



October 2022

# WORKING DOGS

## Federal Agencies Need to Better Address Health and Welfare

Accessible Version

# GAO Highlights

Highlights of [GAO-23-104489](#), a report to congressional committees

## Why GAO Did This Study

GAO and some agencies' Offices of Inspector General have previously identified concerns with the management of federal working dog programs. These concerns include past mistreatment of working dogs that the U.S. government provided to foreign governments for antiterrorism assistance.

Senate Report 116-236 contains a provision for GAO to review the use of working dogs across the federal government. This report examines (1) the number of working dogs used by federal agencies, and their roles; (2) the extent to which federal agencies' policies and contract-related documents address the health and welfare of working dogs they use; and (3) the number of working dogs the U.S. government provides to foreign partners, and the standards to protect the health and welfare of these dogs.

GAO identified 18 issues important to the health and welfare of working dogs, analyzed working dog program documents to determine whether they addressed these issues, and interviewed agency officials.

## What GAO Recommends

GAO is making 19 recommendations to agencies to ensure that their policies and future contracts address, as appropriate, all 18 health and welfare issues. Of the 16 agencies that reviewed this report, 11 concurred with the recommendations; four did not comment on them. The Department of Energy partially concurred with its two recommendations, indicating that it would evaluate the applicability of the issues. GAO continues to believe that addressing all 18 issues is important.

View [GAO-23-104489](#). For more information, contact Steve Morris at (202) 512-3841 or [MorrisS@gao.gov](mailto:MorrisS@gao.gov).

October 2022

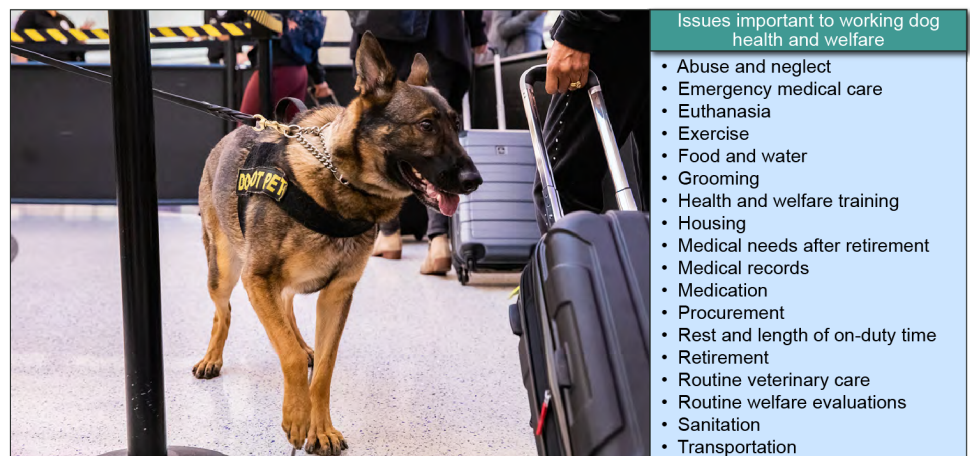
## WORKING DOGS

### Federal Agencies Need to Better Address Health and Welfare

## What GAO Found

As of February 2022, about 5,100 working dogs served the federal government in 40 federally managed programs within eight departments and three independent agencies. In addition, approximately 400 working dogs served the federal government in 24 contractor-managed programs within eight departments and two independent agencies. Officials from federally and contractor-managed working dog programs most commonly reported using working dogs to detect explosives (see fig.) or narcotics, among other things.

#### Working Dog Searching for Explosives at a U.S. Airport, and the 18 Issues That GAO Identified as Important to Working Dog Health and Welfare



Sources: Transportation Security Administration and GAO analysis of agency documents. | [GAO-23-104489](#)

#### Text of Working Dog Searching for Explosives at a U.S. Airport, and the 18 Issues That GAO Identified as Important to Working Dog Health and Welfare

#### Issues important to working dog health and welfare:

- Abuse and neglect
- Emergency medical care
- Euthanasia
- Exercise
- Food and water
- Grooming
- Health and welfare training
- Housing
- Medical needs after retirement
- Medical records

- Medication
- Procurement
- Rest and length of on-duty time
- Retirement
- Routine veterinary care
- Routine welfare evaluations
- Sanitation
- Transportation

Federally and contractor-managed working dog programs address the health and welfare of dogs in policies and contract-related documents. Some of these programs' policies address all 18 issues GAO identified as important to the health and welfare of working dogs (see fig.), but most do not. For example, about half of the federally managed programs do not address abuse and neglect or requirements for rest and duration of on-duty working time in their policies. Similarly, about half of the contractor-managed programs do not address abuse and neglect or how to handle working dog retirement or euthanasia decisions in their contract-related documents. One contractor-managed program did not address any of the 18 important issues GAO identified.

Three Department of State programs were providing more than 1,000 working dogs to foreign partners, primarily for explosives and narcotics detection, as of February 2022. All three State Department programs have standards to help ensure that foreign partners are maintaining the health and welfare of these dogs. One of the three programs addressed all 18 health and welfare issues, while the other two did not. Addressing all 18 of the issues GAO identified for federally managed programs, future contracts, and standards for foreign partners, as appropriate, can help ensure that federal agencies adequately provide for the health and welfare of their working dogs. This, in turn, would help ensure the dogs' humane treatment and optimal performance.

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#### Abbreviations

ATA	Office of Antiterrorism Assistance
CT	Bureau of Counterterrorism
FPDS	Federal Procurement Data System
INL	Bureau of International Narcotics and Law Enforcement Affairs
OIG	Office of Inspector General
PM/WRA	Bureau of Political and Military Affairs, Office of Weapons Removal and Abatement

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October 19, 2022

The Honorable Jack Reed  
Chairman  
The Honorable James M. Inhofe  
Ranking Member  
Committee on Armed Services  
United States Senate

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

Dozens of agencies across the federal government use thousands of working dogs to help them fulfill their missions in areas such as law enforcement and security. Working dogs may be used for tasks such as the detection of explosives or narcotics, among other things. These dogs may be managed by federal government programs for working dogs or by contractors. The U.S. government also provides working dogs to some foreign partners to support their work.<sup>1</sup> In addition to the humanitarian need to treat these animals properly, basic standards of health and welfare are critical to ensuring that working dogs can perform their important functions and help agencies accomplish their missions. Currently, however, according to agency officials across the government, no overarching federal requirements exist for the general health and welfare of federal working dogs, and there is no consensus health and welfare standard that applies to all federal working dogs.

In September 2019, the State Department Office of Inspector General (OIG) reported serious animal welfare concerns for working dogs provided to foreign governments for antiterrorism assistance.<sup>2</sup> The Inspector General found that dogs provided to at least one foreign

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<sup>1</sup>Foreign partners that receive working dogs include both foreign governments and international nongovernmental organizations.

<sup>2</sup>Department of State, Office of Inspector General, *Evaluation of the Antiterrorism Assistance Explosives Detection Canine Program – Health and Welfare*, ESP-19-06 (Arlington, VA: September 2019). The State Department Office of Inspector General (OIG) closed all of the recommendations from this report in September 2021.



government did not receive proper medical care and, in some cases, dogs were found to be dangerously underweight. The Inspector General also reported on the death of at least one dog from heat stroke.

In addition, prior work by GAO and some federal agencies' Offices of Inspector General has identified concerns with the management of agencies' own working dog programs. For example, we reported in January 2013 that the Transportation Security Administration did not fully analyze data the agency collected on the amount of time canine teams spent conducting training as well as searching for explosives odor.<sup>3</sup> We reported that such analyses could be used to determine canine teams' proficiency, inform future deployment efforts, and help ensure that taxpayer funds are used effectively. In addition, the Department of Defense Office of Inspector General reported in March 2018 that the Army's plan and process to transfer or adopt retiring tactical explosives detection dogs lacked proper management and oversight.<sup>4</sup> The report found that certain records related to the adoption of the dogs were missing and that civilians' applications to adopt the dogs moved very quickly, with applicants potentially not being fully educated about the dogs they were adopting and whether they could handle them. According to the report, one Department of Defense official said that there were adopters whose home environments had not been vetted for adoption suitability, as was required by Department of Defense policy.

Senate Report 116-236 includes a provision for us to review the use of working dogs across the federal government, including any federal policies related to the protection or health and welfare of working dogs.<sup>5</sup> This report examines (1) the number of working dogs that serve federal agencies, and the roles in which these dogs are used; (2) the extent to which federal agency policies and contracts and related documents address the health and welfare of working dogs that serve the agencies; and (3) the number of working dogs that the U.S. government provides to foreign partners, the roles in which these dogs are used, and the standards to protect the health and welfare of these dogs. We also

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<sup>3</sup>GAO, *TSA Explosives Detection Canine Program: Actions Needed to Analyze Data and Ensure Canine Teams Are Effectively Utilized*, [GAO-13-239](#) (Washington, D.C.: January 2013).

<sup>4</sup>Department of Defense, Office of Inspector General, *The Army's Tactical Explosives Detection Dog Disposition Process from 2011 to 2014*, DODIG-2018-081 (Alexandria, VA: Mar. 1, 2018).

<sup>5</sup>S. Rep. No. 116-236, at 181 (2020).

examined the steps that agencies take to ensure that provisions addressing health and welfare issues are followed for federally managed working dogs, contractor-managed working dogs, and working dogs provided to foreign partners.

For all objectives, we interviewed agency officials and collected documents from federal agencies with federally managed or contractor-managed working dog programs and from those who provide them to foreign partners. Agencies may have federally managed working dog programs, contractor-managed working dog programs, or both, and agencies may have more than one working dog program. To identify these programs, we (1) conducted an initial search for executive branch agencies that used working dogs as part of their law enforcement or security programs, (2) examined the Federal Procurement Data System to identify contractor-managed working dog programs not captured in the initial search, and (3) asked officials to identify other agencies that they were aware of that use working dogs.<sup>6</sup> To determine how many dogs serve these agencies and in what roles they are used, we requested a count of the total number of dogs at each agency as of February 15, 2022, and a description of their roles. (See app. I for detailed information about our objectives, scope, and methodology.)

To determine the extent to which federal agency policies and contracts and related documents address the health and welfare of working dogs that serve the agencies, we examined agency documents, such as guidance documents and training policies that officials identified as addressing the health and welfare of working dogs. For contractor-managed programs, we examined contract-related documents, including the contract's solicitation or statement of work; and documents produced by the contractors, such as company policies or standard operating procedures. We generally attributed to agency officials any statements about whether contractors were contractually required to comply with provisions of those contractor documents and did not independently evaluate whether compliance with such provisions was contractually required.

Next, since there is no consensus health and welfare standard for federal working dogs, we developed a list of issues that are important to the

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<sup>6</sup>Some federal working dog programs, such as those managed by the judicial and legislative branches, were not included in our review.

health and welfare of working dogs. We reviewed policies from several federal agencies to develop a list of 18 health and welfare issues.<sup>7</sup> We sent the list to representatives from three stakeholder organizations—the American Veterinary Medical Association; the North American Police Working Dog Association; and the National Institute of Standards and Technology’s Organization of Scientific Area Committees for Forensic Science, Subcommittee on Orthogonal Sensors and Detector Dogs—who reviewed and validated the list of issues. Agency officials expressed broad support for the importance of addressing all of these issues in federal programs’ policies and contract-related documents. While addressing all issues is not legally required, agency officials generally agreed that it was important to address these issues in federal programs’ policies and contract-related documents. While these 18 issues are not deemed to be exhaustive, on the basis of our work and the confirmation of knowledgeable stakeholders, including agency officials, we believe this list of issues is comprehensive and foundational for ensuring the health and welfare of federal working dogs.

We examined agencies’ working dog policies and contract-related documents to determine whether they addressed each of the 18 issues. We made these determinations for each program based on all the documents provided to us by the program; agencies may address certain issues in one document and other issues in a different document. To determine what steps agencies take to ensure that these policies and requirements in contract-related documents that address these issues are followed, we interviewed agency officials and collected and analyzed written responses.

To determine the extent to which the U.S. government provides working dogs to foreign partners and the roles in which these dogs are used, we analyzed agency documents and interviewed agency officials. We also reviewed agency policies and standards for foreign partners’ use of the dogs to determine whether they addressed the 18 issues related to the

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<sup>7</sup>These issues are: abuse and neglect, emergency medical care, euthanasia, exercise, food and water, grooming, health and welfare training, housing, medical needs after retirement, medical records, medication, procurement, rest and length of on-duty time, retirement, routine veterinary care, routine welfare evaluations, sanitation, and transportation. A list of these issues, with illustrative examples, appears in table 1.

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health and welfare of working dogs.<sup>8</sup> We also examined actions taken by the Department of State in response to the September 2019 State Department OIG report.<sup>9</sup> Finally, we examined the steps that State Department bureaus that provide working dogs to foreign partners take to ensure that these partners comply with these standards. For more information on the State Department's current efforts to conduct oversight on the implementation of the health and welfare of working dogs provided to foreign partners, see appendix VI.

We conducted this performance audit from August 2020 to October 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Federal agencies employ different breeds of working dogs. For example, the standard breeds used for U.S. military working dogs are German and Dutch shepherds and Belgian Malinois. The U.S. Department of Agriculture uses beagles, Labrador retrievers, and Jack Russell terriers to help safeguard American agriculture. Certain breeds are frequently used for particular applications. For example, retrievers are typically used to detect one particular scent, such as cocaine or marijuana.

Agencies procure their working dogs using a variety of processes. For example, the Department of Defense obtains its dogs from the U.S. Air Force, which procures and trains working dogs for every service branch at Lackland Air Force Base.<sup>10</sup> Roughly 85 percent of the dogs procured by

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<sup>8</sup>The three Department of State working dog programs we reviewed establish their expectations for the health and welfare of working dogs provided to foreign partners in various types of documents. Some of those expectations are considered to be requirements, whereas others are standards or best practices. For the purposes of this report, we refer to all of these expectations as "standards."

<sup>9</sup>ESP-19-06.

<sup>10</sup>The Department of Defense designated the Secretary of the Air Force as the Department of Defense's Executive Agent for the Military Working Dog Program resourcing, training, utilization, and final disposition in Directive 5200.31E, *DOD Military Working Dog Program*.

the Air Force are from breeders located in either Germany or the Netherlands. Other agencies generally procure their dogs from commercial working dog providers in the U.S. and Europe. According to officials, procuring and training a dog can cost approximately \$65,000 to \$85,000 per dog. Figure 1 shows a pup from the Department of Defense's Military Working Dog Program.

**Figure 1: Malinois Pup from the Department of Defense's Military Working Dog Program**



Source: Department of Defense Military Working Dog (MWD) Program. | GAO-23-104489

Working dogs perform a wide variety of functions and, therefore, require different types of specialized skills. For example, working dogs might need the strength to suddenly run fast, or to leap over a tall barrier, as well as the physical stamina to stand or walk all day. They might need to search over rubble or in difficult environmental conditions, such as extreme heat or cold, often wearing heavy body armor. They also might spend the day detecting specific scents among thousands of others, requiring intense mental concentration. Each function requires dogs to undergo specialized training. A working dog typically works in a team with a human handler, who is responsible for the care and training that the dog needs to perform its assigned tasks. Figure 2 shows a military working dog in training.

**Figure 2: Military Working Dog in Training**



Source: Department of Defense Military Working Dog (MWD) Program. | GAO-23-104489

Depending on their specialized functions, working dogs can undergo training for several months. For example, the Transportation Security Administration's National Explosives Detection Canine Team Program requires its dogs to receive 6 weeks of training before being paired with a

handler, followed by 11 weeks of training after being paired with a handler. Passenger screening dogs receive 8 weeks of training before being paired with a handler, followed by 16 weeks of training after being paired with a handler. Figure 3 shows various types of canine teams conducting searches based on their specialized functions.

**Figure 3: Canine Teams Conducting Searches Based on Their Specialized Functions**



Law enforcement officer team patrolling mass transit terminal



Transportation security inspector team screening air cargo



Passenger screening canine team searching airport terminal

Source: GAO. | GAO-23-104489

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## About 5,600 Dogs Serve the Federal Government, Primarily in Detecting Explosives, Narcotics, and People

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### Approximately 5,160 Working Dogs Are Managed by Federal Agencies; about 420 Are Managed by Contractors

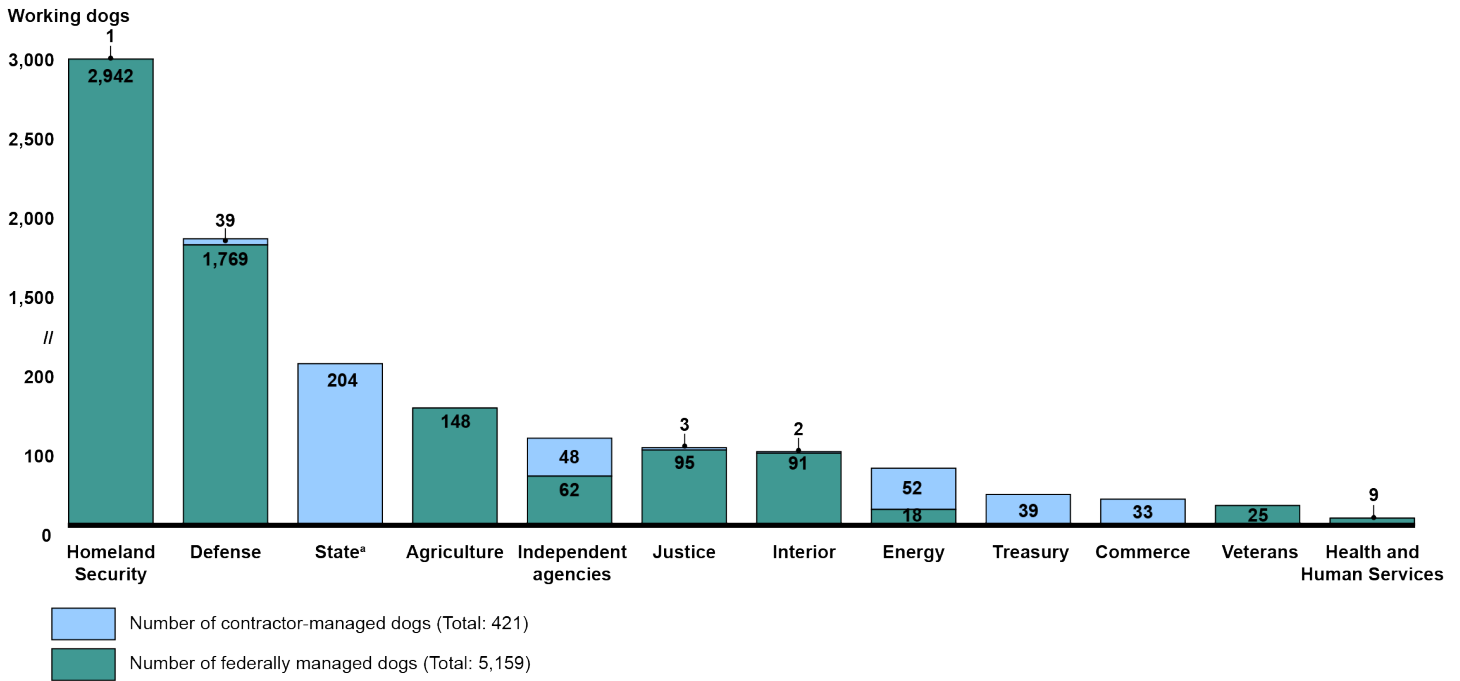
As of February 15, 2022, 5,159 working dogs served the federal government in 40 federally managed programs across eight departments and three independent agencies.<sup>11</sup> In addition, 421 working dogs served the federal government in 24 contractor-managed programs across eight departments and two independent agencies (see fig. 4 and apps. II and III for additional details).

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<sup>11</sup>Some agencies reported having more than one federally managed working dog program. For example, U.S. Customs and Border Protection reported having four different canine programs within the agency (Agriculture, Office of Field Operations, Office of Training and Development, and U.S. Border Patrol). See app. II for a full list of federally managed working dog programs. The Tennessee Valley Authority reported having federally managed working dogs as part of its police program but does not make the numbers of its working dogs publicly available. As a result, its dogs are not included in this total.



