviews.<sup>34</sup>

DOD's vetting procedures include:

**Initial security vetting.** The DOD security vetting process for IMS and accompanying family members includes multiple steps and stakeholders. The stakeholders (see sidebar) are the Security Cooperation Organizations (SCO), Defense Security Cooperation Agency, Defense Counterintelligence and Security Agency, and three military departments (Departments of the Army, Navy, and Air Force).

These stakeholders are to take the following steps.

1. SCO personnel are required to collect and enter biographical and biometric data on IMS and accompanying family members into the Security Cooperation-Training Management System—the Defense Security Cooperation Agency's training management system. The SCO takes these steps and is to then indicate in the training management system that the student is "ready to vet." The Defense Counterintelligence and Security Agency, through its Expedited Screening Center, is responsible for vetting IMS.
2. Expedited Screening Center (screening center) personnel conduct vetting. They are required to search intelligence databases and other

---

<sup>33</sup>Initial vetting occurs prior to travel with two exceptions: (1) with a country-by-country or person-by-person basis determined by DOD officials, an IMS or accompanying family member from a country that generally sends fewer than 25 IMS to the U.S. for education or training each year and who has completed initial biographic vetting and been assessed as low risk based on that biographic vetting, can undergo initial biometric vetting after their travel to the U.S. but before granting of installation access; and (2) an IMS or accompanying family member who has previously undergone vetting and been determined fit for access, and whose access ends for reasons other than termination or removal for cause, can have access reinstated on an interim basis within 2 years of the previous end of that access, and undergo required vetting in parallel with associated training or education. Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>34</sup>DOD guidance refers to post-entry, periodic reviews, as "continuous review." Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

---

data sources for any derogatory information about the IMS and their accompanying family members.

3. Screening center personnel develop an Expedited Screening Information Report and assign a risk category (low, moderate, or high) to the IMS case. If the screening center does not find any derogatory information, it is not required to develop a report. In this instance, screening center personnel are to assign “no findings” and provide a positive recommendation for unescorted physical access. IMS cases determined high risk receive a negative recommendation.
4. The military departments receive the reports and recommendations and decide whether to allow unescorted physical access for low- or moderate-risk IMS cases based on their assessment of risk and ability to implement risk mitigations.
5. SCO personnel issue travel orders for IMS reviewed with no alerts or with alerts and adjudicated favorably by the military departments.

**Post-entry, periodic review.** DOD also has procedures for periodic reviews once IMS and accompanying family members arrive in the U.S. for training. On a regular and recurring basis, and for as long as the IMS and accompanying family member continues to have unescorted physical access to DOD sites, the screening center repeats the biographic and biometric vetting. Considered an ongoing extension of the vetting process, information identified in this review process is assessed in the same manner as information identified during initial vetting.<sup>35</sup> Officials are to share the results with the military departments, which are responsible for determining fitness for continued access to DOD sites.

DOD security vetting results. We identified 56,614 unique IMS cases in DOD’s training management system from October 1, 2019, through March 31, 2023.<sup>36</sup> These cases included planned or completed trips for training as well as trips that were subsequently canceled.<sup>37</sup> According to the training management system data, SCOs submitted 32,482 cases for

---

<sup>35</sup>Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>36</sup>Vetting results are captured at the case level and include a single vetting result for the IMS and any accompanying family members. Vetting of IMS began with basic screening in December 2019 and DOD continued to phase in initial security vetting through March 2022. DOD completed vetting for group one on May 28, 2021, group two on October 1, 2021, and group three on March 14, 2022 (see also footnote 25).

<sup>37</sup>We included these cases because they may have produced a vetting result prior to training cancellation.

DOD’s initial security vetting.<sup>38</sup> The remaining 24,132 cases were not submitted for vetting because the IMS completed training prior to vetting phase-in, training was canceled, the SCO had started collecting information but not yet submitted it, or the IMS was exempt from DOD security vetting, according to DSCA officials familiar with the data.<sup>39</sup>

As shown in table 1, the screening center identified findings that met the threshold for issuing a security alert in 103 cases, and classified four as high risk, 18 as moderate and 81 as low. The DOD data included 29,202 cases that did not meet the threshold for issuing an alert and had a “no findings” result.<sup>40</sup>

**Table 1: International Military Student (IMS) Cases by Risk Level from October 1, 2019, through March 31, 2023**

Risk level	Number of IMS cases
High	4
Moderate	18
Low	81
No findings	29,202
<b>Total</b>	<b>29,305</b>

Source: GAO analysis of data from the Defense Security Cooperation Agency. | GAO-24-106421

<sup>38</sup>The 32,482 cases submitted for DOD initial security vetting are fewer than the 37,802 IMS participating in training courses in the U.S. cited in the background of this report because not all IMS in the U.S. for training from fiscal year 2020 through March 31, 2023, were submitted for vetting. This is because either the IMS was exempt from DOD security vetting, not considered a “covered individual” for security vetting based on the duration of training or need for physical access to the installation, or completed training during the phase-in process, according to DOD officials familiar with the training management system.

<sup>39</sup>IMS are exempt from vetting if they meet one of the exceptions in accordance with section 1090 and DOD policy. For example, an IMS or accompanying family member who holds U.S. citizenship (including a dual citizen of the U.S. and another country) or is a national of Australia, Canada, New Zealand, or the United Kingdom who has been granted a security clearance that is reciprocally accepted by the U.S. is exempt from this DOD vetting. See Pub. L. No. 116-283, § 1090(e)(2) (2021); Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>40</sup>According to DSCA officials, as of March 31, 2023, an additional 2,628 IMS cases were awaiting vetting results, 516 IMS cases were returned to the Security Cooperation Organization to collect more information needed to complete vetting prior to providing access to training, and 33 IMS cases were submitted for vetting, but the screening center did not produce a result because the IMS was not considered a covered individual for initial security vetting based on training location, duration, or need for credentialed recurring access.

Note: Vetting of IMS began with basic screening in December 2019 and DOD continued to phase in initial security vetting through March 2022. According to DSCA officials as of March 31, 2023, an additional 2,628 IMS cases were awaiting vetting results, 516 IMS cases were returned to the Security Cooperation Organization to collect more information needed to complete vetting prior to providing access to training, and 33 IMS cases were submitted for vetting, but the screening center did not produce a result because the IMS was not considered a covered individual for initial security vetting based on training location, duration, or need for credentialed recurring access.

