



## Testimony

Before the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

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# COAST GUARD

## Action Needed to Evaluate Efforts to Address Sexual Assault and Harassment

Accessible Version

Statement of Heather MacLeod, Director, Homeland Security and Justice

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# GAO Highlights

Highlights of [GAO-24-107388](#), a testimony before the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

## Why GAO Did This Study

The Coast Guard is a maritime military service within the Department of Homeland Security that employs more than 55,000 personnel. Sexual assault and harassment have a negative effect on the victims, negatively affect retention, and disrupt mission readiness.

This statement discusses the Coast Guard's recent efforts to address sexual assault and harassment.

GAO analyzed Coast Guard documents, interviewed agency officials, and reviewed prior GAO reports on Department of Defense and Coast Guard efforts to prevent sexual assault and harassment. We also compared Coast Guard efforts to the Commandant instruction on internal controls as well as federal internal control standards.

## What GAO Recommends

Previously, GAO has made four recommendations to the Coast Guard regarding implementation of laws pertaining to sexual assault. The Coast Guard has fully addressed one of them and GAO continues to monitor implementation.

In this statement, GAO recommends that the Coast Guard develop an evaluation plan and mechanisms for assessing the effectiveness of actions taken to help ensure service members have an experience free from sexual assault and harassment.

The Department of Homeland Security provided technical comments, which we incorporated as appropriate.

View [GAO-24--107388](#). For more information, contact Heather MacLeod at (202) 512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov).

March 6, 2024

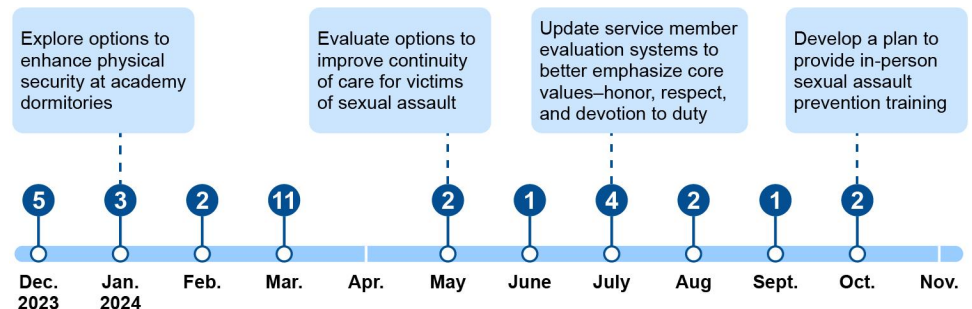
# COAST GUARD

## Action Needed to Evaluate Efforts to Address Sexual Assault and Harassment

### What GAO Found

The Coast Guard has taken action to address sexual assault and harassment but has not developed a plan to assess its efforts. In a 2020 internal investigation called "Operation Fouled Anchor," the Coast Guard examined 102 separate allegations of sexual assault from 1990 to 2006 at the Coast Guard Academy and concluded that the academy often mishandled these cases. More recently, service members reported a total of 263 sexual harassment allegations between September 2020 through April 2023, according to Coast Guard data. After media reporting on Operation Fouled Anchor in June 2023, the Commandant directed a 90-day review of policy processes, practices, and service culture relevant to countering sexual assault and harassment in the Coast Guard. The resulting report identified areas for organizational improvement to ensure a culture of accountability and transparency. In November 2023, the Commandant directed the Coast Guard to implement 33 initial actions by certain dates to address the findings of the review and help ensure service members have an experience free from sexual assault and harassment (see figure). The actions span six categories, including training, the academy, and information and data. According to Coast Guard officials, they have completed five actions as of February 2024.

### Number of Coast Guard Planned Actions Each Month to Respond to Sexual Assault and Harassment and Selected Examples



Source: GAO analysis of U.S. Coast Guard documents. | GAO-24-107388

### Accessible Text for Number of Coast Guard Planned Actions Each Month to Respond to Sexual Assault and Harassment and Selected Examples

Date	Planned action
January of 2024	Explore options to enhance physical security at academy dormitories
May of 2024	Evaluate options to improve continuity of care for victims of sexual assault
July of 2024	Update service member evaluation systems to better emphasize core values—honor, respect, and devotion to duty
October of 2024	Develop a plan to provide in-person sexual assault prevention training

Source: GAO analysis of U.S. Coast Guard documents. | GAO-24-107388

The Commandant-directed actions include administering a Coast Guard-wide survey and analyzing survey results. However, the service has not developed an evaluation plan to assess the results of its 33 initial actions. According to Coast Guard officials, they have had discussions about assessing the results of the actions but have not developed plans or mechanisms to do so because measuring culture change is difficult. However, these officials identified certain resources, such as employee surveys and Department of Defense officials, that could prove useful in this effort.

Developing an evaluation plan and mechanisms for assessing the effectiveness of actions taken to improve its culture of accountability and transparency would better ensure that Coast Guard has the information it needs to evaluate whether the actions are helping service members have an experience free from sexual assault and harassment. Further, taking these steps would help ensure the service is improving its culture, which could assist in the recruitment and retention of its workforce.

Chairman Webster, Ranking Member Carbajal, and Members of the Subcommittee:

Thank you for the opportunity to discuss our work on the U.S. Coast Guard workforce and actions intended to prevent and respond to sexual assaults. Sexual assault is a heinous crime that can have lasting, harmful effects on victims. It contradicts the core values of the Coast Guard—a maritime military service within the Department of Homeland Security (DHS) with more than 55,000 personnel.<sup>1</sup> Sexual assault and harassment also disrupt mission readiness.<sup>2</sup> Further, the Coast Guard’s workforce strategic plan, *Ready Workforce 2030*, states that attracting enough qualified young women and men to serve is one of the biggest challenges facing each of the U.S. military services today.<sup>3</sup> As we have previously reported, a number of factors, including sexual assault and harassment, influence the Department of Defense’s (DOD) ability to retain active-duty personnel, a factor that Coast Guard officials have stated also influences their ability to retain personnel.<sup>4</sup>

The issue of sexual assault and harassment in the Coast Guard is not new, according to the Coast Guard.<sup>5</sup> In a series of investigations called “Operation Fouled Anchor,” the Coast Guard Investigative Service examined 102 separate allegations of sexual assault that occurred between 1990 and 2006 at the Coast Guard Academy, according to a

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<sup>1</sup>The Coast Guard’s core values are honor, respect, and devotion to duty.