**Figure 4: Federal Departments and Independent Agencies with Working Dogs, as of February 15, 2022**



Source: GAO analysis of agency data. | GAO-23-104489

**Data table for Figure 4: Federal Departments and Independent Agencies with Working Dogs, as of February 15, 2022**

	Number of Federally Managed Dogs	Number of Contractor-Managed Dogs
Department of Homeland Security	2942	1
Department of Defense	1769	39
Department of State <sup>a</sup>	0	204
Department of Agriculture	148	0
All Independent agencies	62	48
Department of Justice	95	3
Department of Interior	91	2
Department of Energy	18	52
Department of Treasury	0	39
Department of Commerce	0	33
Veterans Affairs	25	0
Department of Health and Human Services (National Institute of Health)	9	0
<b>Total</b>	<b>5159</b>	<b>421</b>

Source: GAO analysis of agency data. | GAO-23-104489

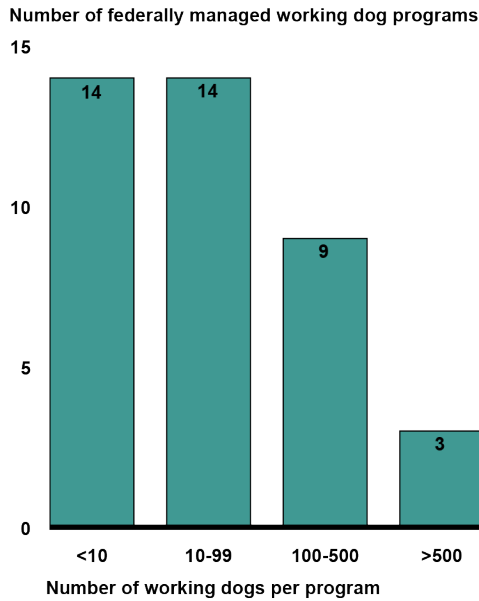
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Note: Some federal working dog programs, such as those managed by the judicial and legislative branches, were not included in our review. Additionally, the Tennessee Valley Authority reported having federally managed working dogs as part of its police program but does not make the numbers of its working dogs publicly available. As a result, its dogs are not included in this total.

<sup>a</sup>Department of State officials noted that the 194 working dogs in their Office of Overseas Protective Operations program are owned by the federal government but managed by contractors. According to State officials, the contractors managing the dogs in that program are responsible for the accountability, stewardship, veterinary care, overall welfare, and protection of the canines throughout their service life. As a result, we classified this program as a contractor-managed program for the purposes of this report.

Working dog programs managed by the federal government varied in size. Approximately three-quarters of the 40 federal working dog programs had fewer than 100 dogs, while 14 had fewer than 10 dogs (see fig. 5). Three federally managed working dog programs—those managed by the Transportation Security Administration and the U.S. Customs and Border Protection’s Border Patrol, both within the Department of Homeland Security, as well as the U.S. Air Force within Department of Defense—had over 500 dogs each. The Transportation Security Administration reported having 1,097 working dogs in its program, the most of any single federal working dog program. Nine additional programs, including those managed by the Customs and Border Protection’s Office of Field Operations, the U.S. Army, and the Department of Agriculture’s Animal and Plant Health Inspection Service, had between 100 and 500 working dogs each.

**Figure 5: Number of Federally Managed Working Dog Programs, by Number of Dogs in Each Program**



Source: GAO analysis of agency data. | GAO-23-104489

**Data table for Figure 5: Number of Federally Managed Working Dog Programs, by Number of Dogs in Each Program**

Number of working dogs per program	Number of federally managed working dog programs
Agencies with >500 Dogs	3
Agencies with 100-500 dogs	9
Agencies with 10-99 dogs	14
Agencies with <10 dogs	14

Source: GAO analysis of agency data. | GAO-23-104489

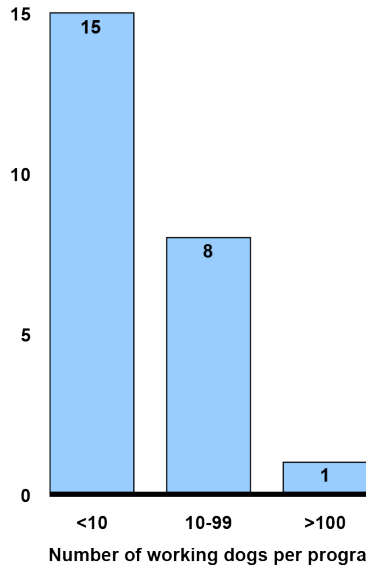
Of the 421 working dogs that served the federal government in contractor-managed programs, 194 served the Office of Overseas Protective Operations in the State Department’s Bureau of Diplomatic Security.<sup>12</sup> The Department of Defense and the Department of the

<sup>12</sup>Department of State officials noted that the 194 working dogs in their Office of Overseas Protective Operations program are owned by the government but managed by contractors. According to State Department officials, these contractors are responsible for the accountability, stewardship, veterinary care, overall welfare, and protection of the canines throughout their service life. As a result, we classified this program as a contractor-managed program for the purposes of this report.

Treasury each had 39 dogs managed by contractors, while the Department of Energy had 52 contractor-managed dogs.<sup>13</sup> Most other contractor-managed programs were smaller, with 10 or fewer dogs each, as shown in figure 6.

**Figure 6: Number of Contractor-Managed Working Dog Programs, by Number of Dogs in Each Program**

Number of contractor-managed working dog programs



Source: GAO analysis of agency data. | GAO-23-104489

**Data table for Figure 6: Number of Contractor-Managed Working Dog Programs, by Number of Dogs in Each Program**

Number of working dogs per program	# of Contractor-Managed working dog programs
>100 Dogs	1
10-99 dogs	8
<10 dogs	15

Source: GAO analysis of agency data. | GAO-23-104489

<sup>13</sup>Some agencies reported having more than one contractor-managed working dog program. For example, the Department of Defense had six different programs within the Army (Carlisle Barracks, PA; Ft. McCoy, WI; Kwajalein Atoll; Sierra Army Depot, CA; West Point, NY; and U.S. Army European Command). See app. III for a full list of contractor-managed working dog programs.

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## Working Dogs Serve Federal Agencies in a Variety of Roles, Primarily Related to Detection

Officials from federally managed and contractor-managed working dog programs reported having dogs serve in a variety of roles, such as detection of explosives or narcotics.<sup>14</sup> Officials from many working dog programs managed by the federal government reported having some of their dogs serve in explosives detection. For example, officials from the Transportation Security Administration reported that their working dogs serve in explosives detection roles at transportation venues, such as airports and mass transit facilities, as well as conduct passenger screening for improvised explosive devices (see fig. 7). Officials from Amtrak reported using their working dogs for explosives detection on Amtrak's national rail system.<sup>15</sup>

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<sup>14</sup>Officials noted that any individual dog will usually be used for one detection activity, though an agency may employ different dogs for different detection activities.

<sup>15</sup>Amtrak was established by Congress, and most members of the Amtrak Board of Directors are appointed by the President and confirmed by the U.S. Senate. Amtrak is operated as a for-profit company.

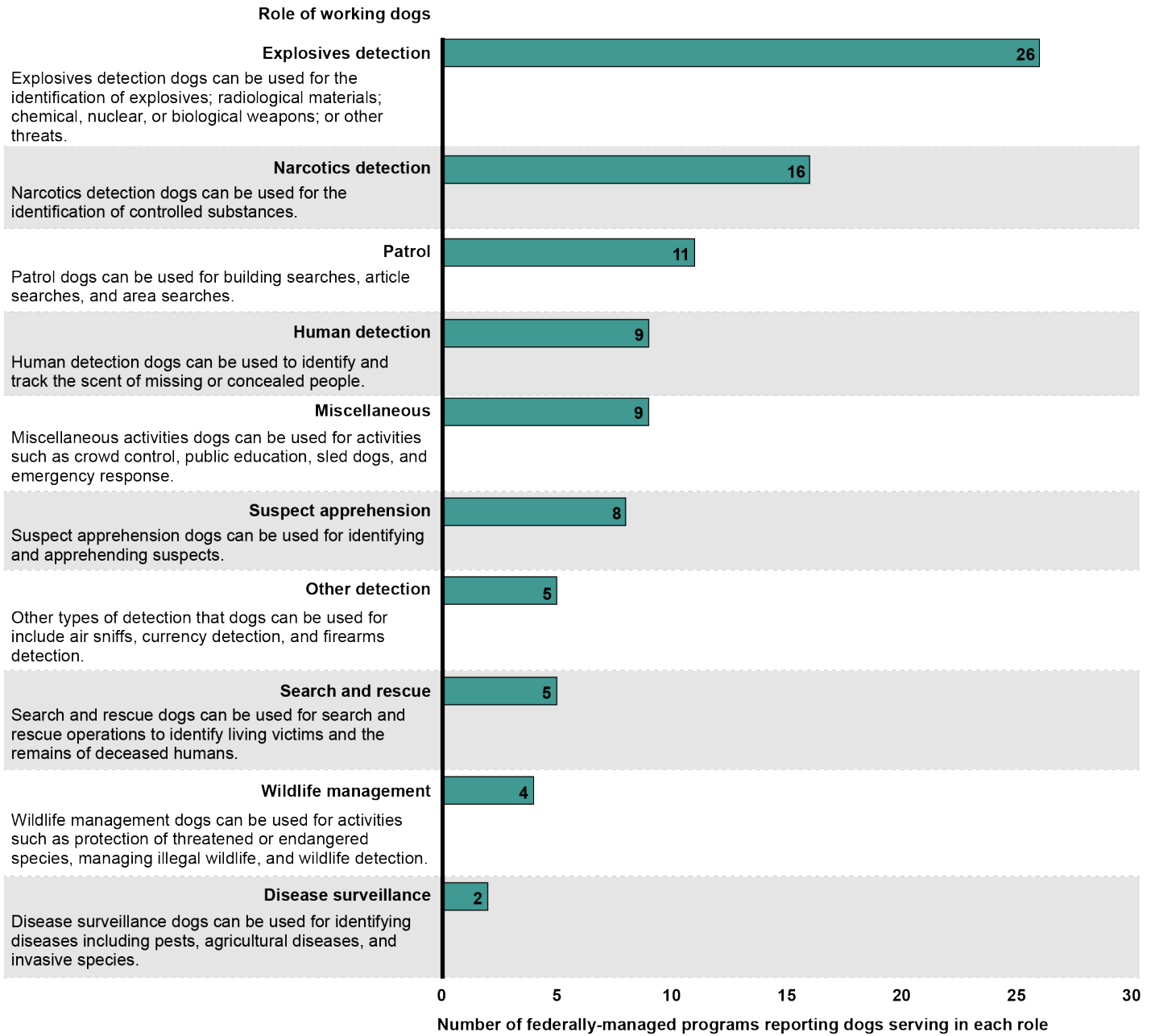
**Figure 7: Working Dog Searching for Explosives at a U.S. Airport**



Source: Transportation Security Administration. | GAO-23-104489

Agencies that managed their own federal working dog programs also commonly reported using their working dogs for roles other than detection, including for patrol, wildlife management, and search and rescue. For example, the Department of Agriculture's Forest Service reported using dogs to search for people who get lost in the wilderness or to search for fugitives on Forest Service-managed land. While individual dogs generally serve in a single role, many agencies reported using different dogs in different roles. For example, the U.S. Customs and Border Protection's Border Patrol reported using dogs for narcotics detection, human detection, patrol, and search and rescue. Figure 8 lists the roles reported for dogs in federally managed working dog programs.

**Figure 8: Roles of Working Dogs in Federally Managed Programs, by Number of Programs Reporting Dogs in Each Role**



Source: GAO analysis of agency data. | GAO-23-104489

**Data table for Figure 8: Roles of Working Dogs in Federally Managed Programs, by Number of Programs Reporting Dogs in Each Role**

Role	Number of dogs in that role
explosives detection	26
narcotics detection	16
patrol	11
Human detection	9
miscellaneous	9
suspect apprehension	8
other detection	5
search and rescue	5
wildlife management	4
disease surveillance	2

Source: GAO analysis of agency data. | GAO-23-104489

1. Explosives detection dogs can be used for the identification of explosives; radiological materials; chemical, nuclear, or biological weapons; or other threats.
2. Human scent detection dogs can be used to identify and track the scent of missing or concealed people.
3. Narcotics detection dogs can be used for the identification of controlled substances
4. Wildlife management dogs can be used for activities such as protection of threatened or endangered species, managing illegal wildlife, and wildlife detection.
5. Patrol dogs can be used for building searches, article searches, and area searches.
6. Miscellaneous activities dogs can be used for activities such as crowd control, public education, sled dogs, and emergency response.
7. Disease surveillance dogs can be used for identifying diseases including pests, agricultural diseases, and invasive species.
8. Search and rescue dogs can be used for search and rescue operations to identify living victims and the remains of deceased humans.
9. Other types of detection that dogs can be used for include air sniffs, currency detection, and firearms detection.
10. Suspect apprehension dogs can be used for identifying and apprehending suspects.

Note: While individual dogs generally serve in a single role, many agencies reported using different dogs in different roles.

Some agencies that managed their own working dog programs also reported using their working dogs in other specialized roles. The National Park Service, for example, reported using dogs as sled dogs to help park rangers traverse Denali National Park in winter (see fig. 9), while the Department of Agriculture reported using dogs to detect waterfowl feces or carcasses infected with avian influenza.



**Figure 9: National Park Service Sled Dogs at Denali National Park, Alaska**



Source: National Park Service. | GAO-23-104489

As with dogs in federally managed working dog programs, dogs in contractor-managed working dog programs mainly served in detection roles. Officials from 23 of the 24 contractor-managed working dog programs that we identified reported using dogs for explosives detection. For example, the Smithsonian Institution deploys dogs around its buildings to scan large packages that cannot be scanned with an X-ray machine, in search of explosives. Dogs in contractor-managed programs were also used for narcotics detection.

## Federal Agencies' Policies Address Many, but Not All, Issues Important to the Health and Welfare of Working Dogs

The policies of the 40 federally managed working dog programs in this review generally address many, but not all, of the 18 issues that we identified as important to the health and welfare of working dogs. Contract-related documents from those agencies with contractor-managed working dog programs generally address some, but not all, of the 18 issues.

Policies for federally managed working dog programs typically address a range of health and welfare issues, such as housing, routine and emergency medical care, food and water, and working dog retirement.<sup>16</sup> These are among the 18 issues that our analysis identified as being important to the health and welfare of working dogs (see table 1). While addressing all issues is not legally required, agency officials and knowledgeable stakeholders generally agreed that it was important to address all of these issues in the policies for federally managed working dog programs.<sup>17</sup> In addition, agency officials generally agreed that these issues were important to address in contractor-managed programs' contract-related documents.

**Table 1: Eighteen Issues That GAO Identified as Important to the Health and Welfare of Working Dogs**

Issue	Examples of subjects addressed
Abuse and neglect	How to prevent, identify, report, investigate, and sanction suspected abuse and neglect of working dogs
Emergency medical care	How working dogs are to receive emergency medical care, either by a veterinarian or a trained handler
Euthanasia	Conditions under which euthanasia is permissible, the decision-making process, and which officials have decision-making authority
Exercise	Exercise for working dogs appropriate to weight and breed, including specific regimens (possibly developed in consultation with a veterinarian)
Food and water	How working dogs are provided food and water, including timing of feeding, type and amount of food, and specific regimens (possibly developed in consultation with a veterinarian)
Grooming	Handlers' responsibilities for grooming working dogs; practices to be followed
Health and welfare training	The training related to the health and welfare of working dogs that handlers should receive
Housing	How working dogs are to be housed (either at a handler's home or at a kennel), standards for housing, and contingencies when usual housing is unavailable
Medical needs after retirement	Who has responsibility for addressing the medical needs of working dogs after they retire
Medical records	Requirements and practices for keeping and storing working dog medical records
Medication	How to provide medication for working dogs, including frequency or types of medication and instructions for administering medication and safe storage of medication

<sup>16</sup>Additionally, some agencies have adopted health and welfare standards from external organizations. For example, Denali National Park uses standards from an outside organization, Mush with PRIDE, for its sled dogs.

<sup>17</sup>The list of issues identified by GAO is not intended to be exhaustive of all issues that may be important to working dog health and welfare. However, according to our work and the input of knowledgeable stakeholders, it is a comprehensive and foundational list of issues important to federal working dog health and welfare.

Issue	Examples of subjects addressed
Procurement	Requirements for procuring working dogs, including sourcing, providers, preferred breeds, selection criteria, health and temperament testing, and identification of responsible officials
Rest and length of on-duty time	Requirements for giving working dogs rest and off-duty time, including length of shifts and timing of breaks
Retirement	Criteria for retiring working dogs and systems for determining who may adopt retired working dogs
Routine veterinary care	How frequently to take working dogs for routine veterinary care, issues addressed at periodic visits, and identification of officials responsible for ensuring that routine care takes place
Routine welfare evaluations	Checks for health and well-being carried out by handlers at regular intervals, such as daily; procedures for such checks
Sanitation	Sanitation requirements for housing, vehicles, food, or water
Transportation	Characteristics of vehicles used to transport canines, provisions for transporting dogs in heat or cold, frequency of checks on dogs in vehicles, and practices for air travel

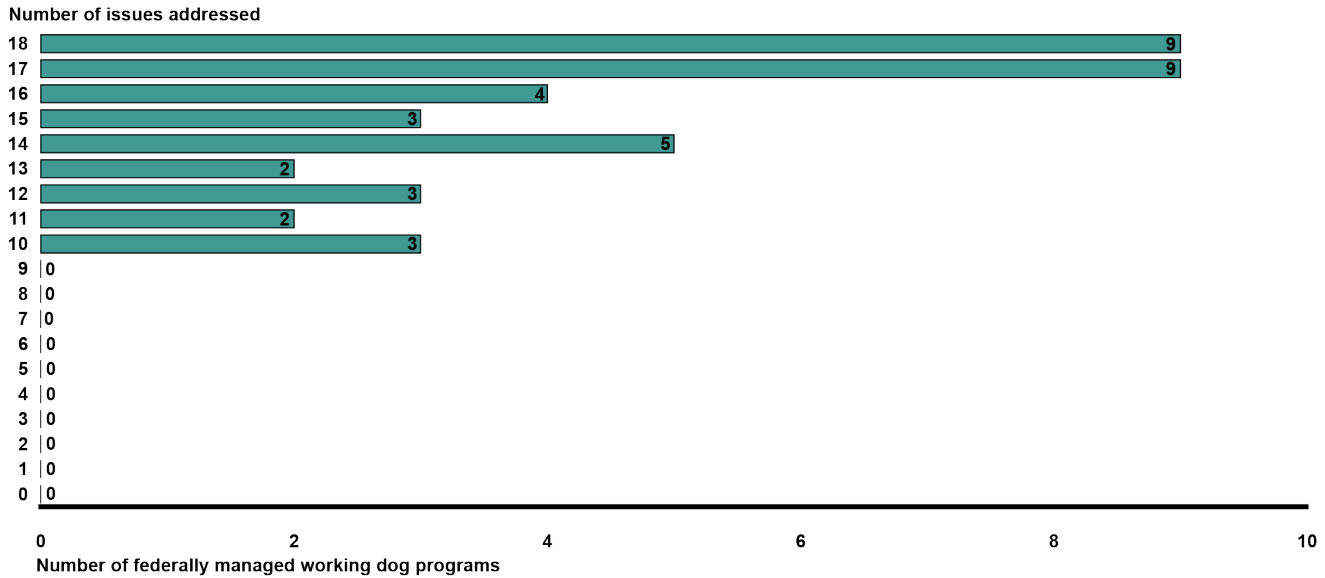
Source: GAO analysis of agency documents. | GAO-23-104489

Note: The list of issues identified by GAO is not intended to be exhaustive of all issues that may be important to working dog health and welfare. However, according to our work and the input of knowledgeable stakeholders, it is a comprehensive and foundational list of issues important to federal working dog health and welfare.

