



December 2024

# CLIMATE CHANGE

## Improved Data and Performance Management Would Strengthen U.S. Support to the Indo- Pacific

## Why GAO Did This Study

Countries and U.S. territories in the Indo-Pacific region are among the most vulnerable to the impacts of climate change, such as sea level rise, coral reef bleaching, and drought.

GAO was asked to review federal agencies' assistance to address climate risks to countries and U.S. territories in the region. Also, the Inflation Reduction Act asked GAO to oversee the use of these funds. This report examines (1) the assistance federal agencies have provided to selected countries and U.S. territories in the Indo-Pacific; (2) the extent to which selected agencies have practices to monitor the performance of such assistance in selected locations; and (3) any challenges affecting the provision and use of such assistance and agency efforts to address them.

GAO analyzed funding data and documentation of agency activities and monitoring mechanisms; interviewed agency, territorial, foreign government, and activity officials; and conducted site visits to Palau, Papua New Guinea, American Samoa, the Commonwealth of the Northern Mariana Islands, and Guam. GAO also interviewed officials in Bangladesh and Fiji. GAO selected agencies and locations based on type and number of activities and geographic diversity, among other factors.

## What GAO Recommends

GAO is making seven recommendations, including to improve efforts to track funding data and to address factors affecting climate activities, to Interior, State, NOAA, USAID, and USTDA. Agencies concurred with all GAO recommendations.

View [GAO-25-106236](#). For more information, contact Latesha Love-Grayer at (202) 512-4409 or [lovegrayerl@gao.gov](mailto:lovegrayerl@gao.gov)

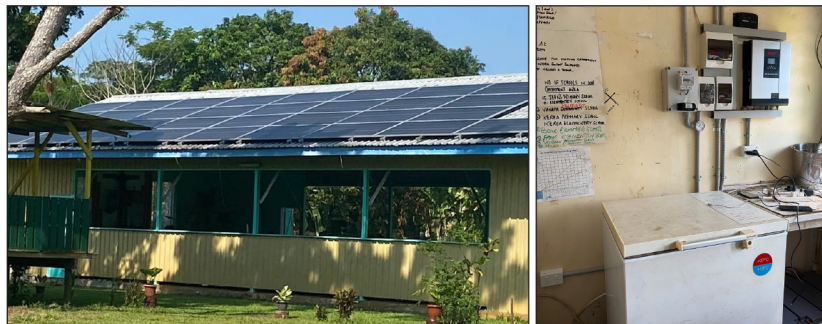
## CLIMATE CHANGE

### Improved Data and Performance Management Would Strengthen U.S. Support to the Indo-Pacific

## What GAO Found

Twelve U.S. agencies provided about \$1.9 billion, across 477 activities, to address climate risks in Bangladesh, the Maldives, 14 Pacific Island countries, and three U.S. territories in the Pacific from fiscal years 2017 through 2023. This funding was for a range of activities both directly and indirectly related to climate, with some implemented in a single country and others in multiple countries. The activities address areas such as solar energy, reforestation, coral reef and mangrove health, and hazard mitigation. However, the Department of State and the U.S. Trade and Development Agency (USTDA) do not track data on award amount by each country for multi-country activities because the activities are not budgeted for a specific country, among other reasons. By having data that is more precise and readily available, agency officials and policymakers would be better able to ensure the accountability of U.S. funding and make informed decisions about future resource needs.

#### U.S. Agency for International Development Activity in Papua New Guinea to Install Solar Panels to Power a School and Health Clinic Including a Refrigerator Containing Vaccines



Source: GAO. | GAO-25-106236

The Departments of the Interior and State, the U.S. Agency for International Development (USAID), and the National Oceanic and Atmospheric Administration (NOAA) demonstrated that they generally followed most of the six selected key practices for evidence-based policymaking and performance management for the 17 activities GAO reviewed. However, none of the four agencies demonstrated that they consistently followed the key practice related to identifying strategies to address internal and external factors that could affect achieving activity results. Identifying strategies to address such factors can help agencies focus on the aspects of activity implementation that are most likely to encounter risks and to threaten the success of the activity in meeting its goals.

Agencies have identified and taken steps to address some challenges affecting climate-related assistance. Federal, territorial, and host governments, and other entities identified challenges such as capacity and resource constraints, limited collaboration, and limited information, such as climate-related data on sea level rise and extreme heat. Some agencies reported taking steps to address some of these challenges, such as leveraging interagency resources and establishing partnership forums.

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# Contents

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Letter		1
	Background	3
	Agencies Provided about \$1.9 Billion in Climate Assistance to Selected Countries and U.S. Territories, but Two Could Not Identify Country-Specific Funding Data	8
	Agencies Followed Most Performance Monitoring Key Practices but Gaps Existed in Activity Planning and Assessing Progress	16
	Agencies Have Identified and Taken Steps to Address Some Challenges Affecting Climate-Related Assistance	30
	Conclusions	35
	Recommendations for Executive Action	36
	Agency Comments and Our Evaluation	37
Appendix I	Objective, Scope, and Methodology	39
Appendix II	Examples of Activity Goals and Performance Measures for Climate-Related Activities	45
Appendix III	Comments from the Department of Commerce	48
Appendix IV	Comments from the Department of the Interior	51
Appendix V	Comments from the Department of State	52
Appendix VI	Comments from the U.S. Agency for International Development	54
Appendix VII	GAO Contact and Staff Acknowledgments	57

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Tables

Table 1: Federal Agencies that Provided Climate-Related Activities to the Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023	9
Table 2: Direct and Indirect Climate-Related Activities Provided by Federal Agencies to Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023	11
Table 3: Award Value for Single-Country and U.S. Territory Climate-Related Activities of Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023	14
Table 4: Number of Single and Multi-Country Climate-Related Activities by Selected Country and U.S. Territory in the Indo-Pacific Region, Fiscal Years 2017 through 2023	15
Table 5: Select Key Practices from GAO's Evidence-Based Policymaking to Help Manage and Assess the Results of Federal Efforts	17
Table 6: Examples of Activity Goals and Performance Measures for Selected Climate-Related Activities	45

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Figures

Figure 1: Selected Indo-Pacific Countries and U.S. Territories that Received Climate-Related Assistance from Fiscal Years 2017 through 2023	4
Figure 2: Extent to Which Agencies Followed the Key Practice to Assess the Environment for Selected Climate Activities, Fiscal Years 2017 through 2023	21
Figure 3: U.S. Agency for International Development Activity in Palau to Construct Chicken Coops and Plant Crops, November 2023	24
Figure 4: Extent to Which Agencies Followed the Key Practice to Use Evidence to Learn for Selected Climate Activities, Fiscal Years 2017 through 2023	27
Figure 5: Categories of Challenges and Actions Taken or Suggested to Address Them Reported by Federal Agencies, U.S. Territories, or Foreign Countries in the Indo-Pacific Region	31

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## Abbreviations

CNMI	Commonwealth of the Northern Mariana Islands
COVID-19	Coronavirus Disease 2019
CRCP	Coral Reef Conservation Program
DHS	Department of Homeland Security
DOD	Department of Defense
DOE	Department of Energy
DOT	Department of Transportation
EPA	United States Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FWS	U.S. Fish and Wildlife Service
GDO	Grid Deployment Office
IIJA	Infrastructure Investment and Jobs Act
INDOPACOM	U.S. Indo-Pacific Command
IRA	Inflation Reduction Act
Marshall Islands	Republic of the Marshall Islands
MCC	Millennium Challenge Corporation
Micronesia	Federated States of Micronesia
NOAA	National Oceanic and Atmospheric Administration
NREL	National Renewable Energy Laboratory
OES	Bureau of Oceans and International Environmental and Scientific Affairs
OIA	Office of Insular Affairs
Palau	Republic of Palau
PRC	People's Republic of China
SCEP	Office of State and Community Energy Programs
SPSD	Standardized Program Structure and Definitions
USAID	U.S. Agency for International Development
USDA	U.S. Department of Agriculture
USTDA	U.S. Trade and Development Agency

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December 10, 2024

### Congressional Requesters

Key U.S. partner countries and territories in the Indo-Pacific are among the most vulnerable to the adverse impacts of climate change, including sea level rise, coral reef bleaching, drought, and more frequent natural disasters. According to the United Nations, more than 50,000 people every year in the Pacific region are forced to flee their homes due to the devastating impacts of disasters and climate change. Some of these countries are among the world’s most disaster-prone and bear the greatest risk of population displacement.

For more than 70 years, U.S. economic and commercial engagement, security operations, and development assistance have advanced freedom, openness, and economic prosperity across the Indo-Pacific region. Many countries in the region are recognized U.S. partners on critical issues that affect U.S. economic and national security interests, such as the global food supply and U.S. military interests. These partnerships are particularly important given the growing regional presence of the People’s Republic of China (PRC), which, the 2022 National Security Strategy notes, has “ambitions to create an enhanced sphere of influence in the Indo-Pacific and to become the world’s leading power.” The U.S. also has made economic and other commitments to the Freely Associated States—the Republic of the Marshall Islands (Marshall Islands), Federated States of Micronesia (Micronesia), and Republic of Palau (Palau), as well as the U.S. territories in the Pacific—American Samoa, the Commonwealth of the Northern Mariana Islands (CNMI), and Guam.<sup>1</sup>

You asked us to review U.S. government assistance to the Indo-Pacific region to address climate risks. Additionally, the Inflation Reduction Act (IRA) of 2022 includes a provision for GAO to support oversight of the use

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<sup>1</sup>Freely Associated States are three sovereign states consisting of Micronesia, the Marshall Islands, and Palau that through Compacts of Free Association with the United States receive U.S. economic assistance and provide the United States with exclusive military use rights in their countries.

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of funds appropriated in the IRA, including ensuring the impacts of funding decisions are equitable.<sup>2</sup>

This report addresses: (1) the assistance federal agencies have provided to Bangladesh, the Maldives, Pacific Island countries, and the U.S. territories in the Indo-Pacific region to address climate risks, (2) the extent to which selected federal agencies have practices to monitor the performance of such assistance in selected locations, and (3) any challenges that have affected the provision and use of such assistance and agency efforts to address these challenges.

To address our first objective, we obtained and examined data on the number and types of activities identified by federal agencies as related to addressing climate risks during fiscal years 2017 through 2023 in 19 selected Indo-Pacific locations. Specifically, we included Bangladesh, the Maldives, 14 Pacific Small Island Developing States,<sup>3</sup> and three U.S. territories in the Pacific.<sup>4</sup> We identified 12 federal agencies with activities addressing climate risks in these countries during that time.<sup>5</sup>

To address our second objective, we reviewed selected agencies' climate activities and compared agency practices to monitor performance of these activities against selected key practices for evidence-based policymaking and performance.<sup>6</sup> We focused our review on activities of the U.S. Agency for International Development (USAID), the Department of Commerce's National Oceanic and Atmospheric Administration

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<sup>2</sup>Pub. L. No. 117-169, § 70004, 136 Stat. 2087 (2022).

<sup>3</sup>Pacific Small Island Developing States are countries recognized by the United Nations as countries in the Pacific region that face unique social, economic, and environmental vulnerabilities.

