



June 2022

# ECONOMIC AND COMMERCIAL DIPLOMACY

State and Commerce  
Could Build on Efforts  
to Improve  
Coordination and  
Effectiveness

# GAO Highlights

Highlights of [GAO-22-105860](#), a report to congressional committees

## Why GAO Did This Study

The U.S. government has maintained an economic and commercial diplomacy program to help advance its national interests abroad in the global economy. State and Commerce have key roles in supporting U.S. businesses on foreign markets. The Championing American Business Through Diplomacy Act of 2019 includes provisions focused on the efforts of these agencies to support U.S. businesses abroad through economic and commercial diplomacy.

The act includes a provision for GAO to report on several issues related to State's and Commerce's efforts to support U.S. commercial interests abroad. This report examines the coordination and effectiveness of State's and Commerce's efforts. To examine these efforts, GAO assessed them against leading collaboration practices and federal standards. GAO also reviewed documentation; interviewed agency officials; reviewed program data; and analyzed State and Commerce performance data.

This is a public version of a sensitive report that GAO issued in February 2022. Information that State deemed sensitive has been omitted.

## What GAO Recommends

GAO is making 11 recommendations to State and Commerce to more fully incorporate leading collaboration practices into their MOU and joint cables, and one recommendation to State to consistently collect and record performance data. State and Commerce concurred with the recommendations.

View [GAO-22-105860](#). For more information, contact Kimberly Gianopoulos at (202) 512-8612 or [GianopoulosK@gao.gov](mailto:GianopoulosK@gao.gov).

June 2022

## ECONOMIC AND COMMERCIAL DIPLOMACY

### State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness

## What GAO Found

The Departments of State and Commerce coordinate on economic and commercial diplomacy efforts to support the work of U.S. businesses to enter or expand in foreign markets through various programs. Through these programs, State provides Commerce services to U.S. businesses abroad in countries where Commerce's Global Markets and U.S. and Foreign Commercial Service does not have a presence and both agencies work together to help U.S. companies secure business deals overseas.

State and Commerce signed a memorandum of understanding (MOU) and issued joint cables to formalize and facilitate their collaboration. As shown below, they incorporated some, but not all, of the leading collaboration practices into the MOU and cables. For example, the MOU indicates a broad agreement on shared roles and responsibilities, but does not clarify how the agencies will sustain leadership over the long term, which can weaken the effectiveness of the MOU. The cables document decisions at a broad level regarding leadership, resources, and roles and responsibilities, but do not establish a method for routinely monitoring and updating the cables. Without regular updating, the guidance in the cables may become outdated. More fully incorporating these and other leading practices could help State and Commerce build on their existing efforts to support the sale of goods and services of U.S. businesses overseas.

#### Extent to Which State and Commerce Have Incorporated Leading Collaboration Practices

Leading Collaboration Practices	Memorandum	Cables
Defining outcomes and monitoring accountability	●	◐
Bridging organizational cultures	◐	◐
Identifying and sustaining leadership	◐	◐
Clarifying roles and responsibilities	◐	◐
Including relevant participants	◐	◐
Identifying and leveraging resources	●	◐
Developing/updating guidance and agreements	●	◐

Legend: Partially incorporates leading practice ◐. Fully incorporates leading practice ●.  
Source: GAO analysis of Departments of State and Commerce documents. | GAO-22-105860

State and Commerce have established performance measures to assess the effectiveness of their economic and commercial diplomacy efforts. However, State did not collect sufficient data to determine how well it performed. State did not consistently record two pieces of information relevant to assessing its performance—a target performance level and an actual performance level. For example, State's scorecard did not include any target data for 10 of the 16 performance measures. Consequently, GAO could not evaluate State's performance for those aspects of its economic and commercial diplomacy efforts. Commerce uses nine performance measures to assess the effectiveness of its economic and commercial diplomacy and met most of its performance targets for fiscal years 2016 to 2020. For example, Commerce met its target for the percentage of U.S. exporter clients that achieved their export objectives for the last 5 years.

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## Abbreviations

CABDA	Championing American Business Through Diplomacy Act of 2019
CBA Commerce	Office of Commercial and Business Affairs Department of Commerce
EB	Bureau of Economic and Business Affairs
FAH	Foreign Affairs Handbooks
FAM	Foreign Affairs Manual
GM/CS	Global Markets and the U.S. and Foreign Commercial Service
I&A	Industry and Analysis
ITA	International Trade Administration
LBD	Longitudinal Business Database
LFTTD State	Longitudinal Foreign Trade Transaction Database Department of State
TPCC	Trade Promotion Coordinating Committee
USPTO	U.S. Patent & Trademark Office

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June 9, 2022

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

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

The U.S. government has long maintained an economic and commercial diplomacy program to help advance its commercial and national interests abroad in the challenging global economy. The American Academy of Diplomacy released two reports in 2016 and 2017 that highlighted a range of opportunities to better support U.S. businesses through enhanced commercial diplomacy programs, and the January-February 2019 issue of the *Foreign Service Journal* focused on economic diplomacy and its importance for U.S. foreign policy.<sup>1</sup> The Departments of State and Commerce have key roles in the U.S. government's efforts to support U.S. businesses in foreign markets, with efforts carried out by State and Commerce personnel domestically as well as at overseas posts.<sup>2</sup>

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<sup>1</sup>The American Academy of Diplomacy is an independent, non-profit association of former U.S. ambassadors and senior government officials whose mission is to strengthen American diplomacy. See American Academy of Diplomacy and Una Chapman Cox Foundation, *Support for American Jobs, Part I: Requirements for Next-Generation Commercial Diplomacy Programs* (Washington, D.C.: March 2016), and *Support for American Jobs, Part II: A New Government-Business Partnership for Commercial Diplomacy* (Washington, D.C.: June 2017); and Shawn Dorman, ed. "Focus on Economic Diplomacy Works," special issue, *Foreign Service Journal*, vol. 96, no. 1 (January-February 2019).

<sup>2</sup>State and Commerce personnel include Civil Service, Foreign Service, and locally employed staff overseas. Overseas posts include U.S. embassies, consulates, and other posts that represent the United States in foreign countries.

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The Championing American Business Through Diplomacy Act of 2019 (CABDA) includes provisions focused on the efforts of State and Commerce, in cooperation with other U.S. agencies and the private sector, to support U.S. businesses abroad through economic and commercial diplomacy.<sup>3</sup> The act codifies the promotion of U.S. economic and commercial interests as a principal duty of each chief of mission overseas.<sup>4</sup> It includes provisions requiring coordination between State and Commerce on matters relating to economic and commercial diplomacy.<sup>5</sup> In addition, CABDA includes a provision for GAO to report on these issues, among others.<sup>6</sup>

This report examines (1) State's and Commerce's coordination mechanisms for economic and commercial diplomacy efforts to support U.S. businesses abroad, and (2) the effectiveness of State and Commerce economic and commercial diplomacy efforts to support U.S. businesses overseas.

This report is a public version of a sensitive report that we issued in February 2022.<sup>7</sup> State deemed some of the information in our February report to be sensitive, which must be protected from public disclosure. Therefore, this report omits information about the specific performance measures, data, and assessments pertaining to State's economic and commercial diplomacy efforts that State deemed sensitive. The omitted information pertained to the second objective examining State's performance measurement efforts. Although the information provided in

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<sup>3</sup>The Championing American Business Through Diplomacy Act of 2019, Div. J, Title VII of the Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, 133 Stat. 3069-76 (Dec. 20, 2019) (CABDA).

<sup>4</sup>Sec. 704 of CABDA. The Chief of Mission is the principal officer in charge of a diplomatic mission of the United States or of a United States office abroad, which the Secretary of State has designated as diplomatic in nature. Department of State, *Foreign Affairs Handbook*, 2 FAH-2 H-112.

<sup>5</sup>Sections 707, 708, and 710 of CABDA.

<sup>6</sup>Sec. 711 of CABDA. In a companion report, we address issues related to State and Commerce on matters relating to economic and commercial diplomacy activities, staff resources, and State's training efforts in this area. See GAO, *Economic and Commercial Diplomacy: State and Commerce Implement a Range of Activities, but State Should Enhance Its Training Efforts*, [GAO-22-104181](#) (Washington, D.C.: Dec 13, 2021).

<sup>7</sup>GAO, *Economic and Commercial Diplomacy: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness*, GAO-22-104591SU (Washington, D.C.: Feb 22, 2022).

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this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

To address these objectives, we reviewed documents and spoke with officials from State, including from the Bureau of Economic and Business Affairs (EB), and from Commerce, including the International Trade Administration (ITA) and its Trade Promotion Coordinating Committee (TPCC) Secretariat on the economic and commercial diplomacy activities that the agencies implemented in fiscal years 2016 to 2020.<sup>8</sup> To examine how State and Commerce coordinate on economic and commercial diplomacy efforts to support U.S. businesses, we focused on the formal coordination mechanisms for two programs that both agencies identified as being key for economic and commercial diplomacy activities in our prior work.<sup>9</sup> The two programs are the Partner Post Program and the Deal Team Initiative. We identified the State and Commerce 2021 Memorandum of Understanding (MOU) for the Partner Post Program and the 2020 and 2021 guidance cables for the Deal Team Initiative as the formal coordination mechanisms the agencies use.<sup>10</sup> We assessed the MOU and the guidance cables against the seven leading practices to enhance and sustain interagency collaboration that we identified in GAO's prior work.<sup>11</sup> We also identified and reported on selected provisions in CABDA related to coordination between State and Commerce on economic and commercial diplomacy, and the status of the agencies' efforts to implement those provisions.

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<sup>8</sup>From our review of relevant legislation, State and Commerce documents and interviews, and background research conducted for this review, we found no specific definition for "economic and commercial diplomacy." For the purposes of our review, we broadly refer to State and Commerce economic and commercial diplomacy activities as efforts to promote U.S. economic and commercial interests abroad and to create an enabling environment for U.S. businesses to enter or expand in an overseas market. Given the interrelated nature of activities and the lack of clear definitions, we do not divide the activities into separate categories (e.g., economic diplomacy versus commercial diplomacy); rather, we generally refer to "economic and commercial diplomacy" activities.

<sup>9</sup>[GAO-22-104181](#).

<sup>10</sup>Cables are official records of State policies, program activities, post operations, and personnel management that State sends to organizational entities, such as U.S. embassies.

<sup>11</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). In this report, and in our past work, we define collaboration as any joint activity intended to produce more public value than an organization could produce when it acts alone. We use the terms "coordination" and "collaboration" interchangeably in this report.



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To determine how State and Commerce assess the effectiveness of their economic and commercial diplomacy efforts, we reviewed documentary and testimonial information from State, including from EB, and from ITA concerning performance measurement. For both departments, we reviewed strategic plans and annual performance reports, as well as State's EB scorecard for economic and commercial diplomacy activities. We interviewed agency officials to determine any other measures or practices used to measure effectiveness and compared these practices with federal internal control standards. Appendix I provides more information on our scope and methodology. Appendix II provides information on the economic literature concerning the effectiveness of economic and commercial diplomacy.

The performance audit upon which this report is based was conducted from October 2020 to February 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. We subsequently worked with State from February 2022 to June 2022 to prepare this public version of the original sensitive but unclassified report for public release. This public version was also prepared in accordance with these standards.

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## Background

### State's and Commerce's Organization for Economic and Commercial Diplomacy

State's mission is to lead U.S. foreign policy through diplomacy, advocacy, and assistance by advancing the interests, safety, and economic prosperity of the American people. Within State, various functional bureaus generally manage and coordinate specific issues and activities for the department. For economic and commercial diplomacy, EB focuses on economic and business issues, including efforts to create U.S. jobs and boost economic opportunities overseas. In addition, six geographical regional bureaus coordinate the conduct of U.S. foreign relationships relating to specific regions of the world.<sup>12</sup>

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<sup>12</sup>They include the Bureaus of African Affairs, East Asian and Pacific Affairs, European and Eurasian Affairs, Near Eastern Affairs, South and Central Asian Affairs, and Western Hemisphere Affairs. State also has diplomatic missions at overseas posts in many countries around the world, including U.S. embassies and consulates.

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Commerce's mission is to create conditions for U.S. economic growth and opportunity by ensuring fair trade, providing the data necessary to support commerce, and fostering innovation. Within Commerce, ITA works to strengthen the international competitiveness of U.S. industry, promote trade and investment, and ensure fair trade.