## Agency Policies Generally Address Many, but Not All, Issues Important to the Health and Welfare of Working Dogs

According to our analysis, all of the 40 federally managed working dog programs have policies that address at least some of the 18 issues important to the health and welfare of working dogs. Agency policies address these issues in varying levels of detail. We did not assess the quality or extent of the policies' coverage of an issue beyond determining whether a policy document addressed it. Nine programs addressed all 18 issues that we identified as important to the health and welfare of working dogs in their policies. Thirty-two of the 40 federally managed working dog programs' policies addressed at least 13 of the 18 issues that we identified (see fig. 10).

**Figure 10: Extent to Which Federally Managed Working Dog Program Policies Address 18 Issues That GAO Identified as Important to Working Dog Health and Welfare**



Source: GAO analysis of agency documents. | GAO-23-104489

**Data table for Figure 10: Extent to Which Federally Managed Working Dog Program Policies Address 18 Issues That GAO Identified as Important to Working Dog Health and Welfare**

Number of Issues Addressed	Number of Programs
18	9
17	9
16	4
15	3
14	5
13	2
12	3
11	2
10	3
9	0
8	0
7	0
6	0
5	0
4	0
3	0

Number of Issues Addressed	Number of Programs
2	0
1	0
0	0

Source: GAO analysis of agency documents. | GAO-23-104489

Some of the 18 issues are more frequently addressed in the policies of federally managed working dog programs than other issues. As figure 11 shows, routine veterinary care (40 of 40 programs), emergency medical care, food and water, housing, retirement, and transportation (each 39 of 40 programs), were among the issues that policies most frequently addressed. Examples of how policies address these issues include the following:

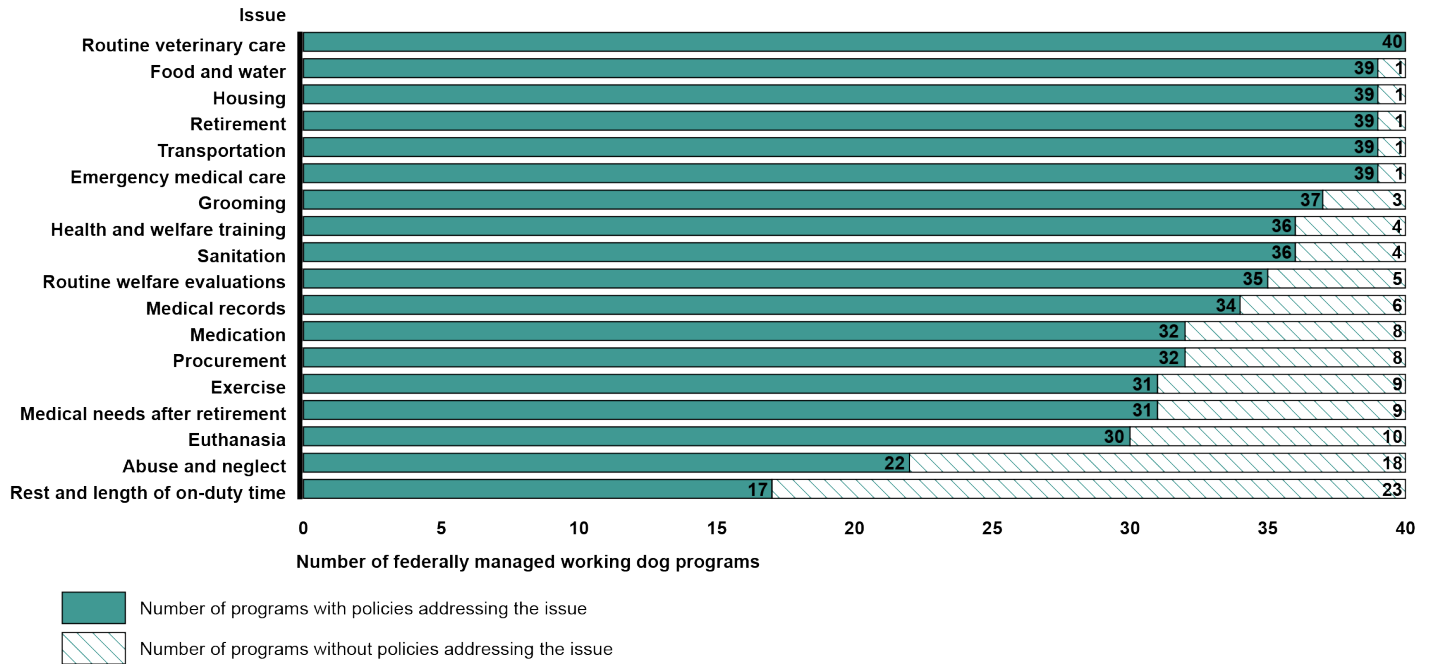
- **Food and water.** Customs and Border Protection’s DHS [Department of Homeland Security] Canine Policy requires handlers to provide clean water, as well as food, in the type and amount according to a veterinarian or agency’s or a subject matter expert’s instructions and to maintain the ideal working weight of a working dog.<sup>18</sup>
- **Routine veterinary care.** The U.S. Army’s policy states that its Office of the Surgeon General is to provide complete veterinary health care services for military working dogs and that a veterinarian will examine all assigned military working dogs during routine semiannual exams.<sup>19</sup>
- **Housing.** Air Force Instruction 31-121 includes specific requirements for a military working dog’s housing. For example, the policy includes requirements related to daily inspection, ventilation, cooling, heating, and noise level.<sup>20</sup>

<sup>18</sup>U.S. Department of Homeland Security, DHS Canine and Equine Governance Board, *DHS Canine Policy* (November 2019).

<sup>19</sup>Department of the Army, Army Regulation 190-12, *Military Working Dog Program* (Washington, D.C.: October 2019).

<sup>20</sup>U.S. Air Force, *Military Working Dog Program*, Air Force Instruction 31-121 (May 2018). The Department of Defense designated the Secretary of the Air Force as the Department of Defense’s Executive Agent for the Military Working Dog Program resourcing, training, utilization, and final disposition in Directive 5200.31E, *DOD Military Working Dog Program*.

**Figure 11: Number of Federally Managed Programs’ Policies That Address Each of the 18 Issues That GAO Identified as Important to the Health and Welfare of Working Dogs**



Source: GAO analysis of agency documents. | GAO-23-104489

**Data table for Figure 11: Number of Federally Managed Programs’ Policies That Address Each of the 18 Issues That GAO Identified as Important to the Health and Welfare of Working Dogs**

ISSUE	Number of programs with policies addressing the issue	Number of programs without policies addressing the issue
Routine Veterinary Care	40	0
Food and Water	39	1
Housing	39	1
Retirement	39	1
Transportation	39	1
Emergency Medical Care	39	1
Grooming	37	3
Health and welfare training	36	4
Sanitation	36	4
Routine Welfare evaluations	35	5
Medical records	34	6
Medication	32	8
Procurement	32	8

ISSUE	Number of programs with policies addressing the issue	Number of programs without policies addressing the issue
Exercise	31	9
Medical Needs after retirement	31	9
Euthanasia	30	10
Abuse and neglect	22	18
Rest/Length of on-duty time	17	23

Source: GAO analysis of agency documents. | GAO-23-104489

Note: The list of issues identified by GAO is not intended to be exhaustive of all issues that may be important to working dog health and welfare. However, according to our work and the input of knowledgeable stakeholders, it is a comprehensive and foundational list of issues important to federal working dog health and welfare.

As shown in figure 11, agencies’ working dog policies address some issues less frequently than others. The least-frequently addressed issues were abuse and neglect (22 of 40 programs) and rest and length of on-duty time (17 of 40 programs). Examples of how some agencies’ policies address these issues include the following:

- **Abuse and neglect.** The Department of Agriculture’s Animal and Plant Health Inspection Service policy requires that new handlers receive training on standards for the treatment of detector dogs and guidelines concerning what constitutes abuse or neglect of dogs.<sup>21</sup>
- **Rest and length of on-duty time.** Department of Veterans Affairs policy states that handlers must receive training that addresses how to ensure that dogs receive adequate and appropriate rest periods.<sup>22</sup> This includes both rest in a kennel and adequate rest between operational periods.

Appendix IV shows our analysis of whether each program’s policies address each of the 18 important issues that we identified.

Officials from those programs with policies that do not address certain issues provided various reasons why their programs’ policies did not do so. For example, reasons given for policies not addressing medical needs after retirement included that a retired dog’s medical needs become the responsibility of the adopter and so are not in the agency’s purview. Officials from one program said that their existing employee misconduct policies were sufficient to address cases of abuse and neglect. Officials

<sup>21</sup>U.S. Department of Agriculture, Animal and Plant Health Inspection Service, *National Detector Dog Manual* (updated April 2012).

<sup>22</sup>Department of Veterans Affairs, Law Enforcement Training Center, “Canine Program” (September 2021).

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from some agencies reported that their policies did not address rest and length of on-duty time because working dogs' needs vary too greatly with climate, type of activity, and other factors for policy to address this issue adequately.

**Agencies Use Various Steps to Ensure Compliance with Policies Related to the Health and Welfare of Working Dogs**

Officials from all federally managed working dog programs in our scope reported having steps in place to ensure compliance with their working dog policies. These included, for example, handler certification and training, supervisory review and inspection, explicit assignment of responsibilities, and reporting requirements. For example, Federal Protective Service officials, speaking about the agency's federally managed working dog program, told us that canine handlers receive advanced training in canine health care and that the first-line supervisor must ensure that canine handlers follow all health and welfare procedures. Officials added that verification of procedures is done by the Regional Canine Coordinator and through annual audits by headquarters Operational Program Managers.

Source: GAO analysis of agency statements. | GAO-23-104489

However, without comprehensive policies, agencies cannot ensure the humane treatment and optimal performance of their working dogs or ensure that officials carry out certain actions, like retirement and euthanasia, consistently (see sidebar for agency steps used to ensure compliance actions). For example, the Department of Defense Office of Inspector General found, in its 2018 report examining the Army's tactical explosives detection dog disposition process from 2011 to 2014, that the Army did not have a policy to determine what kinds of applicants would receive priority for transfer or adoption of its dogs.<sup>23</sup> In addition, according to the report, the Army did not have a process for vetting applicants who wished to adopt dogs during this time. As a result, some former handlers did not have the opportunity to adopt retired dogs, and the Army may have placed some dogs into unsuitable situations, the report stated. For example, the Army placed a dog trained to bite people in a household with small children and transferred 13 other dogs to a private company that ultimately abandoned them at a private kennel.<sup>24</sup>

Comprehensive policies can clearly articulate standards and delineate responsibilities and, in doing so, help management ensure that important activities, such as providing routine medical care or processing dogs at retirement, are carried out according to established standards. By developing policies that address all 18 of the issues that GAO identified, federally managed working dog programs can better ensure that they adequately provide for the health and welfare of their working dogs.

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### Contract-Related Documents for Working Dog Programs Generally Address Some, but Not All, Issues Important to the Health and Welfare of Working Dogs

According to our analysis, all but one of the 21 contractor-managed working dog programs that we examined address at least some of the 18

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<sup>23</sup>DODIG-2018-081.

<sup>24</sup>According to this report, two nonprofit canine rescue organizations eventually intervened and arranged to reunite most of the dogs with their former handlers.



issues important to the health and welfare of working dogs in their contract-related documents.<sup>25</sup> Contract-related documents address these issues in varying levels of detail. We did not assess the quality or extent of the documents' coverage of an issue beyond determining whether a document addressed it. The documents that agencies provided related to contracts for these programs, which included solicitations, statements of work, contractor policies, and other documents, typically provide for the services of a certain number of dog-handler teams for specific purposes, such as explosives detection at particular facilities. While the dogs are typically the contractor's property, contracts and related documents may specify contractor responsibility for particular aspects of the dogs' health and welfare.<sup>26</sup> We attributed to agency officials any statements about whether contractors were contractually required to comply with provisions of those documents and did not independently evaluate whether compliance with such provisions was contractually required.

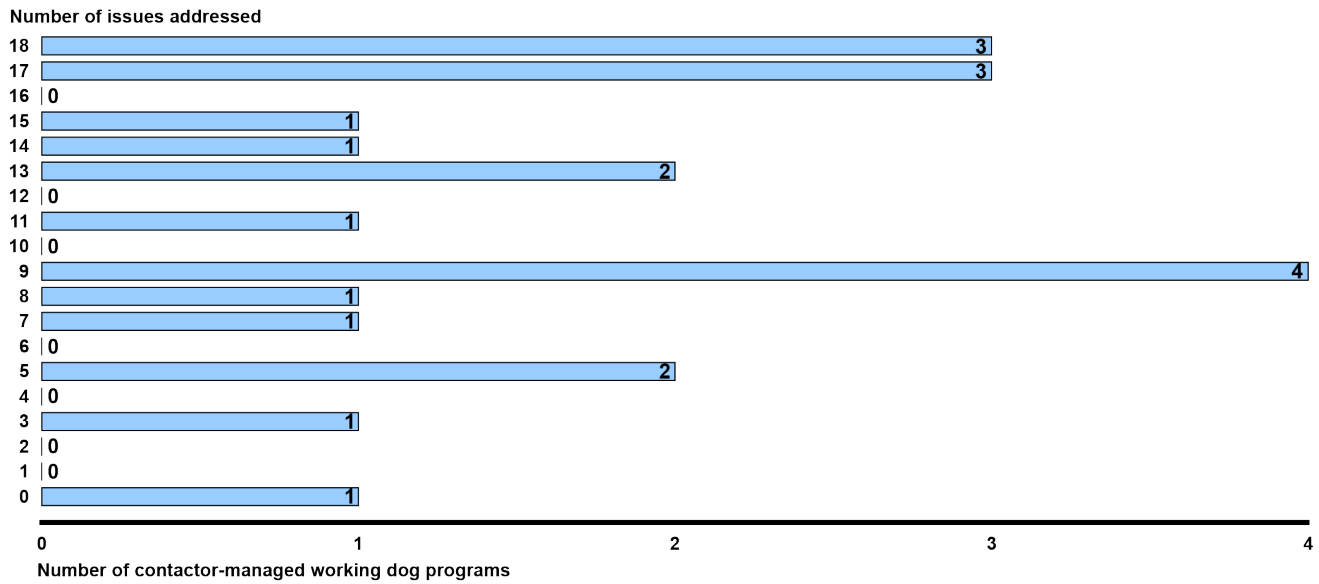
Our analysis showed that contract-related documents for contractor-managed working dog programs vary widely in the number of the 18 health and welfare issues that we identified that they address. Documents for these programs also tend to address fewer of the 18 issues than do policies for federally managed programs. Specifically, policies for federally managed programs address about 15 of the 18 issues on average, while documents for contractor-managed programs address about 11 issues on average. Documents for three of the 21 contractor-managed programs address all 18 issues. Overall, 10 of the programs address 13 or more issues in their documents, while 11 of the programs address fewer than 12 issues, and one addresses none of the 18 issues (see fig. 12).

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<sup>25</sup>This analysis covers the 21 contractor-managed working dog programs for which we received timely information and documentation. After we concluded our analysis of the 18 issues, the U.S. Army provided information on two additional contractor-managed programs, at Kwajalein Atoll and U.S. Army European Command, and the U.S. Postal Inspection Service provided information on its Third-Party Canine Program. These programs are not included in this analysis.

<sup>26</sup>Department of State officials noted that the 194 working dogs in their Office of Overseas Protective Operations program are owned by the federal government but managed by contractors. According to State Department officials, the contractors managing the dogs in that program are responsible for the accountability, stewardship, veterinary care, overall welfare, and protection of the canines throughout their service life. As a result, we classified this program as a contractor-managed program for the purposes of this report.

**Figure 12: Extent to Which Contract-Related Documents for Contractor-Managed Working Dog Programs Address 18 Issues That GAO Identified as Important to Working Dog Health and Welfare**



Source: GAO analysis of agency and contractor documents. | GAO-23-104489

**Data table for Figure 12: Extent to Which Contract-Related Documents for Contractor-Managed Working Dog Programs Address 18 Issues That GAO Identified as Important to Working Dog Health and Welfare**

Number of Issues Addressed	Number of Programs
18	3
17	3
16	0
15	1
14	1
13	2
12	0
11	1
10	0
9	4
8	1
7	1
6	0
5	2
4	0
3	1

Number of Issues Addressed	Number of Programs
2	0
1	0
0	1

Source: GAO analysis of agency and contractor documents. | GAO-23-104489

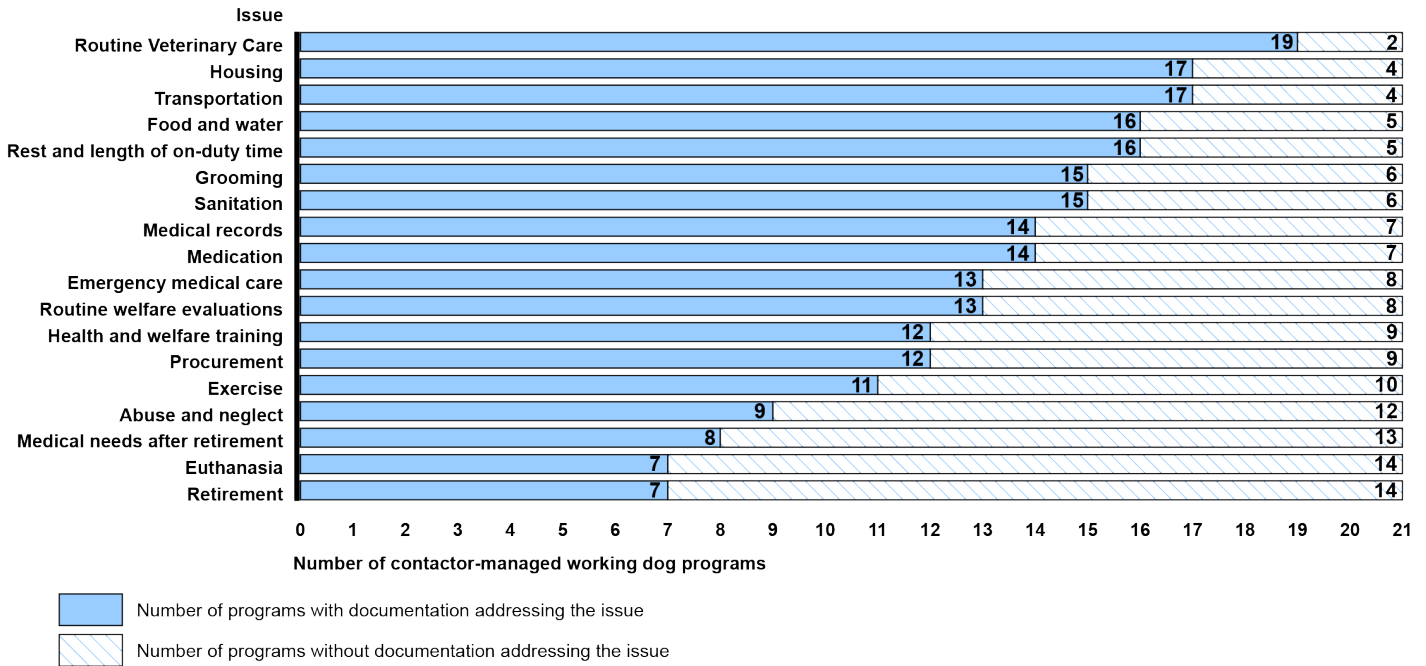
Note: This analysis covers the 21 contractor-managed working dog programs for which we received timely information and documentation. After we concluded our analysis of the 18 issues, the U.S. Army provided information on two additional contractor-managed programs, at Kwajalein Atoll and U.S. Army European Command, and the U.S. Postal Inspection Service provided information on its Third-Party Canine Program. These programs are not included in this analysis.

As with policies for federally managed working dog programs, contract-related documents for contractor-managed working dog programs address some issues more frequently than others. As shown in figure 13, contract-related documents most frequently address routine veterinary care (19 of 21 programs). Housing and transportation are the next most-frequently addressed issues (each 17 of 21 programs).