<sup>4</sup>For this report, we included Bangladesh; the Maldives; Fiji; the Cook Islands; Kiribati; Nauru; Niue; Papua New Guinea; Samoa; the Solomon Islands; Tonga; Tuvalu; Vanuatu; the three Freely Associated States: Micronesia, the Marshall Islands, and Palau; and the three U.S. territories in the Pacific: American Samoa, CNMI, and Guam. We used the United Nations list of Pacific Small Island Developing States to inform our selection of Pacific Island countries.

<sup>5</sup>The 12 federal agencies are the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, the Interior, State, and Transportation; United States Environmental Protection Agency (EPA); the Millennium Challenge Corporation (MCC); the U.S. Agency for International Development (USAID); and the U.S. Trade and Development Agency (USTDA).

<sup>6</sup>GAO, *Evidence-based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

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(NOAA), and the Departments of State and the Interior in Bangladesh, Papua New Guinea, Fiji, Palau, and American Samoa. We selected these four agencies and five locations based on various factors, such as the number of locations in which agencies provided assistance; the number, type, and funding level of activities; and the number of agencies with activities in specific locations. We examined agency documents for the selected activities, interviewed agency and partner country officials, and analyzed agency efforts against key practices for managing project performance.

To address our third objective, we interviewed officials from 12 agencies and, in selected locations, agency, territorial, and foreign government officials as well as implementing partners and beneficiaries. We conducted these interviews to understand any challenges these entities experience in providing and using climate-related assistance, and any actions the 12 agencies have undertaken or plan to undertake to address these challenges.

To support all three of our objectives, we conducted site visits in Papua New Guinea, Palau, American Samoa, CNMI, and Guam where we observed activities and interviewed U.S., foreign, and territorial government officials; implementing partners; and activity beneficiaries. We interviewed similar types of officials from Bangladesh and Fiji by videoconference. For additional details on our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from September 2022 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

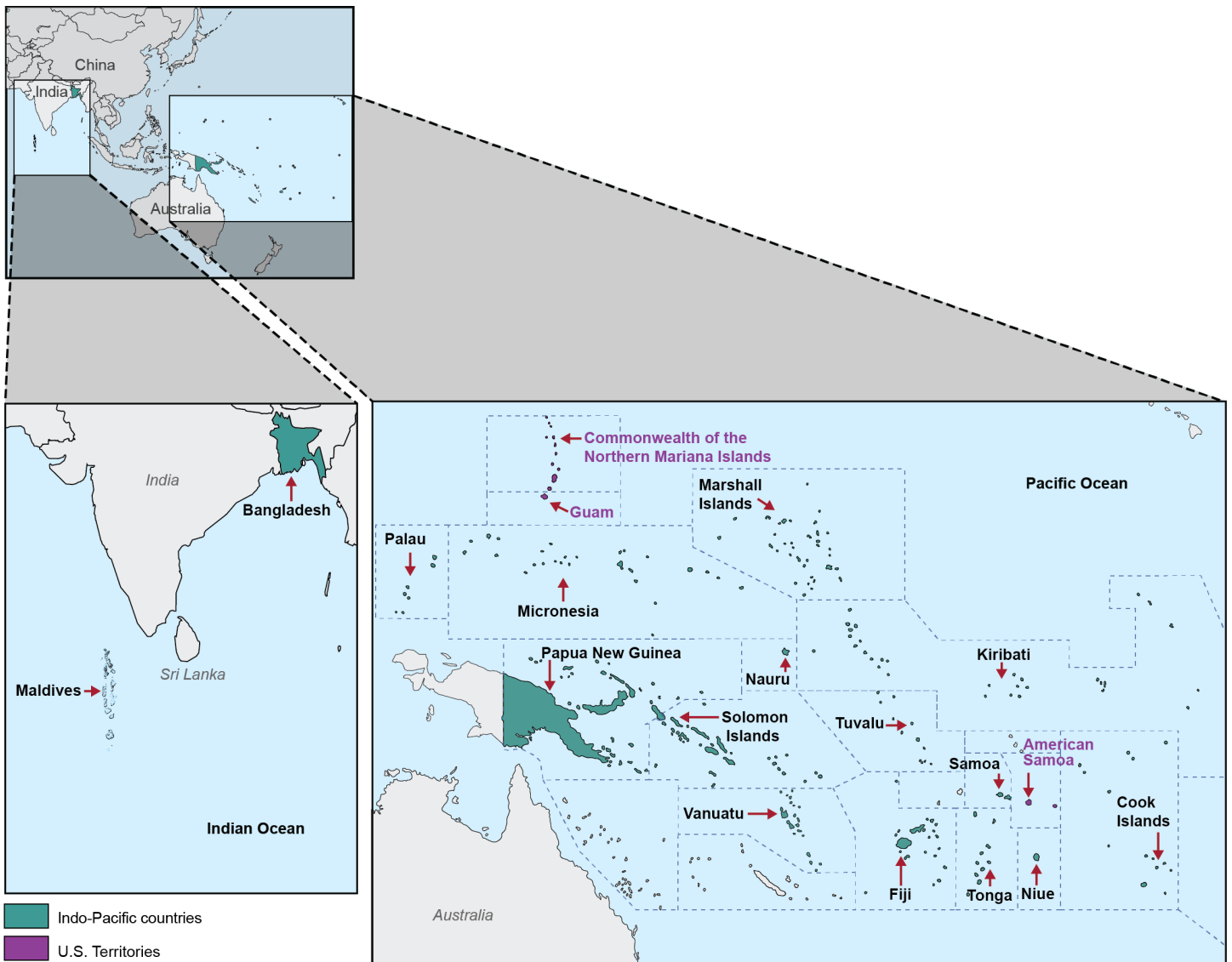
### Locations of Selected Countries and U.S. Territories in the Indo-Pacific Region

Selected countries and U.S. territories in the Indo-Pacific within our scope of review include 16 Indo-Pacific countries and three Pacific U.S. territories as shown in figure 1.



- Sixteen Indo-Pacific countries: Bangladesh, the Maldives, Fiji, the Cook Islands, Kiribati, Nauru, Niue, Papua New Guinea, Samoa, the Solomon Islands, Tonga, Tuvalu, Vanuatu, Micronesia, Marshall Islands, and Palau.
- Three U.S. Pacific territories: American Samoa, CNMI, and Guam.

**Figure 1: Selected Indo-Pacific Countries and U.S. Territories that Received Climate-Related Assistance from Fiscal Years 2017 through 2023**



Sources: GAO analysis based on information provided by agencies (data); Map resources (map). | GAO-25-106236

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Note: For this report, GAO included Bangladesh, the Maldives, the three U.S. territories in the Pacific, and those countries identified by the United Nations as the Pacific Small Island Developing States.

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## Impact of Climate Change in the Indo-Pacific Region

The effects of climate change vary across the Indo-Pacific region but are generally predicted to have negative impacts on food and economic security due to damage to infrastructure and declines in freshwater availability, altered crop production, and changes in fisheries distributions. The countries and the U.S. territories in the region are often not the most significant contributors to climate change but are among the most affected and the least able to respond to such threats, according to the U.S. Global Change Research Program.<sup>7</sup> These threats also pose additional challenges to very low-lying areas, such as Kiribati and the Marshall Islands, which face a greater risk of sea level rise because most of their population and infrastructure are in the coastal zone with no option for moving to a higher elevation.

According to the Indo-Pacific Strategy of the United States, 70 percent of the world's natural disasters occur in the Indo-Pacific region.<sup>8</sup> Various sources also noted that potential climate-related changes in this area in ocean temperature and acidification, precipitation patterns, and stream discharges can lead to impacts on water supplies, agriculture, forest cover, and biodiversity conservation. For example, coral reefs, which play a vital role in coastal protection, nearshore fisheries, and tourism, are among the most vulnerable ecosystems to the effects of climate change in the Pacific.

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## U.S. Strategies and Commitments to Address Climate Risks in the Indo-Pacific

The U.S. government has taken various actions in recent years to assist these countries and U.S. territories in addressing climate risks. For example:

- In November 2021, the President launched the President's Emergency Plan for Adaptation and Resilience to support middle or low income countries and communities in vulnerable situations in their efforts to adapt to and manage the impacts of climate change.<sup>9</sup> As

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<sup>7</sup>See Joel B. Smith et al., "Climate Effects on U.S. International Interests," and V. Keener et al., "Hawai'i and U.S.-Affiliated Pacific Islands," in *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II*, Reidmiller, D.R., et al., eds., U.S. Global Change Research Program (Washington, D.C., 2018).

<sup>8</sup>See White House, *Indo-Pacific Strategy of the United States* (Washington, D.C.: Feb. 2022).

<sup>9</sup>See White House, *President's Emergency Plan for Adaptation and Resilience (PREPARE)* (Washington, D.C.: Nov. 2021).

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part of its implementation approach, the plan called for U.S. federal agencies to respond to the adaptation priorities identified by countries in their National Adaptation Plans and nationally determined contributions, among others.

- In February 2022, the White House released the Indo-Pacific Strategy of the United States—a whole-of-government strategy to prioritize the region in American foreign policy.<sup>10</sup> The strategy detailed a commitment to working with Indo-Pacific countries as they build their capacity and climate resilience, establishing multilateral strategic groups, and improving security to safeguard fisheries, among other commitments.
- In June 2022, the United States established the Partners in the Blue Pacific, an informal mechanism to support Pacific priorities, including the climate crisis, in coordination with Australia, Japan, New Zealand, and the United Kingdom.<sup>11</sup>
- In September 2022, the U.S. government established the Pacific Partnership Strategy of the United States. This strategy followed the first-ever U.S.-Pacific Islands Summit held at the White House in which countries recommitted to strengthening their partnership and to develop sustainable, climate resilient ocean economies.<sup>12</sup>

In addition, since the release of the Indo-Pacific Strategy, the United States has made several commitments, such as announcing at the 8th Our Ocean Conference in March 2023 \$6 billion in commitments to address climate change, sustainable fisheries, and sustainable blue economies, among other issues. The United States has also expanded diplomatic representation in the Indo-Pacific, including opening embassies in the Solomon Islands, Tonga, and the Maldives in 2023 and Vanuatu in 2024; launching a USAID country representative office in

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<sup>10</sup>See White House, *Indo-Pacific Strategy of the United States* (Washington, D.C.: Feb. 2022).

<sup>11</sup>See White House, *Statement by Australia, Japan, New Zealand, the United Kingdom, and the United States on the Establishment of the Partners in the Blue Pacific (PBP)* (Washington, D.C.: Jun. 24, 2022). Since its establishment, Partners in the Blue Pacific has expanded to include Canada, Germany, and the Republic of Korea.

<sup>12</sup>Countries present in the summit included the Cook Islands, Micronesia, Fiji, French Polynesia, Nauru, New Caledonia, Palau, Papua New Guinea, the Marshall Islands, Samoa, Solomon Islands, Tonga, Tuvalu, Vanuatu, and the United States. See White House, *Pacific Partnership Strategy of the United States* (Washington, D.C.: Sep 2022); and White House, *Declaration on U.S.-Pacific Partnership* (Washington, D.C.: Sep. 29, 2022).