DOD denied unescorted physical access to its sites for all four high-risk cases (see table 2). The screening center gives high-risk cases a negative recommendation and denies access to DOD sites unless the military departments seek a waiver from the Secretary or Deputy Secretary of Defense.<sup>41</sup> The military department adjudication process approved access for the IMS in seven of the 18 moderate-risk cases, and 47 of the 81 low-risk cases.

The military departments did not adjudicate 22 of the moderate- and low-risk cases for various reasons. For example, the training may have been canceled or the IMS completed training during the phase-in period and departed before the vetting result was produced, according to DOD officials. As of March 31, 2023, 18 moderate- and low-risk cases were awaiting an adjudication decision.

**Table 2: International Military Student (IMS) Cases by Risk Level and Adjudication Result, for October 1, 2019, through March 31, 2023**

Risk level	Total	Approved	Denied	Adjudication not performed <sup>a</sup>	Pending
High	4	0	4	0	0
Moderate	18	7	3	4	4
Low	81	47	2	18	14
<b>All</b>	<b>103</b>	<b>54</b>	<b>9</b>	<b>22</b>	<b>18</b>

Source: GAO analysis of data from the Defense Security Cooperation Agency. | GAO-24-106421

Note: Vetting of IMS began with basic screening in December 2019 and DOD continued to phase in initial security vetting through March 2022.

<sup>41</sup>Prior to issuing such a high-risk assessment, DCSA will notify the military department sponsoring the IMS in question, or sponsoring the IMS whom the family member in question is accompanying. That military department may provide any potentially mitigating information to DCSA within 3 business days. The secretaries of the military departments and the combatant commanders may submit a request to the Secretary of Defense or Deputy Secretary of Defense, through the Under Secretary of Defense for Intelligence and Security, for a waiver to grant credentialed recurring access to an IMS or accompanying family member that is assessed to be a high risk. Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>a</sup>Adjudication was not performed on 22 of the moderate- and low-risk cases, for reasons such as training cancellation or the IMS completed training during the phase-in period, and departed before the vetting result was produced, according to Department of Defense officials.

Approximately 9,957 IMS cases underwent at least one post-entry, periodic review, from October 1, 2019, through March 31, 2023, according to DOD data. As shown in table 3, none of these periodic reviews resulted in an identification of a high-risk case. The screening center identified an additional 11 moderate- and 20 low-risk cases through the review process. As of March 31, 2023, the military departments approved 14 of the additional 31 moderate- and low-risk cases to continue with installation access, while adjudication results were pending for 16 of these cases.<sup>42</sup>

**Table 3: International Military Student (IMS) Post-Entry, Periodic Review Cases by Risk Level and Adjudication Result, for October 1, 2019, through March 31, 2023**

Risk level	Total	Approved	Denied	Adjudication	
				not performed <sup>a</sup>	Pending <sup>b</sup>
High	0	0	0	0	0
Moderate	11	7	0	0	4
Low	20	7	0	1	12
No findings	9,926	9,926	0	0	0
<b>All</b>	<b>9,957</b>	<b>9,940</b>	<b>0</b>	<b>1</b>	<b>16</b>

Source: GAO analysis of data from the Defense Security Cooperation Agency. | GAO-24-106421

Note: Vetting of IMS began with basic screening in December 2019 and DOD continued to phase in initial security vetting through March 2022. According to a Department of Defense (DOD) official with direct knowledge, the post-entry, periodic review process resulted in denial of unsorted physical access in at least two cases. One of these cases occurred outside the scope of the data used in our review. The other case was not in the system because the Defense Security Cooperation Agency was updating the process for tracking these reviews at the time of our data request, the official stated.

<sup>a</sup>Adjudication was not performed on one low-risk case, for reasons such as training cancellation or the IMS completed training during the phase-in period, and departed before the vetting result was produced, according to Department of Defense (DOD) officials.

<sup>b</sup>Adjudication time for determining access varies depending on the derogatory information found, but generally occurs within 5 days from notification, according to DOD officials.

<sup>42</sup>According to DOD officials, adjudication time for determining access varies depending on the derogatory information found, but generally occurs within 5 days from notification. According to a DOD official with direct knowledge, the post-entry, periodic review process resulted in denial of unsorted physical access in at least two cases. One of these cases occurred outside the scope of the data used in our review. The other case was not in the system because the Defense Security Cooperation Agency was updating the process for tracking these reviews at the time of our data request, the official stated.

---

The screening center assesses derogatory information against six risk-category thresholds, identified in DOD guidance and assigns an overall risk category for each case.<sup>43</sup> We reviewed summary data provided by the screening center and found that it assigned the vast majority of cases to two.<sup>44</sup>

---

### DOD Has Taken Steps to Improve Vetting Procedures, but Has Not Assessed Implementation of the Procedures

Since developing procedures to vet IMS, DOD has taken some steps to improve implementation. For example:

- DOD shortened its biographic information-collection form from 66 to 4 pages and established a process by which countries that send small numbers of IMS may request that DOD collect biometric information (e.g., fingerprints) when IMS arrive in the U.S., but before they obtain access to DOD sites.<sup>45</sup>
- The Defense Security Cooperation Agency modified its training management system so that IMS travel orders cannot be issued before DOD security vetting is complete in response to a December 2022 report from the DOD Inspector General.<sup>46</sup>
- DOD also made improvements to the management of periodic reviews of students by providing the screening center with monthly updates of students and accompanying family members who are approaching the threshold for post-entry, periodic reviews in response to the DOD Inspector General’s report.<sup>47</sup>

---

<sup>43</sup>Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>44</sup>According to DOD officials, these summary results include expedited screening reports for accompanying family members, which the training management database data rolls up into one overall alert level for the IMS. Derogatory information for an IMS can trigger risk level alerts in more than one category. The Expedited Screening Center officials told us that they select only one risk category per case based on the highest risk level.