Examples of how contract-related documents address these issues include the following:

- **Routine veterinary care.** The National Park Service U.S. Park Police contractor requires that its dogs have an annual wellness visit with a veterinarian meeting certain requirements, including being familiar with working dogs.
- **Housing.** The U.S. Army contract for the working dog program at Carlisle Barracks, Pennsylvania, states that the contractor is required to provide kenneling facilities within 15 miles of the U.S. Army War College.
- **Transportation.** The statement of work for the Bureau of Reclamation’s contractor-managed working dog program states that the contractor is to provide a vehicle that must be able to ensure the health and safety of working dogs while on Bureau property, including hydration, nutrition, and relief from heat.

**Figure 13: Number of Contractor-Managed Programs with Contract-Related Documents Addressing Each of the 18 Issues That GAO Identified as Important to the Health and Welfare of Working Dogs**



Source: GAO analysis of agency and contractor documents. | GAO-23-104489

**Figure 13: Number of Contractor-Managed Programs with Contract-Related Documents Addressing Each of the 18 Issues That GAO Identified as Important to the Health and Welfare of Working Dogs**

Issue	Number of programs with documentation addressing the issue	Number of programs without documentation addressing the issue
Routine Veterinary Care	19	2
Housing	17	4
Transportation	17	4
Food and water	16	5
Rest and length of on-duty time	16	5
Grooming	15	6
Sanitation	15	6
Medical records	14	7
Medication	14	7
Emergency medical care	13	8
Routine welfare evaluations	13	8
Health and welfare training	12	9
Procurement	12	9

Issue	Number of programs with documentation addressing the issue	Number of programs without documentation addressing the issue
Exercise	11	10
Abuse and neglect	9	12
Medical needs after retirement	8	13
Euthanasia	7	14
Retirement	7	14

Source: GAO analysis of agency and contractor documents. | GAO-23-104489

Notes: The list of issues identified by GAO is not intended to be exhaustive of all issues that may be important to working dog health and welfare. However, according to our work and the input of knowledgeable stakeholders, it is a comprehensive and foundational list of issues important to federal working dog health and welfare.

This analysis covers the 21 contractor-managed working dog programs for which we received timely information and documentation. After we concluded our analysis of the 18 issues, the U.S. Army provided information on two additional contractor-managed programs, at Kwajalein Atoll and U.S. Army European Command, and the U.S. Postal Inspection Service provided information on its Third-Party Canine Program. These programs are not included in this analysis.

As figure 13 shows, the least-frequently addressed issues in contractor-managed working dog program documentation are abuse and neglect (nine of 21 programs), medical needs after retirement (eight of 21 programs), euthanasia (seven of 21 programs), and retirement (seven of 21 programs). Examples of how contract-related documents address these issues include the following:

- **Abuse and neglect.** The Bureau of Engraving and Printing’s working dog contractor’s canine policies and procedures document cites the definition of animal abuse and neglect from the Manual for Courts-Martial under article 134 of the Uniform Code of Military Justice.<sup>27</sup> It further states that there is no tolerance for handlers using excessive force, compulsion, electric shock, or collars that inflict pain and, instead, that dogs are trained and utilized using only positive and negative reinforcement by means of voice and touch. The policy further states that violations will lead to immediate removal of the dog from the handler’s control and the termination of the handler.
- **Medical needs after retirement.** The U.S. Marshals Service’s contractor’s working dog health and welfare policy states that a retired

<sup>27</sup> See Article 134, UCMJ, 10 U.S.C. § 934; *MCM*, pt. IV, ¶ 92c(2)(a). Specifically, the Manual for Courts-Martial provides that “abuse” means intentionally and unjustifiably overdriving, overloading, overworking, tormenting, beating, depriving of necessary sustenance, allowing to be housed in a manner that results in chronic or repeated serious physical harm, carrying or confining in or upon any vehicles in a cruel or reckless manner, or otherwise mistreating an animal. The manual further notes that abuse may include any sexual touching of an animal if not included in the definition of sexual act with an animal.

dog's new owner agrees to diligently care for the dog in a humane and responsible manner and provide vaccinations and health care, including veterinary care, among other needs.

- **Euthanasia.** The U.S. Marshals Service's contractor's working dog health and welfare policy states that when a working dog is terminally ill or injured, the contractor's staff and management will consult with the attending authorized veterinarian for their professional recommendations regarding euthanasia.
- **Retirement.** The Department of Energy's Pantex site's contract provides for handlers to adopt working dogs when the dogs have reached retirement and that handlers are to maintain proper housing, medical care, food, and exercise for the duration of a dog's retirement.

Appendix V shows our analysis of whether each contractor-managed program's documentation addresses each of the 18 important issues that we identified.

Agency officials provided several reasons for not addressing certain issues in documents related to their contractor-managed working dog programs. For example, officials from one agency said that their contract-related documents did not specifically address abuse and neglect because it is understood to be addressed by the requirements for the care and general well-being of the canines. Officials from another agency said that their contract-related documents did not address dogs' medical needs after retirement because they chose to focus on efforts to ensure mission performance rather than other issues or, in another case, because medical needs become the adopter's responsibility at retirement. Reasons that officials gave for not addressing retirement or euthanasia in contract-related documentation included that they believed the issues did not apply to a contract for services involving working dogs that the agency did not own.

**Agencies Use Various Steps to Ensure Compliance with Provisions in Contract-Related Documents Related to the Health and Welfare of Working Dogs**

Officials from some agencies that have contractor-managed working dog programs reported relying on provisions of contract-related documents to ensure the health and welfare of working dogs. However, some programs reported taking additional steps to ensure compliance with the provisions of contract-related documents related to the health and welfare of working dogs. For example, Department of Energy officials said that they use surveys, review programs, and require self-assessments of all contractors to help ensure compliance with requirements in contract-related documents concerning the health and welfare of working dogs. Officials from the Department of Homeland Security's Federal Protective Service reported that contracting officers conduct periodic post inspections and will notify the contractor about any dog observed to be in poor health.

Source: GAO analysis of agency statements. | GAO-23-104489

Contract-related documents for most contractor-managed working dog programs address at least some of the issues important to the health and welfare of their working dogs (see sidebar for steps used to ensure compliance). However, documents related to most contractor-managed programs failed to address all issues, with abuse and neglect, and three issues related to the end of a dog's service, being the least-frequently addressed issues. Failure to ensure the health and welfare of contractor-managed working dogs while they perform services contracted for by the federal government can limit the working dogs' ability to accomplish their assigned tasks and can also endanger the animals. Explicitly addressing in contracts, as appropriate, all 18 of the issues that we identified as important would provide clear expectations for the treatment of working dogs in contractor-managed programs. This, in turn, would help ensure the health and welfare of those dogs, as well as their optimal performance in supporting the agency's mission.

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**The Department of State Provides About 1,000 Working Dogs to Foreign Partners but Does Not Address All Issues Important to the Health and Welfare of Working Dogs**

The U.S. government, through the Department of State, provides working dogs to foreign partners in support of U.S. foreign policy priorities through three programs. As of February 15, 2022, about 1,000 of these dogs were active in 23 foreign countries. The department's documented standards for working dogs provided to foreign partners address many, but not all, of the 18 issues that we identified as important to the health and welfare of working dogs.<sup>28</sup>

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<sup>28</sup>The three Department of State working dog programs we reviewed establish their expectations for the health and welfare of working dogs provided to foreign partners in various types of documents. Some of those expectations are considered to be requirements, whereas others are standards or best practices. For the purposes of this report, we refer to all of these expectations as "standards."

## The Department of State Provides Working Dogs to Foreign Partners, Primarily for Explosives and Narcotics Detection

The Department of State provides working dogs to foreign partners—including foreign governments and international nongovernmental organizations—and, as of February 15, 2022, 1,031 of these dogs were active in 23 foreign countries.<sup>29</sup> Two Department of State programs—one operated by the Bureau of Diplomatic Security, in partnership with the Bureau of Counterterrorism (CT), and the other by the Bureau of International Narcotics and Law Enforcement Affairs (INL)—provided almost all of these working dogs. The Bureau of Diplomatic Security, using funding from CT, provides its dogs to foreign governments through its Office of Antiterrorism Assistance (ATA) working dog program.<sup>30</sup> The Bureau of Political and Military Affairs’ Office of Weapons Removal and Abatement (PM/WRA) working dog program also provided a relatively small number of dogs to certain international nongovernmental organizations. The dogs support U.S. foreign policy priorities abroad—such as countering terrorism and strengthening law enforcement—and primarily assist with explosives and narcotics detection (see table 2).

**Table 2: Working Dogs Provided by Department of State Bureaus to Foreign Partners, as of February 15, 2022**

Bureau(s)	Number of working dogs	Roles	Number of countries in which dogs are located
Bureau of Diplomatic Security/Bureau of Counterterrorism (Office of Antiterrorism Assistance)	93	Explosives detection, generally for counterterrorism-focused missions, such as screening at border security checkpoints, airports, dignitary venues, and major events	7

<sup>29</sup>In addition to the dogs provided by the Department of State, in 2015, Customs and Border Protection provided four working dogs to the Tanzanian government as part of Tanzania’s ivory and narcotics detection canine program. The dogs were transferred to the Tanzanian government, and Customs and Border Protection does not have an oversight role in the dogs’ health or welfare, according to officials. Customs and Border Protection officials told us that they are not aware of any plans for the agency to provide additional dogs to Tanzania or any other foreign government.

<sup>30</sup>ATA partners with the Bureau of Counterterrorism in managing the Department of State’s antiterrorism assistance program. ATA is responsible for program administration and implementation of foreign assistance training. The Bureau of Counterterrorism controls the funding for antiterrorism assistance and is responsible for policy formulation, strategic guidance, and oversight of the program.



Bureau(s)	Number of working dogs	Roles	Number of countries in which dogs are located
Bureau of International Narcotics and Law Enforcement Affairs	914	Explosives and narcotics detection, as well as law enforcement and crime prevention activities such as tracking persons and detecting firearms, currency, human remains, and blood	13
Bureau of Political and Military Affairs (Office of Weapons Removal and Abatement)	24	Explosives detection for “remnant of war” clearance, through which dogs detect unexploded landmines, ordnance, and other explosives	3

Source: GAO analysis of Department of State information. | GAO-23-104489

Note: Foreign partners include foreign governments and international nongovernmental organizations.

Department of State bureaus provide working dogs to foreign partners either directly or through grant funding that is used to purchase the dogs. ATA’s Explosives Detection Canine Program trains explosives detection dogs and provides them to foreign governments in partner nations.<sup>31</sup> INL officials state that the bureau procures working dogs—generally from U.S. vendors—and provides the dogs to foreign governments as donated property. PM/WRA awards grants to international nongovernmental organizations, and grant recipients may use the funds to purchase working dogs when such a purchase falls within an eligible use of funding under the terms of the grant.<sup>32</sup> In all cases, the foreign partners are responsible for the health and welfare of the working dogs once the dogs are in their possession, according to agency officials.

## Department of State Standards Address Many, but Not All, Important Health and Welfare Issues

The three Department of State programs that provide working dogs to foreign partners have standards that address many of the working dog health and welfare issues that we identified. ATA and INL’s standards are outlined in agency policies and other documents. PM/WRA uses the

<sup>31</sup>ATA’s Explosives Detection Canine Program is one component of the Department of State’s overall antiterrorism assistance program. Prior to 2016, the Department of State partnered with the Department of Justice’s Bureau of Alcohol, Tobacco, Firearms and Explosives to provide dogs and training for the antiterrorism assistance program, and it established its own canine training center in 2016. According to officials, ATA does not differentiate working dogs based on their original source or training. As a result, our discussion of ATA’s health and welfare requirements extends to all dogs provided to partner nations by the antiterrorism assistance program, regardless of source.

<sup>32</sup>As of October 2020, PM/WRA awarded seven grants to two international nongovernmental organizations that employ working dogs as part of their humanitarian mine action work.

International Mine Action Standards, issued by an office of the United Nations, as its standards for the working dogs provided by its program.<sup>33</sup> Our determination of whether each program’s standards address the 18 important health and welfare issues that we identified is shown in table 3 below.

**Table 3: Extent to Which Department of State Program Standards for Working Dogs Provided to Foreign Partners Address 18 Issues Important to Working Dog Health and Welfare**

Issues important to the health and welfare of working dogs	Bureau of Diplomatic Security/Bureau of Counterterrorism (Office of Antiterrorism Assistance)	Bureau of International Narcotics and Law Enforcement Affairs	Bureau of Political and Military Affairs (Office of Weapons Removal and Abatement)
Abuse and neglect	addressed	addressed	not addressed
Emergency medical care	addressed	addressed	addressed
Euthanasia	addressed	addressed	not addressed
Exercise	addressed	addressed	addressed
Food and water	addressed	addressed	addressed
Grooming	addressed	addressed	addressed
Health and welfare training	addressed	not addressed	addressed
Housing	addressed	addressed	addressed
Medical needs after retirement	addressed	not addressed	not addressed
Medical records	addressed	addressed	addressed
Medication	addressed	not addressed	not addressed
Procurement	addressed	addressed	addressed
Rest and length of on-duty time	addressed	addressed	not addressed
Retirement	addressed	addressed	not addressed
Routine veterinary care	addressed	addressed	addressed
Routine welfare evaluations	addressed	addressed	addressed
Sanitation	addressed	addressed	addressed
Transportation	addressed	addressed	addressed
<b>Number of issues addressed in program’s standards</b>	<b>18</b>	<b>15</b>	<b>12</b>
<b>Number of issues not addressed in program’s standards</b>	<b>0</b>	<b>3</b>	<b>6</b>

Legend:

<sup>33</sup>According to State Department officials, the International Mine Action Standards are the authoritative source of international best practices for all aspects of humanitarian mine action. The United Nations develops and maintains the standards, with assistance from technical specialists and international, governmental, and nongovernmental organizations.

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- = Issue is addressed in program's standards
  - = Issue is not addressed in program's standards

Source: GAO analysis of Department of State documents. | GAO-23-104489

Note: The list of issues identified by GAO is not intended to be exhaustive of all issues that may be important to working dog health and welfare. However, according to our work and the input of knowledgeable stakeholders, it is a comprehensive and foundational list of issues important to federal working dog health and welfare.

According to our analysis, ATA's standards address all 18 of the issues that we identified as important to the health and welfare of working dogs. INL and PM/WRA's standards for working dog health and welfare address many, but not all, of the important issues that we identified. However, there is variation across the three bureaus in the issues addressed. For example, the International Mine Action Standards used by PM/WRA do not address working dog retirement, whereas ATA and INL have standards for working dog retirement that identify the age at which dogs should be retired, contain provisions for early retirement due to medical or behavioral issues, and describe the process for adoption of the dogs at the end of their service.

Without comprehensive standards for the Department of State's INL and PM/WRA working dog programs that address all of the 18 issues that we identified, the Department of State cannot ensure that foreign partners are treating working dogs in a manner consistent with program goals. For example, in 2019, the Department of State OIG found that the ATA program did not impose standards of care on the foreign nations receiving working dogs from the program.<sup>34</sup> As a result, at the time, the Inspector General reported that the Department of State lacked any assurances that partner nations were maintaining at least a minimum level of care necessary for the dogs to perform the explosives detection tasks assigned. The Inspector General also found in this report that the ATA program did not have clear standards for performing adequate health and welfare checks on explosives detection canines provided under the antiterrorism assistance program and did not consistently ensure that the checks occurred. The Inspector General found that at least 10 of the dogs provided to Jordan died from various medical conditions between 2008 and 2016. The OIG published its findings and recommendations in September 2019 and a follow-up report with additional recommendations in December 2019.<sup>35</sup> (See app. VI for additional details on the State

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<sup>34</sup>ESP-19-06.

<sup>35</sup>Department of State, Office of Inspector General, *Management Assistance Report: Continued Health and Welfare Concerns for Antiterrorism Assistance Explosives Detection Canines*, ESP-20-02 (Arlington, VA: December 2019).

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Department's current efforts to conduct oversight of the implementation of the health and welfare of working dogs provided to foreign partners.) After reviewing steps that ATA and CT took to comply with all of the recommendations for their joint program, the Inspector General closed all of the recommendations from these reports in September 2021.

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## Conclusions

Thousands of working dogs serve dozens of agencies across the federal government in a variety of roles, including explosives and narcotics detection. Aside from the humanitarian need to treat these animals properly, basic standards of health and welfare are critical to ensuring that working dogs can perform their important functions and help agencies accomplish their missions. Agencies have addressed many of the 18 issues that GAO identified as important to the health and welfare of working dogs. However, numerous federally managed and contractor-managed programs have not addressed all of the issues. Without addressing the issues in program policies and, as appropriate, in contracts, agencies cannot ensure the humane treatment and optimal performance of working dogs.

In addition, the Department of State provides approximately 1,000 working dogs to foreign partners in support of U.S. foreign policy priorities, such as counterterrorism, law enforcement, and mine clearance. Of the three Department of State bureaus that provide working dogs to foreign governments and nongovernmental organizations, only one has policies that address all 18 of the health and welfare issues that we identified. Without standards that comprehensively address these issues, the Department of State cannot ensure that foreign partners are treating working dogs in a manner consistent with program goals.

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## Recommendations for Executive Action

We are making a total of 19 recommendations, including nine to departments and agencies that manage their own working dog programs, nine to departments and agencies that have contractor-managed working dog programs, and one additional recommendation to the Department of State.

We are making the following recommendations to those departments and agencies that manage their own working dog programs:

The Attorney General should direct all of the Department of Justice's agencies with federally managed working dog programs to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 1)

The Chief Executive Officer of Amtrak should direct the Amtrak Police to revise its policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 2)

The Secretary of Agriculture should direct all of the Department of Agriculture's agencies with federally managed working dog programs to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 3)

The Secretary of Defense should, through the Secretary of the Air Force as the executive agent for the Military Working Dog Program, direct all of the Department of Defense's agencies with federally managed working dog programs to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 4)

The Secretary of Energy should direct all of the Department of Energy's agencies with federally managed working dog programs to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 5)

The Secretary of Health and Human Services should direct the National Institute of Health Police to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 6)

The Secretary of Homeland Security should direct all of the Department of Homeland Security's agencies with federally managed working dog programs to revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 7)

The Secretary of the Interior should direct all of the Department of the Interior's agencies with federally managed working dog programs to

revise their policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 8)

The Chief Executive Officer of the Tennessee Valley Authority should direct the Tennessee Valley Authority Police to revise the agency's policies, as necessary, to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 9)

We are also making the following recommendations to those departments and agencies that have contractor-managed working dog programs:

The Attorney General should direct all of the Department of Justice's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 10)

The Secretary of Commerce should direct all of the Department of Commerce's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 11)

The Secretary of Defense should, through the Secretary of the Air Force as the executive agent for the Military Working Dog Program, direct all of the Department of Defense's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 12)

The Secretary of Energy should direct all of the Department of Energy's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 13)

The Secretary of Homeland Security should direct all of the Department of Homeland Security's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 14)

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The Secretary of the Interior should direct all of the Department of the Interior's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 15)

The Secretary of the Smithsonian Institution should direct the Smithsonian Institution's Office of Protective Services to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 16)

The Secretary of State should direct all of the Department of State's bureaus with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 17)

The Secretary of the Treasury should direct all of the Department of the Treasury's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 18)

Finally, we are making the following recommendation to the Department of State:

The Secretary of State should direct the Bureau of International Narcotics and Law Enforcement Affairs and the Bureau of Political and Military Affairs to ensure that the standards for working dogs provided to foreign partners address, as appropriate, all 18 issues GAO identified as important to the health and welfare of working dogs. (Recommendation 19)

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of Agriculture, Commerce, Defense, Energy, Health and Human Services, Homeland Security, the Interior, Justice, State, the Treasury, and Veterans Affairs; as well as to Amtrak, the Federal Reserve, the Smithsonian Institution, the Tennessee Valley Authority, and the U.S. Postal Service for review and comment.