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Papua New Guinea that also covered the Solomon Islands and Vanuatu in 2023; and reestablishing a USAID regional mission for the Pacific Islands in Fiji in 2023.<sup>13</sup>

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## Types of U.S. Government Assistance to Address Climate Risks in the Indo-Pacific Region

U.S. assistance to address climate risks in the Indo-Pacific includes:

- **Foreign assistance** provided to foreign countries and international organizations in the form of, among other types of support, grants; activities implemented by U.S. agencies, international agencies, contractors, or nongovernmental organizations; technical assistance; training; equipment; and infrastructure.
- **Assistance to the Insular Areas** in the Indo-Pacific Region provided to the three U.S. territories of American Samoa, CNMI, and Guam, as well as the three Freely Associated States of Micronesia, the Marshall Islands, and Palau. Assistance to the U.S. territories is provided through domestic federal programs. The compacts with the three Freely Associated States include provisions on supporting, among others, defense, security, migration, disaster preparedness and response, and certain economic assistance. In addition, the compacts include provisions on support for environmental protection, climate change adaptation, health care, education, and infrastructure.<sup>14</sup>

In recent years, the U.S. government has provided additional climate funding, for example:

- The Inflation Reduction Act (IRA) of 2022 provides Interior with funding for technical assistance for climate change planning, mitigation, adaptation, and resilience to U.S. Insular Areas governments.<sup>15</sup>

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<sup>13</sup>See State, Fact Sheet: *The United States' Enduring Commitment to the Indo-Pacific: Marking Two Years Since the Release of the Administration's Indo-Pacific Strategy* (Washington, D.C.: Feb. 9, 2024); State, *Vanuatu Embassy Opening* (Washington, D.C.: July 18, 2024); USAID, *USAID Announces Expansion in the Pacific Region and Reaffirms Commitment to Bolster Resilience in the Pacific Islands at the 2022 U.S.-Pacific Island Country Summit* (Washington, D.C.: Sep. 29, 2022); USAID, *Administrator Samantha Power Launches Country Representative Office for Papua New Guinea, Solomon Islands, and Vanuatu* (Washington, D.C.: Aug. 14, 2023); and USAID, *Administrator Samantha Power Visits Suva, Fiji* (Washington, D.C.: Aug. 15, 2023).

<sup>14</sup>In 2023 the U.S. signed agreements with the Freely Associated States extending economic assistance for 20 years, through 2043.

<sup>15</sup>Pub. L. No. 117-169, § 50241, 136 Stat. at 2054.

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- The Infrastructure Investment and Jobs Act (IIJA) broadly supports programs, such as ecosystem restoration funding, that Interior says helps address the climate crises.<sup>16</sup>
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## Agencies Provided about \$1.9 Billion in Climate Assistance to Selected Countries and U.S. Territories, but Two Could Not Identify Country-Specific Funding Data

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### Agencies Provided about \$1.9 Billion for Climate-Related Activities to the Selected Countries and U.S. Territories in the Indo-Pacific Region from Fiscal Years 2017 through 2023

We identified 12 federal agencies that reported providing about \$1.9 billion for climate-related activities in the Indo-Pacific countries and U.S. territories within the scope of our review, as shown in table 1.<sup>17</sup> These agencies identified 477 climate-related activities that received this funding and were active in fiscal years 2017 through 2023. Because the activities that the agencies identified tracked award amounts differently, award amounts shown in table 1 do not use the same unit of analysis. For example, some agencies defined the award amount for their activities as obligations, while others defined the amount as allocations. For more information on agencies' prior, ongoing, and potential climate-related activities in each selected country and U.S. territory in the Indo-Pacific region from fiscal years 2017 through 2023, see our [interactive graphic](#).

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<sup>16</sup>Pub. L. No. 117-58, div. J, tit. II, § 40804, 135 Stat. 429, 1356 (2021).

<sup>17</sup>For this report, the total award value includes, in some cases, awards identified by agencies as climate-related activities in the Indo-Pacific region that may also include other countries in the same award which are outside of the region.

**Table 1: Federal Agencies that Provided Climate-Related Activities to the Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023**

Federal agencies	Components	Awards (dollars in million) <sup>a</sup>
U.S. Agency for International Development (USAID)	USAID	839.2 <sup>b</sup>
Department of Transportation (DOT)	Federal Highway Administration (FHWA) and Federal Transit Administration (FTA)	197
Department of Defense (DOD) <sup>c</sup>	U.S. Army, U.S. Navy, and U.S. Indo-Pacific Command (INDOPACOM)	196.4
Department of Energy (DOE)	Grid Deployment Office (GDO), National Renewable Energy Laboratory, and Office of State and Community Energy Programs (SCEP)	188.1
Department of State	Bureau of Energy Resources; Bureau of East Asian and Pacific Affairs/Office of Australia, New Zealand, and Pacific Island Affairs; Bureau of East Asian and Pacific Affairs/Office of Economic Policy; Bureau of Oceans and International Environmental and Scientific Affairs; and Bureau of South and Central Asian Affairs	139.5
United States Environmental Protection Agency (EPA)	EPA	117.14
Department of the Interior	Office of Insular Affairs and U.S. Fish and Wildlife Service	62.2
Department of Homeland Security (DHS)	Federal Emergency Management Agency	55.2
U.S. Department of Agriculture	U.S. Forest Service and Rural Utilities Service	48.3
Department of Commerce	National Oceanic and Atmospheric Administration	30
Millennium Challenge Corporation (MCC)	MCC	6.5
U.S. Trade and Development Agency (USTDA)	USTDA	5.7
<b>Total</b>		<b>1,885.1<sup>d</sup></b>

Source: GAO summary based on information provided by federal agencies. | GAO-25-106236

<sup>a</sup>Agencies tracked their activities and their award amounts differently. According to officials from these various agencies, the types of award amounts varied by agency. For example, for State, MCC, DOT/FTA, DOE/GDO, USTDA, and Interior, the award amounts for their activities are obligations; for DOD/Army and DHS, the award amounts for their activities are the actual amount of the activities; for DOE/SCEP and DOT/FHWA, the award amounts for their activities are allocations; and for DOD/INDOPACOM, the award amounts are disbursements. USAID officials said that the award amount for USAID activities reflects the maximum amount of the awards over their full period of performance with multiple-year awards subject to future appropriations. Because of these differences, we were not able to report awards using the same unit of analysis.

<sup>b</sup>According to USAID officials, they do not consider the entire value of an activity to be climate-related if some components of the activity were not climate-related.

<sup>c</sup>DOD activities include activities implemented on DOD installations in the U.S. territory or country as well as activities implemented in the broader community. Some activities implemented on installations also have benefits for the community.

<sup>d</sup>Figures might not add up to total due to rounding. For this report, the total award value includes, in some cases, awards identified by agencies as climate-related activities in the Indo-Pacific region that may also include other countries in the same award that are outside of the region.

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The climate-related activities that agencies identified included some they determined to be directly related to addressing climate risk (direct climate-related activities) and some they determined to be indirectly related (indirect climate-related activities). Agencies varied in how they defined direct and indirect climate-related activities. For example, USAID and State, which provide most of the U.S. government's foreign assistance, categorize climate-related activities using their Standardized Program Structure and Definitions (SPSD).<sup>18</sup> Using the SPSP program areas, USAID and State categorized funding for activities related to climate change in two ways:

- Funding for direct climate-related activities—or funding for activities that fall under one of three SPSP economic growth program areas—for Adaptation, Clean Energy, or Sustainable Landscapes.<sup>19</sup>
- Funding for indirect climate-related activities—or funding that is not allocated to a climate specific SPSP program area but has activity components which have climate related effects. For example, an activity in the program area, Environment, under the SPSP category for economic growth might also indirectly address climate risks because it helps improve the design of protected marine areas, including adaptation to the impacts of climate change.

Other agencies do not categorize direct and indirect climate-related activities in the same manner. For example, some agencies defined activities to be direct or indirect based on agency authority, consultation with internal subject-matter experts, whether the activity clearly indicated its principal purpose was climate-related, or other means.

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<sup>18</sup>State and USAID created the SPSP to provide the agencies with a common set of definitions and a consistent way to categorize and account for foreign assistance. The SPSP divides foreign assistance into seven categories: (1) democracy, human rights, and governance; (2) economic growth; (3) education and social services; (4) health; (5) humanitarian assistance; (6) peace and security; and (7) program development and oversight. These categories comprise multiple programs areas and program elements.

<sup>19</sup>According to State Bureau of Energy Resources officials, their activities under SPSP EG.7 (Modern Energy Services) that have climate benefits generally are also directly attributable to clean energy. Adaptation is SPSP program area EG.11; adaptation programs are defined as those that enhance resilience and reduce vulnerability to climate change of people, places, and livelihoods. Clean Energy is SPSP program area EG.12; clean energy programs are defined as those that reduce greenhouse gas and other climate-warming emissions while improving livelihoods. Sustainable Landscapes is SPSP program area EG.13; sustainable landscapes programs are defined as those that promote sustainable land use practices through the development of low emissions development plans, improved data and analytical tools, and enabling laws and policies, among other things.

Agencies indicated that 206 of 418 climate-related activities they identified were direct climate-related activities, and 212 were indirect climate-related activities, as shown in table 2. USAID reported an additional 59 activities that have both direct and indirect components based on their SPSD program areas. For instance, USAID identified 24 activities in which all the SPSD program areas were indirect climate-related activities, 10 in which all the SPSD program areas were direct climate-related activities, and 25 activities in which all the SPSD program areas were classified as both direct and indirect climate-related activities.

**Table 2: Direct and Indirect Climate-Related Activities Provided by Federal Agencies to Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023**

Federal agency	Number of direct climate-related activities	Number of indirect climate-related activities	Total number of direct and indirect climate-related activities <sup>a</sup>
<b>Agencies with climate-related activities to selected foreign countries<sup>b</sup> and U.S. territories</b>			
Department of Commerce	21	9	30
Department of Defense <sup>c</sup>	51	43	94
Department of Homeland Security	15	14	29
Department of the Interior	49	53	102
United States Environmental Protection Agency	13	3	16
U.S. Department of Agriculture	3	5	8
<b>Agencies with climate-related activities to only selected foreign countries</b>			
Millennium Challenge Corporation	1	0	1
Department of State	23	6	29
U.S. Agency for International Development	10	24	59 <sup>d</sup>
U.S. Trade and Development Agency	6	1	7
<b>Agencies with climate-related activities to only selected U.S. Territories</b>			
Department of Energy	12	43	55
Department of Transportation	12	35	47
<b>Total</b>	<b>216</b>	<b>236</b>	<b>452<sup>e</sup></b>

Source: GAO analysis of federal agencies data | GAO-25-106236



### Example of a U.S. Agency for International Development (USAID) Direct Climate-Related Activity

USAID's Papua New Guinea Electrification Partnership is an almost \$57 million activity to support green technology and renewable energy. The activity partners with government agencies, the private sector, and communities in Papua New Guinea, to facilitate electricity connections in both on-grid and off-grid areas. For example, the partnership worked with TotalEnergies to build a solar mini-grid to provide electricity to a school, staff houses, and a church and health center in Kuriva including supplying electricity to a refrigerator to store vaccines and anti-venom (see photo).