<sup>45</sup>Specifically, the “bio-on-arrival” exception is available on a country-by-country or person-by-person basis if approved by DOD officials for countries that generally send fewer than 25 IMS to the U.S. for education or training each year, where the IMS or accompanying family member has completed initial biographic vetting and been assessed as low risk based on that vetting. Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).

<sup>46</sup>DOD Inspector General, *Audit of Vetting and Continuous Review of International Military Students Training in the United States*, DODIG-2023-036 (Dec. 7, 2022).

<sup>47</sup>DODIG-2023-036.

---

However, our work identified some factors in the vetting implementation that could be improved. These factors include limited in-country data collection equipment and staff and a time-consuming process for sharing information between stakeholders.

- **Limited in-country data collection equipment and staff.** SCOs face certain limitations in collecting the data needed for vetting, according to training managers who oversee the SCOs in all six of the combatant commands that we contacted.<sup>48</sup> These limitations include: lack of available and functioning equipment for biometric data collection (e.g., fingerprints) and limited number of trained and qualified staff for IMS security vetting support, including U.S. citizen staff for biometric data collection. Training managers also discussed difficulty in coordinating timely travel for IMS located throughout a country to provide biographic and biometric data—which takes place only at specific locations where staff and biometric collection equipment are located.

For example, officials with two of the commands we interviewed stated that SCOs within their respective areas of responsibilities encountered issues with using older, legacy biometric machines to collect fingerprints of their IMS. Officials from another command stated that a lack of trained and qualified U.S. citizen personnel to collect biometric data is an issue, particularly when the SCO covers more than one country.<sup>49</sup>

In those cases, according to combatant command officials, State officials at the regional security offices may accept the responsibility of collecting biometric data for DOD security vetting. In addition, officials with two of the commands we interviewed stated that SCOs in their areas of responsibility must work long hours to collect and input IMS biometric and biographical data due to the number of IMS originating from their geographic area. These officials also stated that support for the vetting of IMS imposes an additional burden on the SCO's normal day-to-day duties.

---

<sup>48</sup>We interviewed or received written responses from the combatant command training managers for U.S. Africa Command, U.S. Central Command, U.S. European Command, U.S. Indo-Pacific Command, U.S. Northern Command and U.S. Southern Command. We selected these commands because all countries within their geographic areas of responsibility send IMS to the U.S. for training on U.S. DOD sites.

<sup>49</sup>According to guidance, DOD biometrics must be collected by U.S. government employees or contractors, who must be U.S. citizens. Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021).



- 
- **Complicated information sharing process.** Officials with security vetting stakeholder organizations—the screening center, Defense Security Cooperation Agency, and the military departments—told us that the processes for sharing information, such as vetting results, rely on a manual exchange of information. Stakeholders identified this as a complicating factor when prioritizing and managing IMS cases. For example, screening center officials cited the manual process for exchanging student biographic information as one of their biggest limitations.

As a result, the screening center undergoes a complicated process to manually transfer students' information between unclassified and classified data storage systems to track, manage, and conduct the security vetting. In addition, officials from one military department stated that they must sort through spreadsheets to identify students at their installations, and to ensure that they are including them in additional monitoring activities. The Defense Security Cooperation Agency officials described how personnel must work through spreadsheets of vetting results from the screening center to enter data daily into their training management system.

Although DOD has taken steps to improve IMS vetting procedures, it has not assessed implementation to identify additional opportunities to improve them. According to officials, the primary reason that DOD has not assessed their implementation is time and resource constraints. As of July 2023, officials also stated that it was too soon to determine the effect of any implementation challenges or identify additional opportunities for improvement because full implementation of the security vetting process occurred in March 2022. Officials stated they need more time to collect data and conduct analysis to determine how well IMS vetting is meeting DOD expectations or needs, and if it needs to take action to improve implementation.

The Secretary of Defense memorandum on the implementation of section 1090 required the under secretaries of defense for Intelligence & Security and for Policy to produce a 6-month progress report on the implementation of vetting procedures, and to make recommendations for changes or revisions to section 1090 and to DOD implementation procedures.<sup>50</sup> In addition, section 1090 included a provision for DOD to report to the appropriate congressional committees no later than 2 years after the date of enactment on the implementation and effects of DOD

---

<sup>50</sup>Secretary of Defense Memorandum, *Implementation of Section 1090 of the National Defense Authorization Act for Fiscal Year 2021* (Nov. 18, 2021).

---

security vetting for IMS.<sup>51</sup> As of November 2023, DOD has not produced either report, which were due in May 2022 and January 2023, respectively.

In July 2023, a DOD official told us that he had begun to circulate a draft progress report within the department, and that the draft would provide a status of the program metrics for fiscal year 2022, including the total number of students who had undergone DOD security vetting in that time frame. However, that progress report was in draft, and it was unclear if it would include an assessment of vetting implementation and the factors we identified, such as limited in-country data collection equipment and staff and a time-consuming process for sharing information between stakeholders.

Key practices for program evaluation state that decision-makers, such as those in the executive branch and congressional committees, need evaluative information to help them make decisions about the programs they oversee—information that tells them whether and why a program is working well or not.<sup>52</sup> Evaluations include assessing the extent to which program elements are in place and conform to statutory and regulatory requirements, program design, professional standards, or customer expectations.

Additionally, Standards for Internal Control in the Federal Government states that agency managers should periodically review policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks.<sup>53</sup> Also, the standards state that management should remediate deficiencies on a timely basis.<sup>54</sup>

Without assessing the implementation of IMS vetting procedures, DOD will not have a comprehensive understanding of any factors that hinder IMS vetting implementation or that present opportunities for improvement. DOD also cannot determine whether or how it should take action to

---

<sup>51</sup>Pub. L. No. 116-283, § 1090(d)(1) (2021).

<sup>52</sup>GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: March 2021). These key practices updated an earlier version in fiscal year 2011. See [GAO-11-646SP](#).

<sup>53</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>54</sup>[GAO-14-704G](#).

---

improve IMS vetting implementation. Assessing its procedures and taking mitigating action as needed could also help ensure that DOD conducts vetting as early and promptly as practicable to minimize disruptions to U.S. programs to train IMS, while also minimizing risk to safety and security of DOD sites.