<sup>2</sup>The Coast Guard defines sexual assault as sexual contact characterized by use of force, threats, intimidation, or abuse of authority when the victim does not or cannot consent. The term includes a broad category of sexual offenses consisting of rape, sexual assault, aggravated sexual contact, abusive sexual contact, forcible sodomy, or attempts to commit any of these offenses. The Coast Guard defines sexual harassment as harassment including, but not limited to, unwelcome verbal, nonverbal, or physical conduct, intended to or effect unreasonable interference with an individual’s work performance or creating an intimidating, offensive, or hostile environment based on a protected status. Sexual harassment is a form of prohibited harassment. See Coast Guard COMDTINST 1754.10F, *Sexual Assault Prevention, Response, and Recovery (SAPR) Program* (Apr. 2023) and COMDTINST 5350.6, *Harassing Behavior Prevention, Response, and Accountability* (Feb. 2023).

<sup>3</sup>U.S. Coast Guard, *Ready Workforce 2030* (Washington, D.C.: Apr. 2022).

<sup>4</sup>GAO, *Coast Guard: Recruitment and Retention Challenges Persist*, [GAO-23-106750](#) (Washington, D.C.: May 11, 2023).

<sup>5</sup>Coast Guard, *Accountability and Transparency Review Team Report*, (Washington, D.C.: Nov. 2023).

2020 Coast Guard report.<sup>6</sup> The investigations' final report concluded that the academy often mishandled these cases and failed to take sufficient action to ensure a safe environment and instill a culture intolerant of any form of sexual misconduct. Further, in 2015, the Coast Guard conducted a gap analysis comparing the current and optimal state of Coast Guard culture and identified 41 gaps.<sup>7</sup> At least 28 of these 41 gaps pertained to efforts to prevent or respond to sexual assault and harassment.

The Coast Guard and Congress took some steps to address these issues, but according to several published reports and Coast Guard data on this matter, the problems persist.<sup>8</sup> Between 2002 and 2023, the Coast Guard established 19 policies and initiatives, 10 trainings, and six victims services efforts intended to prevent, respond to, and support victims of sexual assault and harassment, according to a Coast Guard report.<sup>9</sup> Further, since the National Defense Authorization Act (NDAA) for Fiscal Year 2004, Congress has established numerous requirements to help DOD and Coast Guard efforts for preventing and responding to incidents of sexual assault in the military.<sup>10</sup> However, sexual assault and harassment remains an ongoing issue. According to Coast Guard Anti-Harassment & Hate Incident data, from fiscal year 2020 through April 2023, Coast Guard service members reported a total of 263 alleged incidents of sexual harassment, of which 164 (62 percent) were substantiated.<sup>11</sup>

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<sup>6</sup>Coast Guard, "Fouled Anchor" Investigation – Final Report, Memo of 31 Jan 2020. The Coast Guard Academy typically has about 1,000 cadets enrolled.

<sup>7</sup>Coast Guard, *Culture of Respect (COR) Integrated Process Team (IPT): Phase I Report*, (Yorktown, VA: Apr. 2015).

<sup>8</sup>Reports including K. Hall, K. Keller, D. Schulker, S. Weiland, K. Kidder, N. Lim, *Improving Gender Diversity in the U.S. Coast Guard: Identifying Barriers to Female Retention*, (Mar. 29, 2019). Homeland Security Operational Analysis Center operated by the RAND Corporation, [https://www.rand.org/pubs/research\\_reports/RR2770.html](https://www.rand.org/pubs/research_reports/RR2770.html).

<sup>9</sup>Coast Guard, *Commandant's Directed Actions – Accountability and Transparency*, Memo of 27 Nov 2023.

<sup>10</sup>Congress passed a total of 249 statutory requirements directing, in part, DOD and the Coast Guard to address prevention of and response to sexual assault incidents, about 34 of which applied to the U.S. Coast Guard, and most remained in force as of March 2022. See GAO, *Sexual Assault: DOD and Coast Guard Should Ensure Laws Are Implemented to Improve Oversight of Key Prevention and Response Efforts*, [GAO-22-103973](https://www.gao.gov/products/GAO-22-103973) (Washington, D.C.: Mar. 28, 2022).

<sup>11</sup>Anti-Harassment & Hate Incident complaints can be based on a single event of harassment or hate. The goal of the complaint process is to stop the behavior before it becomes severe or pervasive and to improve overall workplace climate. Coast Guard complaint processes are outlined in the *U.S. Coast Guard Civil Rights Manual*.

My statement today focuses on the Coast Guard's recent efforts to address sexual assault and harassment in the service. We analyzed Coast Guard documentation of efforts to prevent sexual assault and harassment in the service since June 2023—when the media first reported on Operation Fouled Anchor and the Coast Guard began taking actions to respond.<sup>12</sup> In addition, we interviewed Coast Guard officials responsible for overseeing implementation of these efforts. We compared Coast Guard efforts to the Commandant instruction on internal controls, as well as federal internal control standards for performing monitoring activities.<sup>13</sup> We also considered selected GAO and Office of Management and Budget (OMB) leading practices concerning evidence-based policymaking and evaluation planning.

We also reviewed our prior work since 2014 on DOD and the Coast Guard's efforts to prevent sexual assault and harassment and the extent to which the military services incorporated internal controls into those efforts.<sup>14</sup> For these eight reports, we reviewed laws and DOD and Coast Guard documents and interviewed agency officials. Detailed information on the objectives, scope, and methodology for our work can be found in the issued reports listed in Related GAO Products at the conclusion of this statement.