We received written comments from the Departments of Commerce, Defense, Energy, Health and Human Services, Homeland Security, the Interior, State, and the Treasury (including separate letters from the Bureau of Engraving and Printing and from the Internal Revenue Service) that are reprinted in appendices VII through XV and summarized below. We received email comments from the Departments of Justice, Amtrak, the Smithsonian Institution, and the Tennessee Valley Authority that are summarized below. The Departments of Agriculture and Veterans Affairs, as well as the Federal Reserve, informed us that they had no comments. The U.S. Postal Service did not comment on the report as a whole, but they and five other departments and agencies provided technical comments, which we incorporated as appropriate.

The Departments of Commerce, Defense, Health and Human Services, Homeland Security, the Interior, Justice, State, and the Treasury, as well as Amtrak, the Smithsonian Institution, and the Tennessee Valley Authority, concurred with our recommendations. Some of these agencies indicated actions they would take or had already taken to implement the recommendations.

With regard to our recommendation to the Department of State related to standards for working dogs provided to foreign partners, the department noted that its Bureau of International Narcotics and Law Enforcement Affairs will review its internal processes and work to determine the bureau's ability to comply with all 18 issues GAO identified as important to the health and welfare of working dogs. The department also noted that its Bureau of Political and Military Affairs is constrained from taking unilateral actions related to addressing certain aspects of the 18 issues GAO identified; however, it noted that the bureau will take steps to develop appropriate terms and conditions for inclusion in grants and contracts and instruct program managers to review implementing partners' standard operating procedures and provide guidance within the parameters of existing awards. We appreciate the department's efforts to implement this recommendation and note that our recommendation provides for some flexibility in the department's implementation.

The Department of Energy partially concurred with our two recommendations to it. For both recommendations, the department indicated that it would evaluate the 18 issues GAO identified as important to the health and welfare of working dogs to determine their applicability to DOE's Canine Program and would issue a policy clarification to address those areas DOE determines are applicable. With regard to our recommendation directed to the department's agencies with contractor-



managed working dog programs, we agree that the department has some flexibility in determining which of the 18 issues are addressed in future contracts. However, with regard to our recommendation directed to the department's agencies with federally managed working dog programs, we continue to believe that addressing all 18 issues is important to ensuring the humane treatment and optimal performance of federal working dogs.

We are sending copies of this report to the appropriate congressional committees; the Attorney General; the Secretaries of Agriculture, Commerce, Defense, Energy, Health and Human Services, Homeland Security, the Interior, Veterans Affairs, State, the Smithsonian Institution, and the Treasury; as well as the Chief Executive Officer of Amtrak, Chair of the Federal Reserve Board, Chief Executive Officer of Tennessee Valley Authority, the Postmaster General of the U.S., 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 any questions about this report, please contact me at (202) 512-3841 or [morriss@gao.gov](mailto:morriss@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 XVI.

A handwritten signature in black ink that reads "Steve D. Morris". The signature is written in a cursive, slightly slanted style.

Steve D. Morris  
Director, Natural Resources and Environment

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## Appendix I: Objectives, Scope, and Methodology

This report examines (1) the number of working dogs that serve federal agencies, and the roles in which these dogs are used; (2) the extent to which federal agency policies and contract-related documents address the health and welfare of working dogs that serve the agencies; and (3) the number of working dogs the U.S. government provides to foreign partners, the roles in which these dogs are used, and the standards to protect the health and welfare of these dogs. We also examined the steps that agencies take to ensure that provisions addressing health and welfare issues are followed for federally managed working dogs, contractor-managed working dogs, and working dogs provided to foreign partners.

For all objectives, we interviewed agency officials and collected and analyzed documents from federal agencies with federally managed or contractor-managed working dog programs and from those who provide working dogs to foreign partners. Agencies may have federally managed, contractor-managed working dog programs, or both, and agencies may have more than one working dog program. To identify these programs, we conducted an initial internet search for agencies that appeared to have working dogs serving as part of their law enforcement or security programs. We then asked officials at each of these agencies to identify any other agencies with working dog programs. To determine if there were any contractor-managed working dog programs that we had not identified through other means, we examined information from the Federal Procurement Data System (FPDS). Specifically, we conducted searches of federal contract actions that were active in fiscal year 2020, using various combinations of keywords related to working dogs.<sup>1</sup> We also searched for contract actions for specific companies that were known to provide working dogs to the federal government. We reviewed the FPDS search results for departments or agencies that had not been previously identified as having contractor-managed working dog programs. Through our FPDS search, we identified four additional

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<sup>1</sup>We searched various combinations of the following phrases: “explosives detection canine,” “bomb detection canine,” “narcotics detection canine,” “drug detection canine,” “search and rescue canine,” “human detection canine,” “patrol canine,” “detector canine,” “canine handler,” and “canine team.”

agencies that could potentially have contractor-managed working dog programs and followed up with these departments and agencies, as appropriate. We did not use the FPDS search as a primary means of identifying contractor-managed working dog programs, in part because agencies do not use standardized wording for the relevant FPDS search fields and, as a result, keyword searches may not capture all relevant contracts. However, this method was sufficient for providing a second layer of verification.

Certain federally managed and contractor-managed working dog programs were excluded from our review. This report only examines working dog programs in the executive branch and does not examine working dog programs in the legislative or judicial branches, such as the United States Capitol Police or the Supreme Court of the United States Police.<sup>2</sup> We also excluded working dog programs at the Central Intelligence Agency, given the agency's concerns about these programs being linked to classified activities. Finally, while we took multiple steps to find all executive branch working dog programs using the steps described previously, we were informed of three additional contractor-managed programs that our initial searches had not identified after we concluded our analysis: the United States Postal Inspection Service and two U.S. Army programs at Kwajalein Atoll and at U.S. Army European Command. We included these three programs in our counts of the number of dogs and the roles in which they serve but did not examine the contract-related documents for these programs to determine whether they address the 18 issues we that identified as being important to the health and welfare of working dogs.

To determine how many dogs serve these agencies in either federally managed or contractor-managed programs and in what roles they are used, we requested a count of the total number of dogs from each agency as of February 15, 2022, and a description of their roles. We separated the counts by federally managed working dog programs and contractor-managed programs. Some agencies reported having more than one working dog program. For example, U.S. Customs and Border Protection reported having four different working dog programs within the agency: Agriculture, Office of Field Operations, Office of Training and

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<sup>2</sup>Amtrak was established by Congress, and most members of the Amtrak Board of Directors are appointed by the President and confirmed by the U.S. Senate. Amtrak is operated as a for-profit company. While it is not a federal agency, we included Amtrak in our review because of its quasi-governmental nature and its use of some canine teams funded by the Transportation Security Administration.

Development, and U.S. Border Patrol. To describe the types of roles dogs are used for, we reviewed agency responses, and we grouped similar descriptions of roles into distinct categories for reporting purposes.

- Some agencies reported using dogs for roles in supporting presidential and other events or certain antiterrorism measures. These terms were combined with other roles described as “explosives detection” because such activities are conducted for the purpose of detecting explosives.
- Agricultural disease detection was described as “disease surveillance.”
- Tracking, as well as tracking missing patients, was described as “human detection.”
- Vehicle searches and concealed narcotics were described as “narcotics detection.”
- Air sniffs, currency detection, firearms apprehension, and other detection were described as “other detection.”
- Patrol and search was described as “patrol.”
- Reduction of human and wildlife conflicts, illegal wildlife, and wildlife detection were described as “wildlife management.”
- Finally, roles that did not fit in other categories described above were described as “miscellaneous.” These roles included crowd control, unit health and welfare checks, emergency response, special response, crisis response, pedestrian processing, law enforcement, and sled dogs.

To determine the extent to which federal agency policies and contract-related documents address the health and welfare of working dogs that serve the agencies, we examined documents provided to us by each agency. Federally managed working dog programs have policies that address a variety of issues related to the functional use of working dogs, such as performance standards and training requirements for dog-handler teams, legal issues related to the deployment of working dogs, and operational practices for deploying working dogs for searches or apprehension. Federally managed programs may address these issues in one or more documents, such as an operational policy, medical or canine care policy, canine training policy, handbooks, guidance, standard operating procedures, and other documents. In addition to performance, legal, and other issues, these policies also address a range of health and welfare issues, including housing, routine and emergency medical care, food and water, and working dog retirement.

Similarly, contractor-managed working dog programs may address issues related to the health and welfare of their working dogs in a number of contract-related documents, such as the contract's solicitation or statement of work. In some cases, agencies provided us with documents produced by the contractors, such as company policies or standard operating procedures, to support that these programs addressed the 18 issues that we identified as being important to the health and welfare of working dogs (described below). We generally attributed to agency officials any statements about whether contractors were contractually required to comply with provisions of those contractor documents and did not independently evaluate whether compliance with such provisions was contractually required.

Next, since there is no consensus health and welfare standard for federal working dogs, we developed a list of issues that are important to the health and welfare of working dogs. We reviewed policies from several federal agencies to develop a list of 18 health and welfare issues.<sup>3</sup> Representatives from three stakeholder organizations with expertise in issues related to the health and welfare of working dogs—the American Veterinary Medical Association; the North American Police Working Dog Association; and the National Institute of Standards and Technology's Organization of Scientific Area Committees for Forensic Science, Subcommittee on Orthogonal Sensors and Detector Dogs—reviewed and validated the list of issues. We also sent the list of issues to officials from all of the federal agencies we identified as having working dog programs in June 2021 and asked them to indicate whether each issue was important to address in agency policies or contracts for working dog services.

While addressing these issues is not legally required, agency officials expressed broad support for the importance of addressing these issues in federal programs' policies and contract-related documents. We developed a questionnaire to provide to agencies and pretested it with one agency in May 2021 to confirm that the descriptions that we developed of the 18 issues were understandable and that it was clear that we were asking them to respond about whether it was important to address the issue in

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<sup>3</sup>These issues were: abuse and neglect, emergency medical care, exercise, euthanasia, food and water, grooming, health and welfare training, housing, medical needs after retirement, medical records, medication, procurement, rest and length of on-duty time, retirement, routine veterinary care, routine welfare evaluations, sanitation, and transportation. A list of these issues with illustrative examples appears in table 1.

policy. Officials from at least 30 of the 39 agencies with federally managed programs that responded to our questionnaire in June 2021 agreed that each of the issues that we identified was important to address in working dog policies.<sup>4</sup> For example, officials from 30 of the 39 agencies said that programs' policies should address medication, while officials from all 39 of the agencies agreed that it was important that working dog policies address retirement, housing, and abuse and neglect. Officials from all 17 agencies with contractor-managed programs that responded to our questionnaire in June 2021 said that it was important to address rest and length of on-duty time and exercise in contract-related documents, while nine of 17 said that it was important to address medical needs after retirement in contracts.

The list of issues that we identified is not intended to be exhaustive of all issues important to working dog health and welfare. In our discussions, stakeholder and agency officials identified other issues that also may be important to the health and welfare of working dogs that were not on our list, such as behavioral needs, microchipping, and emergency and disaster preparedness. However, agency officials and stakeholders broadly agreed that the 18 issues that we identified were important to include in policies and contract documents. While these 18 issues are not deemed to be exhaustive, according to our work and the confirmation of knowledgeable stakeholders, including agency officials, we believe that this list of issues is comprehensive and foundational for ensuring the health and welfare of federal working dogs.

We examined agencies' working dog policies and contract-related documents to determine whether they addressed each of the 18 issues. Our team conducted a review of selected agency documents to calibrate whether the team was providing similar assessments of whether agency documents addressed the issues. Two analysts reviewed each program's working dog policies and contract-related documents. They independently assessed whether the documents addressed each issue. They then met to determine a consensus assessment and resolve disagreements. When

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<sup>4</sup>The number of agencies whose officials responded as part of validating the list of important issues differs from the number of programs reviewed to develop our findings elsewhere in the report for several reasons. For example, we determined that some programs were out of the scope of our review and identified additional programs that were in the scope of our review over the course of the engagement. Also, some agencies that have multiple working dog programs provided a single response rather than one for each program. For example, the U.S. Army provided a single response for its four sites with contractor-managed working dog programs, which we considered, for the purposes of our review, to be separate programs.

the analysts could not resolve a disagreement, they referred the assessment to a third analyst to resolve. We made determinations for all working dog programs and sent them to their respective department-level and independent agencies. We made determinations for each program based on all the documents provided to us by the program. For example, an agency may address certain issues in one document and other issues in one or more other documents. We asked that officials from each working dog program respond about whether they agreed or disagreed with our determinations, provide supporting documentation if they disagreed with our determinations, and provide explanations for issues that they did not address. We examined any new documents provided at this stage and the agencies' explanations and recoded our analysis if we agreed that they had addressed the issue.

We did not evaluate the quality or extent of agencies' policies' and contract-related documents' coverage of an issue beyond determining whether the documents addressed the issues. There may be wide variations in the level of detail in which policies and contract-related documents address certain important health and welfare issues. For example, in regard to health and welfare training, the policies for one program state that the handler is to be trained in basic first aid and medical care for the dogs, but they do not specify the topics to be covered in this training or mention training for daily care of the dogs. In contrast, the policies for another program describe extensive health and welfare training requirements. These requirements state that all personnel with direct responsibility for the dogs should be trained in general health and illness, skin diseases and parasites, epidemic diseases, climatic effects from heat and cold, signs and symptoms of poisoning, nutrition and feeding, kenneling requirements, and safe transportation. Both sets of policies were judged to address the issue of health and welfare training.

To examine what steps working dog programs take to ensure compliance with their policies and provisions of contract-related documents, we interviewed agency officials and collected and analyzed written responses in which agency officials identified illustrative examples of compliance mechanisms.

To determine the extent to which the U.S. government provides working dogs to foreign partners, and the roles in which these dogs are used, we analyzed agency documents and interviewed agency officials. We also reviewed agency policies and standards for foreign partners' use of the dogs to determine whether they addressed the 18 issues related to the health and welfare of working dogs. We also examined actions taken by

the State Department in response to the September 2019 State Department Office of Inspector General report.<sup>5</sup> Finally, we examined the steps that State Department bureaus that provide working dogs to foreign partners take to ensure that these partners comply with these standards. For more information on the State Department's current efforts to conduct oversight on the implementation of the health and welfare of working dogs provided to foreign partners, see appendix VI.

We conducted this performance audit from August 2020 to October 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>5</sup>Department of State, Office of Inspector General, *Evaluation of the Antiterrorism Assistance Explosives Detection Canine Program – Health and Welfare*, ESP-19-06 (Arlington, VA: September 2019). The State Department Office of Inspector General closed all of the recommendations from this report in September 2021.



Appendix II: List of Agencies with Federally  
Managed Working Dog Programs, as of  
February 15, 2022

## Appendix II: List of Agencies with Federally Managed Working Dog Programs, as of February 15, 2022

Department or independent agency	Program	Number of dogs	Roles
Amtrak <sup>a</sup>	Amtrak Police	57	Explosives detection Narcotics detection
Department of Agriculture	Animal Plant Health Inspection Service	134	Disease surveillance Wildlife management
	U.S. Forest Service	14	Human detection Miscellaneous Narcotics detection Other detection Search and rescue Suspect apprehension
	<b>Total – U.S. Department of Agriculture</b>	<b>148</b>	
Department of Defense	Defense Intelligence Agency	4	Explosives detection
	National Geospatial-Intelligence Agency	19	Explosives detection
	National Guard Bureau	9	Search and rescue
	National Security Agency Police	32	Explosives detection Miscellaneous
	Pentagon Force Protection	24	Explosives detection
	U.S. Air Force	564	Explosives detection Narcotics detection Patrol
	U.S. Army	469	Explosives detection Narcotics detection Miscellaneous Patrol
	U.S. Marine Corps	189	Explosives detection Human detection Narcotics detection Patrol

**Appendix II: List of Agencies with Federally  
Managed Working Dog Programs, as of  
February 15, 2022**

<b>Department or independent agency</b>	<b>Program</b>	<b>Number of dogs</b>	<b>Roles</b>
	U.S. Navy	319	Explosives detection Narcotics detection Patrol
	U.S. Special Operations Command	140	Explosives detection Human detection
	<b>Total - Department of Defense</b>	<b>1,769</b>	
Department of Energy	Office of Environment, Health, Safety and Security (Headquarters)	4	Explosives detection
	Hanford Site	6	Explosives detection
	Strategic Petroleum Reserve	8	Explosives detection
	<b>Total - Department of Energy</b>	<b>18</b>	
Federal Reserve	Federal Reserve Board Police	5	Explosives detection
Department of Health and Human Services	National Institutes of Health Police	9	Explosives detection
Department of Homeland Security	Customs and Border Protection – Agriculture	130	Disease surveillance
	Customs and Border Protection – Office of Field Operations	498	Human detection Narcotics detection Other detection
	Customs and Border Protection – Office of Training and Development	151 <sup>b</sup>	Human detection Miscellaneous Narcotics detection Other detection Patrol Search and rescue Suspect apprehension
	Customs and Border Protection – U.S. Border Patrol	863	Human detection Miscellaneous Narcotics detection Other detection Search and rescue Suspect apprehension
	Federal Emergency Management Agency	4	Explosives detection
	Federal Protective Service	70	Explosives detection
	Transportation Security Administration	1,097	Explosives detection
	U.S. Coast Guard	18	Explosives detection
	U.S. Secret Service	111	Explosives detection Suspect apprehension

**Appendix II: List of Agencies with Federally  
Managed Working Dog Programs, as of  
February 15, 2022**

<b>Department or independent agency</b>	<b>Program</b>	<b>Number of dogs</b>	<b>Roles</b>
	<b>Total – Department of Homeland Security</b>	<b>2,942</b>	
Department of the Interior	Bureau of Indian Affairs	6	Narcotics detection Patrol
	Bureau of Land Management	5	Narcotics detection Patrol
	Fish and Wildlife Service – Office of Law Enforcement	5	Wildlife management
	Fish and Wildlife Service – Refuge Law Enforcement	9	Human detection Miscellaneous Narcotics detection Other detection Patrol Search and rescue Suspect apprehension Wildlife management
	National Park Service – Denali National Park	31	Sled dogs
	National Park Service – Park Police	23	Explosives detection Narcotics detection Patrol
	National Park Service – Rangers	12	Human detection Explosives detection Narcotics detection Patrol
	<b>Total – Department of the Interior</b>	<b>91</b>	
Department of Justice	Bureau of Alcohol, Tobacco, Firearms and Explosives – Explosives Detection Canine Team	40	Explosives detection
	Bureau of Alcohol, Tobacco, Firearms and Explosives – Special Response Team Program	9	Miscellaneous Suspect apprehension
	Federal Bureau of Investigation	25	Explosives detection Miscellaneous Suspect apprehension
	U.S. Marshals Service	21	Explosives detection Other detection Suspect apprehension
	<b>Total – Department of Justice</b>	<b>95</b>	
Tennessee Valley Authority	Tennessee Valley Authority Police	c	Explosives detection

**Appendix II: List of Agencies with Federally  
Managed Working Dog Programs, as of  
February 15, 2022**

<b>Department or independent agency</b>	<b>Program</b>	<b>Number of dogs</b>	<b>Roles</b>
Veterans Affairs	Veterans Affairs Police	25	Narcotics detection Human detection
<b>Total federally managed dogs</b>		<b>5,159</b>	

Source: GAO analysis of agency data. | GAO-23-104489

<sup>a</sup>Amtrak was established by Congress, and most members of the Amtrak Board of Directors are appointed by the President and confirmed by the U.S. Senate. Amtrak is operated as a for-profit company.

<sup>b</sup>Department of Homeland Security officials noted that the number of canines in the Office of Training and Development changes significantly on a weekly basis, depending on procurement and training schedules.

<sup>c</sup>Some federal working dog programs, such as those managed by the judicial and legislative branches, were not included in our review. The Tennessee Valley Authority reported having federally managed working dogs as part of its police program, but does not make the numbers of its working dogs publicly available. As a result, its dogs are not included in this total.