Source: GAO | GAO-25-106236

Note: There are activities provided by the agencies that do not have a country of implementation or award amount. Some of the reasons for the incomplete data include activities that have not yet been implemented; activities that include countries in our scope, but which are part of a larger regional or global activity; or activities in which the relevant agency could not identify an award amount. For our analysis, we include all activities identified by the relevant agencies according to their own definitions of climate-related activities.

<sup>a</sup>Agencies varied in how they defined direct and indirect climate-related activities. For example, the U.S. Agency for International Development (USAID) and State categorize climate-related activities using their Standardized Program Structure and Definitions (SPSD). Other agencies defined activities to be direct or indirect based on agency authority, consultation with internal subject-matter experts, whether the activity clearly indicated its principal purpose was climate-related, or other means.

<sup>b</sup>Selected foreign countries include Bangladesh, the Maldives, Fiji, the Cook Islands, Kiribati, Nauru, Niue, Papua New Guinea, Samoa, the Solomon Islands, Tonga, Tuvalu, Vanuatu, and the three Freely Associated States of Micronesia, the Marshall Islands, and Palau.

<sup>c</sup>Department of Defense (DOD) activities include activities implemented on the DOD installation in the U.S. territory or country as well as activities implemented in the broader community. Some activities implemented on the installation also have benefits for the community.

<sup>d</sup>The 59 USAID activities include activities with SPSP program areas that are both direct and indirect climate-related activities. Specifically, for 24 of the activities, all the SPSP program areas were indirect climate-related activities; for 10 of the activities, all the SPSP program areas were direct climate-related activities; and for 25 of the activities, all the SPSP program areas were classified as both direct and indirect climate-related activities.

<sup>e</sup>The total number of 452 direct and indirect climate-related activities does not include the 25 USAID activities that the agency classified as having both direct and indirect climate-related SPSP program areas. Overall, agencies identified 477 climate-related activities that were active in fiscal years 2017 through 2023.

Direct climate-related activities that agencies provided to the selected countries and U.S. territories in the Indo-Pacific region from fiscal years 2017 through 2023 included electrification, assistance in reforestation, and efforts to address coral reef and mangrove health. For example:

- USAID identified its Papua New Guinea Electrification Partnership as a direct climate-related activity. According to USAID documents, this activity promotes climate security by supporting green technology and renewable energy. USAID provides technical assistance focused on four objectives including strengthening the financial viability and operational efficiency of Papua New Guinea Power Limited and developing viable off-grid renewable energy models (see sidebar).
- The U.S. Department of Agriculture's (USDA) U.S. Forest Service identified its Bipartisan Infrastructure Law Reforestation and Nurseries Grants as a direct climate-related activity. According to USDA, this activity provides assistance for locations, including U.S. territories and the Freely Associated States, to invest in nurseries that support reforestation in their jurisdictions.
- Interior's Office of Insular Affairs identified an activity in Palau and Micronesia to improve the health of nearshore reefs and mangroves as a direct climate-related activity. This activity empowers and

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enables women’s groups to actively participate in a series of outreach sessions on climate change with a focus on marine protected area management, fisheries management, and mangrove ecosystems.

Indirect climate-related activities included those for hazard mitigation and natural resources management that can help recipients to mitigate or respond to climate-related risks. For example:

- DHS’s Federal Emergency Management Agency identified a study regarding appropriate building safety codes for disaster impacts in American Samoa as an indirect climate-related activity. This activity will also support the adoption and enforcement of these new codes to prevent damages from natural hazards.
- In DOD, the U.S. Navy identified an activity implementing the goals in the 2015 Naval Base Guam Wildland Fire Management Plan as an indirect climate-related activity. This activity includes establishing and maintaining wildland fuel breaks and establishing native savanna species in the fuel breaks.

Eleven of the 12 agencies reported providing approximately \$595 million for direct climate-related activities and \$451 million for indirect climate-related activities. USAID has awarded \$839 million for 59 climate activities that it considers having both direct and indirect components. According to USAID officials, for this report, the agency categorized any activity funded in whole or in part by one of the SPSD climate change program areas as a direct climate-related activity. However, officials said that this categorization does not mean that the entire value of the activity with both direct and indirect components can be attributed to addressing climate risks.

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### Agencies Implemented Single and Multi-Country Activities but Two Could Not Identify Country Specific Funding for Multi-Country Activities

Agencies implemented some of the climate-related activities in a single country or U.S. territory and others in multiple countries or U.S. territories. For multi-country and territory activities, agencies identified both the potential countries and U.S. territories where the activity could be or was planned to be implemented, as well as the locations where the activity has been implemented. For example, State’s Climate Fellows activity, which embeds experts in countries to provide technical assistance on forest and climate efforts such as monitoring forest and greenhouse gas inventories, could be implemented in 14 countries in the Indo-Pacific region. At the time of our review, the activity has been active in six countries in the region: Fiji, Palau, Solomon Islands, Micronesia, Vanuatu, and Samoa (see sidebar). The U.S. Trade and Development Agency (USTDA) funded an activity to bring a delegation of port sector officials from Papua New Guinea, Fiji, Samoa, and Tonga to the United States to

**Example of a Department of State Multi-Country Activity**

State’s U.S. Forest Service Climate Fellows is an approximately \$4.4 million activity active in six countries including Fiji and Palau. For example, the Climate Fellow in Fiji has helped the Fiji Ministry of Forestry develop a national land use monitoring system that will provide data for greenhouse gas reporting. The Climate Fellow in Palau has worked with the Bureau of Environment and others to select and measure mangrove monitoring plots, data which will contribute to Palau’s greenhouse gas reporting, as well as on community outreach about the benefits of conserving mangroves. The photo below shows mangroves in Palau.



Source: GAO | GAO-25-106236

familiarize them with U.S. technologies, services, and best practices to improve ports, including sustainability.

Agencies awarded over \$1 billion for climate-related activities implemented in a single country or U.S. territory in the Indo-Pacific region, as shown in table 3.

**Table 3: Award Value for Single-Country and U.S. Territory Climate-Related Activities of Selected Countries and U.S. Territories in the Indo-Pacific Region, Fiscal Years 2017 through 2023**

Country	Award (in dollars)
Bangladesh	381,740,925
Guam	175,874,556
Commonwealth of the Northern Mariana Islands	150,253,523
Papua New Guinea	95,731,165
American Samoa	84,827,292
Micronesia	41,381,527
Maldives	38,600,842
Solomon Islands	29,454,448
Fiji	1,500,000
Tonga	1,494,976
Palau	299,994
<b>Total</b>	<b>1,001,159,250</b>

Source: GAO analysis of federal agencies data. | GAO-25-106236

Notes: Analysis based on actual list of countries or U.S. territories of implementation identified by the relevant agency for single-country activities. The following countries are not included in this table as they did not receive any single country activities: Cook Islands, Kiribati, Marshall Islands, Nauru, Niue, Samoa, Tuvalu, and Vanuatu.

While agencies can identify which countries received funding for activities implemented in a single country or U.S. territory in the Indo-Pacific region, State and USTDA could not identify how much funding they provided to the different countries associated with multi-country activities.<sup>20</sup> According to these agencies, they are unable to track data on award amount by country because they are generally not required to do so, or activities are budgeted for the entire activity rather than a specific country. From fiscal years 2017 through 2023, State provided \$104,262,342 in multi-country

<sup>20</sup>The count of single and multi-country activities is based on the actual list of countries and U.S. territories where the activity had been implemented at the time of our review.

activities and USTDA provided \$1,914,853. State officials said they do not track the obligated or disbursement amounts by country because it is not required by State's general term and condition requirements for awards. USTDA officials stated that it would be challenging to track the obligated or disbursement amounts by country as the activities are budgeted for the entire activity rather than country-specific activity.<sup>21</sup> State officials also said that for some of their multi-country activities, such as support for individuals from a country to attend a conference, the cost of determining the award amount by country may be too high. However, officials said that for multi-country activities directly implemented in countries, there may be more value in determining the award amount by country.

As shown in table 4, approximately half of the climate-related activities identified by State and USTDA are multi-country activities.

**Table 4: Number of Single and Multi-Country Climate-Related Activities by Selected Country and U.S. Territory in the Indo-Pacific Region, Fiscal Years 2017 through 2023**

Federal agency	Number of single country or U.S. territories climate-related activity	Number of multi-country or U.S. territories climate-related activity
Department of Commerce	14	16
Department of Defense	77	17
Department of Energy	55	0
United States Environmental Protection Agency	13	3
Department of Homeland Security	29	0
Department of the Interior	101	1
Millennium Challenge Corporation	1	0
Department of State	14	15
Department of Transportation	42	5
U.S. Agency for International Development	49	10
U.S. Department of Agriculture	1	7
U.S. Trade and Development Agency	4	3

Source: GAO analysis of federal agencies information. | GAO-25-106236

<sup>21</sup>According to USTDA, it would be complicated to isolate awards by country for some activities that provide technical assistance delivered as a conference or presentation with attendees from different countries.

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Note: Analysis based on actual list of countries or U.S. territories of implementation identified by the relevant agency. Agencies with a zero for multi-country activities means that the agency did not have activities involving more than one country.

U.S. assistance to these countries also supports the strategic diplomatic goals of the U.S. in the Indo-Pacific region. However, without more detailed and clearer information about the assistance that the U.S. has provided to the countries, it can be unclear even to those countries how the U.S. is supporting these diplomatic goals. For example, according to government officials in Palau and Papua New Guinea, if an activity is for the region and the individual country only receives a portion of the activity, it can be difficult for them to know the value or see the impact of the activity on the country. This contrasts with other activities where funding information is more readily available. For instance, when the Asian Development Bank builds a road in Papua New Guinea, the official said that everyone knows who funded that activity and can report how much was invested.

Standards for Internal Control in the Federal Government states that management should use quality information based on relevant data from reliable sources for achieving intended objectives and effectively monitoring activities.<sup>22</sup> By tracking data on funding provided to specific countries that is both more precise and readily available, agency officials and policy makers would be better positioned to ensure accountability of these U.S. funds and to make informed decisions about whether future distributions of funds in specific countries are warranted.

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## Agencies Followed Most Performance Monitoring Key Practices but Gaps Existed in Activity Planning and Assessing Progress

Interior's Office of Insular Affairs (Interior/OIA), Commerce's NOAA Coral Reef Conservation Program's (NOAA/CRCP), State's Bureau of Oceans and International Environmental and Scientific Affairs (State/OES), and USAID provided documentation that showed they generally followed most of the six selected key practices for evidence-based policymaking and performance management to monitor the performance of the 17 activities from selected locations we reviewed. However, these four agencies did not consistently follow two key practices. For example, all four agencies did not provide documentation demonstrating they had consistently followed the key practice of assessing the environment for all activities to identify internal and external factors that could affect achieving goals. In addition, Interior/OIA did not provide documentation demonstrating it

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<sup>22</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

consistently followed the key practice of using evidence to learn from its activities.