We made 81 recommendations to DOD and the Coast Guard in these reports, including that DOD and the Coast Guard establish mechanisms to track and to document that relevant sexual assault laws are implemented.<sup>15</sup> DOD and the Coast Guard generally concurred with the recommendations. As of February 2024, DOD and the Coast Guard had

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<sup>12</sup>Coast Guard, *Accountability and Transparency Review Team Report* (Washington, D.C.: Nov. 2023) and Coast Guard, *Commandant's Directed Actions – Accountability and Transparency*, Memorandum of 27 Nov 2023.

<sup>13</sup>Coast Guard Commandant Instruction 5200.10A (Nov. 2022). GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>14</sup>We chose 2014 because it aligns with the most recent update of *Standards for Internal Control in the Federal Government*.

<sup>15</sup>Of the 81 recommendations across the eight GAO reports, 77 were to DOD and four were to the Coast Guard. The Coast Guard has fully addressed one of the four recommendations. Specifically, the Coast Guard addressed our recommendation in [GAO-22-103973](#) that it establish an oversight structure to consistently track the implementation of ongoing and future statutory requirements related to sexual assault prevention and response. Coast Guard officials told us that they are working to address our recommendations pertaining to policies on allowing victims to transfer units, training, and publishing required quarterly reports. On February 29, 2024, the Coast Guard provided us with updates on its efforts to address these recommendations, which we are reviewing. We continue to monitor their implementation.

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taken actions to fully implement 22 of these 81 recommendations, and 59 remain unaddressed. We continue to monitor the agencies' progress in implementing them.

The work upon which this statement is based was performed 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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## Coast Guard Has Not Established a Plan to Evaluate Recent Efforts to Address Sexual Assault and Harassment

The Coast Guard has taken action to address sexual assault and harassment, but the service has not developed a plan to assess its efforts. After media reporting on Operation Fouled Anchor in June 2023,<sup>16</sup> the Commandant directed a 90-day Accountability and Transparency Review of current law, policy processes, practices, resources, and service culture relevant to countering sexual assault and harassment in the Coast Guard. The resulting report identified areas for Coast Guard-wide organizational improvement to ensure a culture of accountability and transparency.<sup>17</sup>

According to a November 2023 memorandum from the Commandant, the Accountability and Transparency Review report made clear that change is necessary.<sup>18</sup> To address the issues identified in the report, the Commandant directed implementation of 33 initial actions across six categories. These actions included specific timeframes to help ensure service members have an experience aligned with the Coast Guard's core values and that is free from assault, harassment, and other negative interactions. The six categories include *'workforce training, culture, and*

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<sup>16</sup>B. Ellis, M. Hicken, and A. Ash, "Criminal investigation into Coast Guard Academy revealed years of sexual assault cover-ups, but findings were kept secret," *CNN Politics* (June 30, 2023).

<sup>17</sup>Coast Guard, *Accountability and Transparency Review Team Report* (Washington, D.C.: Nov. 2023).

<sup>18</sup>Coast Guard, *Commandant's Directed Actions – Accountability and Transparency*, Memo of 27 Nov 2023.

*professional development,* *'Coast Guard Academy,'* and *'information, data, and transparency.'*<sup>19</sup> Each category is supported by a number of actions. For example, under the category *Workforce Training, Culture, and Professional Development,* there are eight related actions. These include holding a senior executive summit and developing new in-person and online training courses. Appendix I provides additional information on the Commandant's directed actions in support of the accountability and transparency review.

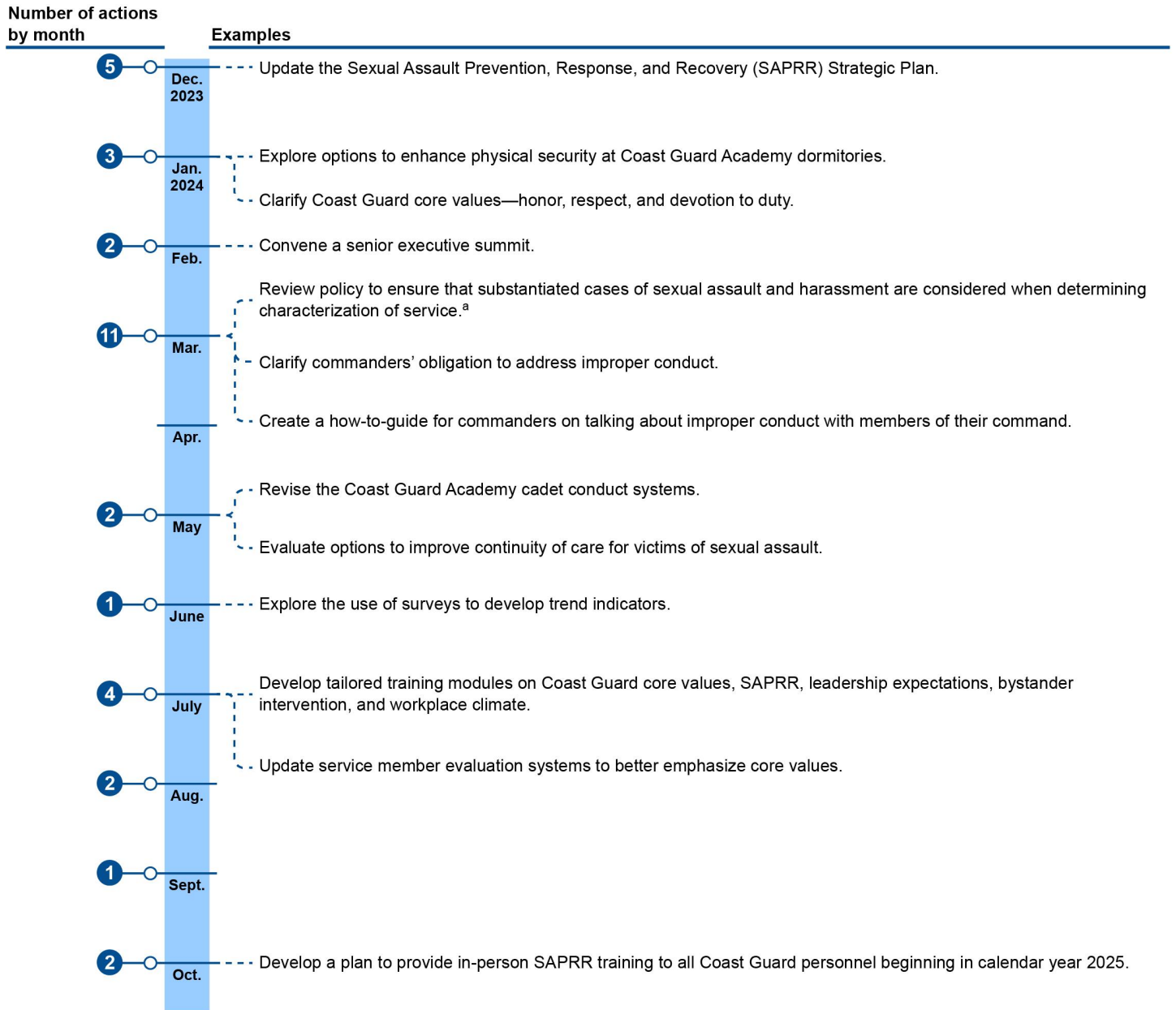
In December 2023, the Coast Guard began implementing the 33 initial actions as directed by the Commandant, an important first step. As shown in figure 1, the Coast Guard's planned timelines for the actions range from December 2023 (to, for example, conduct a senior leadership engagement conference) to October 2024 (to, for example, develop a plan to provide in-person sexual assault prevention training by 2025). Each action has a deadline with identified results, such as convene a summit or brief the Vice Commandant of the Coast Guard. Of the 33 initial actions, the expected results of 29 actions are briefings to the Vice Commandant of the Coast Guard (see appendix I for more details). According to Coast Guard officials, they plan to take subsequent actions after these briefings, as appropriate.