- ITA's Global Markets and the U.S. and Foreign Commercial Service (GM/CS) provides a range of services for U.S. businesses at domestic offices nationwide and at over 70 embassies and consulates overseas.<sup>13</sup>
- ITA's TPCC, established by the Export Enhancement Act of 1992, coordinates U.S. export and export financing activities and develops a government-wide strategic plan for such activities.<sup>14</sup>

State and Commerce collaborate in key foreign markets with the goal to better assist U.S. businesses to enter or expand their business abroad. Formal collaborative mechanisms document this collaboration and describe how the agencies will implement their interagency efforts.

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<sup>13</sup>Foreign commercial services functions have shifted between State and Commerce since the Department of Labor and Commerce's formation in 1903, when State's Bureau of Foreign Commerce was transferred to the Department of Labor and Commerce. In 1912, the Bureau of Foreign and Domestic Commerce—the predecessor to GM/CS, according to ITA officials—was created within the Department of Labor and Commerce. In 1913, the Department of Labor was created, and the Department of Labor and Commerce became the Department of Commerce. The Foreign Commercial Service was established within the Bureau of Foreign and Domestic Commerce in 1927. In 1939, the Foreign Commercial Service, including the functions of the Bureau of Foreign and Domestic Commerce, was transferred to State. In 1979, responsibility for overseas trade promotion and commercial functions was transferred from State to Commerce, after which the Foreign Commercial Service was re-established in 1980, according to ITA officials. In 1981, the name of the Foreign Commercial Service was changed to the U.S. & Foreign Commercial Service in order to emphasize the linkage of domestic and overseas operations under a single organizational purpose. According to ITA officials, ITA changed the name of the organization to Global Markets and the U.S. and Foreign Commercial Service (GM/CS) during a reorganization in 2013, when it merged its Market Access and Compliance and the U.S. and Foreign Commercial Service groups.

<sup>14</sup>Pub. L. No. 102-429, § 201, 106 Stat. 2199-201 (Oct. 21, 1992) (codified as amended at 15 U.S.C. § 4727). Members of the TPCC include the Departments of Agriculture, Commerce, Energy, Defense, Homeland Security, Interior, Labor, State, Treasury, and Transportation, as well as the U.S. Agency for International Development, U.S. Trade and Development Agency, Environmental Protection Agency, Small Business Administration, the Export-Import Bank of the United States, and the Office of the U.S. Trade Representative, according to Commerce officials.

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- The jointly led Partner Post Program is a collaborative effort through which State provides U.S. businesses with GM/CS branded services at posts without a GM/CS presence. The two agencies signed a 5-year MOU for the GM/CS State Partner Post Program in October 2021.
  - The jointly led State and Commerce Deal Team Initiative supports U.S. companies pursuing business deals abroad and identifies new deal prospects for interested U.S. companies. The Initiative is composed of Deal Teams, or working groups, of interagency officers and staff at overseas posts that focus on helping U.S. companies do business in their markets. State and Commerce jointly developed the cables that established the Deal Team Initiative. The cables, issued by State in February, June, and July 2020, and January 2021, describe how the agencies plan to coordinate their efforts to support U.S. businesses abroad.

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### Selected CABDA Provisions Related to State and Commerce Coordination

CABDA includes several provisions related to interagency coordination between State and Commerce on economic and commercial diplomacy.<sup>15</sup> Section 707 of the act requires State and Commerce to jointly produce and publish an annual country- and region-specific report on commercial relations with foreign countries and U.S. economic and business interests abroad. Section 708 requires the President to establish an Economic Diplomacy Action Group that includes the Secretary of State as the chair and the Secretary of Commerce as a vice-chair. As the group's chair, the Secretary of State, in consultation with the Secretary of Commerce and several other agency heads, has primary responsibility for coordinating a whole-of-government effort to expand efforts in supporting United States economic and business interests abroad. The Secretary of State is also responsible for developing and implementing a joint strategic plan for all U.S. capacity building and technical assistance programs, among other things. Finally, Section 710 requires State and Commerce to improve U.S. businesses' awareness of federal tools and services that can assist them overseas. CABDA does not specify timeframes for implementing these provisions.

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### Leading Collaboration Practices

In prior work, GAO identified the range of mechanisms that the federal government uses to lead and implement interagency collaboration, as

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<sup>15</sup>These selected provisions are those we found to be related to coordination between State and Commerce with respect to U.S. economic and commercial diplomacy, one of the subjects to be included in our report under section 711 of CABDA.

well as issues to consider when implementing them. Many of the meaningful results that the federal government seeks to achieve—such as those related to economic and commercial diplomacy—require the coordinated efforts of more than one federal agency.<sup>16</sup> In prior work, GAO found that federal agencies have used a variety of mechanisms to implement interagency collaborative efforts, such as a memorandum of understanding and the joint development of policies, procedures, and programs. It also found that agencies could enhance and sustain their collaborative efforts by engaging in seven leading practices. These leading practices are (1) defining outcomes and monitoring accountability; (2) bridging organizational cultures; (3) identifying and sustaining leadership; (4) clarifying roles and responsibilities; (5) including relevant participants; (6) identifying and leveraging resources; and (7) developing, monitoring, and updating written guidance and agreements. Finally, GAO identified associated issues for each of the seven practices for agencies to consider for full implementation of the practice. We have listed these leading practices with their associated issues in table 1.

**Table 1: Seven Leading Collaboration Practices and Issues to Consider Identified by GAO**

Leading collaboration practice	Issues to Consider
Defining outcomes and monitoring accountability	<ul style="list-style-type: none"> <li>• Have short-term and long-term outcomes been clearly defined?</li> <li>• Is there a way to track and monitor progress toward the short-term and long-term outcomes?</li> <li>• Do participating agencies have collaboration-related competencies or performance standards against which individual performance can be evaluated?</li> <li>• Do participating agencies have the means to recognize and reward accomplishments related to collaboration?</li> </ul>
Bridging organizational cultures	<ul style="list-style-type: none"> <li>• What are the missions and organizational cultures of the participating agencies?</li> <li>• What are the commonalities between the participating agencies' missions and cultures and what are some potential challenges?</li> <li>• Have participating agencies developed ways for operating across agency boundaries?</li> <li>• Have participating agencies agreed on common terminology and definitions?</li> </ul>

<sup>16</sup>[GAO-12-1022](#). In this report, we conducted a literature review on interagency collaborative mechanisms. We also interviewed 13 academic and practitioner experts in the field of collaboration and reviewed their work. Experts that we interviewed in prior work defined an interagency mechanism for collaboration as any arrangement or application that can facilitate collaboration between agencies. We also conducted a detailed analysis of 45 prior GAO reports, selected from more than 300 reports published between 2005 and 2012, which examined aspects of collaboration within the federal government. We selected reports that contained detailed discussions of collaborative mechanisms.

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**Leading collaboration practice****Issues to Consider**

Identifying and sustaining leadership

- Has a lead agency or individual been identified?
- If leadership will be shared between one or more agencies, have roles and responsibilities been clearly identified and agreed upon?
- How will leadership be sustained over the long term?

Clarifying roles and responsibilities

- Have participating agencies clarified the roles and responsibilities of the participants?
- Have participating agencies articulated and agreed to a process for making and enforcing decisions?

Including relevant participants

- Have all relevant participants been included?
- Do the participants have:
  - Full knowledge of the relevant resources in their agency?
  - The ability to commit these resources?
  - The ability to regularly attend activities of the collaborative mechanism?
  - The appropriate knowledge, skills, and abilities to contribute?

Identifying and leveraging resources

- How will the collaborative mechanism be funded? If interagency funding is needed, is it permitted?
- If interagency funding is needed and permitted, is there a means to track funds in a standardized manner?
- How will the collaborative mechanism be staffed?
- Are there incentives available to encourage staff or agencies to participate?
- If relevant, do agencies have compatible technological systems?
- Have participating agencies developed online tools or other resources that facilitate joint interactions?

Developing, monitoring, and updating written guidance and agreements

- If appropriate, have the participating agencies documented their agreement regarding how they will be collaborating? A written document can incorporate agreements reached in any or all of the following areas:
  - Leadership
  - Accountability
  - Roles and responsibilities
  - Resources.
- Have participating agencies developed ways to continually update or monitor written agreements?

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Source: GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). | GAO-22-105860

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## State and Commerce Have Not Fully Incorporated Leading Practices into Their Coordination Mechanisms, but Have Begun Actions Required by CABDA

The State and Commerce MOU for the Partner Post Program and the State and Commerce guidance cables for the Deal Team Initiative follow some leading practices for collaboration but not others. The MOU for the Partner Post Program designates the general roles and responsibilities of the agencies, while the cables for the Deal Team Initiative emphasize the collaborative leadership of their approach. However, the MOU and the cables do not follow other leading practices for successful collaboration.<sup>17</sup> For example, the MOU does not clarify how the agencies will sustain leadership over the long term, such as through succession planning. The State cables do not identify specific outcomes or a way to monitor and evaluate progress toward them. In prior work, we have reported that leading practices for interagency collaboration include developing a means to monitor and track progress toward desired outcomes and identifying needed resources, among other things. Without indicating a method to sustain leadership over time or evaluate outcomes, or a way to track or monitor progress toward them, the agencies may be missing opportunities to collaborate more effectively as they continue to work together to support U.S. businesses abroad. In addition, State and Commerce have begun, but not completed, actions to implement selected provisions in CABDA related to their coordination on economic and commercial diplomacy.

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## Commerce and State Could Better Incorporate Leading Collaboration Practices in the MOU

The Partner Post Program between State and Commerce is a collaborative program, jointly led by both agencies, which enables State economic staff at participating posts without a GM/CS presence to provide GM/CS branded services and other export assistance. Sixty-four posts are formally part of the program, and each has a Commerce Sponsoring Post in the region that provides support, oversight, training, and guidance for the State Partner Posts.

The Partner Post Program has established regional working arrangements, or State Partner Posts, in 64 countries, in which Foreign Service Officers (FSOs) and Locally Employed Staff at these posts assist U.S. business clients. These posts draw on the expertise of a Commerce Sponsoring Post from a nearby assigned embassy in the region with a GM/CS presence, as well as GM/CS headquarters.<sup>18</sup> Commerce and State jointly designate the State Partner Posts based on factors such as

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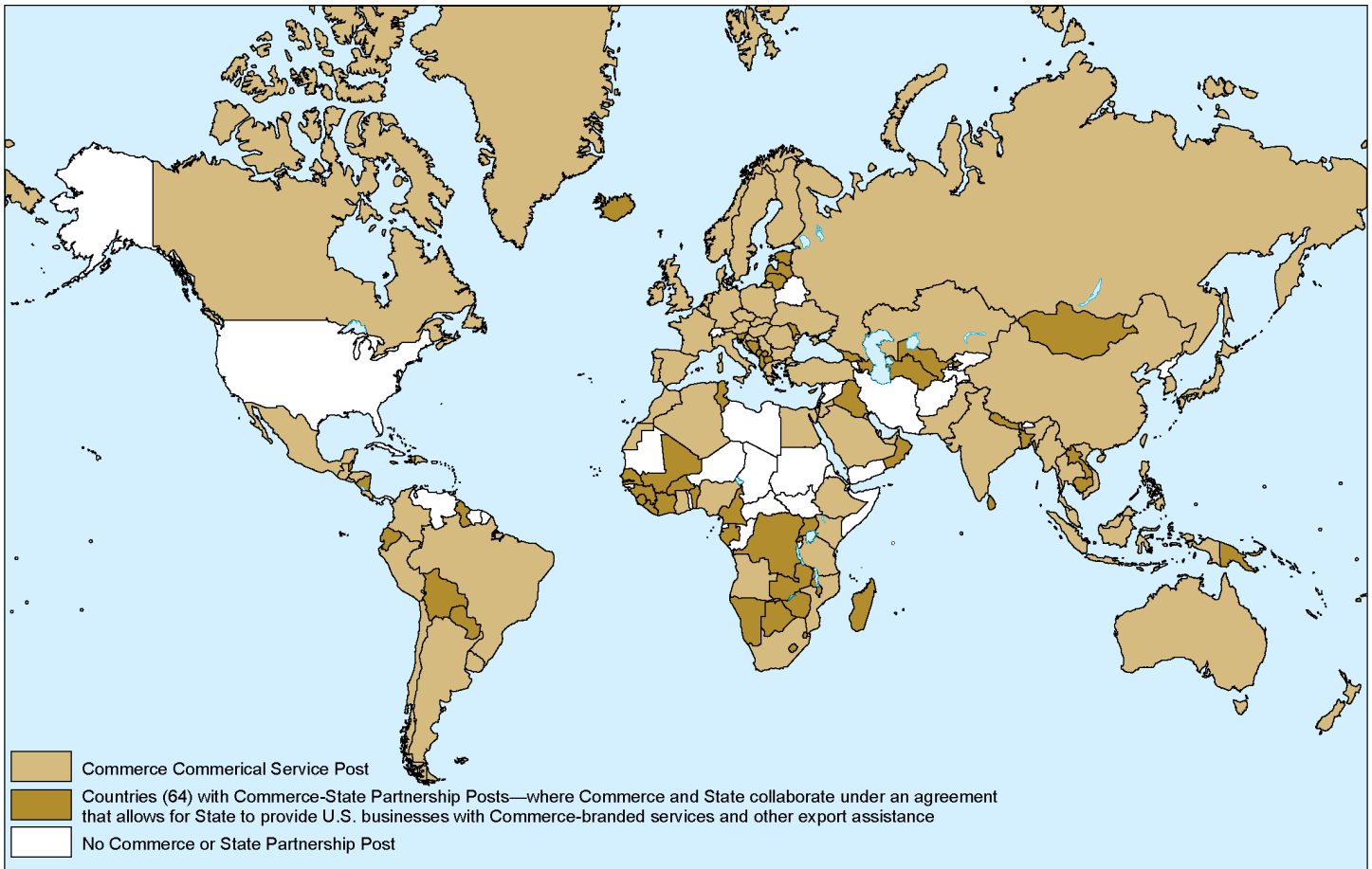
<sup>17</sup>[GAO-12-1022](#).