We previously identified a set of 13 key practices for evidence-based policymaking and performance management.<sup>23</sup> For this review, we focused on six of these key practices that can help agencies monitor implementation and performance of their efforts, including at the activity level (see table 5).<sup>24</sup> These six key practices can, among other things, help agencies define what the agency is trying to achieve, identify potential risks to success, obtain the evidence they need to understand and assess results, and determine how well the agency is performing.

**Table 5: Select Key Practices from GAO’s Evidence-Based Policymaking to Help Manage and Assess the Results of Federal Efforts**

Key practice	Description
Topic area: Planning for results	
Define goals	Goals communicate the results that an organization seeks to achieve. Goals include strategic objectives, the outcomes the organization is intending to achieve through its activities; and performance goals, the target levels of performance to be accomplished within a timeframe. Key actions organizations can take to implement this practice include defining goals for all activities and identifying long-term outcomes and near-term measurable results.
Assess the environment	Factors within and outside an organization can affect its ability to achieve its goals, such as risks or challenges. Planning for these factors provides organizations the ability to anticipate both future opportunities and challenges, including how to address or mitigate these factors. Key actions organizations can take to implement this practice include identifying internal and external factors that could affect goal achievement and defining strategies to address or mitigate the factors.

<sup>23</sup>See [GAO-23-105460](#). We identified these key practices by reviewing our past reports on evidence-building and performance-management activities since 1996. We refined the practices, as appropriate, based on input from (1) officials at 24 major federal agencies involved in implementing evidence-building and performance-management activities, and (2) Office of Management and Budget staff responsible for providing government-wide direction and guidance.

<sup>24</sup>We previously identified and reported on USAID and State compliance with eight key practices for monitoring foreign assistance. See GAO, *U.S. Assistance to Mexico: State Department Could Improve Its Monitoring of Mérida Initiative Projects*, [GAO-20-388](#) (Washington, D.C.: May 12, 2020).and GAO, *Rule of Law Assistance: State and USAID Could Improve Monitoring Efforts*, [GAO-21-14](#) (Washington, D.C.: November 9, 2020). In focusing on the six key practices discussed in this report, we accounted for these prior reports as well as interviews with, and documentation provided by, Interior/OIA and NOAA/CRCP to understand their processes for monitoring such assistance.

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**Topic area: Assessing and building evidence**

Generate new evidence

The organization, based on its priorities, determines how it will build new evidence. Key actions organizations can take to implement this practice include developing an evidence-building implementation plan and ensuring that new evidence will meet quality standards.

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**Topic area: Using evidence**

Use evidence to learn

Evidence helps an organization assess progress towards goals and understand its results. Key actions organizations can take to implement this practice include assessing progress towards goals and developing an understanding of why results were or were not achieved.

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**Topic area: Fostering a culture of learning and continuous improvement**

Build and maintain capacity

One key aspect of capacity is ensuring staff have relevant knowledge, skills, and abilities to undertake various performance-management and evidence building activities. Key actions organizations can take to implement this practice include identifying actions to maintain or enhance capacity.

Promote accountability

Organizations assign responsibility for performance management and evidence-building activities to help create a successful organization culture. Key actions organizations can take to implement this practice include assigning responsibility.

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Source: GAO, Evidence-based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023). | GAO-25-106236

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## Agencies Generally Followed the Key Practice of Defining Goals but Did Not Consistently Assess Factors Affecting Achievability

### Define Goals

All four of the agencies in our review generally followed the key practice of defining goals at the activity planning stage.<sup>25</sup> The agencies provided activity planning documentation that showed they had defined goals for all of the activities in our sample. In addition, the documentation we reviewed indicated that agencies aligned expected performance results for their activities with these goals. This alignment helps ensure that the goals are met by creating a means to measure the contribution of near-term efforts to the broader goals. These performance results could include outcome or output goals. Agency documentation for their goals varied based on

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<sup>25</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they had defined goals, we reviewed activity documentation for goals, objectives, timetables, and requirements for tracking expected performance results. We also looked at whether activity goals aligned with broader goals such as agency, program, or country strategy goals. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when the agency had documented most of or all these elements for the activity; partially followed when the agency had documented some, but not all these elements for the activity; and not followed when the agency had not documented any of these elements for the activity.

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the type of activity and processes for documenting the information. For example:

- The USAID activities we reviewed included a cooperative agreement with an implementing partner to provide technical assistance to Bangladesh to address ecosystem conservation. The overall goal of the activity is to improve ecosystem conservation in and around targeted key biodiversity areas in the country. This activity also included intermediate goals such as strengthening environmental governance and management. Performance measures aligned with the goals included outcome indicators, such as greenhouse gas emissions reduced, sequestered, or avoided through sustainable landscapes activities supported by U.S. government assistance. They also included output indicators, such as the number of people supported by the U.S. government to adapt to the effects of climate change. The implementing partner documented these goals and performance measures in its monitoring, evaluation, and learning plan, among other documents.
- The State/OES activities we reviewed included an interagency agreement with the U.S. Forest Service to embed experts in government ministries to provide technical assistance on issues such as monitoring forests and meeting United Nations climate change reporting requirements. Goals for this activity included enhancing climate change adaptation and mitigation actions in partner nations. Performance measures aligned with the goals included outcome indicators, such as the amount of investment mobilized for sustainable landscapes as supported by U.S. government assistance, which had an initial target of \$85,000 for the 4 years of the activity. They also included output indicators, such as the number of people trained in sustainable landscapes supported by U.S. government assistance, which had an initial target of 75 for the 4 years of the activity. The implementing partner documented these goals and performance measures in its monitoring and evaluation plan and framework, among other documents.
- The two Interior/OIA activities we reviewed provided grants to entities in American Samoa to install solar power systems with goals that included increasing the use of renewable energy. The activities also had milestones and outcomes that included installing the relevant equipment to produce renewable energy. The grantees documented these goals and milestones in their activity proposals.
- The two NOAA/CRCP activities we reviewed were NOAA-funded and NOAA-led activities with goals to produce data and model coral reef



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health and related activity milestones to deliver reports and scientific publications. The activity managers documented these goals and planned milestones by completing a letter of intent in CRCP's activity database.

See appendix II for examples of goals and objectives for all 17 activities we reviewed.

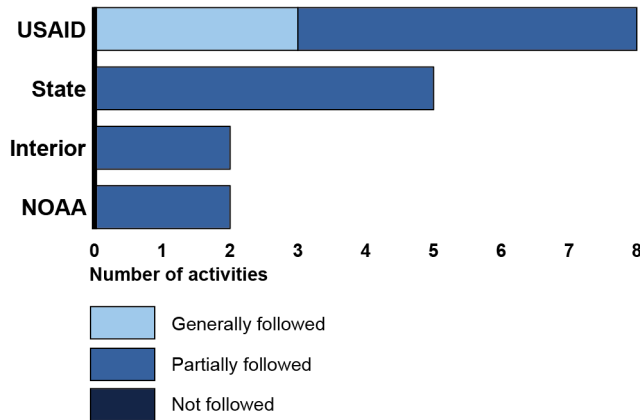
### **Assess the Environment**

All four of the agencies in our sample lacked documentation showing that they had consistently followed the key practice of assessing the environment at the activity planning stage (see fig. 2).<sup>26</sup> Specifically, State/OES, Interior/OIA, and NOAA/CRCP did not consistently identify external or internal factors that could affect their ability to achieve their activities' results. Nor did they describe how they planned to address the factors they did identify in the planning documentation for all their activities. Although USAID's planning documentation included factors that could affect the ability of the activities to achieve results, it did not consistently identify strategies to address those factors for all activities.

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<sup>26</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they had assessed the environment, we reviewed whether agency documentation identified risks to achieving activity objectives and potential actions to mitigate those risks. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when activity documentation both identified risks and potential ways to mitigate these risks; partially followed when activity documentation identified only risks or potential mitigation strategies or had other types of risk assessments; and not followed when activity documentation did not identify either risks or potential mitigation strategies.

**Figure 2: Extent to Which Agencies Followed the Key Practice to Assess the Environment for Selected Climate Activities, Fiscal Years 2017 through 2023**



Legend: Interior = Department of the Interior, NOAA = National Oceanic and Atmospheric Administration, State = Department of State, USAID = U.S. Agency for International Development.

Source: GAO analysis of agencies documentation. | GAO-25-106236

Note: For each activity, we rated the extent to which the agency had followed this key practice as generally followed when activity documentation both identified risks and potential ways to mitigate these risks; partially followed when activity documentation identified only risks or potential mitigation strategies or had other types of risk assessments; and not followed when activity documentation did not identify either risks or potential mitigation strategies.

- USAID:** Three of the eight USAID activities had planning documents that identified external or internal factors which could affect achieving activity results and described strategies to address those factors. For example, a clean energy activity in Bangladesh identified that COVID-19 restrictions could present challenges to timely implementation of intended activities and suggested mitigation actions, including the use of videoconferencing to conduct meetings and events. The other five activities identified external or internal factors that could affect achieving results in their planning documents but did not have strategies to address those factors. For example, a clean energy related activity in Papua New Guinea identified a set of assumptions, risks, and conditions, such as the need to ensure that government entities uphold their commitments to work with the activity. However, the planning document for the activity did not identify any strategies to address these conditions. According to officials, mitigation actions are described in the activity’s implementation documents. USAID guidance recommends monitoring plans address plans for monitoring context and emerging risks that could affect the achievement of the

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activity's results but does not indicate they should identify mitigation actions for these risks.<sup>27</sup>

- **State:** None of the five State/OES activities had planning documents that identified external or internal factors which could affect achieving results or strategies to address those factors.<sup>28</sup> State/OES provided documentation showing it had assessed factors, such as prior satisfactory use of State indicators to measure performance, which could inform the appropriate number of site visits to conduct as part of the oversight of each activity. However, this assessment did not include a discussion of how these factors could affect achieving the activities' results. According to State/OES officials, they do not require additional risk assessments beyond the document used to inform the appropriate number of site visits and an Office of Acquisition Management Risk Assessment and Monitoring Form. Officials said that they also identify and mitigate the risk to activities through ongoing monitoring and oversight of activity implementation.
- **Interior:** Neither of the two Interior/OIA activities had planning documents that identified external or internal factors which could affect achieving results or strategies to address those factors. Interior/OIA provided evidence of conducting other types of risk assessments. For example, Interior/OIA provided a financial risk assessment for one of the activities we reviewed. It explained the second activity pre-dated the requirement for a financial risk assessment and the activity had plans to complete a National Environmental Policy Act assessment, but that assessment had been delayed.<sup>29</sup> According to Interior/OIA officials, they document risks to activities through their financial risk assessment as well as engineering or National Environmental Policy Act assessments depending on the type of grant. However, these assessments identify only financial risks or risks the activity poses to the environment and do not identify external or internal factors that could affect achieving

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<sup>27</sup>USAID Automated Directive System Chapter 201 Program Cycle Operational Policy; USAID How-To Note: Activity Monitoring, Evaluation, & Learning (MEL) Plan, Version 2, May 2021.