**Definitions of role categories:**

- Disease surveillance dogs can be used for identifying diseases including pests, agricultural diseases, and invasive species.
- Explosives detection dogs can be used for the identification of explosives; radiological materials; chemical, nuclear, or biological weapons; or other threats.
- Human scent detection dogs can be used to identify and track the scent of missing or concealed humans.
- Miscellaneous activities dogs can be used for activities such as crowd control, public education, and emergency response.
- Narcotics detection dogs can be used for the identification of controlled substances.
- Other types of detection that dogs can be used for include air sniffs, currency detection, firearms detection, and other contraband detection.
- Patrol dogs can be used for building searches, article searches, and area searches.
- Search and rescue dogs can be used for search and rescue operations to identify living victims and the remains of deceased humans.
- Suspect apprehension dogs can be used for identifying and apprehending suspects.

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**Appendix II: List of Agencies with Federally  
Managed Working Dog Programs, as of  
February 15, 2022**

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- Wildlife management dogs can be used for activities such as protecting threatened or endangered species, managing illegal wildlife, and detecting wildlife.

Appendix III: List of Agencies with Contractor-Managed Working Dog Programs, as of February 15, 2022

# Appendix III: List of Agencies with Contractor-Managed Working Dog Programs, as of February 15, 2022

Department or independent agency	Program	Number of dogs	Roles
Department of Commerce	Security Operations Branch, Herbert C. Hoover Building	17	Explosives detection
	National Institute of Standards and Technology	16	Explosives detection
	<b>Total – Department of Commerce</b>	<b>33</b>	
Department of Defense	Defense Intelligence Agency	2	Explosives detection
	U.S. Army – Carlisle Barracks, PA	1	Explosives detection
	U.S. Army – Ft. McCoy, WI	4	Explosives detection Narcotics detection
	U.S. Army – Sierra Army Depot, CA	2	Explosives detection Narcotics detection
	U.S. Army – West Point, NY	2	Explosives detection Narcotics detection
	U.S. Army – Kwajalein Atoll	4	Explosives detection Narcotics detection
	U.S. Army – European Command	24	Explosives detection
	<b>Total – Department of Defense</b>	<b>39</b>	
Department of Energy	Los Alamos National Laboratory	8	Explosives detection
	Oak Ridge National Laboratory	1	Explosives detection
	Pantex Facility	6	Explosives detection
	Savannah River Site	12	Explosives detection Narcotics detection
	Y-12 National Security Complex	25	Explosives detection Narcotics detection
<b>Total – Department of Energy</b>	<b>52</b>		
Department of Homeland Security	Federal Protective Service	1	Explosives detection
Department of the Interior	National Park Service – Park Police	1	Explosives detection
	Bureau of Reclamation	1	Explosives detection

**Appendix III: List of Agencies with Contractor-Managed Working Dog Programs, as of February 15, 2022**

<b>Department or independent agency</b>	<b>Program</b>	<b>Number of dogs</b>	<b>Roles</b>
<b>Total – Department of the Interior</b>		<b>2</b>	
Department of Justice	U.S. Marshals Service	3	Explosives detection
Smithsonian Institution	Smithsonian Institution – Office of Protection Services	1	Explosives detection
Department of State	Bureau of Diplomatic Security – Office of Overseas Protective Operations	194	Explosives detection <sup>a</sup>
	Bureau of Diplomatic Security – Uniformed Protective Division	10	Explosives detection
	<b>Total – Department of State</b>	<b>204</b>	
Department of the Treasury	Bureau of Engraving and Printing	4	Explosives detection
	Internal Revenue Service Police	35	Explosives detection
	<b>Total – Department of the Treasury</b>	<b>39</b>	
United States Postal Service	United States Postal Inspection Service	47	Explosives detection
<b>Total contractor-managed dogs</b>		<b>421</b>	

Source: GAO analysis of agency data. | GAO-23-104489

<sup>a</sup>Department of State officials noted that the working dogs in their Office of Overseas Protective Operations program are owned by the federal government, but managed by contractors. According to State Department officials, the contractors managing the dogs in that program are responsible for the accountability, stewardship, veterinary care, overall welfare, and protection of the canines throughout their service life. As a result, we classified this program as a contractor program for the purposes of this report.

**Definitions of role categories:**

- Explosives detection dogs can be used for the identification of explosives; radiological materials; chemical, nuclear, or biological weapons; or other threats.
- Narcotics detection dogs can be used for the identification of controlled substances.

Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies

# Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha-nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi-cation	Procure-ment	Rest/ length of on-duty time	Retire-ment	Routine veterinary care	Routine welfare evalu-ations	Sani-tation	Trans- portation
<b>Amtrak*</b>																		
Amtrak Police	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
<b>Department of Agriculture</b>																		
Animal Plant Health Inspection Service	addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Forest Service	not addressed	addressed	addressed	not addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	not addressed	addressed
<b>Department of Defense</b>																		
Defense Intelligence Agency	not addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	not addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	addressed
National Geospatial-Intelligence Agency	not addressed	not addressed	not addressed	not addresse d	addresse d	not addressed	not addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	not addressed	addressed
National Guard Bureau	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed
National Security Agency Police	addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed



**Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha-nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi-cation	Procure-ment	Rest/ length of on-duty time	Retire-ment	Routine veterinary care	Routine welfare evalu-ations	Sani-tation	Trans- portation
Pentagon Force Protection	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Air Force	not addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	addressed
U.S. Army	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Marine Corps	not addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Navy	addressed	addressed	addressed	not addresse d	addresse d	addressed	addressed	addressed	addressed	not addressed	addressed	not addressed	not addressed	addressed	addressed	not addressed	addressed	addressed
U.S. Special Operations Command	not addressed	addressed	addressed	addresse d	addresse d	not addressed	addressed	addressed	addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	not addressed
<b>Department of Energy</b>																		
Office of Environment, Health, Safety and Security (Headquarters)	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Hanford Site	addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	not addressed	not addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	addressed
Strategic Petroleum Reserve	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
<b>Federal Reserve Board</b>																		
Federal Reserve Board Police	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
<b>Department of Health and Human Services</b>																		

**Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha-nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi-cation	Procure-ment	Rest/ length of on-duty time	Retire-ment	Routine veterinary care	Routine welfare evalu-ations	Sani-tation	Trans-portion
National Institutes of Health Police	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed
<b>Department of Homeland Security</b>																		
Customs and Border Protection – Agriculture	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Customs and Border Protection – Office of Field Operations	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Customs and Border Protection – Office of Training and Development	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Customs and Border Protection – U.S. Border Patrol	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Federal Emergency Management Agency	not addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Federal Protective Service	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Transportation Security Administration	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Coast Guard	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
U.S. Secret Service	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
<b>Department of the Interior</b>																		

**Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha-nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi-cation	Procure-ment	Rest/ length of on-duty time	Retire-ment	Routine veterinary care	Routine welfare evalu-ations	Sani-tation	Trans- portation
Bureau of Indian Affairs	addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Bureau of Land Management	not addressed	addressed	addressed	addresse d	addresse d	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
Fish and Wildlife Service – Office of Law Enforcement	not addressed	addressed	addressed	addresse d	not addresse d	addressed	not addressed	addressed	not addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	not addressed	addressed
Fish and Wildlife Service – Refuge Law Enforcement	not addressed	addressed	addressed	not addresse d	addresse d	addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	addressed
National Park Service – Denali National Park	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
National Park Service – Park Police	not addressed	addressed	not addressed	not addresse d	addresse d	addressed	addressed	addressed	not addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	addressed
National Park Service – Rangers	not addressed	addressed	addressed	not addresse d	addresse d	addressed	not addressed	addressed	addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	addressed
<b>Department of Justice</b>																		
Bureau of Alcohol, Tobacco, Firearms and Explosives—Explosives Detection Canine Team	not addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Bureau of Alcohol, Tobacco, Firearms and Explosives—Special Response Team Program	addressed	addressed	not addressed	not addresse d	addresse d	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	addressed

**Appendix IV: Working Dog Health and Welfare Issues Addressed In Agency Policies**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha-nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi-cation	Procure-ment	Rest/ length of on-duty time	Retire-ment	Routine veterinary care	Routine welfare evalu-ations	Sani-tation	Trans- portation
Federal Bureau of Investigation	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
U.S. Marshals Service	addressed	addressed	not addressed	addresse d	addresse d	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed
<b>Tennessee Valley Authority</b>																		
Tennessee Valley Authority Police	not addressed	addressed	addressed	not addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed
<b>Department of Veterans Affairs</b>																		
Veterans Affairs Police	addressed	addressed	addressed	addresse d	addresse d	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed

Legend:  
 ● = Issue is addressed in program's policies.  
 ○ = Issue is not addressed in program's policies.  
 Source: GAO analysis of agency documents. | GAO-23-104489

<sup>3</sup>Amtrak was established by Congress, and most members of the Amtrak Board of Directors are appointed by the President and confirmed by the U.S. Senate. Amtrak is operated as a for-profit company.

Appendix V: Working Dog Health and Welfare Issues Addressed in Agency Contract-Related Documents

# Appendix V: Working Dog Health and Welfare Issues Addressed in Agency Contract-Related Documents

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha- nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi- cation	Procure- ment	Rest/ length of on-duty time	Retire- ment	Routine veterinary care	Routine welfare evalu- ations	Sani- tation	Trans- portation
<b>Department of Commerce</b>																		
National Institute of Standards and Technology Police	not addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed
Security Operations Branch, Herbert C. Hoover Building	not addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed
<b>Department of Defense</b>																		
Defense Intelligence Agency	not addressed	not addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	addressed
U.S. Army (Carlisle Barracks, PA)	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	not addressed	addressed
U.S. Army (Fort McCoy, WI)	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed
U.S. Army (Sierra Army Depot, CA)	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	not addressed	addressed
U.S. Army (West Point, NY)	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	not addressed	not addressed	addressed	not addressed	addressed	not addressed	not addressed	addressed

**Appendix V: Working Dog Health and Welfare Issues Addressed in Agency Contract-Related Documents**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha- nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi- cation	Procu-re- ment	Rest/ length of on-duty time	Retire- ment	Routine veterinary care	Routine welfare evalu- ations	Sani- tation	Trans- portation
<b>Department of Energy</b>																		
Los Alamos National Laboratory	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed	addressed	addressed
Oak Ridge National Laboratory	addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	addressed	addressed
Pantex Facility	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Savannah River Site	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed
Y-12 National Security Complex	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed
<b>Department of Homeland Security</b>																		
Federal Protective Service	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	not addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	addressed
<b>Department of the Interior</b>																		
National Park Service – Park Police	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Bureau of Reclamation	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	not addressed	addressed	not addressed	not addressed	not addressed	addressed	addressed
<b>Department of Justice</b>																		
U.S. Marshals Service	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
<b>Smithsonian Institution</b>																		

**Appendix V: Working Dog Health and Welfare Issues Addressed in Agency Contract-Related Documents**

Department/ agency Program	Abuse and neglect	Emer-gency medical care	Eutha- nasia	Exer-cise	Food and water	Grooming	Health and welfare training	Housing	Medical needs after retirement	Medical records	Medi- cation	Procu-re- ment	Rest/ length of on-duty time	Retire- ment	Routine veterinary care	Routine welfare evalu- ations	Sani- tation	Trans- portation
Smithsonian Institution Office of Protection Services	not addressed	addressed	not addressed	not addressed	addressed	addressed	not addressed	addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed
<b>Department of State</b>																		
Bureau of Diplomatic Security – Office of Overseas Protective Operations	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Bureau of Diplomatic Security – Uniformed Protective Division	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	not addressed	not addressed	addressed	addressed	addressed	addressed
<b>Department of the Treasury</b>																		
Bureau of Engraving and Printing	addressed	addressed	addressed	addressed	addressed	addressed	not addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed	addressed
Internal Revenue Service Police	not addressed	not addressed	not addressed	not addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	not addressed	addressed	addressed	not addressed	addressed	not addressed	addressed	addressed

**Legend:**

- = Issue is addressed in program's contract-related documents
- = Issue is not addressed in program's contract-related documents

Source: GAO analysis of agency and contractor documents. | GAO-23-104489

## Appendix VI: State Department Oversight of the Implementation of Working Dog Health and Welfare Standards

The U. S. government, through the Department of State, provides working dogs to foreign partners in support of U.S. foreign policy priorities through three programs: one operated by the Bureau of Diplomatic Security's Office of Antiterrorism Assistance (ATA), in partnership with the Bureau of Counterterrorism (CT); another by the Bureau of International Narcotics and Law Enforcement Affairs (INL); and a third by the Bureau of Political and Military Affairs' Office of Weapons Removal and Abatement (PM/WRA). The Department of State conducts oversight to verify that foreign partners are properly using and caring for the dogs it provides.

Policies for oversight vary among the three programs. The ATA and INL programs have recently made changes to their oversight policies. As of April 2022, INL officials noted that the INL program had not fully implemented these changes because of travel and other restrictions related to the COVID-19 pandemic. Meanwhile, ATA officials noted that the ATA program has fully implemented its updated oversight policies in all partner nations that have ATA-granted dogs but, as of April 2022, ATA has not completed the process of negotiating and securing signed letters of agreement with all partner nations.

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### Bureau of Diplomatic Security/Bureau of Counterterrorism (CT), Office of Antiterrorism Assistance (ATA)

Officials from the ATA program said that the office expects partner nations to provide adequate care for the working dogs and to use them for their intended purpose.<sup>1</sup> Prior to providing the dogs, ATA performs an initial country assessment to evaluate the country's ability to care for the

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<sup>1</sup>The department's antiterrorism assistance program provides training and equipment to foreign countries under the Foreign Assistance Act of 1961, as amended, which calls for U.S. development resources to be effectively and efficiently utilized. Pub. L. No. 87-195, 75 Stat. 424 (codified as amended at 22 U.S.C. § 2151(a)).



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**Appendix VI: State Department Oversight of  
the Implementation of Working Dog Health and  
Welfare Standards**

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dogs and to operate a working dog program.<sup>2</sup> In May 2018, the Department of State Office of Inspector General (OIG) initiated a review of ATA's Explosives Detection Canine Program in response to allegations that the department was providing explosives detection dogs to partner nations without conducting follow-up to ensure that these dogs were receiving adequate health care. The report found that ATA did not have clear standards for overseeing the health and welfare of ATA-provided working dogs once the dogs were in the partner nation's possession before November 2018. The OIG published its findings and recommendations in September and December 2019 (see sidebar). According to officials, after reviewing steps that ATA and CT took to comply with the recommendations, the OIG closed all of the recommendations from these reports in September 2021.

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<sup>2</sup>The Department of State's Canine Training and Operations Center is managed by the department's Office of Overseas Protective Operations and operated by a contractor. According to a March 2016 Memorandum of Agreement between ATA and the Canine Training and Operations Center, training center personnel are responsible for conducting initial country assessments, handler training, and testing and validation visits to partner nations. Thus, officials noted that contracted personnel may perform these functions. However, to simplify the discussion in this report, we refer to ATA as the responsible party for all functions.

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**Appendix VI: State Department Oversight of the Implementation of Working Dog Health and Welfare Standards**

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**Department of State OIG Investigation of Canine Health and Welfare Claims**

In July 2017, the Department of State's Office of Inspector General (OIG) received a hotline complaint alleging that explosives detection dogs that the department's antiterrorism assistance program had provided to partner nations were dying from various medical conditions, lack of veterinary care, and poor working conditions.

In a September 2019 report, the OIG confirmed these concerns. According to the OIG, at least 10 of the dogs provided to Jordan had died from various medical conditions between 2008 and 2016, and the department identified additional health and welfare concerns during an April 2016 visit to Jordan. The department stationed two mentors in Jordan in January 2017 and installed a full-time, department-funded veterinary team in the country in November 2018. Despite these steps, the OIG reported at least two additional canine deaths from preventable causes in Jordan after the interventions were put in place. The OIG also reported other serious canine health and welfare concerns. For example, one dog was severely emaciated, malnourished, and living in unsanitary conditions, while another contracted Leishmaniasis, a preventable but potentially deadly and transmittable disease.

Furthermore, in December 2019, the OIG reported that three of the 10 dogs provided to Egypt had died between August 2018 and September 2019—one from lung cancer, another from a ruptured gall bladder, and the third from hyperthermia.

As a result of the findings, the OIG recommended that the department cease providing dogs to Jordan and Egypt until there was a plan in place to ensure the dogs' health and welfare. The department initially disagreed with the recommendation concerning Jordan, citing national security concerns, but ultimately agreed to the recommendations for both countries.

Source: Department of State OIG. | GAO-23-104489

In October 2019, ATA issued an updated policy for the implementation of its canine program, which included additional provisions related to the oversight of dogs received by partner nations.<sup>3</sup> Specifically, two oversight-

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<sup>3</sup>Department of State, Office of Antiterrorism Assistance, *Canine Programs*, Standard Operating Procedure Publication #3-402 (Oct. 11, 2019).

related provisions in this updated policy address (1) bilateral agreements with partner nations; and (2) regular, in-country site visits.

**Bilateral agreements.** The updated policy states that ATA is to develop bilateral agreements governing the conditions under which a partner nation can receive or maintain ATA-provided working dogs.<sup>4</sup> The agreements typically transfer responsibility for care of the dogs to the partner nations; commit the partner nations to meeting ATA standards for care of the dogs; and commit the partner nations to allowing Department of State, embassy, and U.S. government personnel access to the dogs for periodic inspections, health and welfare checkups, and observation.

ATA officials said that the COVID-19 pandemic has delayed ATA's efforts to develop bilateral agreements with partner nations. According to officials, as of April 2022, ATA had finalized agreements from three of the seven partner nations with ATA-provided dogs and were in the final stages of negotiation with two others. Officials stated that travel and other restrictions related to the COVID-19 pandemic had slowed progress toward finalizing agreements with the remaining partner nations.

**Regular, in-country site visits.** The updated policy states that a veterinarian is to conduct health and welfare reviews of ATA-provided dogs at least annually and that the veterinarian will attempt to conduct such reviews every 6 months. The objectives of such reviews, according to the policy are, in addition to assessing the health of ATA-provided dogs, to perform validation and operational testing of all dog and handler teams.<sup>5</sup> During these in-country site visits, teams, consisting of a veterinarian and, according to officials, other trained professionals, must conduct a veterinary check-up to assess the health of each ATA-provided dog and to verify that the dog is being well cared for and remains functionally effective. If a health and welfare review determines that any dogs are being mistreated, abused, or neglected, the relevant program

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<sup>4</sup>ATA officials noted that officials from CT and the respective embassies are also involved with obtaining these agreements.

<sup>5</sup>Testing and validation visits—including a health and welfare inspection of ATA-provided working dogs—have been a requirement since 2016, when ATA began training its own dogs at the Department of State's Canine Training and Operations Center. However, the 2016 requirement established these as one-time visits after completion of a handler training course and delivery of the dogs to the partner nation. ATA's updated October 2019 policy calls for regular, in-country visits at least once per year.

officials are to prepare a report that, among other things, details the findings and indicates the corrective actions required.

In response to the OIG's investigation, ATA planned expedited in-country site visits to all partner nations with ATA-provided dogs. ATA completed visits to five of the seven partner nations between August 2019 and March 2020, but officials said that COVID-19-related travel restrictions have limited their ability to conduct the remaining visits.<sup>6</sup> In consideration of these delays, ATA officials told us that they instructed embassy personnel in the partner nations to meet with ATA-provided working dog teams. According to these officials, there have not been any new reports of abuse, neglect, or mistreatment of ATA-provided dogs since the OIG completed its investigation.

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## **Bureau of International Narcotics and Law Enforcement Affairs (INL)**

INL uses a process called "end-use monitoring" to conduct oversight of certain property, including canines, purchased with foreign assistance funds.<sup>7</sup> End-use monitoring generally entails an annual inspection of property by INL end-use monitors stationed in the recipient country. According to officials, prior to 2021, INL's end-use monitoring policy did not contain specific information on how to conduct monitoring of working dogs. According to INL officials, INL end-use monitors had to independently determine how to apply general end-use monitoring requirements to working dogs.