<sup>18</sup>The GM/CS unit within Commerce's International Trade Administration has the lead on commercial services and commercial diplomacy activities at overseas posts where it is present.

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the number of requests for Commerce services in the market, the number of U.S. companies already active in the market, the amount of pending advocacy requests and commercial diplomacy cases in the market, key macroeconomic data, and the presence of key high-growth sectors. For example, according to Commerce officials, Guyana applied for a designation based on oil exploration inquiries and became a State Partner Post in 2020. According to Commerce officials, the Partner Post Program MOU between State and Commerce outlines the process for applying to be a State Partner Post. Figure 1 shows the locations of State Partner Posts, many of which are in sub-Saharan Africa. See appendix III for a list of the 64 State Partner Posts, grouped by region.

Figure 1: Countries with State Partner Posts, as of June 8, 2021



Sources: GAO analysis of Department of State data (data); Map Resources (map). | GAO-22-105860

Note: State Partner Posts are overseas posts where economic sections at participating posts without a Global Markets (GM)/Commercial Service (CS) presence provide GM/CS branded services and other export assistance with GM/CS support and guidance.

**2021 Partner Post Program 5-year MOU.** We found that the MOU for the Partner Post Program has fully incorporated three and partially incorporated four of the seven leading practices for collaboration. Without fully incorporating the leading practices, the agencies may not collaborate as effectively as possible while they continue to work together to support U.S. businesses abroad. For example:

- **Defining outcomes and monitoring accountability.** The MOU included a method to evaluate program outcomes and a way to track or monitor progress toward those outcomes.



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- **Bridging organizational cultures.** At a high level, the MOU states that Commerce and State will provide feedback to each other to maintain an effective working relationship. However, it does not indicate the methods the agencies will use to provide one another feedback to maintain an effective working relationship across agency boundaries. Commerce officials said that neither Commerce nor State is required to record this type of communication or to exchange feedback in a specified format. We have previously reported that fostering an interagency culture helps facilitate collaborative efforts across agency boundaries and enhances a cohesive working relationship among staff from different federal agencies, such as those with economic and commercial diplomacy responsibilities.
  - **Identifying and sustaining leadership.** The MOU requires leadership from Commerce and State jointly to designate State Partner Posts, but does not identify how the agencies will sustain leadership over the long term, including through succession planning. For example, the MOU does not address how the agencies will handle transitions when leadership rotates in or out of posts. We have previously reported that given the importance of leadership to any collaborative effort, transitions and inconsistent leadership can weaken the effectiveness of any collaborative mechanism.<sup>19</sup>
  - **Clarifying roles and responsibilities.** The MOU indicates a broad agreement on shared roles and responsibilities, but does not articulate a process for making and enforcing decisions. We have previously reported that clarity can come from agencies working together to define and agree on their respective roles and responsibilities, as well as steps for making decisions.
  - **Including relevant participants.** The MOU identifies Commerce and State as the only agencies having responsibilities for the Partner Post Program. Stakeholders, such as clients purchasing services, are to participate in surveys from the agencies and provide client feedback. However, the MOU does not discuss how the agencies are to use this client information. For example, the MOU does not discuss whether the agencies are to use the feedback to address how client experiences and assessments varied depending on the officers and partner posts involved, which Commerce has acknowledged limits its ability to serve clients at some partnership posts. We have previously reported that it is important for agencies to ensure they have included relevant participants in the collaborative effort with the appropriate

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<sup>19</sup>[GAO-12-1022](#).

knowledge, skills, and abilities. For example, agencies can include participants from the private sector and their feedback about the services they received.<sup>20</sup>

- **Identifying and leveraging resources.** The MOU included a method to evaluate the resources needed and assessed staff and training needs.
- **Developing, monitoring, and updating written guidance and agreements.** The MOU included a method to document program decisions about such matters as accountability and detailed decisions regarding responsibilities and resources.

Table 2 summarizes our analysis of the agencies' incorporation of these leading practices in the MOU.

**Table 2: GAO Analysis of Incorporation of Leading Collaboration Practices in the Commerce and State 2021 Memorandum of Understanding (MOU) on the Partner Post Program**

Leading collaboration practice	Overall assessment	Practices included in the MOU	Practices not included in the MOU
Defining outcomes and monitoring accountability	●	The MOU included a method to evaluate program outcomes and a way to track or monitor progress toward those outcomes.	
Bridging organizational cultures	◐	The MOU states that Commerce and State will provide feedback to each other to maintain an effective working relationship.	The MOU does not indicate a method to document or report on the feedback State and Commerce provide one another to maintain an effective working relationship.
Identifying and sustaining leadership	◐	The MOU identifies how the agencies will share and jointly assign leadership for State Partner Posts.	The MOU does not clarify how the agencies will sustain leadership over the long term, such as through succession planning.
Clarifying roles and responsibilities	◐	The MOU indicates a broad agreement on shared roles and responsibilities.	The MOU does not articulate a process for making and enforcing decisions.
Including relevant participants	◐	The MOU identifies only Commerce and State as having responsibilities, although they are to survey stakeholders, such as clients' purchasing services, who provide feedback.	The MOU does not discuss whether the agencies are to use client feedback to appropriately address how client experiences and assessments vary depending on the officers and partner posts involved, which Commerce has acknowledged limits its ability to serve clients at some partnership posts.

<sup>20</sup>GAO-12-1022.

Leading collaboration practice	Overall assessment	Practices included in the MOU	Practices not included in the MOU
Identifying and leveraging resources	●	The MOU states that collaboration is subject to the availability of staffing, resources, and funds, and that each agency will fund its own responsibilities. The MOU also includes a method to evaluate the resources needed and assessed staff and training needs.	
Developing, monitoring, and updating written guidance and agreements	●	The MOU documents decisions regarding leadership, resources, and roles, and it establishes a method for updating the document.	

Legend:

- = Fully incorporated: State and Commerce incorporated all aspects of this leading practice.
- ◐ = Partially incorporated: State and Commerce incorporated some but not all aspects of this leading practice.
- = Not incorporated: State and Commerce did not incorporate any aspects of this leading practice.

Source: GAO analysis of Departments of State and Commerce policy documents and other information provided by agency officials. | GAO-22-105860

As Commerce and State continue to collaborate on the Partner Post Program, they will have more opportunities to address the remaining four practices they did not fully incorporate in the MOU as indicated in table 2 above. Those practices are as follows: bridging organizational cultures, identifying and sustaining leadership, clarifying roles and responsibilities, and including relevant participants. By more fully incorporating the leading practices for collaboration into their MOU, State and Commerce could build on their existing efforts to support the sale of goods and services of U.S. businesses overseas.

### State’s and Commerce’s Deal Team Initiative Could Better Incorporate Leading Collaboration Practices in Guidance Cables

The Deal Team Initiative, led jointly by State and Commerce, has established Deal Teams in 179 countries and in Washington, D.C., to better coordinate agency programs that support overseas opportunities for U.S. companies.<sup>21</sup> For example, according to State officials, an effort by Commerce’s Advocacy Center and sector experts with the Deal Team in Taiwan resulted in a deal for General Electric to build a \$4.5 billion, 6,500-megawatt power plant, the world’s largest, which will support 10,500 U.S. jobs. Commerce officials said sector experts provide analysis to the Deal Teams in industry competitiveness and other matters, including policy considerations. Four cables, developed by the agencies in 2020 and 2021, described how State and Commerce coordinate on Deal

<sup>21</sup>Various other U.S. government agencies with roles in export promotion and financing participate in the Deal Team effort, including the Department of Agriculture and the Department of Energy.

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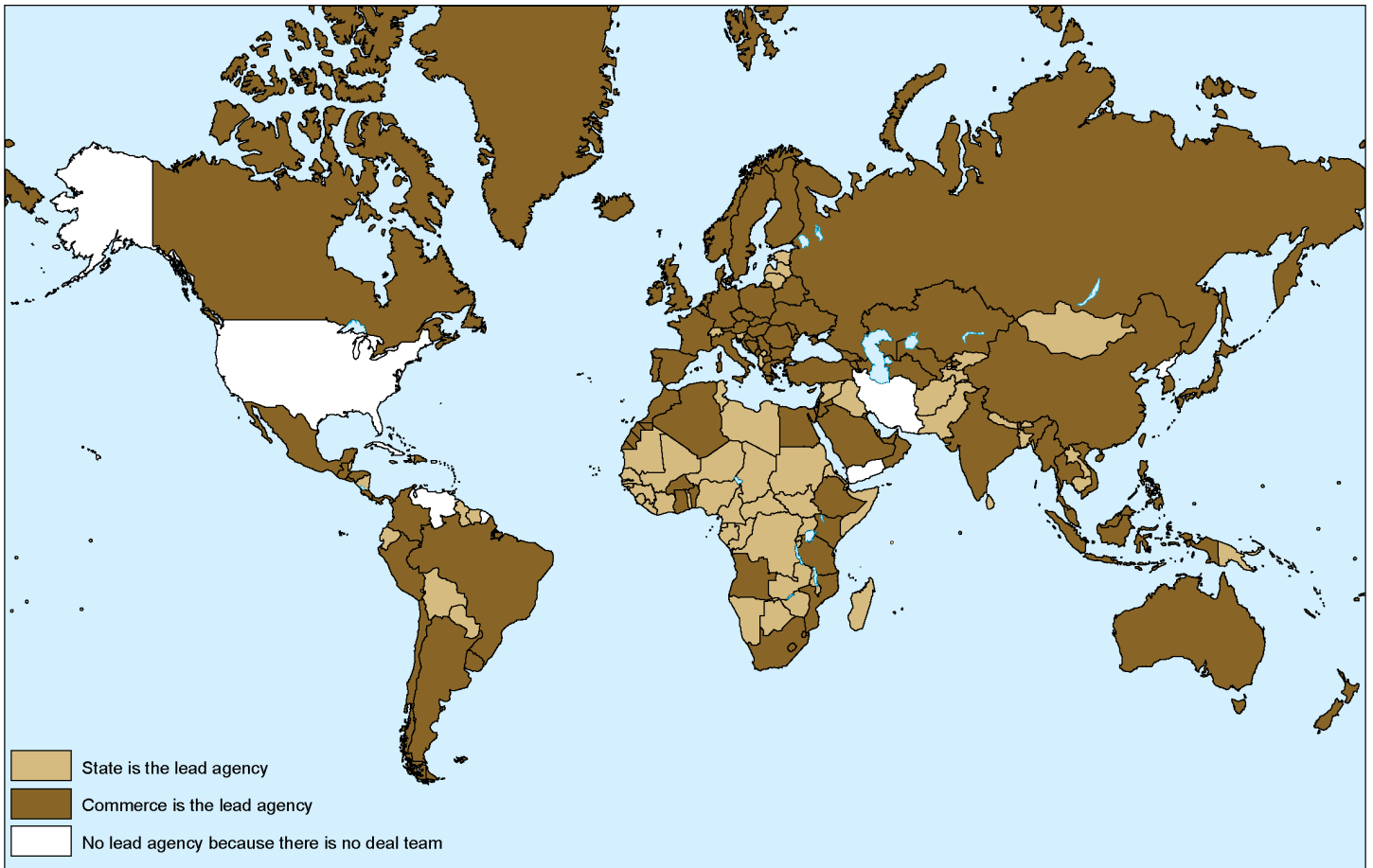
Teams. State issued and sent the cables to posts on behalf of both agencies. Deal Teams receive support from Washington through the DC Central Deal Team with assistance from State officials.