<sup>28</sup>The five State activities we reviewed were all interagency agreements in which one agency performs services or provides items to another agency. According to State officials, the requirement for conducting a risk assessment for these types of awards is the document we reviewed, which scores factors to determine the level of oversight State needs to provide for the activity. Officials noted that State requires a different type of risk assessment for grant agreements.

<sup>29</sup>The National Environmental Policy Act requires federal agencies to prepare an environmental assessment for certain proposed actions. 42 U.S.C. § 4336.

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results or strategies to address those factors. Officials also said that assessing the environment, as defined by our key practice, is incumbent upon the grantee to consider when it develops its proposal for grant funding. However, we did not find that grantees had documented such assessments in their proposals. In addition, our review of Interior's financial assistance manual did not indicate that the agency's review of funding proposals includes an assessment of external or internal factors which could affect achieving results or strategies to address those factors.

- **NOAA:** Neither of the two NOAA/CRCP activities had planning documents that identified external or internal factors which could affect achieving results or strategies to address those factors. One of the two activities documented some discussion of challenges to the activity in its annual reporting, but not how they could be mitigated. The annual reports for the second activity did not include any references to discussions of risks or challenges and associated mitigation efforts. According to NOAA/CRCP officials, they do not have a specific document to assess risk to their activities. Instead, they are supposed to conduct risk assessment through conversations between activity management officials and to capture the outcome in the CRCP's database. However, our review of activity documentation in this database did not demonstrate such an assessment had occurred.

The activities agencies are implementing in the Indo-Pacific can face a variety of challenges, such as limited workforce capacity because of their small population sizes and the logistical hurdles of working in remote locations, which can potentially affect the ability of activities to achieve their results if they are not planned for before implementation. For example, one of the activities we visited in Palau aims to address the effects of coastal erosion and higher temperatures by moving farming to higher ground, using drought resilient crops, and raising chickens as alternatives to traditional farming methods, according to officials. The activity was expected to be completed in March 2023. According to activity officials they requested and received approval for no cost extensions from USAID until March 2024 after reporting delays from challenges in coordinating with local government officials who were unable to dedicate sufficient time to the activity due to their other commitments.

Officials also said this activity encountered challenges with the availability of necessary farm materials because of supply chain issues. As a result, when we visited the site in November 2023 to see the activity, the

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community-based organization responsible for its implementation had not yet planted crops and was in the process of constructing the chicken coops (see fig. 3). Identifying challenges such as these, and potential strategies to address them during activity planning, can help agencies focus their efforts on the aspects of monitoring and activity implementation that are most likely to threaten the success of the activity in meeting its goals.

**Figure 3: U.S. Agency for International Development Activity in Palau to Construct Chicken Coops and Plant Crops, November 2023**



Source: GAO. | GAO-25-106236

Key practices state that agencies should identify external and internal factors, such as risks and challenges, that can affect their ability to achieve goals and develop mitigation strategies. Planning for these factors provides agencies the ability to anticipate both future opportunities and challenges, including how to address these factors. By identifying external or internal factors that could affect achieving results and mitigation actions to address them during activity planning, officials would be better positioned to plan for and address obstacles to activity success and related goals.

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Agencies Generally Followed Key Practices for Generating and Using Evidence, but Interior Did Not Demonstrate It Reviewed Relevant Evidence to Assess Progress

**Generate New Evidence**

All four agencies in our review generally followed the key practice of generating new evidence.<sup>30</sup> The agencies provided documentation that showed they collected performance information through periodic performance reports—which ranged in frequency from quarterly to annual—for almost all the activities in our sample.<sup>31</sup> The information collected in an agencies’ periodic performance reporting can provide evidence of what a specific activity has accomplished based on activity-level performance measures. For example, one of the goals of USAID’s Climate Ready activity, which ended in September 2023, was to have climate change policies and laws in place and in practice in the Pacific Island countries where the activity was implemented. In its final report, USAID collected information on the performance indicator “number of institutions with improved capacity to address climate change risks as a result of U.S. government assistance,” indicating that the activity had improved the capacity of 42 institutions. One of the goals of a NOAA/CRCP coral reef activity we reviewed is understanding the processes that support reef resilience. In the annual report for this activity, NOAA collected information on the performance of this activity, for example reporting the publication of a paper on drivers of juvenile coral density in *Frontiers of Marine Sciences*.

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<sup>30</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they had generated new evidence, we reviewed activity periodic performance reporting for the most recent year including that these reports included activity-level performance measures. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when, for all activities, the agency had all required performance reports and these contained performance measures; partially followed when the agency provided some but not all required performance reports or if they agency had all required reports but they did not contain performance measures for all activities; and not followed when the agency did not provide any of the required performance reports for all activities.

<sup>31</sup>According to NOAA/CRCP officials, the two activities in our sample are internal NOAA principal investigator-led activities and are not required to provide quarterly monitoring or progress reports. However, officials noted that they are required to provide final reports or results of an activity upon its completion as well as annual activity updates in the Coral Project Database. Interior/OIA was missing one performance report for one activity and explained the grantee missed that report because of the death of the activity’s principal investigator.

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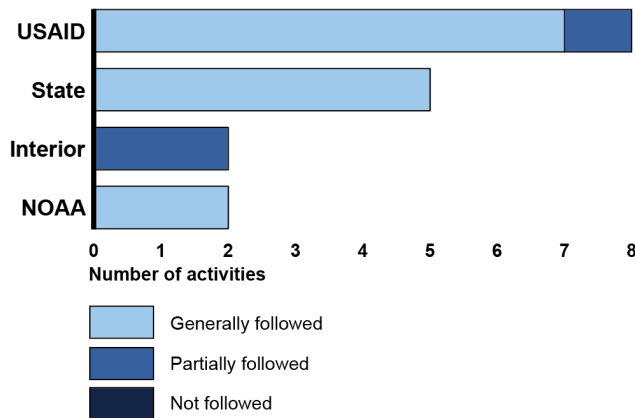
## Use Evidence to Learn

Three of the four agencies in our review showed they had generally followed the key practice of using evidence to learn.<sup>32</sup> They did so by providing documentation, such as written reviews or email correspondence, that showed that activity management staff used evidence by assessing or approving periodic performance reports and, as appropriate, conducting site visits to assess activity performance. The process of reviewing performance reports and conducting site visits provides agencies with evidence to help them understand whether their activities are making progress to achieve their goals. The fourth agency, Interior, provided documentation for conducting site visits, but did not provide documentation indicating review of its activities' reports (see fig. 4). Interior/OIA officials explained that they met with or had phone calls with grantees to discuss information in the grantees' performance reports but did not have any documentation related to these discussions.

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<sup>32</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they had used evidence to learn, we (1) examined whether agencies had documentation that showed that activity management staff assessed or approved periodic performance reports and data and (2) whether officials validated activity performance, such as by site visits. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when the agency had documentation that most periodic performance reports had been reviewed or approved and that the activity had received some form of validation by agency officials; partially followed when the agency had documentation that some periodic performance reports had been reviewed and approved and there were some instance of activity validation; and not followed when there was no documentation of review of periodic performance reports or validation of activity performance.

**Figure 4: Extent to Which Agencies Followed the Key Practice to Use Evidence to Learn for Selected Climate Activities, Fiscal Years 2017 through 2023**



Legend: Interior = Department of the Interior, NOAA = National Oceanic and Atmospheric Administration, State = Department of State, USAID = U.S. Agency for International Development.

Source: GAO analysis of agencies documentation. | GAO-25-106236

Note: For each activity, we rated the extent to which the agency had followed this key practice as generally followed when the agency had documentation that most periodic performance reports had been reviewed and that the activity had received some form of validation by agency officials; partially followed when the agency had documentation that some periodic performance reports had been reviewed and approved and there were some instance of activity validation; and not followed when there was no documentation of review of periodic performance reports or validation of activity performance.

- USAID:** Documentation for the eight activities we reviewed showed that USAID had reviewed performance reports for all but one of the activities. For example, in its review of the annual report for the Pacific American Fund activity, USAID provided feedback to the implementing partner that it should use quantitative information to better support the discussion of achievements of the activity. These comments resulted in the implementing partner providing USAID with the requested quantitative data that could help provide USAID with new evidence to better assess the progress of the activity. For the one activity where USAID did not have complete documentation of report review, USAID provided emails showing that it reviewed and approved two of the three reports. In addition, USAID provided documentation of conducting site visits for six of the eight activities. In the case of one of these activities, officials explained that USAID had conducted no site visits due to the cost of travel and because the activity involved only technical assistance. For the other activity, officials explained that it was only in the first year of implementation, and they had used other methods to review performance during this period, such as holding biweekly meetings to discuss the progress of the activity.



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- **State:** Documentation for all five State/OES activities we reviewed showed that State had reviewed periodic performance reports, including tracking progress toward achieving the activities' indicator targets, and conducted site visits to review implementers' performance. For example, in State's review of a semiannual report for its interagency agreement with EPA on assisting countries with their international reporting of greenhouse gas emissions, State noted that some of that activity's performance measures had not achieved their targets and that EPA had reported multiple impediments to implementing the activity due to COVID-19. State activity managers therefore planned to discuss indicator targets and results with EPA.
  - **Interior:** Documentation for the two Interior/OIA activities we reviewed showed that Interior had conducted site visits for both activities to review implementers' performance. Interior/OIA did not provide evidence that it had documented the review of implementers' performance reports to assess the level of progress and to provide oversight. According to an Interior/OIA official, the agency has no requirement to accept or approve these reports and it would conduct follow-up on the reports with questions by email. For the reports that we reviewed, an Interior/OIA official said that the agency did not follow-up by email either because it met with the grantee in-person or had phone calls to discuss issues related to grantee performance. The official said that email exchanges, when they occur, are saved in email in-box files and then eventually transferred into project files. Performance information from emails or phone calls that might recommend corrective action would be discussed with the budget director. Key practices state that agencies should use evidence to learn, including such actions as assessing progress towards activities' goals and developing an understanding of why results were achieved. Although Interior/OIA indicated it had reviewed its grantee reports and communicated with its grantees about their performance, by establishing procedures to document that the review of implementer reports occurs, the agency would be better able to demonstrate it is using these reports to monitor whether activities are achieving their objectives. Through such documentation, Interior/OIA would also be better able to ensure its continuity of operations and to transfer knowledge in the event of staff turnover.
  - **NOAA:** Annual reports for the two NOAA/CRCP activities we reviewed showed that NOAA had recorded activity data in the program's management database, including deliverable information and activity status. NOAA used data from the activities, for example, to generate the publication of peer reviewed articles and to communicate to external stakeholders.

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Officials from the four agencies also described other practices they use to assess the progress of activities, such as monitoring media reports and regular meetings. For example, State and USAID officials in select countries said they use informal practices such as regular meetings to discuss progress and identify any challenges. USAID officials in Papua New Guinea and Bangladesh said that security concerns can limit site visits, so they use meetings and feedback from government partners and beneficiaries to help obtain information on activity progress. Interior/OIA officials said they have frequent meetings with grantees and will monitor media reports to determine if they need to address any issues. NOAA/CRCP officials said they use regular communications between activity leads and Coral Reef Conservation Program staff and monthly staff meetings to verify progress.