---

## State and DOD Share Certain IMS Information, but Gaps Remain

State and DOD share certain IMS vetting information and have established procedures for doing so. For example, State and DOD have procedures to share database access and vetting information, and confirming vetting completion, as needed. However, State and DOD have not consistently established clear roles and responsibilities for sharing information, resulting in information gaps. Specifically, they have not consistently communicated with each other in regard to updates to DOD's guidance for vetting or ensured that additional IMS data and analysis reached their intended recipients.

---

## State and DOD Share Vetting Information to Support Visa Screening, Leahy Vetting, and DOD Security Vetting

State and DOD have procedures to share information to support visa screening, Leahy vetting, and DOD security vetting. These include sharing database access and vetting information, and confirming vetting completion, as needed.

For example, when State's visa screening processes find derogatory information on an IMS applicant, they send the information to the screening center, officials stated. Similarly, when the screening center finds derogatory information on an IMS, it will send the information to State. This type of information sharing typically happens via top-secret classified emails on the Joint Worldwide Intelligence Communications System.<sup>55</sup>

State's Bureau of Democracy, Human Rights, and Labor (DRL) officials said they conduct Leahy vetting for gross violations of human rights for relevant IMS who are participating in U.S. training funded by DOD appropriations or furnished under the Foreign Assistance Act or Arms Export Control Act. DRL officials told us they are required to check prospective IMS for derogatory information and any past adjudication results in relevant files and databases for credible information about gross violations of human rights. DRL officials enter Leahy vetting results into

---

<sup>55</sup>Joint Worldwide Intelligence Communications System—The sensitive compartmented information portion of the Defense Information Systems Network. It is also called JWICS.

---

the International Vetting and Security Tracking-cloud information system where DOD's SCOs access the information.

DRL officials told us it is the SCO's responsibility to ensure applicable Leahy vetting has been completed for IMS. The SCO enters the Leahy vetting completion date in the DOD Security Cooperation-Training Management System before issuing the travel order to the IMS.

In addition, State does not issue a visa to an IMS or accompanying family member until after the responsible DOD representative at each post (i.e., the SCO or Senior Defense Official/Defense Attaché) formally notifies the consular section that DOD security vetting is complete, according to DOD and State policies.<sup>56</sup> Defense Security Cooperation Agency officials said the SCO is to notify State's consular section at post of completion of DOD security vetting on DOD letterhead or through an official U.S. government email. DOD guidance states that the notification will include the forms and other documents submitted by the SCO in conjunction with the official visa application from the IMS or accompanying family member.

---

### State and DOD Have Not Consistently Shared IMS Policy Updates and Additional IMS Information

State and DOD have some venues to share IMS information. For example, DOD's Defense Security Cooperation Agency hosts a monthly security vetting teleconference to which State partners are invited. However, State and DOD have not consistently communicated updates to DOD's guidance for vetting or clearly shared additional IMS data and analysis.

**Inconsistent information sharing on IMS vetting policy.** State and DOD have inconsistently shared updates on security vetting policy. For example:

- In September 2023, we identified examples of State guidance and Standard Operating Procedures at embassies referring to outdated or superseded DOD implementing guidance for section 1090, not the

---

<sup>56</sup>Defense Security Cooperation Agency, Manual 5105.38, *Electronic Security Assistance Management Manual* (as of December 2023); U.S. Department of State, Foreign Affairs Manual, 9 FAM 402.3 *Officials and Employees of Foreign Governments and International Organizations—A, C-2, C-3, G, NATO Visas, and Diplomatic Type and Official Type Visas* (Sept. 8, 2022); and 21 STATE 86738, *DOD Security Vetting Requirements for International Military Students Attending Military Training and Education in the United States, Part III* (April 2021).

---

most current guidance that was issued in November 2021.<sup>57</sup> For its part, DOD sent an email regarding this update in policy on November 22, 2021, to over 100 recipients, including recipients from State. The email included the updated November 2021 guidance.

- As of August 2023, according to State officials with the Bureau of Consular Affairs, they were unaware of a January 2022 update from the Departments of the Army, Navy, and Air Force requiring vetting for courses for 14 days or less and otherwise not subject to DOD security vetting.

A January 2022 memorandum from the military departments noted that IMS attending courses of 14 days or less are exempt from DOD's expanded biographic and biometric security vetting under section 1090 and DOD's November 2021 guidance memorandums, but that other DOD guidance authorized the military departments to conduct vetting for such IMS if desired.<sup>58</sup> The military departments' memorandum states that the military departments have coordinated with the Defense Counterintelligence and Security Agency's Expedited Screening Center to begin screening IMS biographic information submitted as part of the student's nonimmigrant visa application for courses 14 days or less in duration and not subject to the enhanced security vetting required by section 1090.<sup>59</sup>

As a result of the lack of coordination on this update, State officials said they were unsure if they should be confirming completion of this vetting prior to issuing the student a visa in the same way they do for DOD security vetting (e.g., notification on DOD letterhead or through an official U.S. government email). In October 2023, Consular Affairs officials said that, upon request, the Defense Counterintelligence and

---

<sup>57</sup>U.S. Department of State, Foreign Affairs Manual, 9 FAM 402.3 *Officials and Employees of Foreign Governments and International Organizations--A, C-2, C-3, G, NATO Visas, and Diplomatic Type and Official Type Visas* (Sept. 8, 2022); *Mission Colombia, NIV Unit SOP Diplomatic/Official Visas*, no date; *Mission Italy Consular Team SOP Processing NATO 2 Visas for IMS* (Sept. 6, 2023); and *Mission Saudi Arabia, Local Security Screening Policy and Process Guide for Non-Leahy IMS Training* (July 2023).

<sup>58</sup>Specifically, the memorandum noted that DOD guidance stated that an installation-owning military department could require security vetting for courses or classes scheduled to last 14 days or less. Defense Security Cooperation Agency Manual 5105.38-M, *Electronic Security Assistance Management Manual*, para. CI0.8.3.2.3 (as of December 2023).

<sup>59</sup>Department of the Navy, Department of the Army, and Department of the Air Force Memorandum, *Required Screening for International Military Student (IMS) Attending Training Courses 14 Days or Less in Duration Prior to Credential Issuance* (Jan. 31, 2022).