According to State and Commerce officials and documentation they provided, both agencies collaborate extensively through interagency meetings and joint training to support the Deal Team Initiative. Figure 2 shows the Deal Teams located in 179 countries: 87 led by State, and 92 by Commerce.<sup>22</sup>

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<sup>22</sup>The GM/CS unit within Commerce's ITA has the lead on commercial services and commercial diplomacy activities at the 75 overseas posts where it is present.

Figure 2: Countries with Departments of State and Commerce Deal Teams, as of May 18, 2021



Sources: GAO analysis of Department of State (State) data (data); Map Resources (map). | GAO-22-105860

Note: The Deal Team initiative coordinates agencies' programs at overseas posts to promote U.S. commercial interests.

We found that the Deal Team Initiative cables partially incorporate all seven leading practices for collaboration. Without fully incorporating the leading practices, the agencies might not collaborate as effectively as they continue to work together to support U.S. businesses abroad. For example:

- **Defining outcomes and monitoring accountability.** The cables identify broad outcomes, including the number of prospective deals and the value of deals transmitted, but do not specify goals or how the agencies will monitor progress toward them. The January 2021 cable reported supporting 83 export and investment wins by U.S.

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companies, valued at \$76.5 billion. However, the cables do not indicate what specific goals the agencies should attain, such as how many deals to aim for or their value. The agencies can enhance the cables by incorporating more of this type of information.

- **Bridging organizational cultures.** The cables state that State and Commerce will improve results for U.S. companies through better interagency coordination. They also state that Deal Teams should coordinate the use of dozens of U.S. government programs that support U.S. commercial interests overseas, but do not specify which programs or how to coordinate them. State and Commerce officials said they coordinate through Deal Team training, monthly regional calls, interagency meetings, and the Deal Team tracking process. However, the cables do not specify how the Deal Teams might use these various methods to identify relevant government programs to enhance coordination. We have previously reported that fostering an interagency culture helps facilitate collaborative efforts across agency boundaries. It also enhances a cohesive working relationship among the staff from different federal agencies, such as those with economic and commercial diplomacy responsibilities.
- **Identifying and sustaining leadership.** The cables designate shared leadership between Commerce and State to establish and support Deal Teams. They do not identify how the agencies will sustain leadership over the long term, including through succession planning. For example, the cables do not address how the agencies will handle transitions when leadership rotates in or out of posts. Commerce and State officials said the cables clearly state that the Chief of Mission at the post will provide leadership, and that each post should designate a coordinator. The cables, however, do not specify how the agencies will manage leadership transitions when the Chief of Mission and coordinator rotate at posts. We have previously reported that transitions or interruptions in leadership can weaken the effectiveness of any collaborative mechanism.<sup>23</sup>
- **Clarifying roles and responsibilities.** The cables indicate a broad agreement on shared roles and responsibilities. State and Commerce officers and staff at post on Deal Teams do focus on helping U.S. companies do business in their markets. However, the cables do not show that agencies have articulated and agreed to a process for making and enforcing decisions. Commerce officials said the cables clearly state that the Deal Teams are the decision-makers when it comes to identifying and prioritizing deals appropriate for interagency

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<sup>23</sup>[GAO-12-1022](#).

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interventions. Commerce also has a deal tracking process for organizing and sharing those decisions. The cables, however, do not specify the roles of the agencies. Nor do they describe how the agencies will organize their joint and individual efforts or enforce decisions to facilitate them. We have previously reported that agencies can achieve greater clarity in collaborative efforts by working together to define and agree on their respective roles and responsibilities, as well as steps for decision-making.

- **Including relevant participants.** The cables document the relevant Deal Team participants as Commerce and State staff. They state that Commerce and State have begun a training program to ensure the Embassy Deal Teams are capable of implementing the Deal Team Initiative's goals and objectives. The agencies are also planning additional training sessions. The cables also indicate that the relevant Deal Team participants may not have the appropriate knowledge, skills, and abilities to contribute to those goals and objectives, although the agencies indicated they have plans to address these gaps. However, the cables do not include the plans to address these gaps or specify when the agencies will develop the plans. We have previously reported that it is helpful when the participants in a collaborative mechanism have the knowledge, skills, and abilities to contribute to the outcomes of the effort.
- **Identifying and leveraging resources.** The cables state that Commerce and State will staff the Deal Teams with officers and locally employed staff, but do not include information on whether the agencies have incentives available to encourage staff to participate in the teams. We have previously reported that agencies can use a number of individual incentives to bolster participation in collaborative efforts, such as factoring participation into promotion decisions.
- **Developing, monitoring, and updating written guidance and agreements.** The cables broadly describe roles and responsibilities regarding how Commerce and State will collaborate, but do not establish a method for monitoring and updating the cables. For example, the last cable, issued in January 2021, does not state whether the agencies may update the cable or issue a new guidance cable. Developing and updating written guidance and agreements is a leading practice for collaboration, as we have previously reported. We have also reported that the most effective written agreements are the ones that agencies regularly monitor. Because the cables do not specify a method for updating the guidance, the guidance they provide may become outdated.

Table 3 provides more detail about the agencies' incorporation of these leading practices in the Deal Team Initiative cables.

**Table 3: GAO Analysis of Incorporation of Leading Collaboration Practices in State and Commerce Cables for the Deal Team Initiative**

Leading collaboration practice	Overall assessment	Practices included in the cables	Practices not included in the cables
Defining outcomes and monitoring accountability	●	The cables state Deal Teams capture information on prospective deals, which includes project value and outcomes.	The cables do not indicate a method to evaluate outcomes or a way to track or monitor progress toward goals.
Bridging organizational cultures	●	The cables state that State and Commerce will improve results for U.S. companies through better coordination across agency boundaries.	The cables do not specify which U.S. government programs, among the dozens supporting U.S. commercial interests overseas, the agencies will select for participation, or describe the method of coordination.
Identifying and sustaining leadership	●	The cables emphasize a collaborative leadership approach between State and Commerce to establish and support Deal Teams.	The cables do not clarify how the agencies will sustain leadership over the long term, such as succession planning.
Clarifying roles and responsibilities	●	The cables indicate a broad agreement on shared roles and responsibilities. State and Commerce officers and staff at post on Deal Teams focus on helping U.S. companies do business in their markets.	The agencies have not yet articulated and agreed to a process for making and enforcing decisions in the cables.
Including relevant participants	●	The cables document the relevant Deal Team participants as Commerce and State staff.	The cables do not include the plans to address these gaps or specify when the agencies will develop the plans.
Identifying and leveraging resources	●	The cables state Commerce and State will staff the Deal Teams with agency officers and locally employed staff.	The cables do not include information on whether Commerce and State have incentives available to encourage their staff to participate in Deal Teams.
Developing, monitoring, and updating written guidance and agreements	●	The cables document decisions at a broad level regarding leadership, resources, and roles and responsibilities.	The cables do not establish a method for routinely monitoring and updating the cables.

Legend:

- = Fully incorporated: State and Commerce incorporated all aspects of this leading practice.
- = Partially incorporated: State and Commerce incorporated some but not all aspects of this leading practice.
- = Not incorporated: State and Commerce did not incorporate any aspects of this leading practice.

Source: GAO analysis of the Departments of State and Commerce Deal Team Initiative cables. | GAO-22-105860



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As Commerce and State continue to collaborate on the Deal Team Initiative, they will have more opportunities to address the seven leading practices they did not fully incorporate in the cables as indicated in table 3 above. By more fully incorporating all seven leading practices for collaboration into their guidance cables, State and Commerce could build on their existing efforts to support the sale of goods and services of U.S. businesses overseas.

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**State and Commerce Have Not Completed Actions to Implement the Provisions in CABDA Related to Their Coordination on Economic and Commercial Diplomacy**

CABDA includes several provisions requiring actions for interagency coordination between State and Commerce on matters relating to economic and commercial diplomacy. State and Commerce have begun, but not completed, actions called for in these selected provisions.

- Section 707 of CABDA requires that State and Commerce jointly produce and publish an annual country- and region-specific report regarding commercial relations with foreign countries and regions and safeguarding U.S. economic and business interests abroad. Each report must include specific information, such as information on the selling of U.S. products and services or doing business in each country or region. CABDA does not include a specific timeframe for implementing this requirement. State and Commerce offered differing assessments of the status of implementation to date for Section 707 provisions.
  - According to State officials, they are working with Commerce to integrate information from State's Investment Climate Statement (ICS) with Commerce's Country Commercial Guide (CCG) reports to fulfill this requirement.<sup>24</sup>
  - According to Commerce officials, as of July 2021, they have integrated the information from the ICS and the CCG reports to fulfill this requirement. Commerce officials said each CCG now incorporates a brief description of the ICS report, the complete ICS Executive Summary for the specific country, and a web link to view the full report at the State website. In addition, Commerce officials said State now includes language in its ICS to cross-promote the information with that in the CCG.
- Section 708 of CABDA requires, among other things, that State, in collaboration with Commerce (and other agencies), coordinate a

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<sup>24</sup>According to State officials, State targets its Investment Climate Statements (ICS) at U.S. firms looking to enter foreign markets for investment purposes, whereas Commerce targets its Country Commercial Guides (CCG) at businesses seeking information on major export markets.

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whole-of-government effort to expand U.S. efforts in supporting U.S. economic and business interests abroad. The section also directs the President to establish an interagency coordinating committee, known as the “Economic Diplomacy Action Group,” which must develop a joint strategic plan for all U.S. capacity building and technical assistance programs, among other things. Section 708 also directs State, as the chair (and Commerce as one of two vice-chairs with the U.S. Trade Representative) of the group, to establish a trade expansion advisory committee. This committee is to be composed of selected representatives from the U.S. private sector and other organizations, including labor unions, with direct and relevant operational experience in importing from and exporting into developing countries, as appropriate, to provide comment and advice on priorities for trade expansion initiatives. According to State officials, State has not yet established this coordinating committee. CABDA does not include specific timeframes for implementing these requirements.

- According to State officials, the COVID-19 pandemic and the 2020 election cycle delayed implementation of these various Section 708 requirements. According to the officials, State plans to take a number of actions and has begun preliminary discussions with Commerce on these requirements.
- Section 710 of CABDA requires the Secretaries of State and Commerce to take actions to improve awareness of U.S. government tools and services to assist businesses overseas, especially small- and medium-sized enterprises, including by coordinating with State trade agencies, Export Assistance Centers, and Small Businesses Development Centers. CABDA does not specify timeframes for implementing this requirement.
  - According to State and Commerce officials, they have offered various activities to implement this requirement, such as trade events, webinars, seminars, and conferences, which are improving awareness of U.S. government tools and services to assist businesses.

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## State and Commerce Established Performance Measures, but State Lacks Complete Performance Data

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State Has Several  
Performance Measures to  
Assess Its Economic and  
Commercial Diplomacy  
Efforts, but Has Not  
Collected Enough Data to  
Determine How Well It Is  
Meeting Goals

According to State, it uses 16 performance measures to assess the effectiveness of its economic and commercial diplomacy activities.<sup>25</sup> We found that State's data for these performance measures for fiscal years 2016 to 2020 were incomplete. Our analysis shows that State did not consistently record and maintain the data for targets and actual performance for each performance measure for this period. Our review of State's method for tracking progress on strategic objectives showed that while State included some data from prior years, some data were missing. As a result, State lacks information to fully demonstrate whether its activities are effectively meeting its goals to support U.S. businesses overseas.

State's EB uses a spreadsheet to track progress on strategic objectives and sub-objectives for economic and commercial diplomacy activities, which officials referred to as their scorecard. The scorecard includes 16 performance measures. State had 10 of the 16 performance measures in place from fiscal years 2016 to 2019. It created six new measures in fiscal year 2020.