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<sup>19</sup>The remaining three categories are: integrated primary prevention program; core values; and accountability.



**Figure 1: Number of Coast Guard Planned Actions Each Month to Respond to Sexual Assault and Harassment and Selected Examples**



Source: GAO analysis of U.S. Coast Guard documents. | GAO-24-107388

**Accessible Text for Figure 1: Number of Coast Guard Planned Actions Each Month to Respond to Sexual Assault and Harassment and Selected Examples**

Date	Number of actions by month	Examples
December of 2023	5	Update the Sexual Assault Prevention, Response, and Recovery (SAPRR) Strategic Plan.
January of 2024	3	<ul style="list-style-type: none"> <li>• Explore options to enhance physical security at Coast Guard Academy dormitories.</li> <li>• Clarify Coast Guard core values—honor, respect, and devotion to duty.</li> </ul>
February of 2024	2	Convene a senior executive summit.
March of 2024	11	<ul style="list-style-type: none"> <li>• Review policy to ensure that substantiated cases of sexual assault and harassment are considered when determining characterization of service.<sup>a</sup></li> <li>• Clarify commanders' obligation to address improper conduct.</li> <li>• Create a how-to-guide for commanders on talking about improper conduct with members of their command.</li> </ul>
May of 2024	2	<ul style="list-style-type: none"> <li>• Revise the Coast Guard Academy cadet conduct systems.</li> <li>• Evaluate options to improve continuity of care for victims of sexual assault.</li> </ul>
June of 2024	1	Explore the use of surveys to develop trend indicators.
July of 2024	4	<ul style="list-style-type: none"> <li>• Develop tailored training modules on Coast Guard core values, SAPRR, leadership expectations, bystander intervention, and workplace climate.</li> <li>• Update service member evaluation systems to better emphasize core values.</li> </ul>
October of 2024	2	Develop a plan to provide in-person SAPRR training to all Coast Guard personnel beginning in calendar year 2025.

Source: GAO analysis of U.S. Coast Guard documents. | GAO-24-107388

<sup>a</sup>The characterization of service is the process to determine the type of discharge and characterization of service a service member receives when separating from the Coast Guard. There are three types of discharge and characterization of service: (1) an honorable discharge (characterization of service as honorable), (2) a general discharge (characterization of service as under honorable conditions), or (3) a discharge under other than honorable conditions (characterization of service as under other than honorable conditions).

As of February 2024, the Coast Guard had completed five actions, according to Coast Guard officials. For example, in December 2023, the Coast Guard administered a service-wide survey on unit climate, harassment and discrimination, diversity and inclusion, and other aspects of organizational climate, according to Coast Guard officials. These officials also stated that the service held a senior executive Accountability and Transparency Report leadership summit in February 2024.

Swift implementation of defined actions is important, but it must be balanced with effective controls for ensuring the anticipated improvements to the culture of accountability and transparency are achieved. The Coast Guard has not developed a performance plan to assess the results of its 33 actions in response to the Accountability and Transparency Report, even though it has already implemented certain actions. The Commandant-directed actions include administering a Coast Guard-wide climate survey, as discussed above, and analyzing the results of the survey. However, the Commandant memorandum directing the actions did not include any direction to develop a plan to assess the results to ensure the actions are helping to meet the Coast Guard's goals. Coast Guard officials stated that they are partnering with DOD to understand unit, regional, and service-wide issues, concerns, and trends but have not yet determined how they will evaluate the effectiveness of efforts to improve service members' experiences.

According to the Coast Guard's Commandant instruction on internal controls, plans are to be developed to assess control performance and evaluate results in the planning stage.<sup>20</sup> In addition, federal internal control standards highlight the importance of developing plans to monitor the performance of agencies' actions and evaluating the results.<sup>21</sup>

Further, according to leading practices concerning evidence-based policymaking and program evaluation planning, agencies should establish

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<sup>20</sup>Coast Guard Commandant Instruction 5200.10A: *Management's Responsibility for Internal Controls and Reporting Requirements* (Nov. 2022).