---

Security Agency provided a copy of the guidance. Consular Affairs officials said they plan to update their Foreign Affairs Manual to reflect that all IMS attending training at the DOD installation in the U.S. need to be vetted by DOD.

**Incomplete sharing of additional IMS information.** State and DOD have not clearly established roles and responsibilities for sharing additional information related to IMS. For example:

- State and DOD have not clarified how trend data on students who go absent without leave (AWOL) is shared. The Defense Security Cooperation Agency collects and analyzes these statistics, including trend analysis by factors such as country, training program type, age, and rank. Officials stated they share this information with several State recipients via email. However, some State Consular Affairs officials told us they were not fully aware of these data. State Consular Affairs officials stated that DOD notifies them when individual students go absent without leave but were not clearly aware of additional statistical analysis conducted by DOD.

We reviewed an AWOL notification email that the Defense Security Cooperation Agency sent to over 90 recipients, including State officials. The email body included information on one individual IMS (e.g., country, date absence began, name, location) who had been added to the AWOL list. The email also included a spreadsheet with summary AWOL statistics and analysis dating back to 2016 (e.g., numbers by country and reasons if known).

However, the email body is not clear because it does not reference or describe the attached spreadsheet and thus does not inform recipients that the AWOL statistics are included. In addition, DOD officials said it is not DOD's responsibility to follow up with State on whether State Consular Affairs understands that the emails contain DOD's statistical analysis.

Open sharing and routine discussion of these data could help consular officials perform their role of facilitating legitimate travel for IMS, and could make them more aware of AWOL trends, consular officials told us. For example, consular officials would have access to DOD's summary AWOL statistics and could see which countries have the most AWOLs. However, Consular Affairs officials said they would still make visa adjudication decisions on a case-by-case basis.

- In addition, State and DOD have not clarified an interoperable approach to IMS data collection, which limits their ability to share information across the population. For example, State officials said

---

that State's data systems for visa screening and Leahy vetting do not specifically identify IMS in a data field. As a result, State personnel cannot easily identify students in either system, readily provide aggregated data on visa screening or Leahy vetting results for IMS, or crosscheck their data with DOD's training management system. State DRL officials said that adding an IMS identifier would make it easier to identify students who were Leahy vetted.

Without such an identifier, personnel must individually search each database to identify cases, which is time-consuming and creates difficulty in extracting the data for the purposes of broader analysis of vetting outcomes. The relevant portions of the Foreign Affairs Manual and the Leahy Vetting Guide do not require State to identify IMS differently from other applicants in its databases.<sup>60</sup>

DOD and State have taken steps to address this challenge. For example, State officials said a forthcoming Foreign Affairs Manual update will add a requirement that consular officers add an identifier to the case notes of applicants. State officials said the anticipated time frame for completing the Foreign Affairs Manual update was January 2024. Further, as we were concluding our review, Consular Affairs officials said that State representatives at the National Vetting Center and DOD have agreed to use unique text, that each IMS will include in his or her visa application starting in Summer 2024, which will be used to identify IMS applications and route these applications into a specific interagency vetting process.

*Standards for Internal Control in the Federal Government* states that management communicates with, and obtains the necessary quality information from, external parties using established reporting lines to achieve the entity's objective.<sup>61</sup>

In addition, one leading practice for collaboration that we have previously identified calls for agencies to clarify the roles and responsibilities of participants.<sup>62</sup> Defined and agreed-upon roles and responsibilities can help agencies clarify who will do what and overcome barriers when

---

<sup>60</sup>U.S. Department of State, Foreign Affairs Manual, 9 FAM 402.3 *Officials and Employees of Foreign Governments and International Organizations—A, C-2, C-3, G, NATO Visas, and Diplomatic Type and Official Type Visas* (Sept. 8, 2022); and State, *2017 Leahy Vetting Guide: A Guide to Implementation and Best Practices* (2017).

<sup>61</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014). See principle 15.

<sup>62</sup>GAO, *Government Performance Management*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

---

working across agency boundaries. Another leading collaboration practice is to develop and update written guidance and agreements regarding the collaborative effort.<sup>63</sup> Further, another leading practice for collaboration calls for agencies to leverage resources and information by sharing relevant, quality data and information. Doing so can help agencies address coordination challenges.<sup>64</sup>

State and DOD have taken steps to share information related to IMS; however, they have not clarified roles and responsibilities for consistently doing so. For example, DOD officials stated that updates to guidance are posted and available for State officials to access in the Security Cooperation-Training Management System. However, we found that DOD could strengthen its communication by sending updates to its guidance directly to State or specifically informing State to check the Security Cooperation-Training Management System when updates are made.

As a result of the lack of clarity in roles and responsibilities, the departments face gaps in how they update and clarify IMS vetting policies, share additional analysis on IMS, such as AWOL data, and develop an interoperable approach to IMS data collection. Such roles and responsibilities could be clarified and documented, for example, through the agencies' regular process for updating relevant guidance or by developing new written agreements.

If DOD and State take actions to clarify roles and responsibilities for sharing IMS information, the departments would be better positioned to coordinate on IMS vetting, including communicating relevant policy updates, sharing additional information, and conducting program analysis. Improving information sharing and collaboration can help ensure that DOD and State work together effectively to oversee implementation of vetting practices for IMS, while minimizing disruptions to U.S. security cooperation and security assistance programs.

---

## Conclusions

In response to the 2019 attack at Naval Air Station Pensacola, Florida, DOD developed and implemented procedures to vet IMS who are training on DOD sites in the U.S. DOD has used these procedures to vet tens of thousands of IMS and make risk-based determinations on their fitness for installation access and training since fiscal year 2020. DOD has taken some steps to improve implementation of the IMS vetting procedures.

---

<sup>63</sup>[GAO-23-105520](#).

<sup>64</sup>[GAO-23-105520](#).



---

However, DOD stakeholders have identified factors that present opportunities for improvement, and the department has yet to complete an assessment of IMS vetting implementation.

Without such an assessment, DOD will not have a comprehensive understanding of factors that could affect program implementation, including limitations with in-country data collection and time-consuming processes for sharing information among vetting stakeholders. DOD also cannot determine whether or how it should take action to address these factors to improve implementation.