In January 2021, INL updated its end-use monitoring policy to (1) establish enhanced monitoring procedures for working dogs and (2) delineate specific requirements for conducting end-use monitoring of working dogs. According to INL officials, INL end-use monitors had not identified any problems related to canine health and welfare but had asked for standardized requirements specific to dogs, given the special nature of the dogs as live assets. INL officials said that the bureau took

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<sup>6</sup>In addition to the five completed in-country site visits, ATA also has daily access to dogs in Jordan, where the Department of State funds a permanent cadre of in-country veterinarians and technicians. According to officials, there are six full-time ATA canine program mentors in Jordan who provide weekly updates on the status of each ATA-provided working dog.

<sup>7</sup>Property designated for end-use monitoring is subject to inspection, monitoring, and reporting for the duration of its useful life.

into consideration the findings from the OIG investigation into ATA's Explosives Detection Canine Program when determining how to update its policy.

**Enhanced monitoring procedures.** The enhanced monitoring procedures required end-use monitoring inspections of working dogs every 3 months and noted that on-site, visual inspections are the only acceptable method of monitoring dogs. As of April 2022, INL officials said that all posts have developed schedules for conducting the more frequent end-use monitoring inspections and have been adhering to them when not under COVID-19 travel restrictions imposed by host governments. According to officials, INL end-use monitors have reported travel restrictions imposed by both their respective embassies and the foreign governments. Officials said that INL is exploring the possibility of allowing posts to conduct virtual inspections or secondary inspections in lieu of the required on-site visual inspections until pandemic-related restrictions are lifted.<sup>8</sup>

**End-use monitoring requirements.** INL's updated policy describes specific steps that INL end-use monitors must take in conducting their inspections of INL-provided working dogs. Specifically, INL end-use monitors are to physically inspect the working dogs and their living conditions, assess kennel facilities, assess veterinary clinics and treatment facilities, interview veterinarians supervising the care of the dogs, and review each dog's medical records. Results of the inspections—including photographs of the dogs—must be documented using a new Canine Welfare Checklist and become part of the post's official end-use monitoring record. As with the ATA policy for conducting in-country site visits, if an end-use monitoring inspection determines that there is mistreatment, abuse, or neglect, the INL policy requires that the relevant official prepare a report detailing the findings and requesting notification of the host government of the findings and required actions, among other things. INL officials said that the Department of State has mechanisms to remove dogs from a foreign government's possession if instances of mistreatment or poor living conditions are discovered.

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<sup>8</sup>In general, end-use monitoring inspections by secondary means are conducted in certain situations, such as when in-person inspections are not feasible from a cost/benefit perspective, or because of degraded security conditions. Secondary means of conducting inspections can include, for example, documented discussions with host government officials.

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## **Bureau of Political and Military Affairs, Office of Weapons Removal and Abatement (PM/WRA)**

PM/WRA requires grant recipients to adhere to International Mine Action Standards, which, according to PM/WRA officials, are generally incorporated by reference into the statement of objectives for PM/WRA's grant awards. According to PM/WRA officials, PM/WRA ensures that grant recipients adhere to the terms and conditions of their grant awards through regular monitoring and evaluation. PM/WRA officials said that grant oversight procedures are not specific to health and welfare oversight but typically involve personnel visiting grant locations at least once a year to observe operations. Additionally, the International Mine Action Standards require that covered organizations employing covered working dogs establish systems, procedures, and facilities to ensure the occupational and general health care of their dogs, which are to be in accordance with any relevant national standards and other guidelines. PM/WRA officials said that, as part of general grant administration oversight, they usually review organizations' standard operating procedures. As of April 2022, PM/WRA officials said that they were not aware of any problems related to working dog health and welfare among their grant recipients.

## Appendix VII: Comments from the Department of Commerce



UNITED STATES DEPARTMENT OF COMMERCE  
Office of the Chief Financial Officer and  
Assistant Secretary for Administration  
Washington, D.C. 20230

August 25, 2022

Steve Morris  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street NW, Washington, DC 20548

Dear Mr. Morris:

Thank you for the opportunity to respond to the GAO draft report entitled *Working Dogs: Federal Agencies Need to Better Address Health and Welfare* (GAO-22-104489).

The Department agrees with the recommendation made to us and will prepare a formal action plan upon issuance of GAO's final report.

If you have any questions, please contact MaryAnn Mausser, Department GAO Audit Liaison, at (202) 482-8120 or [mmausser@doc.gov](mailto:mmausser@doc.gov).

Sincerely,

JEREMY PELTER Digitally signed by JEREMY PELTER  
Date: 2022.08.25 15:43:43 -0400

Jeremy Pelter  
Acting Chief Financial Officer and  
Assistant Secretary for Administration

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## Text of Appendix VII: Comments from the Department of Commerce

August 25, 2022

Steve Morris

Director, Natural Resources and Environment

U.S. Government Accountability Office 441 G Street NW, Washington, DC 20548

Dear Mr. Morris:

Thank you for the opportunity to respond to the GAO draft report entitled Working Dogs: Federal Agencies Need to Better Address Health and Welfare (GAO-22-104489).

The Department agrees with the recommendation made to us and will prepare a formal action plan upon issuance of GAO's final report.

If you have any questions, please contact MaryAnn Mausser, Department GAO Audit Liaison, at

(202) 482-8120 or [mmausser@doc.gov](mailto:mmausser@doc.gov).

Sincerely,

Jeremy Pelter

Acting Chief Financial Officer and Assistant Secretary for Administration



## Appendix VIII: Comments from the Department of Defense



AND SECURITY

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

Mr. Steve Morris  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Morris,

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-22-104489, 'WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare,' dated August 4, 2022 (GAO Code 104489). My point of contact is Ms. Shelley Verdejo, who can be reached at shelly.a.verdejo.civ@mail.mil or 703-697-9339.

Sincerely,

DIXSON.JOHN, Digitally signed by  
DIXSON.JOHN; P.1068423259  
Date: 2022.09.14 17:20:41  
-0400

John P. Dixson  
Acting Director for Defense Intelligence  
Counterintelligence, Law Enforcement,  
& Security

GAO DRAFT REPORT DATED AUGUST 4, 2022  
GAO-22 (GAO CODE 104489)

**“WORKING DOGS: FEDERAL AGENCIES NEED TO BETTER ADDRESS HEALTH  
AND WELFARE”**

**DEPARTMENT OF DEFENSE COMMENTS  
TO THE GAO RECOMMENDATIONS**

**RECOMMENDATION 4:** The GAO recommends the Secretary of Defense should, through the Secretary of the Air Force as the executive agent (EA) for the Military Working Dog (MWD) Program, direct all of the Department of Defense’s (DoD) Components with federally-managed working dog programs to revise their respective policies as necessary to ensure that they address the 18 issues identified by the GAO as important to the health and welfare of working dogs.

**DoD RESPONSE:** Concur. DoD has included this direction and assigned responsibility for oversight to the Secretary of the Air Force as the EA in the current draft revision of DoD Directive 5200.31E, “DoD Working Dog Program,” which is in formal coordination for publication.

The Department of the Air Force exercises its authority as the EA by providing policy and guidance to DoD Components via Air Force Instruction 31-126, “DoD Military Working Dog (MWD) Program,” which is undergoing revision with an expected publication date during FY23. The Air Force will use this instruction to address GAO findings. Additionally, the EA will continue to work closely with the Defense Health Agency - Veterinary Corps and Defense Acquisition Regulation System to address medical and contractual requirements better suited to those agencies’ regulatory documents.

In the interim, the DoD MWD Schoolhouse and the Director, MWD Hospital are developing a current ‘standards of care’ requirement that directly addresses issues such as exercise, food and water, grooming, health and welfare, and training. The Air Force has already addressed several of the 18 issues identified as important to the health and welfare of working dogs and will address the remaining issues through the next calendar year.

**RECOMMENDATION 12:** The GAO recommends that the Secretary of Defense should, through the Secretary of the Air Force as the EA for the MWD Program, direct all of the DoD’s Components with contractor-managed working dog programs to ensure that all 18 issues identified by the GAO as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**DoD RESPONSE:** Concur. DoD has included this direction and assigned responsibility for oversight to the Secretary of the Air Force as the EA in the current draft revision of DoD Directive 5200.31E, “DoD Working Dog Program,” which is currently in formal coordination for publication.

The Department of the Air Force exercises its authority as the EA by providing policy and guidance to DoD Components via Air Force Instruction 31-126, “DoD Military Working Dog (MWD) Program,” which is undergoing revision with an expected publication date during FY23.

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**Appendix VIII: Comments from the Department  
of Defense**

The Air Force will use this instruction to ensure that all 18 issues identified by the GAO as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

Additionally, the Air Force will continue to work closely with the Defense Health Agency - Veterinary Corps and Defense Acquisition Regulation System to address medical and contractual requirements better suited to those agencies' regulatory documents.

In the interim, the Secretary of the Air Force's Acquisition/Contracting Policy division will ensure all 18 issues identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

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## Text of Appendix VIII: Comments from the Department of Defense

Mr. Steve Morris

Director, Natural Resources and Environment

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548 Dear Mr. Morris,

This is the Department of Defense (DoD) response to the GAO Draft Report, GAO-22-104489, 'WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare,' dated August 4, 2022 (GAO Code 104489). My point of contact is Ms. Shelley Verdejo, who can be reached at shelley.a.verdejo.civ@mail.mil or 703-697-9339.

Sincerely,

John P. Dixon

Acting Director for Defense Intelligence Counterintelligence, Law Enforcement, &  
Security

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GAO DRAFT REPORT DATED AUGUST 4, 2022 GAO-22 (GAO  
CODE 104489) "WORKING DOGS: FEDERAL AGENCIES NEED  
TO BETTER ADDRESS HEALTH AND WELFARE"

DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATIONS

RECOMMENDATION 4: The GAO recommends the Secretary of Defense should, through the Secretary of the Air Force as the executive agent (EA) for the Military Working Dog (MWD) Program, direct all of the Department of Defense's (DoD) Components with federally-managed working dog programs to revise their respective policies as necessary to ensure that they address the 18 issues identified by the GAO as important to the health and welfare of working dogs.

**DoD RESPONSE: Concur. DoD has included this direction and assigned responsibility for oversight to the Secretary of the Air Force as the EA in the**

**current draft revision of DoD Directive 5200.31E, “DoD Working Dog Program,” which is in formal coordination for publication.**

The Department of the Air Force exercises its authority as the EA by providing policy and guidance to DoD Components via Air Force Instruction 31-126, “DoD Military Working Dog (MWD) Program,” which is undergoing revision with an expected publication date during FY23. The Air Force will use this instruction to address GAO findings. Additionally, the EA will continue to work closely with the Defense Health Agency - Veterinary Corps and Defense Acquisition Regulation System to address medical and contractual requirements better suited to those agencies’ regulatory documents.

In the interim, the DoD MWD Schoolhouse and the Director, MWD Hospital are developing a current ‘standards of care’ requirement that directly addresses issues such as exercise, food and water, grooming, health and welfare, and training. The Air Force has already addressed several of the 18 issues identified as important to the health and welfare of working dogs and will address the remaining issues through the next calendar year.

RECOMMENDATION 12: The GAO recommends that the Secretary of Defense should, through the Secretary of the Air Force as the EA for the MWD Program, direct all of the DoD’s Components with contractor-managed working dog programs to ensure that all 18 issues identified by the GAO as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**DoD RESPONSE: Concur. DoD has included this direction and assigned responsibility for oversight to the Secretary of the Air Force as the EA in the current draft revision of DoD Directive 5200.31E, “DoD Working Dog Program,” which is currently in formal coordination for publication.**

The Department of the Air Force exercises its authority as the EA by providing policy and guidance to DoD Components via Air Force Instruction 31-126, “DoD Military Working Dog (MWD) Program,” which is undergoing revision with an expected publication date during FY23.

The Air Force will use this instruction to ensure that all 18 issues identified by the GAO as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

Additionally, the Air Force will continue to work closely with the Defense Health Agency - Veterinary Corps and Defense Acquisition Regulation System to address

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medical and contractual requirements better suited to those agencies' regulatory documents.

In the interim, the Secretary of the Air Force's Acquisition/Contracting Policy division will ensure all 18 issues identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

# Appendix IX: Comments from the Department of Energy



## Department of Energy

Washington, DC 20585

September 23, 2022

Frank Rusco  
Director  
Natural Resources and Environment  
U. S. Government Accountability Office  
441 G Street N.W.  
Washington, DC 20548

Dear Mr. Rusco,

The Department of Energy (DOE or Department) appreciates the opportunity to comment on the Government Accountability Office's (GAO) draft report titled "*WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare (GAO-22-104489)*." The draft report contains 19 recommendations, two of which are directed to the DOE.

**Recommendation 5:** The Secretary of Energy should direct all of the Department of Energy's agencies with federally managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.

**Management Decision:** Partially Concur

**Action Plan:** DOE will evaluate the 18 issues GAO identified as important to the health and welfare of working dogs to determine their applicability to DOE's Canine Program and will issue a policy clarification to address those areas DOE determines are applicable.

**Estimated Completion Date:** December 31, 2022

**Recommendation 13:** The Secretary of Energy should direct all of the Department of Energy's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**Management Decision:** Partially Concur

**Action Plan:** DOE will evaluate the 18 issues GAO identified as important to the health and welfare of working dogs to determine their applicability to DOE's Canine Program and will issue a policy clarification to address those areas DOE determines are applicable.

**Estimated Completion Date:** December 31, 2022

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**Appendix IX: Comments from the Department  
of Energy**

If you have any questions regarding this response, please contact Sam Callahan, Director, Office of Security, at 301-903-3767.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lapointe', with a horizontal line extending to the right.

Todd N. Lapointe  
Acting Director  
Office of Environment, Health, Safety and Security



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## Text of Appendix IX: Comments from the Department of Energy

September 23, 2022

Frank Rusco Director

Natural Resources and Environment

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

Washington, DC 20548 Dear Mr. Rusco,

The Department of Energy (DOE or Department) appreciates the opportunity to comment on the Government Accountability Office's (GAO) draft report titled "WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare (GAO-22-104489)." The draft report contains 19 recommendations, two of which are directed to the DOE.

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**Recommendation 5: The Secretary of Energy should direct all of the Department of Energy's agencies with federally managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.**

**Management Decision: Partially Concur**

Action Plan: DOE will evaluate the 18 issues GAO identified as important to the health and welfare of working dogs to determine their applicability to DOE's Canine Program and will issue a policy clarification to address those areas DOE determines are applicable.

Estimated Completion Date: December 31, 2022

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**Recommendation 13: The Secretary of Energy should direct all of the Department of Energy's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified**

as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

Management Decision: Partially Concur

Action Plan: DOE will evaluate the 18 issues GAO identified as important to the health and welfare of working dogs to determine their applicability to DOE's Canine Program and will issue a policy clarification to address those areas DOE determines are applicable.

Estimated Completion Date: December 31, 2022

If you have any questions regarding this response, please contact Sam Callahan, Director, Office of Security, at 301-903-3767.

Sincerely,

Todd N. Lapointe Acting Director

Office of Environment, Health, Safety and Security

# Appendix X: Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation  
Washington, DC 20201

August 30, 2022

Steve Morris  
Director  
Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

Dear Mr. Morris:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "**Working Dogs: Federal Agencies Need to Better Address Health and Welfare**" (GAO-22-104489).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

*Melanie Anne Egorin*

Melanie Anne Egorin, PhD  
Assistant Secretary for Legislation

Attachment

**GENERAL COMMENTS FROM THE DEPARTMENT OF  
HEALTH & HUMAN SERVICES ON THE GOVERNMENT  
ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED —  
WORKING DOGS: Federal Agencies Need to Better Address  
Health and Welfare(GAO-22-104489)**

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

**General Comments**

**Recommendation 6**

The Secretary of Health and Human Services should direct the National Institute of Health Police to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.

**HHS Response**

**HHS Concur with GAO's recommendation.**

HHS concurs with the GAO recommendation to revise National Institute of Health (NIH) policies about the health and welfare of working dogs. NIH anticipates implementing this GAO recommendation by September 30, 2023.

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## Text of Appendix X: Comments from the Department of Health and Human Services

August 30, 2022

Steve Morris Director

Natural Resources and Environment

U.S. Government Accountability Office 441 G Street NW

Washington, DC 20548 Dear Mr. Morris:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "Working Dogs: Federal Agencies Need to Better Address Health and Welfare" (GAO-22- 104489).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Melanie Anne Egorin, PhD Assistant Secretary for Legislation

Attachment

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### GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED — WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare(GAO-22-104489)

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

#### General Comments Recommendation 6

The Secretary of Health and Human Services should direct the National Institute of Health Police to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.

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**HHS Response**

HHS Concurrs with GAO's recommendation.

HHS concurs with the GAO recommendation to revise National Institute of Health (NIH) policies about the health and welfare of working dogs. NIH anticipates implementing this GAO recommendation by September 30, 2023.

# Appendix XI: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



September 7, 2022

Steve Morris  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-104489, "WORKING DOGS:  
Federal Agencies Need to Better Address Health and Welfare"

Dear Mr. Morris:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition of the important roles performed by canines to carry out the Department's missions, such as detection of explosives or narcotics, search and rescue, and patrol. The DHS Canine and Equine Governance Board (CEGB) was established in May 2018 to facilitate the identification, development, and implementation of best practices across the Department, while also working to harmonize Component requirements for canines and equines. Accordingly, DHS remains committed to CEGB's main objective, which is to ensure the Department can achieve greater policy coordination and implement innovative efficiencies that will ensure consistency and excellence for canine and equine programs throughout the Department.

The draft report contained 19 recommendations, including 2 for DHS with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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**Appendix XI: Comments from the Department  
of Homeland Security**

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Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H  
CRUMPACKER

 Digitally signed by JIM H  
CRUMPACKER  
Date: 2022.09.07 10:38:04 -04'00'

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Enclosure



**Enclosure: Management Response to Recommendations  
Contained in GAO-22-104489**

GAO recommended that the Secretary of Homeland Security:

**Recommendation 7:** Direct all of the Department of Homeland Security’s agencies with federally-managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.

**Response:** Concur. The DHS Office of the Chief Readiness Support Officer (OCRSO), with support from the CEGB, will revise the “DHS Canine Policy,” dated November 2019, to ensure it addresses the 18 issues GAO identified as important to the health and welfare of DHS-managed working dog programs, as appropriate. Estimated Completion Date (ECD): December 30, 2022.

**Recommendation 14:** Direct all of the Department of Homeland Security’s agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**Response:** Concur. OCRSO, with support from the CEGB, will revise the “DHS Canine Policy” dated November 2019, to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed in future contracts, as appropriate. ECD: December 30, 2022.

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## Text of Appendix XI: Comments from the Department of Homeland Security

September 7, 2022

Steve Morris

Director, Natural Resources and Environment

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

Re: Management Response to Draft Report GAO-22-104489, "WORKING DOGS:  
Federal Agencies Need to Better Address Health and Welfare"

Dear Mr. Morris:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

DHS leadership is pleased to note GAO's recognition of the important roles performed by canines to carry out the Department's missions, such as detection of explosives or narcotics, search and rescue, and patrol. The DHS Canine and Equine Governance Board (CEGB) was established in May 2018 to facilitate the identification, development, and implementation of best practices across the Department, while also working to harmonize Component requirements for canines and equines. Accordingly, DHS remains committed to CEGB's main objective, which is to ensure the Department can achieve greater policy coordination and implement innovative efficiencies that will ensure consistency and excellence for canine and equine programs throughout the Department.

The draft report contained 19 recommendations, including 2 for DHS with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

JIM H. CRUMPACKER, CIA, CFE

Director

Departmental GAO-OIG Liaison Office

Enclosure

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**Enclosure: Management Response to Recommendations  
Contained in GAO-22-104489**

GAO recommended that the Secretary of Homeland Security:

Recommendation 7: Direct all of the Department of Homeland Security's agencies with federally-managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.