State's data for the performance measures used to assess the effectiveness of its economic and commercial diplomacy efforts for fiscal years 2016 to 2020 were incomplete. Consequently, we found it difficult to determine how effective its activities were. Federal internal control standards state that management should use quality information to achieve the entity's objectives. Quality information is appropriate, current,

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<sup>25</sup>State includes one of these performance measures, the number of its high-level commercial advocacy efforts to support U.S. export of goods and services, in its publicly available Annual Performance Report. State considers the other 15 performance measures sensitive; therefore, we have omitted them from this version of the report. All 16 performance measures are identified in the SBU version, GAO-22-104591SU.

complete, accurate, accessible, and timely.<sup>26</sup> We analyzed the scorecard State uses to track its progress in achieving its strategic goals for economic and commercial diplomacy activities. State’s scorecard did not include complete data—performance targets and actual performance—for fiscal years 2016 to 2020 for 15 of its 16 performance measures.

State’s scorecard was incomplete because staff did not consistently collect and maintain performance data. State officials said they had not collected some fiscal year 2020 data because the calendar year had not yet ended. In addition, State provided the scorecard to us more than 6 months after fiscal year 2020 had ended, providing it many opportunities to update the data. Without complete data, State will continue to have insufficient information to measure the progress of achieving strategic goals and the effectiveness of efforts in economic and commercial diplomacy.

State provided sufficient data to determine whether it had met its goals for economic and commercial diplomacy activities for six of its performance measures for fiscal years 2016 to 2020. For those six measures, State achieved mixed results. See table 4 below.

**Table 4: Summary of GAO Assessment of Department of State Performance Measures for Economic and Commercial Diplomacy Activities, Fiscal Years (FY) 2016 to 2020**

	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Number of performance measures in use	3	5	8	11	16
Performance measures missing data required for determining results	2	3	3	6	11
Performance measures reported as meeting target	1	2	2	3	2
Performance measures reported as not meeting targets	0	0	3	2	3

Source: Department of State data. | GAO-22-105860

<sup>26</sup>*Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

## Commerce Has Several Performance Measures to Assess Its Economic and Commercial Diplomacy Efforts and Met Most of Its Targets

From fiscal years 2016 to 2020, Commerce’s ITA measured the effectiveness of its economic and commercial diplomacy efforts through nine performance measures, such as the number of U.S. exporters assisted or the number of trade barriers removed, reduced, or prevented. Commerce had six of the nine measures in place from fiscal years 2016 to 2019. It created three new measures and discontinued one in fiscal year 2020. During these five fiscal years, Commerce met most of its targets for the performance measures for economic and commercial diplomacy. From each of the fiscal years from 2016 to 2019, Commerce met all six of the targets for its then current performance measures. In fiscal year 2020, it met six of the eight performance measures then in place (see table 5).

**Table 5: Department of Commerce Performance Measures for Economic and Commercial Diplomacy Activities, Performance Data and Commerce Performance Assessment, Fiscal Years (FY) 2016 to 2020**

Performance measure	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Number of U.S. exporters assisted	28692 ✓	30110 ✓	33086 ✓	29557 ✓	31249 ✓
Percentage of U.S. exporter clients that achieved their export objectives	78 ✓	78 ✓	81 ✓	78 ✓	80 ✓
Number of commercial diplomacy/advocacy Written Impact Narratives	472 ✓	459 ✓	479 ✓	470 ✓	—
Number of investment clients assisted	6072 ✓	6671 ✓	6850 ✓	6471 ✓	6921 ✓
Trade barriers removed, reduced, or prevented (annual) (APG)	110 ✓	115 ✓	138 ✓	142 ✓	176 ✓
Number of trade agreement compliance cases resolved successfully	33 ✓	36 ✓	39 ✓	37 ✓	30 ✗
Number of ITA-facilitated foreign government actions benefiting U.S. companies and industry	—	—	—	—	575 ✓
Dollar value of U.S exports and inward investment facilitated (billions) (APG)	—	—	—	—	105 ✗
Percentage of U.S. exporter clients that are small and medium-sized enterprises (APG)	—	—	—	—	92 ✓

**Legend:**

✓ = Met or exceeded the performance target

✗ = Did not meet the performance target

— = Not applicable because performance measure was not in use.

APG = Performance measure that contributes to the department’s Agency Priority Goals.

ITA = International Trade Administration

Source: Department of Commerce data. | GAO-22-105860

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## Conclusions

State and Commerce work together to support U.S. businesses abroad through a range of economic and commercial diplomacy efforts. Two of their key coordination efforts are the jointly led Partner Post Program and the Deal Team initiative. State and Commerce coordinate the Partner Post Program through a MOU that designates the general roles and responsibilities of the agencies. They coordinate the Deal Team Initiative through cables that provide guidance sent to the participating embassies and posts overseas. These documents partially incorporate the seven leading practices that can enhance and sustain collaboration. For example, Commerce and State have not clarified how the agencies will sustain leadership over the long term, such as through succession planning in the documents they use to manage their joint efforts. More fully incorporating all seven leading practices for collaboration into their MOU and guidance cables could help State and Commerce build on their existing efforts to support the sale of goods and services of U.S. businesses overseas.

State has made progress in identifying several performance measures to assess the effectiveness of its efforts in economic and commercial diplomacy. However, State has not collected and maintained the data necessary to populate the scorecard it uses to track the progress toward those performance measures. Without this data, State will be unable to effectively measure the progress it has achieved toward meeting its strategic goals.

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## Recommendations for Executive Action

We are making 12 recommendations, including 11 jointly to Commerce and State, and one to State, as follows.

The Secretary of Commerce and the Secretary of State should indicate the methods the agencies will use to maintain an effective working relationship in their Memorandum of Understanding for the Partner Post Program. (Recommendation 1)

The Secretary of Commerce and the Secretary of State should clarify how Commerce and State will sustain program leadership over the long term, such as with succession planning, in their Memorandum of Understanding for the Partner Post Program. (Recommendation 2)

The Secretary of Commerce and the Secretary of State should ensure Commerce and State articulate and agree to a process for making and enforcing program decisions in their Memorandum of Understanding for the Partner Post Program. (Recommendation 3)

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The Secretary of Commerce and the Secretary of State should ensure that Commerce and State indicate how they will use client feedback on client experiences in their Memorandum of Understanding for the Partner Post Program. (Recommendation 4)

The Secretary of State and the Secretary of Commerce should ensure their agencies indicate a method to evaluate outcomes or a way to track or monitor progress toward goals for the program in their guidance cables for the Deal Team Initiative. (Recommendation 5)

The Secretary of State and the Secretary of Commerce should ensure their agencies specify how Embassy Deal Teams should identify and coordinate the use of dozens of U.S. government programs supporting U.S. commercial interests overseas in their guidance cables for the Deal Team Initiative. (Recommendation 6)

The Secretary of State and the Secretary of Commerce should clarify how their agencies will sustain program leadership over the long term, such as with succession planning, in their guidance cables for the Deal Team Initiative. (Recommendation 7)

The Secretary of State and the Secretary of Commerce should ensure their agencies articulate and agree to a process for making and enforcing program decisions in their guidance cables for the Deal Team Initiative. (Recommendation 8)

The Secretary of State and the Secretary of Commerce should ensure their agencies' indicate whether Deal Team participants have the appropriate knowledge, skills, and abilities to contribute and, if not, include a plan with timeframes on how they will address this issue in their guidance cables for the Deal Team Initiative. (Recommendation 9)

The Secretary of State and the Secretary of Commerce should ensure their agencies include information on whether incentives are available to encourage State and Commerce and their staff to participate in Deal Teams in their guidance cables for the Deal Team Initiative. (Recommendation 10)

The Secretary of State and the Secretary of Commerce should ensure their agencies establish a method for monitoring and updating the cables in their guidance cables for the Deal Team Initiative. (Recommendation 11)

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## Agency Comments and Our Evaluation

The Secretary of State should take measures to ensure that staff analysts consistently and reliably record performance goals or targets, performance achieved, and other key information used to measure State's progress in achieving its strategic goals related to economic and commercial diplomacy. (Recommendation 12)

We provided a draft of the sensitive report to the Department of Commerce and the Department of State for review and comment. Both departments provided written comments on the sensitive report, which are reproduced in Appendix IV and V, respectively. Both departments provided technical comments, which we incorporated as appropriate. In written comments from Commerce and State, both departments concurred with our recommendations.

In Commerce's written comments, the department stated that it is committed to addressing additional opportunities to improve collaboration mechanisms as highlighted in the report. In State's written comments, the department indicated that it recognizes opportunities to further build and strengthen coordination and to formalize collaborative efforts. To address our recommendations relating to evaluating outcomes and monitoring progress, both departments stated they will use multiple tools and mechanisms as appropriate. For example, the departments indicated that they will establish Partner Post Program and Deal Team Initiative Standard Operating Procedures.

We appreciate the departments' willingness to incorporate the leading practices for collaboration more fully into their efforts. For example, to address our recommendation relating to sustainment of program leadership over the long term, the Department of State committed to coordinating with the Department of Commerce on additional methods to incorporate succession planning into the Partner Post Program through supplemental Standard Operating Procedure documents. To address our recommendation relating to evaluating outcomes and monitoring progress, the departments also committed to developing detailed guidance on "deal" parameters and Deal Team Initiative priority outcomes. They also stated that the program tracking mechanism will be included in upcoming Deal Team Initiative cables and in a document outlining Deal Team Initiative Standard Operating Procedures. Developing such a detailed joint framework and standard operating procedures in accordance with the existing Partner Post Program Memorandum of Understanding and Deal Team Initiative cables that incorporate those leading practices discussed in our report would be



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consistent with the intent of our recommendations to improve the agencies' collaboration.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of State, the Secretary of Commerce, 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) 512-8612 or [GianopoulosK@gao.gov](mailto:GianopoulosK@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs can be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.



Kimberly Gianopoulos  
Director, International Affairs and Trade

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# Appendix I: Objectives, Scope, and Methodology

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This report examines (1) the Departments of State’s and Department of Commerce’s coordination mechanisms for economic and commercial diplomacy efforts to support U.S. businesses abroad, and (2) the effectiveness of State and Commerce economic and commercial diplomacy efforts to support U.S. businesses overseas.

This report is a public version of a sensitive report that we issued in February 2022.<sup>1</sup> State deemed some of the information in our February report to be sensitive, which must be protected from public disclosure. Therefore, this report omits sensitive information about the specific performance measures, data, and assessments pertaining to State’s economic and commercial diplomacy efforts. The omitted information pertained to the second objective examining State’s performance measurement efforts. Although the information provided in this report is more limited, the report addresses the same objectives as the sensitive report and uses the same methodology.

To address these objectives, we reviewed documents and spoke with officials from State, including from the Bureau of Economic and Business Affairs (EB), and from Commerce, including the International Trade Administration (ITA) and the Trade Promotion Coordinating Committee (TPCC), on the economic and commercial diplomacy activities that the agencies implemented in fiscal years 2016 to 2020.<sup>2</sup> To examine how State and Commerce coordinate on economic and commercial diplomacy efforts to support U.S. businesses, we focused on the formal coordination mechanisms for two programs that both agencies identified as being key for economic and commercial diplomacy activities in our prior work.<sup>3</sup>

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<sup>1</sup>GAO, *Economic and Commercial Diplomacy: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness*, GAO-22-104591SU (Washington, D.C.: Feb 22, 2022).

<sup>2</sup>From our review of relevant legislation, State and Commerce documents and interviews, and background research conducted for this review, we found no specific definition for “economic and commercial diplomacy.” For the purposes of our review, we broadly refer to State and Commerce economic and commercial diplomacy activities as efforts to promote U.S. economic and commercial interests abroad and to create an enabling environment for U.S. businesses to enter or expand in an overseas market. Given the interrelated nature of activities and the lack of clear definitions, we do not divide the activities into separate categories (e.g., economic diplomacy versus commercial diplomacy); rather, we generally refer to “economic and commercial diplomacy” activities.

<sup>3</sup>[GAO-22-104181](#).

The two programs are the Partner Post Program and the Deal Team Initiative. We identified the State and Commerce 2021 Memorandum of Understanding (MOU) for the Partner Post Program and the 2020 and 2021 guidance cables for the Deal Team Initiative as the formal coordination mechanisms the agencies use.<sup>4</sup> We assessed the MOU and the guidance cables against the seven leading practices to enhance and sustain interagency collaboration that we identified in GAO's prior work.<sup>5</sup> Specifically, two independent GAO reviewers assessed the degree to which agencies' actions incorporated these seven leading practices and the associated issues to consider. For example, for the first leading practice, Outcomes and Accountability, we assessed the agencies' Partner Post Program MOU and Deal Team Initiative cables with each of the four associated issues for this leading practice. We determined that the leading practices were fully met when all aspects of the criteria were met, agreed upon, established, or started. Aspects may be planned if documented and binding between the two agencies. We determined that the leading practices were partially met when some aspects of the criteria were met, established, or started. Other aspects of criteria were planned without documentation, in discussion between the two agencies, or not fully considered. We determined that the leading practices were not met when no aspects of the criteria was considered or agreed upon between the agencies. A full list of the leading practices and associated issues to consider are in table 1.