Additionally, while State and DOD have established procedures to share vetting information and have taken steps to address issues we identified, gaps in coordination between the departments remain. In-country DOD security cooperation offices coordinate with State on specific vetting issues, but State and DOD have not clarified roles and responsibilities for coordinating more broadly on IMS program management, including communicating relevant policy updates and sharing additional data and analysis regarding IMS vetting.

Oversight and management of IMS is a multiagency and multi-stakeholder process, involving DOD and State entities from across the intelligence, security, and security cooperation community, including the military departments. Assessing procedures and improving collaboration could help ensure that DOD and State work together effectively to minimize disruptions to U.S. security cooperation and security assistance programs, while also minimizing risk to the safety and security of personnel at DOD installations.

---

## Recommendations for Executive Action

We are making a total of four recommendations, including three to DOD and one to State.

The Secretary of Defense should ensure that the Under Secretary of Defense for Intelligence and Security and Under Secretary of Defense for Policy—in coordination with the secretaries of the military departments—assess the implementation of vetting procedures for international military students. The assessment should include in-country data collection and the process for sharing information between stakeholders.

(Recommendation 1)

The Secretary of Defense should ensure that the Under Secretary of Defense for Intelligence and Security and Under Secretary of Defense for Policy—in coordination with the secretaries of the military departments—

---

take action to mitigate any ongoing factors affecting the implementation of the vetting procedures as identified in the assessment of vetting implementation. (Recommendation 2)

The Secretary of Defense should ensure that the Under Secretary of Defense for Intelligence and Security and the Under Secretary of Defense for Policy—in collaboration with the Assistant Secretary of State for the Bureau of Consular Affairs, and the Assistant Secretary of State for the Bureau of Democracy, Human Rights, and Labor—clarify roles and responsibilities for sharing information on issues related to international military students. This should include roles and responsibilities for policy updates, data sharing, and analysis. (Recommendation 3)

The Secretary of State should ensure that the Assistant Secretary of State for the Bureau of Consular Affairs, and the Assistant Secretary of State for the Bureau of Democracy, Human Rights, and Labor—in collaboration with the Under Secretary of Defense for Intelligence and Security, and the Under Secretary of Defense for Policy—clarify roles and responsibilities for sharing information on issues related to international military students. This should include roles and responsibilities for policy updates, data sharing, and analysis. (Recommendation 4)

---

## Agency Comments and Our Evaluation

We provided a draft of this report to DOD and State for review and comment. DOD's written comments are reproduced in Appendix II. DOD concurred with two of our three recommendations to DOD and partially concurred with the third.

DOD concurred with our recommendations that it assess the implementation for international military students and update, clarify, and formalize the roles and responsibilities for sharing information on issues related to international military students. DOD's comments stated that current information sharing is primarily based on personal relationships and standard operating procedures rather than formal written agreements. DOD added that increasing participation in the National Vetting Center will provide a more formal framework for information sharing and could provide the foundation for clarifying roles and responsibilities.

DOD partially concurred with our recommendation that it take action to mitigate any ongoing factors affecting the implementation of the vetting procedures as identified in the assessment of vetting implementation. DOD stated that it will seek to take actions to mitigate negative factors, where appropriate. We agree that DOD should mitigate negative factors,

---

where appropriate, and, as we stated in our report, should use the assessment of the implementation of vetting procedures to identify any such factors. Implementing this recommendation will ensure DOD remediates negative factors it identifies during its assessment of vetting implementation.

State's written comments are reproduced in Appendix III. State concurred with our recommendation to State to work with DOD on clarifying roles and responsibilities for sharing information. State also stated that it is tasking the relevant bureaus with identifying and coordinating on the areas listed for improvement, as well as continuing to engage DOD counterparts on these efforts, as appropriate. State's comments noted that they are committed to implementing the recommendation as part of its continued efforts toward strengthening information-sharing on this critical subject.

DOD also provided technical comments, which we incorporated, as appropriate.

---

We are providing copies of this report to the appropriate congressional committees, the Secretaries of Defense, Army, Navy, Air Force, State, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

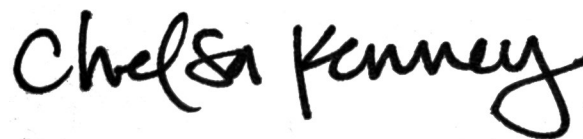
If you or your staff have questions about this report, please contact us at (202) 512-9627 or [MaurerD@gao.gov](mailto:MaurerD@gao.gov), or (202) 512-2964 or [KenneyC@gao.gov](mailto:KenneyC@gao.gov). Contact points for our Offices of Congressional

---

Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

A handwritten signature in black ink that reads "Diana Maurer". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Diana C. Maurer  
Director, Defense Capabilities and Management

A handwritten signature in black ink that reads "Chelsea Kenney". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Chelsea L. Kenney  
Director, International Affairs and Trade

---

*List of Committees*

The Honorable Jack Reed  
Chairman  
The Honorable Roger Wicker  
Ranking Member  
Committee on Armed Services  
United States Senate

The Honorable Benjamin Cardin  
Chairman  
The Honorable James E. Risch  
Ranking Member  
Committee on Foreign Relations  
United States Senate

The Honorable Mike Rogers  
Chairman  
The Honorable Adam Smith  
Ranking Member  
Committee on Armed Services  
House of Representatives

The Honorable Michael McCaul  
Chairman  
The Honorable Gregory Meeks  
Ranking Member  
Committee on Foreign Affairs  
House of Representatives

---

# Appendix I: Objectives, Scope, and Methodology

---

The report evaluates the extent to which (1) the Department of Defense (DOD) has developed vetting procedures for international military students and addressed any implementation challenges; and (2) State and DOD have shared information related to international military students training at DOD sites in the U.S.