**Response: Concur. The DHS Office of the Chief Readiness Support Officer (OCRSO), with support from the CEGB, will revise the "DHS Canine Policy," dated November 2019, to ensure it addresses the 18 issues GAO identified as important to the health and welfare of DHS-managed working dog programs, as appropriate. Estimated Completion Date (ECD): December 30, 2022.**

Recommendation 14: Direct all of the Department of Homeland Security's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**Response: Concur. OCRSO, with support from the CEGB, will revise the "DHS Canine Policy" dated November 2019, to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed in future contracts, as appropriate. ECD: December 30, 2022.**

# Appendix XII: Comments from the Department of the Interior



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

Mr. Steve D. Morris  
Director, Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Morris,

Thank you for providing the Department of the Interior (Department) an opportunity to review and comment on the draft Government Accountability Office (GAO) report titled, "*Working Dogs: Federal Agencies Need to Better Address Health and Welfare*" (GAO-22-104489). We appreciate GAO's review of the Department's working dog programs.

The GAO issued multiple recommendations, including two to the Department of Interior to address its findings. Below is a summary of actions taken or planned to implement the recommendations:

**Recommendation 8: The Secretary of Interior should direct all of the Department of the Interior's agencies with federally managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.**

**FWS Response:** Concur. The Division of Refuge Law Enforcement will update their policy and dog handlers' handbook to incorporate all remaining issues identified.

**Responsible Official:** Chief, National Wildlife Refuge System  
**Target Date:** October 31, 2023

**BLM Response:** Concur. The BLM concurs with the recommendations and is currently drafting new policy to incorporate all 18 issues to improve the health and welfare of the BLM working dogs.

**Responsible Official:** Director, Office of Law Enforcement and Security  
**Target Date:** March 31, 2023

**NPS Response:** Concur. The NPS will update policies to clarify the 18 areas identified in the GAO report.

**Target Date:** May 31, 2023

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**Appendix XII: Comments from the Department  
of the Interior**

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**BIA Response:** Concur. The BIA, Office of Justice Services (OJS), Division of Drug Enforcement (DDE), owns 5 canines, which are assigned and cared for by the DDE officer with whom the canine is partnered. All DDE officers who are selected to become a canine handler participates in a six (6) week course put on by the DDE National Canine Coordinator (NCC). All areas of training are addressed including the 18 items listed in the attached BIA enclosure.

**Responsible Official:** Director, Office of Justice Services-BIA  
**Target Date:** September 12, 2022

**Recommendation 15: The Secretary of Interior should direct all of the Department of Interior's agencies with contractor managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.**

**FWS Response:** Concur. The FWS Office of Law Enforcement will develop a national procedure and training related to the health and welfare of working dogs and methods of how working dogs are to receive emergency medical care, either by a veterinarian or a handler. The Office of Law Enforcement is also currently developing plans to move away from contracted working dogs.

**Responsible Official:** Chief, Office of Law Enforcement  
**Target Dates:** August 31, 2023

**BOR Response:** Concur. Reclamation will work with the Denver acquisition policy office, regional acquisition offices, and pertinent customers to ensure the 18 issues identified by GAO are incorporated into applicable requirements documents going forward.

**Responsible Official:** Director, Mission Support Organization  
**Target Date:** March 31, 2023

**BIA Response:** The BIA, OJS, DDE owns 5 canines, which are assigned and cared for by the DDE officer with whom the canine is partnered. DDE canines are not managed by contractors.

---

**Appendix XII: Comments from the Department  
of the Interior**

If you should have any questions or need additional information, please contact the PFM AM team at [DOI\\_PFM\\_AM@ios.doi.gov](mailto:DOI_PFM_AM@ios.doi.gov).

Sincerely,

**JOAN  
MOONEY**

Digitally signed by JOAN  
MOONEY  
Date: 2022.09.26  
15:22:26 -04'00'

Joan M. Mooney  
Principal Deputy Assistant Secretary  
Exercising the Delegated Authority of the Assistant  
Secretary for Policy, Management and Budget

Enclosure

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## Text of Appendix XII: Comments from the Department of the Interior

Mr. Steve D. Morris

Director, Natural Resources and Environment

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

Dear Mr. Morris,

Thank you for providing the Department of the Interior (Department) an opportunity to review and comment on the draft Government Accountability Office (GAO) report titled, "Working Dogs: Federal Agencies Need to Better Address Health and Welfare" (GAO-22-104489). We appreciate GAO's review of the Department's working dog programs.

The GAO issued multiple recommendations, including two to the Department of Interior to address its findings. Below is a summary of actions taken or planned to implement the recommendations:

---

**Recommendation 8: The Secretary of Interior should direct all of the Department of the Interior's agencies with federally managed working dog programs to revise their policies as necessary to ensure that they address all of the 18 issues GAO identified as important to the health and welfare of working dogs.**

FWS Response: Concur. The Division of Refuge Law Enforcement will update their policy and dog handlers' handbook to incorporate all remaining issues identified.

Responsible Official: Chief, National Wildlife Refuge System

Target Date: October 31, 2023

---

BLM Response: Concur. The BLM concurs with the recommendations and is currently drafting new policy to incorporate all 18 issues to improve the health and welfare of the BLM working dogs.

Responsible Official: Director, Office of Law Enforcement and Security

Target Date: March 31, 2023

NPS Response: Concur. The NPS will update policies to clarify the 18 areas identified in the GAO report.

Target Date: May 31, 2023

BIA Response: Concur. The BIA, Office of Justice Services (OJS), Division of Drug Enforcement (DDE), owns 5 canines, which are assigned and cared for by the DDE officer with whom the canine is partnered. All DDE officers who are selected to become a canine handler participates in a six (6) week course put on by the DDE National Canine Coordinator (NCC). All areas of training are addressed including the 18 items listed in the attached BIA enclosure.

Responsible Official: Director, Office of Justice Services-BIA

Target Date: September 12, 2022

---

Recommendation 15: The Secretary of Interior should direct all of the Department of Interior's agencies with contractor managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

FWS Response: Concur. The FWS Office of Law Enforcement will develop a national procedure and training related to the health and welfare of working dogs and methods of how working dogs are to receive emergency medical care, either by a veterinarian or a handler. The Office of Law Enforcement is also currently developing plans to move away from contracted working dogs.

Responsible Official: Chief, Office of Law Enforcement

Target Dates: August 31, 2023



---

BOR Response: Concur. Reclamation will work with the Denver acquisition policy office, regional acquisition offices, and pertinent customers to ensure the 18 issues identified by GAO are incorporated into applicable requirements documents going forward.

Responsible Official: Director, Mission Support Organization

Target Date: March 31, 2023

BIA Response: The BIA, OJS, DDE owns 5 canines, which are assigned and cared for by the DDE officer with whom the canine is partnered. DDE canines are not managed by contractors.

If you should have any questions or need additional information, please contact the PFM AM team at DOI\_PFM\_AM@ios.doi.gov.

Sincerely,

Joan M. Mooney

Principal Deputy Assistant Secretary

Exercising the Delegated Authority of the Assistant Secretary for Policy,  
Management and Budget

Enclosure

## Appendix XIII: Comments from the Department of State



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

SEPT 22 2022

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

Dear Mr. Melito:

We appreciate the opportunity to review your draft report,  
“WORKING DOGS: Federal Agencies Need to Better Address Health and  
Welfare” GAO Job Code 104489.

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 blue ink, appearing to read "William B. Davisson".

William B. Davisson (Acting)

Enclosure:  
As stated

cc: GAO – Steve Morris  
INL – Todd Robinson  
OIG - Norman Brown

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

**WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare  
(GAO-22-104489, GAO Code 104489)**

Thank you for the opportunity to comment on the GAO draft report, *Working Dogs: Federal Agencies Need to Better Address Health and Welfare*.

**Recommendation 17:** The Secretary of State should direct all of the Department of State bureaus with contractor managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**The Department concurs with the recommendation.**

The Department recognizes canines are an invaluable tool acknowledging their vital role throughout the Department. Canines serve diverse missions, ranging from drug and explosive detection to mine detection to assist in apprehending criminals. The Department acknowledges the 18 issues GAO identified will provide the Department with a uniform standard that will strengthen the oversight of the health and welfare of canines.

**Recommendation 19:** The Secretary of State should direct the Bureau of International Narcotics and Law Enforcement Affairs and the Bureau of Political and Military Affairs to ensure that the standards for working dogs provided to foreign partners address, as appropriate, all 18 issues GAO identified as important to the health and welfare of working dogs.

**The Department concurs with the recommendation.**

The Bureau of International Narcotics and Law Enforcement Affairs (INL) recognizes the importance of developing standards for working dogs provided to foreign partners to adequately monitor and oversee canines provided to host governments. INL will review our internal processes and work to determine the Bureau's ability to comply with the 3 out of the 18 "health and welfare of working dogs" criteria GAO identified in order to satisfy recommendation 19.

The Bureau of Political and Military Affairs (PM) provides assistance through grant and contract awards to support the operation and care of working dogs owned by NGO implementing partners and is therefore constrained from taking unilateral actions related to addressing certain aspects of the 18 issues GAO identified. PM will request the Department's Office of the Procurement Executive determine appropriate and legal options to implement recommendation 19 and develop appropriate terms and conditions for inclusion in grants and contracts entailing the use of working dogs. In the meantime, PM will instruct program managers to review implementing partner standard operating procedures in light of the 18 issues and provide guidance within the parameters of existing award Terms and Conditions.

---

## Text of Appendix XIII: Comments from the Department of State

SEPT 22 2022

Thomas Melito Managing Director

International Affairs and Trade

Government Accountability Office 441 G Street, N.W.

Washington, D.C. 20548-0001

Dear Mr. Melito:

We appreciate the opportunity to review your draft report, "WORKING DOGS: Federal Agencies Need to Better Address Health and Welfare" GAO Job Code 104489.

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

Sincerely,

William B. Davisson (Acting)

Enclosure:

As stated

cc: GAO- Steve Morris INL - Todd Robinson OIG - Norman Brown

---

Department of State Comments on Draft GAO Report WORKING  
DOGS: Federal Agencies Need to Better Address Health and  
Welfare (GAO-22-104489, GAO Code 104489)

Thank you for the opportunity to comment on the GAO draft report, Working Dogs:  
Federal Agencies Need to Better Address Health and Welfare.

Recommendation 17: The Secretary of State should direct all of the Department of State bureaus with contractor managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

**The Department concurs with the recommendation.**

The Department recognizes canines are an invaluable tool acknowledging their vital role throughout the Department. Canines serve diverse missions, ranging from drug and explosive detection to mine detection to assist in apprehending criminals. The Department acknowledges the 18 issues GAO identified will provide the Department with a uniform standard that will strengthen the oversight of the health and welfare of canines.

Recommendation 19: The Secretary of State should direct the Bureau of International Narcotics and Law Enforcement Affairs and the Bureau of Political and Military Affairs to ensure that the standards for working dogs provided to foreign partners address, as appropriate, all 18 issues GAO identified as important to the health and welfare of working dogs.

**The Department concurs with the recommendation.**

The Bureau of International Narcotics and Law Enforcement Affairs (INL) recognizes the importance of developing standards for working dogs provided to foreign partners to adequately monitor and oversee canines provided to host governments. INL will review our internal processes and work to determine the Bureau's ability to comply with the 3 out of the 18 "health and welfare of working dogs" criteria GAO identified in order to satisfy recommendation 19.

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## Appendix XIV: Comments from the Department of the Treasury – Bureau of Engraving and Printing



DEPARTMENT OF THE TREASURY  
BUREAU OF ENGRAVING AND PRINTING  
WASHINGTON, D.C. 20228

Steve Morris  
Director, Natural Resources and Environment  
United States Government Accountability Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Morris:

Thank you for the opportunity to review the draft report of the Government Accountability Office entitled, *Working Dogs: Federal Agencies Need to Better Address Health and Welfare* (GAO-22-104489).

The U.S. Department of Treasury, Bureau of Engraving and Printing (BEP) supports this initiative to enhance the health and welfare of contracted federal working dogs. We recognize the important role these working canines play in the security and safety of our personnel and property.

BEP is committed to ensuring the humane treatment and optimal performance of our contracted federal working dogs and believes the list of issues GAO identified are comprehensive and offer a foundation for ensuring their health and welfare.

The BEP appreciated your acknowledgement of key issues already included in our contractor-managed program. As noted within our contracts, BEP has addressed 17 of the 18 key issues related to their health and welfare.

Through your analysis, our program and the health and welfare of the federal working dogs within future contracts will be greatly improved. In that regard, the BEP agrees with the recommendation directed to the Secretary of Treasury included in the draft report.

Thank you again for the valuable feedback you have provided. We appreciate having the opportunity to review and comment on the draft report. If you have any questions, please contact me.

Attachment

**Alvin E. Shell** Digitally signed by Alvin E. Shell  
Date: 2022.09.14 17:35:22 -0400

Alvin Shell  
Chief, Office of Security, BEP

Attachment

**GAO Recommendations and IRS Responses to GAO Draft Report  
Working Dogs: Federal Agencies Need to Better Address Health and Welfare  
(GAO-22-104489)**

**Recommendation:**

18. The Secretary of Treasury should direct all of the Department of Treasury's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 18)

**Comment:**

The BEP agrees with the recommendation. The BEP recognizes the importance of the federal working dog's health and welfare and will ensure all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts as well as the associated Quality Assurance Surveillance Plan (QASP).

---

## Text of Appendix XIV: Comments from the Department of the Treasury – Bureau of Engraving and Printing

Steve Morris

Director, Natural Resources and Environment

United States Government Accountability Office 441 G Street, N.W.

Washington, DC 20548 Dear Mr. Morris:

Thank you for the opportunity to review the draft report of the Government Accountability Office entitled, *Working Dogs: Federal Agencies Need to Better Address Health and Welfare* (GAO-22-104489).

The U.S. Department of Treasury, Bureau of Engraving and Printing (BEP) supports this initiative to enhance the health and welfare of contracted federal working dogs. We recognize the important role these working canines play in the security and safety of our personnel and property.

BEP is committed to ensuring the humane treatment and optimal performance of our contracted federal working dogs and believes the list of issues GAO identified are comprehensive and offer a foundation for ensuring their health and welfare.

The BEP appreciated your acknowledgement of key issues already included in our contractor- managed program. As noted within our contracts, BEP has addressed 17 of the 18 key issues related to their health and welfare.

Through your analysis, our program and the health and welfare of the federal working dogs within future contracts will be greatly improved. In that regard, the BEP agrees with the recommendation directed to the Secretary of Treasury included in the draft report.

Thank you again for the valuable feedback you have provided. We appreciate having the opportunity to review and comment on the draft report. If you have any questions, please contact me.

Attachment

Alvin Shell



Chief, Office of Security, BEP

Attachment

---

GAO Recommendations and IRS Responses to GAO Draft Report  
Working Dogs: Federal Agencies Need to Better Address Health  
and Welfare (GAO-22-104489)

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**Comment:**

The BEP agrees with the recommendation. The BEP recognizes the importance of the federal working dog's health and welfare and will ensure all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts as well as the associated Quality Assurance Surveillance Plan (QASP).

# Appendix XV: Comments from the Department of the Treasury – Internal Revenue Service



DEPUTY COMMISSIONER

DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, DC 20224

September 9, 2022

Steve Morris  
Director, Natural Resources and Environment  
United States Government Accountability Office  
441 G Street, N.W.  
Washington, DC 20548

Dear Mr. Morris:

Thank you for the opportunity to review the draft report of the Government Accountability Office entitled, Working Dogs: Federal Agencies Need to Better Address Health and Welfare (GAO-22-104489).

The U.S. Department of Treasury and Internal Revenue Service (IRS) support this initiative to enhance the health and welfare of federal working dogs. We recognize the important role our Explosive Detection Canine Team (EDCT) plays in the security and safety of our personnel and property through the screening of mail/deliveries arriving at specific locations and by conducting outer perimeter facility, occupied space or suspicious items sweeps to confirm or deny the presence of explosive materials or explosive odors.

The IRS is committed to the humane treatment and optimal performance of our contracted federal working dogs and believes the list of issues GAO identified is comprehensive and offers a foundation for ensuring their health and welfare.

We appreciate your acknowledgement of the key issues already included in our contractor-managed program. As noted within our contract and the Quality Control Plan (QCP), IRS had addressed nine (9) of the key issues related to their health and welfare.

Through your analysis, our program and the health and welfare of the EDCT within future contracts will be greatly improved. In that regard, the IRS agrees with the recommendation directed to the Secretary of Treasury included in the draft report.

Thank you again for the valuable feedback you have provided. We are grateful for your analysis and recommendation and for the anticipated improvement in the careers and lives of our EDCTs.

---


**Appendix XV: Comments from the Department  
of the Treasury – Internal Revenue Service**

2

If you have any questions, please contact me, or a member of your staff may contact Richard L. Rodriguez, chief, Facilities Management and Security Services, at 202-317-4480.

Sincerely,

**Jeffrey J.  
Tribiano**

 Digitally signed by Jeffrey J.  
Tribiano  
Date: 2022.09.09 16:59:28  
-04'00'

Jeffrey J. Tribiano  
Deputy Commissioner for Operations Support

Enclosure

Enclosure

**GAO Recommendations and IRS Responses to GAO Draft Report  
Working Dogs: Federal Agencies Need to Better Address Health and Welfare  
(GAO-22-104489)**

**Recommendation:**

18. The Secretary of Treasury should direct all of the Department of Treasury's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 18)

**Comment:**

The IRS agrees with the recommendation. The IRS recognizes the importance of the federal working dog's health and welfare and will ensure all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

---

## Text of Appendix XV: Comments from the Department of the Treasury – Internal Revenue Service

September 9, 2022

Steve Morris

Director, Natural Resources and Environment United States Government  
Accountability Office 441 G Street, N.W.

Washington, DC 20548 Dear Mr. Morris:

Thank you for the opportunity to review the draft report of the Government

Accountability Office entitled, Working Dogs: Federal Agencies Need to Better  
Address Health and Welfare (GAO-22-104489).

The U.S. Department of Treasury and Internal Revenue Service (IRS) support this initiative to enhance the health and welfare of federal working dogs. We recognize the important role our Explosive Detection Canine Team (EDCT) plays in the security and safety of our personnel and property through the screening of mail/deliveries arriving at specific locations and by conducting outer perimeter facility, occupied space or suspicious items sweeps to confirm or deny the presence of explosive materials or explosive odors.

The IRS is committed to the humane treatment and optimal performance of our contracted federal working dogs and believes the list of issues GAO identified is comprehensive and offers a foundation for ensuring their health and welfare.

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If you have any questions, please contact me, or a member of your staff may contact Richard L. Rodriguez, chief, Facilities Management and Security Services, at 202-317-4480.

Sincerely,

Jeffrey J. Tribiano

Deputy Commissioner for Operations Support

Enclosure

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**GAO Recommendations and IRS Responses to GAO Draft Report  
Working Dogs: Federal Agencies Need to Better Address Health  
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Recommendation: 18. The Secretary of Treasury should direct all of the Department of Treasury's agencies with contractor-managed working dog programs to ensure that all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts. (Recommendation 18)

**Comment:**

The IRS agrees with the recommendation. The IRS recognizes the importance of the federal working dog's health and welfare and will ensure all 18 issues GAO identified as important to the health and welfare of working dogs are addressed, as appropriate, in future contracts.

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## Appendix XVI: GAO Contacts and Staff Acknowledgments

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### GAO Contact

Steve D. Morris at (202) 512-3841 or [morriss@gao.gov](mailto:morriss@gao.gov)

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### Staff Acknowledgments

In addition to the contact named above, Nico Sloss (Assistant Director), Perry Lusk, Jr. (Analyst-in-Charge), Ellen Fried, Erik Kjeldgaard, Josie Ostrander, Isabel Rosa, Sara Sullivan, and Breanna Trexler made key contributions to this report. Josh Diosomito, Suellen Foth, Gina Hoover, Nancy Lueke, Triana McNeill, Patricia Moye, Sally Newman, Cary Russell, Tina Won Sherman, and Tatiana Winger also made contributions to this report.

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



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## 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

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## 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

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## 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



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