In our report, we include selected examples for each leading practice for brevity and clarity. We did not report on all the associated issues to consider for each of the leading practices. We also identified and reported on selected provisions in the Championing American Business Through Diplomacy Act of 2019 related to coordination between State and Commerce on economic and commercial diplomacy, and the status of the agencies' efforts to implement those provisions.<sup>6</sup>

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<sup>4</sup>Cables are official records of State policies, program activities, post operations, and personnel management that it sends to organizational entities, such as U.S. embassies.

<sup>5</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: Sept. 27, 2012). In this report, and in our past work, we define collaboration as any joint activity intended to produce more public value than an organization could produce when it acts alone. We use the terms "coordination" and "collaboration" interchangeably in this report.

<sup>6</sup>The Championing American Business Through Diplomacy Act of 2019, Div. J, Title VII of the Further Consolidated Appropriations Act, 2020, Pub. L. No. 116-94, 133 Stat. 3069-76 (Dec. 20, 2019) (CABDA).

To determine how State and Commerce assess the effectiveness of their economic and commercial diplomacy efforts, we reviewed documentary and testimonial information from State, including from EB, and from Commerce, including from ITA, concerning performance measurement. For both departments, we reviewed strategic plans and annual performance reports, focusing on those strategic objectives and sub-objectives supported by economic and commercial diplomacy activities. To determine what these assessments show about the effectiveness of State and Commerce efforts, we reviewed the data from the annual performance reports or other performance measurement tools, such as EB's scorecard for economic and commercial diplomacy activities, and compared the reported performance against any available performance targets, or if available, reported the agency's assessment. We interviewed agency officials to determine any other measures or practices used to measure effectiveness. We assessed these performance data against federal internal control standards.<sup>7</sup>

To examine what the available literature tells us about the effectiveness of State's and Commerce's economic and commercial diplomacy efforts, we conducted a literature review. We identified studies for potential review based on a search of various online databases such as Scopus and the Policy File Index. We searched for studies from just the previous 10 years to ensure a broad coverage with results current enough to be relevant. In addition, we selected studies that used statistical analysis to assess effectiveness, discussed the effectiveness of State's or Commerce's economic or commercial diplomacy, and relied on authorized agency and government data. After reviewing the literature, we identified and summarized key findings from a separate report issued by the Small Business Administration that discussed the data limitations U.S. government researchers face in trying to study the effectiveness of commercial diplomacy programs.

To identify the two studies used in our report we took several steps. Specifically, we searched for studies with certain keywords or phrases in the title of the study, such as "commercial diplomacy," "economic diplomacy," "U.S. Department of Commerce," and "U.S. Department of State," among others. Afterward, two economists independently reviewed the abstracts of each study to determine if they discussed the effectiveness of commercial or economic diplomacy. For the studies both economists agreed were relevant to the research question, they each

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<sup>7</sup>[GAO-14-704G](#).

conducted a review of the entire article that included an assessment of each study's methodology, data sources, and limitations and whether the results from a statistical analysis could quantify the effectiveness of commercial and economic diplomacy. For more information on the literature search, see appendix II.

The performance audit upon which this report is based was conducted from October 2020 to February 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. We subsequently worked with State from February 2022 to June 2022 to prepare this public version of the original sensitive but unclassified report for public release. This public version was also prepared in accordance with these standards.

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# Appendix II: GAO Results from the Literature Review

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To examine what the available literature tells us about the effectiveness of the Department of State's and Department of Commerce's economic and commercial diplomacy efforts, we conducted a literature review.

The two studies we identified that specifically examined U.S. economic or commercial diplomacy efforts indicated that diplomatic presence and export promotion efforts appeared to be effective in promoting U.S. businesses in foreign markets. In each study, the authors extracted, compiled, and combined data from several different sources to answer their research questions. The two authors implemented comprehensive regression analyses to account for other factors that could influence outcomes related to the U.S. business activity in foreign markets, such as country or firm fixed effects that control for time invariant country or firm characteristics. Each study also cited several limitations to take into account when interpreting its findings.

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## The Effect of U.S. Ambassadorships

The first study we identified was by Geoffrey Gertz in the *International Studies Quarterly*, which examined the effect of ambassadorships on investment arbitration cases.<sup>1</sup> It found that American firms operating abroad were significantly more likely to initiate investor-state arbitration disputes during temporary vacancies in U.S. ambassadorships, with the effects of these vacancies being particularly strong in countries with a weak rule of law. This observation, according to the author, suggested that American investors frequently sought assistance from the U.S. government to informally resolve investment disputes, and that informal diplomacy influenced important political economy outcomes.

The author, used data from a variety of publically available sources, including arbitration cases obtained from four sources. They were: 1) the list of completed and pending cases on the International Centre for Settlement of Investment Disputes website; 2) the list of treaty-based arbitrations on the italaw website; 3) reporting in Investment Arbitration Reporter; and 4) the list of ongoing treaty-based arbitrations in the "Arbitration Scorecard" published biannually since 2003 by *The American Lawyer*.<sup>2</sup> He also used data on U.S. ambassador appointments from the Office of the Historian of the Department of State; rule of law metrics from the World Governance Indicators; and an indicator for the presence of a

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<sup>1</sup>See Geoffrey Gertz, "Commercial Diplomacy and Political Risk," *International Studies Quarterly*, vol. 62, 2018: 94-107.

<sup>2</sup>Italaw is a free database on investment treaties, international investment law, and investor-state arbitration.

ratified investment agreement between the host state and the United States. In addition, he used data for other economic indicators, such as the host country's U.S. foreign direct investment and Gross Domestic Product. The data set was limited to developing country host states and the period between 2000 and 2013.

To obtain his findings, the author implemented and analyzed several different regression models to examine the relationship between the number of arbitration cases and ambassador vacancies, while controlling for a variety of other variables from publically available data sources.<sup>3</sup> The results, according to the author, suggested that American investors frequently seek assistance from the U.S. government to resolve incipient investment disputes informally. If diplomatic channels were unsuccessful or unavailable, investors then filed formal arbitration cases. The author's findings underlined that, even in areas where treaties granted private actors direct access to legalized dispute resolution mechanisms, informal diplomacy continued to influence important political economy outcomes.<sup>4</sup>

The author identified several limitations and caveats to the study, such as the small sample size of arbitration claims identified. Furthermore, the results on the effect of ambassadorships might have underestimated the effect of commercial diplomacy on informal settlement disputes since commercial diplomacy continued even when there was no ambassador present. Generally, the study could not rule out that host states targeted U.S. firms during ambassador vacancies.

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## The Effect of U.S. Commercial Diplomacy

The second study we identified was by C.J. Krizan in the U.S. Census Bureau Working Papers. The study investigated whether firm participation in U.S. government programs for export assistance led to increased

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<sup>3</sup>According to the author, U.S. domestic political factors were overwhelmingly the driving force behind ambassador turnovers and vacancies. This conclusion means the causes of the vacancies are likely external to host-state economic and political conditions, which allows the author to treat ambassador vacancies as a sign of weakened diplomacy in the host state.

<sup>4</sup>The study, after controlling for a variety of factors, found that American firms operating abroad were statistically significantly more likely to initiate investor-state arbitration disputes during temporary vacancies in U.S. ambassadorships, with the effect of these vacancies being particularly strong in countries with weak rule of law.

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export growth.<sup>5</sup> The author used confidential data collected by Commerce and the U.S. Census Bureau. The author found a positive and statistically significant correlation between firm participation in the U.S. Commercial Service's Global Markets (GM) program (a service where the International Trade Administration (ITA) advocates for U.S. firms wishing to expand into foreign markets) and U.S. exports to foreign markets.

The author combined confidential trade transaction and business data collected and managed by the U.S. Census Bureau with data on firm participation in the GM program (such as forms of goods producers receiving export counseling) to investigate the relationship between participating in the program and changes in export and employment growth. Specifically, the author compiled firm-level data from the Longitudinal Business Database (LBD) and the Longitudinal Foreign Trade Transaction Database (LFTTD) on exports.<sup>6</sup> He then merged the LBD and LFTTD using their common numeric firm identifier and used data programming techniques to identify firms that participated in the GM Program.<sup>7</sup> The author used data for firms that received counselling through the GM program from 2002 through 2011.

The author implemented several different regression models. Each model found a statistically significant positive correlation between GM program participation and export growth and, for small businesses, with positive employment growth. However, the study also found that overall, and for large firms in particular, a negative correlation existed with employment

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<sup>5</sup>C.J. Krizan, "Statistics on the International Trade Administration's Global Markets Program," Center for Economic Studies, U.S. Census Bureau *Working Papers* 15-17: 2015.

<sup>6</sup>The LBD is a confidential dataset containing information on business establishments and firms with paid employees operating across all U.S. industries and states. The data come from several different survey and administrative records. See <https://www.census.gov/programs-surveys/ces/data/restricted-use-data/longitudinal-business-database.html> for more information on the LBD. The LFTTD identifies individual export transactions made by firms operating in the U.S. That is, it links export transactions to the U.S. exporter and import transactions to the U.S. importer. See <https://www.census.gov/programs-surveys/ces/data/restricted-use-data/longitudinal-firm-trade-transaction-database.html> for more information on the LFTTD.

<sup>7</sup>Specifically, the author used probabilistic matching (also known as fuzzy matching), in which a computer algorithm computes the probability the name and address of two firms in each dataset actually refer to the same firm.



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growth and counseling.<sup>8</sup> Given that the modelling strategy used firm-level data, the analysis accounted for many firm characteristics in determining the correlation between firm participation and export as well as employment growth.

The author acknowledged several limitations in the study. Most notably, firms may have used other government programs, and spillover effects of information provided by ITA to other firms could have occurred. In addition, the data did not allow the author to fully capture all interactions that GM had with its client firms, such as unrecorded counseling sessions and other services. Furthermore, the author could not identify casual relationships between outcomes and firm participation. For instance, a firm might have decided to participate in the GM program after suffering business losses. The author also cautioned that the study looked at only a small part of the overall GM program (counseling to goods producers and traders) and did not address several important metrics of firm performance, such as firm survival or the duration of export relationships. Finally, the author noted that the effort to match firms in the ITA data and Census data was imperfect, which we conclude indicates that he could not study all of the firms participating in the program.

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## The Availability of Data

According to Dr. Geoffrey Gertz, a lack of available data makes it difficult to measure the effectiveness of U.S. commercial and economic diplomacy. While data on U.S. economic activity in foreign countries (such as export data from the U.S. Census trade statistics) are publically available, a lack of data on U.S. economic diplomacy efforts makes it difficult to study its impact on U.S. international business outcomes. For instance, a researcher using publically available data would find it difficult to measure the extent to which the U.S. government interacts with U.S. businesses with interests in foreign countries. In the study mentioned above, Gertz stated that diplomatic intervention on behalf of U.S. businesses seeking investment protections are often unobserved. In his study, he resorted to using U.S. ambassador vacancies in foreign

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<sup>8</sup>The study controlled for a variety of variables, such as sector and year, and implemented several regression models, including Ordinary Least Squares, firm fixed-effects, and a two-stage model, in which it used distance from the firm to the nearest GM office as an identifying instrument. The author discussed why it seemed likely that the effects of exporting on firm employment could vary, particularly in the short run. According to the author, all things being equal, more demand is expected to lead to using more inputs, including labor. However, a firm's first exposure to intense international competition could also possibly lead to an over-accumulation of capital, which might lead to employment cuts in the short or medium term.

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countries as a proxy measure of U.S. economic diplomacy efforts in his analysis.

In addition, the lack of advanced planning to create protocols for linking administrative data collected and maintained by U.S. export assistance agencies to other data sources has impeded researchers from conducting beneficial impact evaluations of U.S. export assistance programs, according to a report from the Small Business Administration (SBA) in 2017.<sup>9</sup> For example, in the only study we found in our literature review that matched program data to Census data, the author used complex matching techniques to link firm name and address information in administrative data collected by a U.S. Commercial Service export program with international export transaction data and U.S. business establishment data maintained by the U.S. Census Bureau.<sup>10</sup> According to the author, U.S. agencies typically strove for a 70 percent match rate when linking administrative data before conducting impact evaluation assessments. However, the author was able to reliably identify only about 54 percent of participating firms in the Census data, even when using complex data linking techniques.