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**Agencies Generally Followed Two Key Practices for Fostering a Culture of Learning and Continuous Improvement**

**Build and Maintain Capacity**

All four agencies provided documentation that showed they had generally followed the key practice of building and maintaining capacity by assigning staff with appropriate qualifications to manage activity performance for all the activities.<sup>33</sup> For instance, State/OES, USAID, and Interior/OIA provided documentation of training certifications, such as required training for contracting officer's representative, which allows them to assist with the technical monitoring and administration of a contract. NOAA/CRCP provided documentation that its activity managers had doctoral degrees in the relevant fields of study.

**Promote Accountability**

All four agencies provided documentation that showed they had generally followed the key practice of promoting accountability by establishing roles

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<sup>33</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they built and maintained capacity, we reviewed documentation that relevant staff had the relevant knowledge, skills, and training as established by agency requirements. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when the agency provided documentation that relevant staff were certified or had relevant experience and for those staff requiring certifications that the training occurred before, not after, being assigned to manage the activity; partially followed when the agency provided some, but not complete, documentation showing that the relevant staff had been trained or had relevant experience; and not followed if the agency did not provide documentation showing that relevant staff had appropriate certifications of experience and training.

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and responsibilities for staff to monitor all the activities.<sup>34</sup> For instance, State/OES and USAID provided documentation of designation letters that established roles and responsibilities for personnel responsible for monitoring activities.

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## Agencies Have Identified and Taken Steps to Address Some Challenges Affecting Climate-Related Assistance

### Challenges Identified by Federal Agencies

**Logistical Challenges:** Federal agencies identified the following challenges in addressing climate risk: distance between funding agency and implementing country, time difference, remote locations, limited facilities, or not having adequate road systems at the assistance site. U.S. Agency for International Development officials, for instance, said that the availability, reliability, frequency, and cost of travel to and within the countries in the Pacific presents an ongoing challenge to its activities, leading to higher portions of activity budgets being used for administration and oversight of the activities.

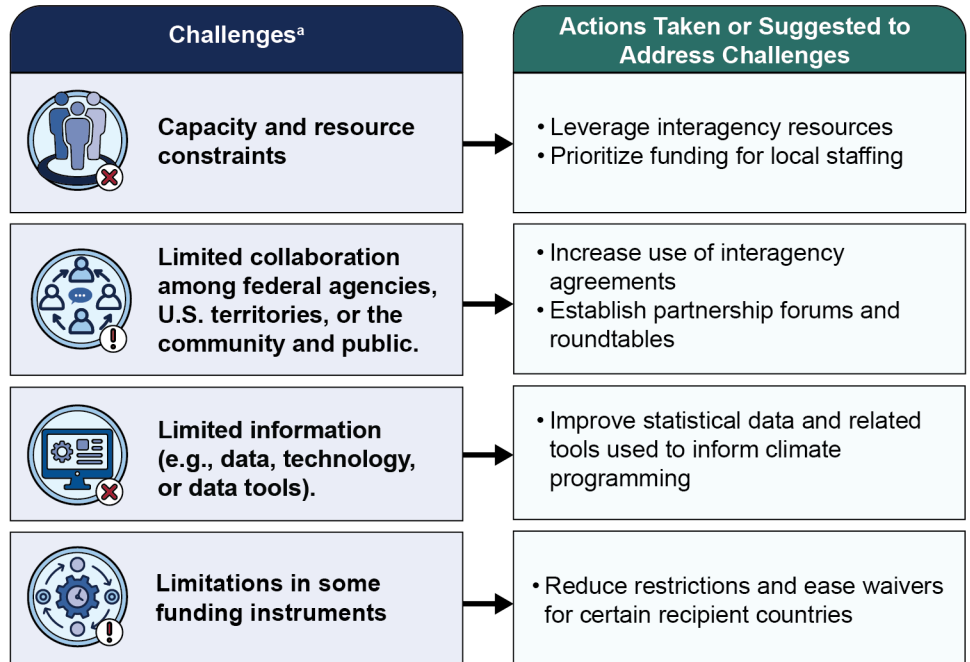
Source: GAO analysis based on information from the federal agencies. | GAO-25-106236

Officials from federal, territorial, and host governments, and other entities (such as implementing partners and local beneficiaries in selected locations) identified various challenges affecting the provision and use of climate-related assistance that we have divided into four categories: (1) capacity and resource constraints; (2) limited collaboration; (3) limited information; and (4) limitations in some funding instruments. Some agencies reported having taken steps to address some of these challenges, while others described additional actions that could be taken to address them (see fig. 5). The identified challenges, along with the steps taken or suggested to address them are described below. Federal, territorial, and host government entities also identified challenges specific to them (see sidebars for additional information).

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<sup>34</sup>To assess the extent to which USAID, State/OES, Interior/OIA, and NOAA/CRCP demonstrated that they had promoted accountability, we reviewed documentation that establishes the roles and responsibilities of personnel responsible for monitoring activities. For each activity, we rated the extent to which the agency had followed this key practice as generally followed when the agency provided documentation that staff had been assigned to manage the activity's performance and the documentation outlines the agency staff's responsibilities for performance management; partially followed when the agency had some but not all activity documentation; and not followed when the agency provided little to no documentation showing the assignment of staff to oversee performance management and their related responsibilities.

**Figure 5: Categories of Challenges and Actions Taken or Suggested to Address Them Reported by Federal Agencies, U.S. Territories, or Foreign Countries in the Indo-Pacific Region**



Sources: GAO analysis based on information provided by agencies, territories, and foreign countries (data); GAO (icons). | GAO-25-106236

<sup>a</sup>Most agencies reported these challenges: capacity and resource constraints; limited collaboration; limited information; and limitations in some funding instruments. Some of the U.S. territories and foreign countries also reported that they experienced the same challenges.

**Capacity and resource constraints** stemming from not having needed technical expertise or skills, limited workforce capacity, physical resource constraints, or financial constraints. For example, State officials said that not having needed expertise within the countries or territories is a challenge, especially due to migration. When staff become well trained and build experience they often move to other places, resulting in the programs losing expertise and skills. Officials from American Samoa stated that capacity building is a challenge, especially as they do not have personnel with specialized skills—such as engineers, laborers, project managers—to ensure projects are completed timely and properly.

Officials from the government of Bangladesh stated there is a need for investments in physical resources, such as fishing landing centers and storage facilities. An implementing partner in Bangladesh made a similar

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## Challenges Identified by Host Governments

**Country-specific factors:** Host governments and entities identified country-specific challenges ranging from geography, bureaucratic delays specific to their government, and disputes with neighboring countries. For example, officials in Bangladesh noted that boundary disputes with India and Myanmar about fishing in disputed waters present a challenge for a climate-related fishing activity. An implementing partner in Papua New Guinea noted that local cash flow issues and the reliance of local contractors on foreign currency present a challenge to adhering to activity requirements.

Source: GAO analysis based on information from host governments and entities in the Indo-Pacific region. | GAO-25-106236

point, stating that because fishers use informal fish landing centers instead of government-operated centers, it is difficult for the government to monitor the production of fisheries and their impact on the ecosystem and the fish population. In addition, officials from multiple agencies noted that funding is limited relative to the personnel and other resources needed to address the vast climate-related needs of the region.

Some agencies reported that they have deployed additional funding or made greater use of existing resources to address these challenges. For example, State officials said that State provided \$5.5 million in fiscal year 2023, through the Office of the Special Envoy for Climate, for the Pacific Islands Forum Pacific Resilience Facility. This funding is intended to support investments in more programs at the local level, according to officials. Officials from Guam also reported that additional federal grants specific to the needs of U.S. territories have helped to address the problem of limited resources. DOE officials stated that they have found ways to mitigate the impact of limited funding by engaging other officials at post (such as State officials) to assist with their projects. In addition, USTDA officials suggested that allowing more program funding to be used for staffing, particularly local staffing in small island economies, could help expand their activities in the Indo-Pacific region and mitigate the challenge of limited local resources. For instance, officials said such expanded local staffing could allow for U.S.-funded consultants to be embedded within those countries' governments to support climate-related initiatives.

## Challenges Identified by U.S. Territories

**Territorial challenges accessing resources:** U.S. territories noted differences in the ability to access climate resources between territories and U.S. states. For example, officials from American Samoa said that they could not compete with U.S. states for certain grant projects as some of the grants considered such factors as size, population, and distance from the mainland U.S., instead of the extent of climate and environmental damages. As a result of these considerations, officials stated that the territory received less climate assistance than it needed.

Source: GAO analysis based on information from U.S. territories in the Pacific region. | GAO-25-106236

**Limited collaboration** among federal agencies, U.S. territories, or the public. For example, DOD officials stated that increased collaboration is needed among federal agencies, affected communities, and the public. They noted that such collaboration is hampered by each group working independently, making it difficult to find points of contact at relevant organizations to track current efforts. These officials added that increased collaboration would help complete climate-related activities faster, more efficiently, and at greater scale. Similarly, Commerce officials stated that, as a technical agency which implements activities for funding agencies, increased collaboration among agencies would help reduce the burden of fulfilling agreement requirements. These officials noted that the uncoordinated way in which agencies provide countries with assistance sometimes disincentivizes the technical experts from doing their work. Furthermore, USTDA officials stated that while a greater level of collaboration exists among federal agencies with a history of working together to support international development, agencies need to continue their efforts to ensure those connections remain open and conducive to

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effective collaboration. EPA officials said new IJJA and IRA grant requirements and processes can feel overwhelming for individual partner agencies and that partners might benefit from collaborative U.S. territory-wide trainings rather than the individual agency training currently used.

Some agencies reported that they have increased their collaboration with other agencies, territories, or the public. For example, EPA cited that it had negotiated interagency agreements with State and Interior and sought additional support from USAID. Government officials from American Samoa stated that federal agencies have made efforts to increase collaboration through partnership forums and official roundtables, which have helped them communicate with federal partners on IJJA and IRA funding opportunities.

Some government officials we interviewed in Papua New Guinea suggested that having earlier involvement by USAID during activity planning could address the challenge of limited collaboration between USAID and local officials. These officials noted that such collaboration would help USAID better assess the environment and align the climate risk program activity's goals with country needs. Earlier involvement by USAID could also allow Papua New Guinea to commit resources and to provide co-financing and support. In March 2024, we reported that USAID is undertaking agencywide efforts and establishing new goals to enhance localization, or collaboration with local partners.<sup>35</sup> Those efforts have not yet been implemented in all the countries that USAID supports.

**Limited information** due to gaps in accurate data, technology to obtain or provide data, and accurate data tools. For example, EPA officials stated that not having climate-related data, such as on sea level rise and extreme heat, from U.S. territories and the Freely Associated States is a challenge, especially as the data from these locations lag behind the continental United States. USDA officials noted that the unreliable internet services on the islands make it difficult to download large spatial data sets

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<sup>35</sup>In March 2024, we described the evolving actions that USAID has taken since 2010 to enhance partnerships with local entities. USAID defines localization as “the set of internal reforms, actions, and behavior changes that we are undertaking to ensure our work puts local actors in the lead.” We reported that to measure progress toward its agencywide localization objectives, USAID established two new high-level targets: (1) funding through direct local awards (25 percent of overall program funding by 2025) and (2) local leadership of USAID programs (50 percent of programs by 2030). See GAO, *Central America: USAID Should Strengthen Staffing and Fraud Risk Management for Initiative Addressing Migration to the U.S.*, [GAO-24-106232](#) (Washington, D.C.: March 14, 2024).