<sup>21</sup>[GAO-14-704G](#).

evaluation plans.<sup>22</sup> These same leading practices state that an evaluation or program evaluation is an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency. In addition, GAO leading practices concerning program evaluations define effectiveness as the extent to which a program or intervention is achieving its intended goals, as determined by a program evaluation.<sup>23</sup> Leading practices concerning evidence-based policymaking and program evaluation planning also highlight that there are different types of evaluations.<sup>24</sup> For example, an OMB memorandum related to program evaluation planning states that outcome evaluations are best suited for helping an agency understand the extent to which a program, policy, or organization has achieved its intended outcome(s) and focuses on outputs and outcomes to assess effectiveness.<sup>25</sup>

According to GAO leading practices, program evaluation and performance measurement are distinct but complementary. Performance measurement can tell an agency how a program is performing.<sup>26</sup> It concerns the ongoing monitoring and reporting of a program's (or strategy's) accomplishments and progress toward preestablished goals.<sup>27</sup>

Coast Guard officials stated that they have had discussions about evaluating the results of the 33 actions but have not developed plans or mechanisms to do so. The officials explained that measuring culture change is difficult. However, these officials identified certain resources, such as regular employee surveys, that could prove useful in this effort.

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<sup>22</sup>GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: Mar. 22, 2021); OMB Memorandum No. M-19-23, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance* (July 10, 2019); and OMB Memorandum No. M-20-12, *Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices* (Mar. 10, 2020). OMB Memorandum No. M-19-23 instructs federal agencies on how to implement the Foundations for Evidence-Based Policy Making Act of 2018. Pub. L. No. 115-435 (2019), 132 Stat. 5529, which mandated that federal agencies create certain plans and other products on a recurring basis, including evaluation plans. While not necessarily controlling for evaluation plans like the one under discussion here, the memorandum includes best practices for agencies to follow when practicing evidence-based policymaking.

<sup>23</sup>[GAO-21-404SP](#).

<sup>24</sup>[GAO-21-404SP](#); and OMB Memorandum No. M-20-12 (Mar. 10, 2020).

<sup>25</sup>OMB Memorandum No. M-20-12 (Mar. 10, 2020).

<sup>26</sup>[GAO-21-404SP](#).

<sup>27</sup>[GAO-21-404SP](#); and OMB Memorandum No. M-19-23 (July 10, 2019).

Coast Guard officials also told us that they have begun conversations with relevant stakeholders, including experts in DOD, on how to better utilize survey information to measure the effectiveness of actions taken to improve the Coast Guard's culture of accountability and transparency. However, according to these officials, it is not clear if or when the Coast Guard will develop an evaluation plan and mechanisms for using survey information to assess the effectiveness of its actions.

Evaluating progress is also important for recruitment and retention. Media reports and Congress have raised concerns that the conclusions of Operation Fouled Anchor could negatively affect recruitment.<sup>28</sup> In fiscal year 2023, the Coast Guard had a shortfall of 3,500 service members and had missed recruiting goals in recent years. I testified before this committee in May 2023 that the service's recruitment and retention challenges persist.<sup>29</sup> Further, Coast Guard participants in a 2019 RAND study raised sexual assault and harassment as concerns that influence retention of female service members.<sup>30</sup> Given the challenges the Coast Guard faces with recruitment and retention and fully staffing its workforce, it is incumbent upon the service to not only establish actions, but to ensure they are effective by assessing progress toward its goal to improve transparency and accountability.

We acknowledge that measuring the effectiveness of actions taken to improve Coast Guard culture may be difficult. However, developing an evaluation plan and mechanisms for assessing the effectiveness of actions taken to improve its culture of accountability and transparency would better ensure that Coast Guard leadership has the information it needs to evaluate whether these actions are helping service members have an experience aligned with the Coast Guard's core values and which is free from assault, harassment, and other harmful behaviors. Further, taking these steps would help ensure the service is improving its culture, which could assist in the recruitment and retention of its workforce.

More broadly, concerns about the military services' implementation of effective controls to prevent and respond to sexual assault and

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<sup>28</sup>See, for example, The Maritime Executive, [Combatting Sexual Assault in the Coast Guard: A Decade of Reflection](#) (Feb. 4, 2024).

<sup>29</sup>[GAO-23-106750](#).

<sup>30</sup>K. Hall, K. Keller, D. Schulker, S. Weiland, K. Kidder, N. Lim, *Improving Gender Diversity in the U.S. Coast Guard: Identifying Barriers to Female Retention*, (Mar. 29, 2019). Homeland Security Operational Analysis Center operated by the RAND Corporation, [https://www.rand.org/pubs/research\\_reports/RR2770.html](https://www.rand.org/pubs/research_reports/RR2770.html).

harassment is long standing. Our reports since 2014 have identified DOD and Coast Guard internal controls deficiencies in this area (see figure 2).<sup>31</sup>

**Figure 2: Internal Control Principles and Deficiencies Identified in GAO Reports since 2014 on Department of Defense and Coast Guard Efforts to Prevent and Respond to Sexual Assault and Harassment**

**Control Environment**

- The oversight body and management should demonstrate a commitment to integrity and ethical values.
- The oversight body should oversee the entity's internal control system.
- Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.
- Management should demonstrate a commitment to recruit, develop, and retain competent individuals.

**Monitoring**

- Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

Source: GAO analysis of prior GAO reports. | GAO-24-107388

**Control Activities**

- Management should design control activities to achieve objectives and respond to risks.
- Management should implement control activities through policies.

**Information and Communication**

- Management should use quality information to achieve the entity's objectives.
- Management should internally communicate the necessary quality information to achieve the entity's objectives.

**Accessible Text for Figure 2: Internal Control Principles and Deficiencies Identified in GAO Reports since 2014 on Department of Defense and Coast Guard Efforts to Prevent and Respond to Sexual Assault and Harassment**

Category	Category information
Control environment	<ul style="list-style-type: none"> <li>• The oversight body and management should demonstrate a commitment to integrity and ethical values.</li> <li>• The oversight body should oversee the entity's internal control system.</li> <li>• Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.</li> <li>• Management should demonstrate a commitment to recruit, develop, and retain competent individuals.</li> </ul>
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
Control activities	<ul style="list-style-type: none"> <li>• Management should design control activities to achieve objectives and respond to risks.</li> <li>• Management should implement control activities through policies.</li> </ul>

<sup>31</sup>See, for example [GAO-22-103973](#). See Related GAO Products, which references our prior work, at the conclusion of this statement.