According to the Small Business Administration report, in order for researchers to adequately study the effectiveness of U.S. business assistance programs, they would ideally have access to economic data on the individual characteristics of companies that could affect choosing to participate and outcomes from participation in the program. For evaluating export assistance programs specifically like the ITA's Global Market program, the business activities to observe would include each program participant's sales to foreign parties or level of employment. Having such data would allow researchers to better understand the effects of program participation in an export assistance program on export or employment growth, while accounting for several different firm characteristics. For instance, after identifying firm participants in an export assistance program using administrative data in Census trade transaction data, researchers could generate a sample of firms most likely to use the

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<sup>9</sup>See [https://www.sba.gov/sites/default/files/aboutsbaarticle/Building\\_Smarter\\_Data1.pdf](https://www.sba.gov/sites/default/files/aboutsbaarticle/Building_Smarter_Data1.pdf) for more information.

<sup>10</sup>See C.J. Krizan's "Statistics on the International Trade Administration's Global Markets Program," Center for Economic Studies, U.S. Census Bureau *Working Papers* 15-17: 2015 described above.

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service and then compare export growth among non-participating firms to participating firms.

# Appendix III: Department of State Partner Posts, Grouped by Region

**Table 6: Countries with Department of State Partner Posts, by Region**

There are 64 countries with State Partner Posts in six regions, as of June 8, 2021.

Sub-Saharan Africa	East Asia and the Pacific	Europe and Eurasia	Middle East and Northern Africa	South and Central Asia	Western Hemisphere
Benin	Brunei	Albania	Bahrain	Bangladesh	Bahamas
Botswana	Cambodia	Azerbaijan	Iraq	Nepal	Barbados
Burkina Faso	Fiji	Bosnia and Herzegovina	Oman	Sri Lanka	Belize
Cameroon	Laos	Cyprus	Tunisia	Turkmenistan	Bolivia
Côte d'Ivoire <sup>a</sup>	Mongolia	Estonia		Uzbekistan	Ecuador
Democratic Republic of the Congo	Papua New Guinea	Georgia			Guyana
Eswatini		Iceland			Haiti
Gabon		Kosovo			Jamaica
Gambia		Latvia			Nicaragua
Guinea		Lithuania			Paraguay
Lesotho		Malta			Trinidad & Tobago
Liberia		Moldova			
Madagascar		Montenegro			
Malawi		North Macedonia			
Mali		Slovenia			
Mauritius					
Namibia					
Rwanda					
Senegal					
Sierra Leone					
Uganda					
Zambia					
Zimbabwe					

Source: GAO, based on Department of State data. | GAO-22-105860

<sup>a</sup>Department of Commerce officials said one State Partner Post (Côte d'Ivoire) is in the process of being transitioned to a Commerce Partner Post.

# Appendix IV: Comments from Department of Commerce



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

January 28, 2022

Kimberly Gianopoulos  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

Dear Ms. Gianopoulos:

Thank you for the opportunity to respond to the GAO draft report entitled GAO-22-104591, *Economic and Commercial Diplomacy: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness*.

The Department agrees with the recommendations with concerns noted in the formal comments 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,

WYNN COGGINS Digitally signed by WYNN  
COGGINS  
Date: 2022.01.28 14:23:33 -05'00'

Wynn W. Coggins  
Acting Chief Financial Officer and  
Assistant Secretary for Administration

Enclosure:

**Department of Commerce's Comments on  
GAO Draft Report entitled Economic and Commercial Diplomacy: State and Commerce  
Could Build on Efforts to Improve Coordination and Effectiveness (GAO-22-104591)**

The Department of Commerce has reviewed the draft report and we offer the following comments for GAO's consideration.

**General Comments**

The Department of Commerce commits to address any additional opportunities in the areas highlighted in the report regarding the Partner Post Program in collaboration with the Department of State; any necessary revisions may be reflected in updated Standard Operating Procedures (SOPs) or in the next iteration of the Partner Post Program Memorandum of Understanding (MOU).

In addition, the Department of Commerce welcomes the thoughtful evaluation of the Deal Team Initiative by GAO. Since launching in early 2020, many steps have been taken to institutionalize effective coordination between State and Commerce and with interagency partners more broadly. Commerce notes one limitation of the evaluation, which is an overreliance on cables when assessing the implementation of leading collaboration practices. Cables, or ALDACs, are issued by the Department of State to communicate guidance or request action of officers at overseas posts. The Department of Commerce does not issue ALDACs, and it is not a means of communication between Commerce headquarters and Foreign Commercial Service personnel. ALDACs are also not used as a form of communication among headquarters-based government agencies or their domestic office networks. The Deal Team Initiative has leveraged multiple tools and methods to enhance interagency collaboration, cables being one among many. Commerce, working in close partnership with State, looks forward to incorporating the leading collaboration practices into the Deal Team Initiative, but a broader range of activities are envisioned beyond the issuance of additional cables, which in some cases may not be the most effective method to fully implement all leading collaboration practices.

**Comments on Recommendations**

The Government Accountability Office (GAO) made 11 recommendations to the Department of Commerce in the report.

**Recommendation 1:** The Secretary of Commerce and the Secretary of State should indicate the methods the agencies will use to maintain an effective working relationship in their Memorandum of Understanding for the Partner Post Program.

**Commerce Response:** The Department of Commerce agrees with this recommendation and notes the inclusion of new language to address any previously identified shortcomings in the working relationship with the Department of State in the renewed Partner Post Program MOU. Both agencies sought to address items such as the application process and the continuity of partner posts in the program. Thus, the new language added some transparency and term limits to the application process and introduced a new annual review scheme to hold partner posts accountable.

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**Recommendation 2:** The Secretary of Commerce and the Secretary of State should clarify how Commerce and State will sustain program leadership over the long term, such as with succession planning, in their Memorandum of Understanding for the Partner Post Program.

**Commerce Response:** The Department of Commerce agrees with this recommendation and acknowledges that there are inherent challenges as it relates to succession planning within an organization where certain leadership positions rotate on a scheduled basis. The Partner Post Program MOU incorporates provisions to minimize the potential impact of these changes; for instance, in section 3.a., *Designation of Partner and Sponsor Posts*, the selection process is delegated to the Deputy Director General within Global Markets/U.S. & Foreign Commercial Service, a non-political foreign service position with a service period of no less than three (3) years. The same section provides for the designation of a Commercial Specialist at the Sponsor Post to serve as the primary point of contact for the partner post; Commercial Specialists are Locally Engaged Staff (LES) that typically enjoy a very low attrition rate, thus supporting continuity in the relationship. Additionally, section 3.f., *Performance Goals, Work Plans, and Training*, notes that the State and Commerce leadership each will designate an employee to serve as the respective Program Manager; this Commerce employee – from the civil service – further helping to ensure continuity of operations.

**Recommendation 3:** The Secretary of Commerce and the Secretary of State should ensure Commerce and State articulate and agree to a process for making and enforcing program decisions in their Memorandum of Understanding for the Partner Post Program.

**Commerce Response:** The Department of Commerce agrees with this recommendation and highlights added language to the renewed Partner Post Program MOU that seeks to clarify the division of duties as well as roles and responsibilities. For instance, in section 3.g., *Feedback, Evaluation, and Continuation Decisions*, a new annual performance review process was negotiated between the two agencies; the MOU dictates the role of the Program Managers and leadership in this process, from the gathering and review of the data to the decision making. Similarly, section 3.b, *GM/US&FCS Services*, was revised to establish a structure through which non-Partner Posts may offer fee-based services. As part of this structure, Regional Senior Commercial Officers (RSCO) have been designated as the decision makers for their regions.

**Recommendation 4:** The Secretary of Commerce and the Secretary of State should ensure that Commerce and State indicate how client feedback on client experiences is to be used in the Memorandum of Understanding for the Partner Post Program.

**Commerce Response:** The Department of Commerce agrees with this recommendation and notes that section 3.e., *Client Feedback*, refers to the applicable GM/US&FCS Survey Policy (a copy of which is provided to all Partner Posts), which provides more detail. Further, the MOU highlights the role and responsibility of both the Sponsor and Partner Posts in ensuring that client feedback is shared and responded to appropriately.

**Recommendation 5:** The Secretary of State and the Secretary of Commerce should ensure their agencies indicate a method to evaluate outcomes or a way to track or monitor progress toward goals for the program in their guidance cables for the Deal Team Initiative.

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**Appendix IV: Comments from Department of Commerce**

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**Commerce Response:** The Department of Commerce agrees with this recommendation and notes that the International Trade Administration (ITA) has already taken steps to outline desired program outcomes and refine an evaluation process tracking the progress toward said outcomes. The Deal Teams Initiative (DTI) has an established Excel-based platform to track post efforts towards identifying, promoting, and closing export and investment deals that further U.S. economic interests and competitiveness. ITA has solicited feedback from relevant embassy-based deal team members and will utilize the results from this assessment to implement needed updates to the Excel DTI tracker with our counterparts at the Department of State. Detailed guidance of deal parameters, DTI priority outcomes, and the program tracking mechanism will be included in upcoming DTI cables and in a cloud-based document outlining DTI Standard Operating Procedures that will be made available to all DTI participants, including embassy-based deal team members, the DC-based managing team, and interagency partners.

**Recommendation 6:** The Secretary of State and the Secretary of Commerce should ensure their agencies specify how Embassy Deal Teams should identify and coordinate the use of dozens of U.S. government programs supporting U.S. commercial interests overseas in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with this recommendation and notes that ITA has already taken steps to outline best practices for Embassy Deal Teams to leverage existing U.S. government trade and economic programs, including but not limited to initiatives such as the 5G Deal Team, the Infrastructure Transaction and Assistance Network (ITAN), the Direct Line program, Prosper Africa, Asia EDGE, and the Digital Connectivity and Cybersecurity Partnership, among others. This guidance will be disseminated via upcoming DTI cables and other electronic communications, training programs, and it will also be accessible on the DTI's cloud-based collaboration site.

**Recommendation 7:** The Secretary of State and the Secretary of Commerce should clarify how their agencies will sustain program leadership over the long term, such as with succession planning, in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with this recommendation. The Deal Teams Initiative (DTI) harnesses the economic insights from our worldwide network of 200+ overseas posts. As such, the DTI has been utilized by hundreds of State and Commerce employees leading a wide range of commercial diplomacy priorities, including the 5G Deal Team that works to identify overseas opportunities for trusted ICT providers and the Infrastructure Transaction and Assistance Network (ITAN) that works to advance sustainable infrastructure in the Indo-Pacific region. The DTI, therefore, has been institutionalized in part by supporting or running parallel to various sector-specific initiatives. These symbiotic processes help ensure the longevity and sustainability of the DTI. At the personnel level, embassy-based deal teams are led by Foreign Service and Commercial Service officers, with leadership positions filled one year ahead of any staffing transitions. The DTI is managed by career staff based at Commerce and State headquarters, which helps to ensure continuity through leadership transitions.



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**Appendix IV: Comments from Department of Commerce**

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**Recommendation 8:** The Secretary of State and the Secretary of Commerce should ensure their agencies articulate and agree to a process for making and enforcing program decisions in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with the recommendation and notes that ITA has already taken steps to outline a process for making and enforcing program decisions. The Deal Teams Initiative (DTI) maintains a long-standing weekly coordination meeting attended by State and Commerce program leads and regularly convenes interagency meetings that include members of the 13 agencies that participate in the DTI. The DTI is currently working on re-establishing a monthly interagency roundtable at the Deputy Assistant Secretary (DAS)-level, which will include representatives of all DTI member agencies and will serve as a recurring forum for the discussion and resolution of urgent Deal Teams project priorities. Guidance related to this mechanism will be disseminated via upcoming DTI cables to State and Commerce participants and other appropriate communications to interagency partners, including the DTI's cloud-based collaboration site.

**Recommendation 9:** The Secretary of State and the Secretary of Commerce should ensure their agencies indicate whether Deal Team participants have the appropriate knowledge, skills, and abilities to contribute and, if not, include a plan with timeframes on how this will be addressed in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with this recommendation and notes that ITA has already taken steps to ensure Deal Team Initiative (DTI) participants are offered timely and consistent opportunities for training. State and Commerce DTI leads are currently conducting a survey of Deal Teams stakeholders aimed at identifying, among other things, region- and sector-specific training needs. The weekly Deal Teams Central Committee (DCC) meeting will be outlining a schedule of upcoming training opportunities in early Spring 2022 that will be disseminated electronically to State, Commerce, and interagency stakeholders.