Both of our objectives focus on international military students attending military education and training programs at DOD sites in the U.S. from October 1, 2019, through March 31, 2023.<sup>1</sup> We included individuals attending military education and training programs funded through U.S. security assistance or security cooperation programs, such as the International Military Education and Training (IMET) program, as well as IMS who attended training that is partner-nation funded, such as training provided in conjunction with the Foreign Military Sales program.<sup>2</sup>

To address our first objective, we reviewed DOD guidance and other publications for screening and vetting requirements. These publications included Secretary of Defense guidance for implementation of section 1090 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Under Secretary of Defense for Intelligence and Security guidance for vetting of international military students and their accompanying family members, and updates to the Security Assistance Management Manual on international military student security vetting requirements.<sup>3</sup>

To analyze vetting results data, we obtained data from the Defense Security Cooperation Agency's Security Cooperation-Training

---

<sup>1</sup>In this report, we use section 1090's definition of the U.S., meaning the several states, the District of Columbia, the commonwealth of Puerto Rico, and Guam. Pub. L. No. 116-283, § 1090(e)(3) (2021).

<sup>2</sup>Authorized by the Foreign Assistance Act, International Military Education and Training, or IMET, is a U.S. security assistance program that provides training to selected foreign military and defense associated civilian personnel on a grant basis. See 22 U.S.C. § 2347 et seq. Foreign Military Sales, or FMS, is a process, authorized by the Arms Export Control Act, through which eligible foreign governments and international organizations may purchase defense articles, services, and training from the U.S. government. See 22 U.S.C. §§ 2761-2762.

<sup>3</sup>Secretary of Defense Memorandum, *Implementation of Section 1090 of the National Defense Authorization Act for Fiscal Year 2021* (Nov. 18, 2021); Under Secretary of Defense for Intelligence and Security Memorandum, *Vetting of International Military Students and Their Accompanying Family Members* (Nov. 18, 2021); Director, DSCA Memorandum, *International Military Students (IMS) Security Vetting Requirements Update, DSCA Policy 21-60 [SAMM E-Change 541]* (Oct. 15, 2021).

Management System. We requested data on all international military students attending or scheduled to attend training from October 1, 2019, through March 31, 2023. We analyzed these data to determine patterns in reported vetting outcomes, such as number of alerts found and adjudication results.<sup>4</sup> We also analyzed summary data provided by the Defense Counterintelligence and Security Agency to determine characteristics of vetting result risk type.

We assessed the reliability of these data by reviewing the data for obvious errors in accuracy and completeness. We also met with Defense Security Cooperation Agency and Defense Counterintelligence and Security Agency officials who report, maintain, and use the data to understand how the information is used and to help us assess its reliability and completeness. Overall, we determined the data were sufficiently reliable for the purposes of identifying general patterns in vetting results.

We interviewed DOD officials responsible for vetting implementation and oversight, including officials from the Defense Security Cooperation Agency, Defense Counterintelligence and Security Agency, military departments, as well as training managers from six unified combatant commands with geographic areas of responsibility, to understand implementation challenges and any mitigations in place to address these challenges.<sup>5</sup>

We assessed DOD efforts to identify and address implementation challenges against relevant DOD guidance and provisions in section 1090 that call for DOD to assess implementation of international military student vetting procedures and provide progress reports.<sup>6</sup> We determined the control activities and monitoring components of the Standards for Internal Control in the Federal Government was significant to this objective, specifically the associated underlying principles that

---

<sup>4</sup>For the purposes of this report, we use the term patterns to refer to the number and characteristics of vetting results for the period covered by our review.

<sup>5</sup>We interviewed or received written responses from the combatant command training managers for U.S. Africa Command, U.S. Central Command, U.S. European Command, U.S. Indo-Pacific Command, U.S. Northern Command and U.S. Southern Command. We selected these commands because all countries within their geographic areas of responsibility send IMS to the U.S. for training on U.S. DOD sites.

<sup>6</sup>Pub. L. No. 116-283, § 1090(d)(1) (2021); Secretary of Defense Memorandum, *Implementation of Section 1090 of the National Defense Authorization Act for Fiscal Year 2021* (Nov. 18, 2021).

management periodically review policies, procedures, and related control activities and remediate identified deficiencies on a timely basis.<sup>7</sup> We also determined that our prior work related to program evaluation was relevant.<sup>8</sup>

To address our second objective, we reviewed—in addition to DOD guidance and other publications for screening and vetting requirements—State’s policies and guidance for consular screening and Leahy (i.e., human rights) vetting requirements that apply to international military students. These publications included the Foreign Affairs Manual and the 2017 Leahy Vetting Guide.<sup>9</sup> We analyzed the requirements for inclusion of counter-terrorism screening and vetting for gross violations of human rights.

We also obtained data from State’s Consular Consolidated Database and International Vetting and Security Tracking-cloud system and assessed State and DOD’s ability to share data related to international military students. We assessed the reliability of these data by reviewing the data for obvious errors in accuracy and completeness; comparing data from State and DOD on international military students to determine whether the required screening and vetting was completed; and interviewing relevant officials from State’s Consular Affairs and Bureau of Democracy, Human Rights and Labor, and DOD’s Defense Security Cooperation Agency.

We assessed the extent to which State and DOD guidance identified coordination procedures for screening and vetting steps and sharing of information. We determined the information and communication component of the Standards for Internal Control in the Federal Government was significant to this objective, specifically the associated underlying principle that management communicates with, and obtains the necessary quality information from, external parties using established

---

<sup>7</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014). See principles 12 and 17.

<sup>8</sup>GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: March 2021). These key practices updated an earlier version in fiscal year 2011; see [GAO-11-646SP](#).

<sup>9</sup>U.S. Department of State, Foreign Affairs Manual, 9 FAM 402.3 *Officials and Employees of Foreign Governments and International Organizations—A, C-2, C-3, G, NATO Visas, and Diplomatic Type and Official Type Visas* (Sept. 8, 2022); State, *2017 Leahy Vetting Guide: A Guide to Implementation and Best Practices* (2017).



reporting lines.<sup>10</sup> We used selected leading collaboration practices to assess State and DOD's coordination.<sup>11</sup> We also interviewed State officials responsible for screening and vetting implementation and oversight, and officials from three U.S. embassies that adjudicate visas for large numbers of IMS and were geographically dispersed (Colombia, Italy, and Saudi Arabia). Our observations from the three embassies are illustrative and provide insights about the adjudication of visas for IMS, but are not generalizable to all posts.

We conducted this performance audit from December 2022 to February 2024 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.

---

<sup>10</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014). See principle 15.