Category	Category information
Information and communication	<p>Management should use quality information to achieve the entity's objectives.</p> <p>Management should internally communicate the necessary quality information to achieve the entity's objectives.</p>

Source: GAO analysis of prior GAO reports. | GAO-24-107388

Note: The reports we assessed were [GAO-23-105381](#), [GAO-22-104673](#), [GAO-22-103973](#), [GAO-21-113](#), [GAO-19-109](#), [GAO-18-33](#), [GAO-17-217](#), and [GAO-15-284](#).

As shown in figure 2 above, assessing the effectiveness of sexual assault and harassment prevention and response efforts, which pertains to “monitoring” internal controls, has been a long standing deficiency across military services. For example:

- In August 2008, we found that DOD and the Coast Guard had not developed an oversight framework for their sexual assault prevention and response programs that included clear objectives, milestones, performance measures, and criteria for measuring progress.<sup>32</sup>
- In March 2022, we found that DOD did not fully implement statutory requirements that directed DOD to assess the effectiveness of its sexual assault prevention and response programs, as it did not establish and implement an evaluation plan and standards for conducting evaluations.<sup>33</sup>
- In May 2022, we found that the Army had not developed and implemented a continuous evaluation plan to systematically evaluate the effectiveness of its Sexual Harassment/Assault Response and Prevention program.<sup>34</sup>

<sup>32</sup>We recommended that the DOD and the Coast Guard develop an oversight framework for their sexual assault prevention and response programs. While the Coast Guard developed such a framework, DOD did not. See GAO, *Military Personnel: DOD's and the Coast Guard's Sexual Assault Prevention and Response Programs Face Implementation and Oversight Challenges*, [GAO-08-924](#) (Washington, D.C.: Aug. 29, 2008).

<sup>33</sup>We recommended that DOD establish an evaluation plan. As of May 2023, the department stated this recommendation has a future estimated date of completion but did not provide the estimated date. See [GAO-22-103973](#).

<sup>34</sup>We recommended that the Army develop and implement a continuous evaluation plan. See GAO, *Sexual Harassment and Assault: The Army Should Take Steps to Enhance Program Oversight, Evaluate Effectiveness, and Identify Reporting Barriers*, [GAO-22-104673](#) (Washington, D.C.: May 27, 2022). As of January 2024, the Army continues its work to develop metrics related to sexual harassment and sexual assault as part of readiness tracking and reporting. They plan to implement this by 2028.

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Federal internal control standards call for entities to continually seek ways to improve accountability in achieving their mission.<sup>35</sup> In addition, as discussed above, developing an evaluation plan is key to accomplishing desired goals. As such, it is important that the Coast Guard develop an evaluation plan and mechanisms for assessing the results of its 33 initial accountability and transparency actions directed by the Commandant.<sup>36</sup>

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## Conclusions

The Coast Guard's core values are honor, respect, and devotion to duty. However, there has been a disconnect between the workplace experience these values espouse and the service's long-standing challenges preventing and responding to sexual assault and harassment. Following media reports on Operation Fouled Anchor, the Coast Guard began implementing 33 initial actions to improve accountability and transparency in an effort to better prevent and respond to sexual assault and harassment. However, the service has not developed a plan to evaluate its efforts because measuring culture change is difficult, according to Coast Guard officials. But these officials identified certain resources, such as regularly administered employee surveys and DOD officials, that could prove useful in this effort. Developing an evaluation plan and mechanisms for assessing the effectiveness of actions taken to improve its culture of accountability and transparency would better ensure that Coast Guard management has the information it needs to evaluate whether its actions are helping to ensure service members have an experience aligned with the Coast Guard's core values and free from assault, harassment and other harmful behaviors and may assist in recruitment and retention efforts.

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## Recommendation for Executive Action

The Vice Commandant of the Coast Guard should develop an evaluation plan with mechanisms for assessing the effectiveness of actions taken to help ensure service members have an experience aligned with Coast Guard's core values and free from sexual assault and harassment. (Recommendation 1)

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<sup>35</sup>GAO-14-704G.

<sup>36</sup>Coast Guard Commandant Instruction 5200.10A: *Management's Responsibility for Internal Controls and Reporting Requirements* (Nov. 2022).



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## Agency Comments

We requested comments on the contents of this statement, including our recommendation, from DHS. DHS provided technical comments, which we incorporated as appropriate.

Chairman Webster, Ranking Member Carbajal, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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## GAO Contacts and Staff Acknowledgements

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## Appendix I: Coast Guard Commandant's Directed Actions in Support of the Accountability and Transparency Review

The issue of sexual assault and harassment in the Coast Guard is not new, according to the Coast Guard.<sup>1</sup> In a series of investigations called “Operation Fouled Anchor,” the Coast Guard Investigative Service reported examining 102 separate allegations of sexual assault that occurred between 1990 and 2006 at the Coast Guard Academy, according to a 2020 Coast Guard report.<sup>2</sup> The investigations’ final report concluded that the academy often mishandled these cases and failed to take sufficient action to ensure a safe environment and instill a culture intolerant of any form of sexual misconduct. In 2015, the Coast Guard conducted a gap analysis comparing the current and optimal state of Coast Guard culture and identified 41 gaps. At least 28 of these 41 gaps pertained to efforts to prevent or response to sexual assault and harassment.

After media reporting on Operation Fouled Anchor in June 2023, the Commandant directed a 90-day Accountability and Transparency Review of policy processes, practices, and service culture relevant to countering sexual assault and harassment in the Coast Guard. The report from this effort focused on Coast Guard-wide actions and incorporated feedback from listening sessions held across the service along with anonymous comments submitted to the Accountability and Transparency Review team providing suggestions and recommendations. In November 2023, the Commandant of the Coast Guard issued a memorandum directing the implementation of 33 actions to address the issues identified in the Accountability and Transparency Review Team Report. The directed actions were divided into six categories: (1) workforce training, culture, and professional development; (2) Integrated Primary Prevention Program; (3) core values; (4) accountability; (5) Coast Guard Academy; and (6) information, data, and transparency.