**Recommendation 10:** The Secretary of State and the Secretary of Commerce should ensure their agencies include information on whether incentives are available to encourage State and Commerce and their staff to participate in Deal Teams in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with this recommendation and notes that ITA has already taken steps to outline potential incentives geared towards incentivizing State and Commerce stakeholders to contribute to Deal Teams goals. These incentives include but are not limited to: (1) post- and Department-level awards, and (2) a monthly newsletter highlighting economic diplomacy successes that will be disseminated broadly to all State Economic officers and all Foreign Commercial Service officers. Relevant information will be disseminated via upcoming DTI cables and other appropriate communications to interagency partners, including the DTI's cloud-based collaboration site.

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**Appendix IV: Comments from Department of  
Commerce**

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**Recommendation 11:** The Secretary of State and the Secretary of Commerce should ensure their agencies establish a method for monitoring and updating the cables in their guidance cables for the Deal Team Initiative.

**Commerce Response:** The Department of Commerce agrees with this recommendation. State and Commerce DTI leads will continue to use cables, among other communication methods, to provide updated guidance to embassy-based DTI participants. Thirteen federal agencies participate in the DTI, and cables are not a method of communication among the interagency. Other appropriate communications methods will be used to provide updated guidance to DTI interagency partners, including memos, meeting summaries, and the DTI's cloud-based collaboration site.

# Appendix V: Comments from Department of State



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

MAY 17 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, “ECONOMIC AND COMMERCIAL DIPLOMACY: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness” GAO Job Code 105860.

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

Sincerely,

A handwritten signature in black ink, appearing to read "William B. Davisson".

William B. Davisson (Acting)

Enclosure:

As stated

cc: GAO – Kim Gianopoulos  
EB – Matthew Murray  
OIG - Norman Brown

Department of State Response to GAO Draft Report

**ECONOMIC AND COMMERCIAL DIPLOMACY: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness**  
(GAO-22-104591SU, GAO Code 104591)

Thank you for providing the Department of State the opportunity to comment on the draft report, *“Economic and Commercial Diplomacy: State and Commerce Could Build on Efforts to Improve Coordination and Effectiveness.”* As the GAO has found, the Bureau of Economic and Business Affairs (EB) within the Department of State already coordinates regularly with the Department of Commerce. We appreciate the GAO’s recognition that the Department has taken important steps to increase coordination with the Department of Commerce across a number of initiatives, such as the February 2020 rollout of the Deal Team Initiative (DTI). We recognize, as does the GAO, that there are opportunities for the Department to further build and strengthen this coordination and to formalize our collaborative efforts. In this regard, the Department of State appreciates the recommendations in this GAO report. As detailed below, we believe that to best address the underlying concerns raised in the recommendations, the Departments of State and Commerce will need to use multiple tools and mechanisms as appropriate. To address the GAO recommendations related to DTI efforts for which officials in Washington have the lead, for example, the two agencies will establish DTI Standard Operating Procedures, a new tool which they will review and update as necessary, at least on an annual basis.

**Recommendation 1:** The Secretary of Commerce and the Secretary of State should indicate the methods the agencies will use to maintain an effective working relationship in their Memorandum of Understanding for the Partner Post Program.

**Department Response:** State concurs with GAO’s recommendation and coordinated with the Department of Commerce to include additional working relationship advancements into the new Partner Post Memorandum of Understanding (MOU) signed in 2021. The new document was jointly signed by senior leadership from both Departments and renewed the working relationship and overall program for an additional 5 years. New language was negotiated and included to clarify roles, responsibilities, and timelines of required program administrative functions. Covered areas include the application process for joining the program, a new annual review structure, and clearer language on existing dispute resolution segments of the MOU.

**Recommendation 2:** The Secretary of Commerce and the Secretary of State should clarify how Commerce and State will sustain program leadership over the long term, such as with succession planning, in their Memorandum of Understanding for the Partner Post Program.

**Department Response:** State concurs with GAO’s recommendation and highlights additional language in the new MOU that clarifies the designation of Partner Post Managers from each Department to oversee clearly defined administrative functions to ensure long-term oversight with specified senior leadership positions linked to high-level administrative decisions, such as final approval for adding or removing posts from the program. EB will also coordinate with the Department of Commerce on additional methods to incorporate succession planning into the program via supplemental Standard Operating Procedure (SOP) documents.

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**Appendix V: Comments from Department of State**

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**Recommendation 3:** The Secretary of Commerce and the Secretary of State should ensure Commerce and State articulate and agree to a process for making and enforcing program decisions in their Memorandum of Understanding for the Partner Post Program.

**Department Response:** State concurs with the importance of this recommendation and points to recent improvements within the new 2021 MOU, with input from legal advisory offices, on articulating position responsibilities, program decision roles, and clear timelines on when enforcement or decisions need to be made. For example, the new MOU designates the Program Managers as the lead for implementing and enforcing the newly structured performance review process on an annual basis under the guidelines agreed to within the MOU that also include clear timelines for how enforcement recommendations are to be resolved. EB will continue to explore refinements to enforcement and decision making via supplemental SOP documents with the Department of Commerce as needed.

**Recommendation 4:** The Secretary of Commerce and the Secretary of State should ensure that Commerce and State indicate how client feedback on client experiences is to be used in the Memorandum of Understanding for the Partner Post Program.

**Department Response:** The Partner Post MOU outlines that client feedback is to be collected and reviewed in accordance with existing Department of Commerce Survey Policy. Partner Posts are identified as having the sole and full accountability for the quality of service provided and any response to client feedback in alignment with policy. Department of Commerce Sponsor Posts are responsible for providing guidance to their Partner Posts on reviewing and incorporating client feedback into the provision of services. Based on this recommendation, EB will continue to explore additional methods for including client-feedback into the MOU and administration of the program.

**Recommendation 5:** The Secretary of State and the Secretary of Commerce should ensure their agencies indicate a method to evaluate outcomes or a way to track or monitor progress toward goals for the program in their guidance cables for the Deal Team Initiative.

**Department Response:** State concurs with the importance of monitoring and evaluation and has already taken steps to outline desired program outcomes and refine an evaluation process tracking the progress toward said outcomes. The Deal Team Initiative (DTI) has an established Excel-based platform that tracks post efforts towards identifying, promoting, and closing export and investment deals that further U.S. economic interests and competitiveness. EB, as the State Department's DTI lead, is in the process of soliciting feedback from relevant bureau stakeholders and will utilize the results from this assessment to discuss needed updates to the Excel DTI tracker with our counterparts at the Department of Commerce. Detailed guidance of "deal" parameters, DTI priority outcomes, and the program tracking mechanism will be included in upcoming DTI cables and in a document outlining DTI Standard Operating Procedures.

**Recommendation 6:** The Secretary of State and the Secretary of Commerce should ensure their agencies specify how Embassy Deal Teams should identify and coordinate the use of dozens of U.S. government programs supporting U.S. commercial interests overseas in their guidance cables for the Deal Team Initiative.

**Department Response:** State has already taken steps to outline best practices for Embassy Deal Teams to apply in leveraging existing U.S. government programs, including but not limited to State initiatives such as the “5G Deal Team,” the “Infrastructure Transaction and Assistance Network” (ITAN), “Direct Line” Program, “Business Facilitation Incentive Fund” (BFIF), and the State-Commerce “Partner Post” Program. This guidance will be disseminated via upcoming DTI cables and in a document outlining DTI Standard Operating Procedures.

**Recommendation 7:** The Secretary of State and the Secretary of Commerce should clarify how their agencies will sustain program leadership over the long term, such as with succession planning, in their guidance cables for the Deal Team Initiative.

**Department Response:** The Deal Teams Initiative (DTI) harnesses the economic insights from our worldwide network of 200+ overseas posts. As such, the DTI mechanism has been utilized by a number of State and Commerce stakeholders who are leading a wide range of commercial diplomacy priorities, including the “5G Deal Team” that works to identify overseas opportunities for trusted information communications technology providers and the “Infrastructure Transaction and Assistance Network” (ITAN) that works to advance sustainable infrastructure in the IndoPacific region. The DTI, therefore, has been institutionalized by supporting or running parallel to various sector-specific initiatives. These symbiotic processes help ensure the longevity and sustainability of the program-at-large. At the personnel level, embassy-based deal teams are led by Foreign Service and Commercial Service Officers, with leadership positions filled one year ahead of any staffing transitions, according to established State Department human resources procedures. The DTI is managed by career staff based at Commerce and State headquarters, which helps to ensure continuity through leadership transitions.

**Recommendation 8:** The Secretary of State and the Secretary of Commerce should ensure their agencies articulate and agree to a process for making and enforcing program decisions in their guidance cables for the Deal Team Initiative.

**Department Response:** State has already taken steps to outline a process for making and enforcing program decisions. The Deal Teams Initiative (DTI) maintains a long-standing weekly coordination meeting attended by State and Commerce program leads. The DTI is currently working on establishing a monthly interagency roundtable at the Deputy Assistant Secretary (DAS)-level, which will include representatives of all DTI member agencies and will serve as a recurring forum for the discussion and resolution of urgent Deal Teams project priorities. Guidance related to this mechanism will be disseminated via upcoming DTI cables and via a document outlining DTI Standard Operating Procedures.

**Recommendation 9:** The Secretary of State and the Secretary of Commerce should ensure their agencies indicate whether Deal Team participants have the appropriate knowledge, skills, and abilities to contribute and, if not, include a plan with timeframes on how this will be addressed in their guidance cables for the Deal Team Initiative.

**Department Response:** State has already taken steps to ensure Deal Team Initiative (DTI) participants are offered timely and consistent opportunities for training. State DTI leads are currently conducting a survey of Deal Teams stakeholders aimed at identifying, among other

things, region- and sector-specific training needs. Through the weekly coordination meeting held between the State and Commerce DTI program leads, the agencies will maintain an active schedule of upcoming training opportunities, which it disseminates to its extensive network of Embassy Deal Team and interagency DTI contacts.

**Recommendation 10:** The Secretary of State and the Secretary of Commerce should ensure their agencies include information on whether incentives are available to encourage State and Commerce and their staff to participate in Deal Teams in their guidance cables for the Deal Team Initiative.

**Department Response:** State has taken steps to outline potential incentives geared towards incentivizing State stakeholders to contribute to Deal Team goals. These incentives include but are not limited to: (1) post- and Department-level awards and (2) a monthly newsletter highlighting economic diplomacy successes that will be disseminated broadly to all State Economic officers. Relevant information will be disseminated via upcoming DTI cables.

**Recommendation 11:** The Secretary of State and the Secretary of Commerce should ensure their agencies establish a method for monitoring and updating the cables in their guidance cables for the Deal Team Initiative.

**Department Response:** State will address this recommendation in two ways – first, by disseminating recurring guidance to the field via an annual Department-wide cable and, second, by ensuring the Standard Operating Procedures (SOP) document is reviewed and updated as needed at least once a year.

**Recommendation 12:** The Secretary of State should take measures to ensure that staff analysts consistently and reliably record performance goals or targets, performance achieved, and other key information used to measure State’s progress in achieving its strategic goals related to economic and commercial diplomacy

**Department Response:** State concurs with GAO’s recommendation. To improve the consistency and reliability of performance measures related to economic and commercial diplomacy, State has substantially revised its data tracking template referred to in the report. The scorecard is an instrument used to assess the Department’s progress related to the four-year Functional Bureau Strategy. The scorecard reviewed by the GAO captured and reviewed data for the years 2018-2021, or FY2019-FY2022. Further, the template was designed to evaluate whether targets were met in the current year only and did not provide historical data. State relied on the Annual Performance Report for a historical look at progress. Going forward, the scorecard will capture progress in the current year as well as previous years beginning with FY2020. Furthermore, State will continue to track select indicators related to commercial and economic diplomacy even if they are not included in the new Functional Bureau Strategy, which will cover 2022-2025.

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# Appendix VI: GAO Contacts and Staff Acknowledgments

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## GAO Contact

Kimberly Gianopoulos, (202) 512-8612 or [GianopoulosK@gao.gov](mailto:GianopoulosK@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Emil Friberg (Assistant Director), Jim Michels (Assistant Director), Claude Adrien (Analyst-in-Charge), Lisa Shibata, James Boohaker, Lilia Chaidez, Adam Cowles, Neil Doherty, Gina Hoover, Bill Johnson, Aldo Salerno, Sarah Veale, and Alex Welsh made key contributions to this report.



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