<sup>11</sup>GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023). We selected leading collaboration practices of clarifying roles and responsibilities, leveraging resources and information, and developing and updating written guidance and agreements since they were most relevant to our assessment on collaboration around information sharing.

# Appendix II: Comments from the Department of Defense



INTELLIGENCE  
AND SECURITY

UNDER SECRETARY OF DEFENSE  
5000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-5000


FEB 15 2024

Ms. Diana C. Maurer  
Director, Defense Capabilities and Management  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Maurer,

Enclosed is the Department of Defense (DoD) response to the GAO Draft Report GAO-24-106421SU, "INTERNATIONAL MILITARY STUDENTS: DoD and State Should Assess Vetting Implementation and Strengthen Information Sharing", dated December 14, 2023. My point of contact is Mr. Joshua A. Freedman who can be reached at (703) 692-3724 or [Joshua.a.freedman.civ@mail.mil](mailto:Joshua.a.freedman.civ@mail.mil).

Sincerely,

  
Ronald S. Moultrie

Enclosures:  
As stated

**GAO DRAFT REPORT DATED DECEMBER 14, 2023  
GAO-24-106421SU  
“INTERNATIONAL MILITARY STUDENTS:  
DOD AND STAE SHOULD ASSESS VETTING IMPLEMENTATION AND  
STRENGTHEN INFORMATION SHARING”**

DoD appreciates the report accurately and objectively describing our efforts to develop and implement procedures to vet international military students attending training or education, lasting longer than 14 days, at a DoD installation or facility in the United States – as well as their accompanying family members. Although the report made four recommendations, only the first three were to the Department of Defense and therefore addressed in this response.

**RECOMMENDATION 1:** The Under Secretary of Defense for Intelligence and Security (USD(I&S)), in coordination with certain other officials, should assess the implementation of vetting procedures for international military students. The assessment should include in-country data collection, the process for sharing information between stakeholders, and service-level monitoring.

**DoD RESPONSE:** Agree. The Office of the USD(I&S) (OUSD(I&S)) will conduct the recommended assessment, which was already directed by the Secretary of Defense on November 18, 2021.

**RECOMMENDATION 2:** The USD(I&S), in coordination with certain other officials, should take action to mitigate any ongoing factors affecting the implementation of the vetting procedures as identified in the assessment.

**DoD RESPONSE:** Partially Agree. OUSD(I&S) will seek to take actions to mitigate negative factors, where appropriate.

**RECOMMENDATION 3:** The USD(I&S), in coordination with the Under Secretary of Defense for Policy and certain officials at the Department of State, clarify roles and responsibilities for sharing information on issues related to international military students, including for policy updates, data sharing, and analysis.

**DoD RESPONSE:** Agree. OUSD(I&S) will seek to update, clarify, and formalize the roles and responsibilities for sharing information on issues related to international military students. OUSD(I&S) notes that, as noted in the report, DoD and State currently do share this information, though that sharing is primarily based on personal relationships and standard operating procedures rather than formal written agreements. OUSD(I&S) further notes that DoD’s increased participation in the National Vetting Center will provide a more formal framework for this information sharing, and could provide the foundation for the recommended clarification.

# Appendix III: Comments from the Department of State



United States Department of State  
*Comptroller*  
Washington, DC 20520

January 16, 2024

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

Dear Mr. Bair:

We appreciate the opportunity to review your draft report, "INTERNATIONAL MILITARY STUDENTS: DOD and State Should Assess Vetting Implementation and Strengthen Information Sharing," GAO Job Code 106421.

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

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Walsh".

James A. Walsh

Enclosure:  
As stated

cc: GAO – Diana C. Maurer  
OIG - Norman Brown

**Department of State Comments on GAO Draft Report**

**INTERNATIONAL MILITARY STUDENTS: DOD and State Should Assess  
Vetting Implementation and Strengthen Information Sharing**  
(GAO-24-106421SU, GAO Code 106421)

Thank you for the opportunity to comment on the GAO draft report,  
*“International Military Students: DOD and State Should Assess Vetting  
Implementation and Strengthen Information Sharing.”*

**Recommendation 4:** The Secretary of State should ensure that the Assistant Secretary of State for the Bureau of Consular Affairs, and the Assistant Secretary of State for the Bureau of Democracy, Human Rights, and Labor—in collaboration with the Under Secretary of Defense for Intelligence and Security, and the Under Secretary of Defense for Policy—clarify roles and responsibilities for sharing information on issues related to international military students. This should include for policy updates, data sharing, and analysis.

**Department Response:** The Department concurs with the recommendation and is tasking the relevant bureaus with identifying and coordinating on the areas listed for improvement, and with continuing to engage Department of Defense counterparts on these efforts, as appropriate.

**Conclusion:** The Department appreciates the opportunity to comment on the draft report and is committed to implementing the recommendation as part of our continued efforts towards strengthening information-sharing on this critical subject.

---

# Appendix IV: GAO Contacts and Staff Acknowledgments

---

## GAO Contacts

Diana C. Maurer (202) 512-9627 or [MaurerD@gao.gov](mailto:MaurerD@gao.gov).

Chelsa L. Kenney (202) 512-2964 or [KenneyC@gao.gov](mailto:KenneyC@gao.gov).

---

## Staff Acknowledgments

In addition to the contacts named above, Sally Newman (Assistant Director), Christina Werth (Assistant Director), Ashley Alley, Katie Bernet, William Carpluk (Analyst in Charge), Jim East, Chad Hinsch, David Jones, Erin O'Brien, Richard Powelson, Lisa Shibata, Michael Silver, Carter Stevens, Tristan T. To, and Sarah Veale made key contributions to this report.

---

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).  
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).  
Visit GAO on the web at <https://www.gao.gov>.

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/about/what-gao-does/fraudnet>

Automated answering system: (800) 424-5454 or (202) 512-7700

---

## Congressional Relations

A. Nicole Clowers, Managing Director, [ClowersA@gao.gov](mailto:ClowersA@gao.gov), (202) 512-4400, U.S. Government Accountability Office, 441 G Street NW, Room 7125, Washington, DC 20548

---

## Public Affairs

Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

---

## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548



Please Print on Recycled Paper.