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<sup>1</sup>Coast Guard, *Accountability and Transparency Review Team Report*, (Washington, D.C.: Nov. 2023).

<sup>2</sup>Coast Guard, *“Fouled Anchor” Investigation – Final Report*, (Jan. 2020).

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## Workforce Training, Culture, and Professional Development Directed Actions

The workforce, training, culture, and professional development directed actions are intended to provide tailored training to personnel to better act on the Coast Guard's core values, understand organizational expectations, and cultivate a positive workplace climate. Table 1 describes the eight directed actions for this category.

**Table 1: Workforce Training, Culture, and Professional Development Directed Actions, Results, and Due Dates**

Action	Action description	Result of action	Due date
Senior Executive summit	Convene a Senior Executive summit to review critical actions and hold in-person bystander intervention training.	Convene Summit	February 2024
Preparatory course for new recruits	Establish a Coast Guard enlisted service preparatory course to immediately follow new recruit training and serve as a continuation of acculturation and acclimation while providing fundamental followership/leadership training.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Workforce in-person training modules	Develop tailored training modules on Coast Guard core values, Sexual Assault Prevention Response and Recovery (SAPRR), leadership expectations, bystander intervention training, and workplace climate. These modules should be incorporated into existing Coast Guard leadership courses.	Briefing to Vice Commandant of the Coast Guard	July 1, 2024
Develop more effective career leadership courses	Identify and develop phased options, including resources needed, to provide Coast Guard members with additional leadership courses across their careers.	Briefing to Vice Commandant of the Coast Guard	August 1, 2024
Senior leader engagement	Incorporate a robust leadership discussion, including case studies surrounding leadership/climate, into all 2024 Commanding Officer conferences.	Briefing to Vice Commandant of the Coast Guard	December 31, 2023
Bystander intervention training	Develop a plan to expand in-person bystander intervention training for all Coast Guard personnel beginning in calendar year 2025.	Briefing to Vice Commandant of the Coast Guard	October 1, 2024
In-person SAPRR training	Develop a plan to provide in-person SAPRR training to all Coast Guard personnel beginning in calendar year 2025.	Briefing to Vice Commandant of the Coast Guard	October 1, 2024
Online mandated training	Separate SAPRR training from Resiliency Training to reestablish a stand-alone SAPRR module in the Coast Guard's online Mandated Training.	Implementation of Action	December 1, 2023

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

## Integrated Primary Prevention Program

The Integrated Primary Prevention Program directed actions are intended to create a Coast Guard Integrated Primary Prevention Program modeled

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after the Department of Defense program.<sup>3</sup> The directed actions memo states that scaled implementation should begin immediately. Table 2 describes the four directed actions for this category.

**Table 2: Integrated Primary Prevention Program Directed Actions, Results, and Due Dates**

<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Workforce Resiliency Organizational Structure	Examine Coast Guard Headquarters program offices for opportunities to modernize organization, ensure continuity, and optimally align capabilities.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Victim Recovery	Identify and evaluate options to improve coordination and continuity of care for victims of sexual assault.	Briefing to Vice Commandant of the Coast Guard	May 1, 2024
Victim Mentor	Utilizing the existing Coast Guard Mentorship program, develop a process by which victims of sexual assault and harassment can request to be paired with a mentor who has demonstrated requisite knowledge of Coast Guard Sexual Assault Prevention, Response, and Recovery (SAPRR) policies and procedures, and who can advise on available resources for recovery, continued service, etc.	Briefing to Vice Commandant of the Coast Guard	September 1, 2024
SAPRR Strategic Plan	Publish an updated SAPRR Strategic Plan.	Published updated SAPRR Strategic Plan	December 31, 2023

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

## Core Values

The core values directed actions are intended to reemphasize the Coast Guard's core values of honor, respect, and devotion to duty and better incorporate them into enterprise communications, training, command philosophy statements, and officer and enlisted evaluations. Table 3 describes the four directed actions for this category.

**Table 3: Core Values Directed Actions, Results, and Due Dates**

<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Core values	Expand the core values definitions so they are clear and less likely to be subject to individual interpretation. Set up a process to ensure that all workforce messaging reinforces the service's core values.	Briefing to Vice Commandant of the Coast Guard	January 31, 2024

<sup>3</sup>Integrated Primary Prevention is a holistic approach for primary prevention of self-directed harm and prohibited abusive or harmful acts. See DOD Instruction 6400.11, *DOD Integrated Primary Prevention Policy for Prevention Workforce and Leaders* (Washington, D.C.: Dec. 20, 2022).

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<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Enlisted performance qualifications	Review and update enlisted service member performance qualifications to include more robust discussion/training on core values.	Briefing to Vice Commandant of the Coast Guard	February 15, 2024
Officer evaluation system	Update the officer evaluation system to better emphasize core values.	Briefing to Vice Commandant of the Coast Guard	July 15, 2024
Enlisted evaluation system	Update the enlisted evaluation system to better emphasize core values.	Briefing to Vice Commandant of the Coast Guard	July 15, 2024

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

## Accountability Directed Actions

The accountability directed actions are intended to develop policies and proposals to improve accountability within the Coast Guard. The memo notes that the accountability directed actions will not address historical cases. Table 4 describes the five directed actions in this category.

**Table 4: Accountability Directed Actions, Results, and Due Dates**

<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Highest grade held	Examine whether policy should be updated to more effectively implement the authority found in 14 U.S. Code § 2501, grade on retirement. Review should specifically address whether the criteria is clear for determining unsatisfactory performance, addressing misconduct in a lower grade, and reopening determinations for retired officers.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Characterization of service	Review policy and procedures to ensure that substantiated cases of sexual assault and harassment are appropriately taken into account when determining characterization of service upon discharge for both officers and enlisted members.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Enhancing rights of crime victims	Develop policy to implement a "Safe-to-Report" framework that addresses certain minor misconduct if that misconduct is collateral to a sexual assault.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Enhancing rights of crime victims	Develop policy to allow a victim of sexual assault the right to be present and the right to be heard at an administrative separation proceeding where conduct related to the sexual assault is a basis for separation.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Addressing improper conduct	Clarify in policy the obligation of commanders to take action to address improper conduct that falls short of our core values even if it fails to establish the elements of sexual harassment, sexual assault, or other violations of the Uniform Code of Military Justice and clarify tools available to the commander to do so.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

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## Coast Guard Academy Directed Actions

The Coast Guard Academy directed actions are intended to improve accountability at the Coast Guard Academy. Table 5 describes the seven directed actions in this category.

**Table 5: Coast Guard Academy Directed Actions, Results, and Due Dates**

<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Academy reporting structure	Make the Coast Guard Academy Superintendent a direct report to the Vice Commandant.	Briefing to Vice Commandant of the Coast Guard	December 31, 2023
Academy Board of Visitors and Board of Trustees	Examine roles, responsibilities, and membership of the Board of Visitors and Board of Trustees to invigorate diverse oversight of the Coast Guard Academy. Recommend improvements and associated resources to strengthen and enhance the Board of Trustees, including changes to oversight, advisory functions, and authorities.	Briefing to Vice Commandant of the Coast Guard	March 31, 2024
Cadet swab summer	Improve the cadet summer training program and increase the supervision of cadet leadership.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Cadet oversight	Increase oversight of the corps of cadets and identify the resources required for these improvements.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Cadet conduct system	Revise the cadet conduct system for implementation in the 2024-2025 academic year, including improving overall transparency and transparency regarding retention criteria.	Briefing to Vice Commandant of the Coast Guard	May 1, 2024
Victim support	Explore courses of action to provide expedited transfer options to allow a cadet victim access to the officer ranks. Identify any potential gaps in existing authorities to inform future legislative efforts.	Briefing to Vice Commandant of the Coast Guard	July 1, 2024
Physical security in Chase Hall	Immediately explore options to enhance physical security throughout Chase Hall including, but not limited to, upgrading locks on cadet barracks rooms.	Briefing to Vice Commandant of the Coast Guard	January 1, 2024

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

## Information, Data, and Transparency Directed Actions

The information, data, and transparency directed actions are intended to improve and centralize information available to personnel: identify options to improve human resources data collection; and complete service-wide command climate surveys to improve accountability and transparency. Table 6 describes the five directed actions in this category.

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**Table 6: Information, Data, and Transparency Directed Actions, Results, and Due Dates**

<b>Action</b>	<b>Action description</b>	<b>Result of action</b>	<b>Due date</b>
Coast Guard-wide climate survey	Coast Guard units, directorates, and offices with at least 16 members must complete a Defense Organizational Climate Survey (DEOCS) by January 31, 2024. Units that initiated a DEOCS after August 1, 2023 and completed or expect to complete the survey before January 31, 2024, do not need to initiate a new survey.	Deputy Commandant of Mission Support release to all Coast Guard with amplifying information	December 15, 2023
Survey analysis and trend development	Explore the use of surveys (including DEOCS) and environmental and location data to develop climate trend indicators. Recommend resources and processes for commands to receive assistance in interpreting and addressing climate.	Briefing to Vice Commandant of the Coast Guard	June 1, 2024
Direct access	Identify immediate investments to improve the functionality of Direct Access—a key component in the Coast Guard's personnel and pay system—to enhance accountability and transparency across the enterprise, particularly with regards to personnel analytics and force management.	Briefing to Vice Commandant of the Coast Guard	January 31, 2024
Command transparency toolkit	Create a tool kit to guide commands in how and when to talk about SAPRR/climate incidents with members of their command.	Briefing to Vice Commandant of the Coast Guard	March 1, 2024
Resources hub	Develop a Resources Hub for the entire workforce to have ready access to information regarding awareness, prevention, accountability, victim support, and recovery. The Resources Hub should also include resiliency resources.	Briefing to Vice Commandant of the Coast Guard	August 1, 2024

Source: GAO analysis of Coast Guard documentation. | GAO-24-107388

## Related GAO Products

Unwanted Sexual Behavior: Improved Guidance, Access to Care, and Training Needed to Better Address Victims' Behavioral Health Needs, [GAO-23-105381](#) (Washington, D.C.: Aug. 2, 2023)

Sexual Harassment and Assault: The Army Should Take Steps to Enhance Program Oversight, Evaluate Effectiveness, and Identify Reporting Barriers, [GAO-22-104673](#) (Washington, D.C.: May 27, 2022).

Sexual Assault: DOD and Coast Guard Should Ensure Laws Are Implemented to Improve Oversight of Key Prevention and Response Efforts, [GAO-22-103973](#) (Washington, D.C.: Mar. 28, 2022).

Sexual Harassment and Assault: Guidance Needed to Ensure Consistent Tracking, Response, and Training for DOD Civilians, [GAO-21-113](#) (Washington, D.C.: Feb. 09, 2021).

National Guard: Office of Complex Investigations Should Update Policies to Require Additional Documentation for Sexual Assault Cases, [GAO-19-109](#) (Washington, D.C.: Dec. 12, 2018).

Sexual Violence: Actions Needed to Improve DOD's Efforts to Address the Continuum of Unwanted Sexual Behaviors, [GAO-18-33](#) (Washington, D.C.: Dec. 18, 2017).

Sexual Assault: Better Resource Management Needed to Improve Prevention and Response in the Army National Guard and Army Reserve, [GAO-17-217](#) (Washington, D.C.: Feb. 27, 2107).

Military Personnel: Actions Needed to Address Sexual Assaults of Male Servicemembers, [GAO-15-284](#) (Washington, D.C.: Mar. 19, 2015).

Military Personnel: DOD's and the Coast Guard's Sexual Assault Prevention and Response Programs Face Implementation and Oversight Challenges, [GAO-08-924](#) (Washington, D.C.: Aug. 29, 2008).



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