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and to use certain computing models to assess and predict climate conditions and to obtain real-time climate data. Interior officials stated that data limitations specific to the territories severely hinder the ability of territories to be included in funding decisions.

Officials from some federal agencies suggested additional actions that could be taken to address this challenge. For example, USDA and Interior reported that the Climate and Economic Justice Screening Tool, which the Office of Management and Budget encourages agencies to use to identify disadvantaged communities for certain programs where a statute directs resources to disadvantaged communities, does not have complete data on the U.S. territories in the Pacific and the Freely Associated States.<sup>36</sup> USDA officials stated that improvements to this data tool would enable them and other agencies to identify eligible communities more comprehensively. In May 2024, we reported that U.S. territories face many data gaps, primarily because federal agencies do not include them in many federal statistical products, such as this tool, and these gaps can limit the identification of resource needs of the territories.<sup>37</sup> In January 2024, we reported on the insufficient clarity and information in guidance and data tools, including the Climate and Economic Justice Screening Tool, intended to identify disadvantaged communities for federal investments including those that address climate risks.<sup>38</sup>

**Limitations in some funding instruments** that provide certain types of assistance but may preclude others. For example, DOE, USAID, and State reported that certain award agreements limit them to providing technical assistance to address climate-related needs. USAID officials stated that a host government may need help in areas such as infrastructure, technology transfer, and resilience building, but USAID may be unable to address these concerns within these agreements.

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<sup>36</sup>See Exec. Order No. 14,008, § 223, 86 Fed. Reg. 7619, 7631 (Feb. 1, 2021), *Tackling the Climate Crisis at Home and Abroad*; and Office of Management and Budget, Council on Environmental Quality, and White House Office of Domestic Climate Policy, *Interim Implementation Guidance for the Justice40 Initiative*, M-21-28; and *Addendum to the Interim Implementation Guidance for the Justice40 Initiative*, M-21-28, on using the *Climate and Economic Justice Screening Tool (CEJST)*, M-23-09 (Washington, D.C.: Jan. 27, 2023).

<sup>37</sup>See GAO, *U.S. Territories: Coordinated Federal Approach Needed to Better Address Data Gaps*, [GAO-24-106574](#) (Washington, D.C.: May 09, 2024). We recommended that the Office of Management and Budget ensure that the Chief Statistician, among other things, identify as appropriate, ways to address any data gaps.

<sup>38</sup>See GAO, *Justice40: Use of Leading Practices Would Strengthen Efforts to Guide Environmental Justice Initiative*, [GAO-24-105869](#) (Washington, D.C.: Jan 29, 2024).

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Officials said that they develop country development objectives and select certain types of assistance and award types to support them, such as providing technical expertise to support a government program. However, other countries, such as the PRC and Japan, are providing physical infrastructure assistance that more visibly addresses the climate needs of communities, according to USAID officials.

State officials suggested that more flexible funding, possibly with fewer restrictions or easier waivers for high-income Pacific Island countries, could mitigate these challenges. Some host government officials also stated that while U.S. technical assistance was important and useful, in some cases these activities could be enhanced by additional assistance. For example, officials from the government of Papua New Guinea suggested that additional physical resources, such as weather stations, would enable climate vulnerability assessments to compliment programming supported by U.S. technical assistance.

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## Conclusions

Many countries and U.S. territories in the Indo-Pacific are vulnerable to the adverse impacts of climate change. U.S. government agencies provide assistance designed to mitigate these effects in various ways across the region. However, some agencies could strengthen their management of this assistance to improve accountability over program funding and effectiveness.

Twelve U.S. agencies provided about \$1.9 billion in funding for activities active in fiscal years 2017 through 2023 to address the risks of climate change to some of the most vulnerable countries in the world—Bangladesh, the Maldives, and Pacific Island countries, as well as the U.S. territories in the Pacific. While some of the agencies responsible for this funding can determine how much of their awards go to specific countries for activities implemented in multiple countries, State and USTDA cannot. Better data on funding provided to individual countries could enable agency officials and policy makers to better ensure accountability of U.S. funding and to make informed decisions about future resource needs.

The four agencies we selected for review—NOAA, State, USAID, and Interior—generally followed key performance management practices to assess the effectiveness of their climate activities. However, given the challenging environment in the Indo-Pacific region in which they are implementing climate activities, all four agencies could better assess factors that could affect achieving activity results and identify mitigations to address them. In addition, Interior could further strengthen its



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procedures to ensure the review and assessment of performance reporting.

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## Recommendations for Executive Action

We are making a total of seven recommendations, including two to State, two to Interior, and one each to USTDA, USAID, and NOAA. Specifically:

The Secretary of State should ensure that all relevant bureaus and offices implement improvements to track award amounts by country for multi-country activities provided to countries in the Indo-Pacific region to address climate risks, when possible. (Recommendation 1)

The Director of USTDA should ensure that all relevant offices track award amounts by country for multi-country activities provided to countries in the Indo-Pacific region to address climate risks, when possible. (Recommendation 2)

The USAID Administrator should clarify agency guidance for context monitoring to ensure the officials who manage the performance of climate activities develop mitigation strategies in their activity planning documents to address any identified external or internal factors that could affect achieving the activity's results. (Recommendation 3)

The Secretary of State should ensure that the Bureau of Oceans and International Environmental and Scientific Affairs establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies. (Recommendation 4)

The Secretary of the Interior should ensure that the Office of Insular Affairs establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies. (Recommendation 5)

The Administrator of NOAA should ensure that the Director of the CRCP establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies. (Recommendation 6)

The Secretary of the Interior should ensure that the Office of Insular Affairs establishes procedures for the officials who manage the

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performance of climate activities to assess performance reports from implementing partners. (Recommendation 7)

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## Agency Comments and Our Evaluation

We provided a draft of this report to the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, the Interior, Transportation, and State, and to the United States Environmental Protection Agency (EPA), MCC, USAID, and USTDA for their reviews and comments. Commerce, Interior, State, and USAID provided written comments, which are reproduced in appendices III through VI. In their comments, these agencies concurred with our recommendations and described actions under way or planned to address them. For example, USAID noted that it intends to more consistently incorporate context monitoring and risk mitigation strategy formulation into its activity documentation. USTDA did not provide a written comment but concurred with our recommendation. Agriculture, Commerce, Defense, Interior, MCC, USAID, and USTDA also provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees and the Secretaries of the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, the Interior, Transportation, and State; the Administrators of EPA and USAID; the Director of USTDA; and the Chief Executive Officer of MCC. In addition, the report is available at no charge on GAO's website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-4409 or [lovegrayerl@gao.gov](mailto:lovegrayerl@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix VII.



Latesha Love-Grayer  
Director, International Affairs and Trade

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*List of Requesters*

The Honorable Gregory W. Meeks  
Ranking Member  
Committee on Foreign Affairs  
House of Representatives

The Honorable Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources  
House of Representatives

The Honorable Ed Case  
House of Representatives

The Honorable James Moylan  
House of Representatives

The Honorable Katie Porter  
House of Representatives

The Honorable Aumua Amata Coleman Radewagen  
House of Representatives

The Honorable Gregorio Kilili Camacho Sablan  
House of Representatives

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# Appendix I: Objective, Scope, and Methodology

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This report addresses: (1) the assistance federal agencies have provided to Bangladesh, the Maldives, Pacific Island countries, and the U.S. territories in the Pacific region to address climate risks, (2) the extent to which selected federal agencies have practices to monitor the performance of such assistance in selected locations, and (3) any challenges that have affected the provision and use of such assistance and agency efforts to address these challenges.

To address our first objective, we obtained and analyzed Indo-Pacific climate-related assistance data provided by 12 federal agencies. The agencies are the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, the Interior, State, and Transportation; United States Environmental Protection Agency; the Millennium Challenge Corporation; the U.S. Agency for International Development (USAID); and the U.S. Trade and Development Agency. We selected these agencies based on prior GAO reports on similar topics, federal and international organizations' reports on climate-related activities to the countries and U.S. territories under our review, and recommendations from federal agencies we met with as well as from the U.S. territories in the Pacific region we visited.

We collected data on climate-related activities by obtaining written and oral responses from officials responsible for these data from each of the 12 agencies. We asked each agency to provide a list of activities that were active between fiscal years 2017 and 2023. For each of these activities, we asked the agencies to identify the activity name, timeframes, funding agency, locations, and whether the activity was directly or indirectly related to addressing climate change, among other things. We also followed up with agency officials to clarify aspects of the data, such as what processes agencies used to identify activities as directly or indirectly related to climate change. We tested the data for missing information, outliers, and obvious errors; and reviewed existing information about Foreign Assistance Data system managed by State as well as internal controls related to collecting and maintaining the data. We determined the data, based on these steps, to be sufficiently reliable for the purposes of reporting Indo-Pacific climate-related assistance activities from fiscal years 2017 through 2023. The activities identified by the federal agencies as related to addressing climate risk in the Indo-Pacific include the following 16 countries and three U.S. territories eligible to receive climate-related appropriations funds enacted in 2022: Bangladesh, the Maldives, Fiji, the Cook Islands, Kiribati, Nauru, Niue, Papua New Guinea, Samoa, the Solomon Islands, Tonga, Tuvalu, Vanuatu, the three Freely Associated States of Micronesia, the Marshall

Islands, Palau, and the three U.S. territories of American Samoa, the Commonwealth of the Northern Mariana Islands (CNMI), and Guam. We used the United Nations list of Pacific Small Island Developing States to inform our selection of Pacific Island countries.

Each agency identified climate-related activities and categorized them as direct or indirect activities except USAID. For USAID, for the purpose of counting the number of direct or indirect climate-related activities, we defined an activity as direct if all the Standardized Program Structure and Definitions (SPSDs) were directly related to climate or indirect if all SPSPDs were defined as indirect. For activities that had both direct and indirect SPSPD elements, we did not classify that activity as either direct or indirect but included these activities in the total number of climate-related activities. Agencies also identified, for each activity, a country or territory or list of countries or territories where the activity has been implemented as well as a list of countries or territories where the activity would or could potentially be implemented. We also identified which activities were designed to take place in a single country or territory and which were designed to take place in multiple countries or territories. Since some agencies could not separate funding by countries or territories for those activities design to take place in multiple locations, we identified funding only for those activities designed to take place in a single country or territory.

We then assessed the agencies' ability to identify funding, by country or territory, for both types of activities—that is, both those designed to take place in a single or multiple location—against Standards for Internal Control related to the use of quality information based on relevant data from reliable sources for achieving intended objectives and effectively monitoring activities.<sup>1</sup>

To address our second objective, we identified key practices for evidence-based policymaking and performance management and examined the extent to which USAID, State's Bureau of Oceans and International Environmental and Scientific Affairs (State/OES), Commerce's National Oceanic and Atmospheric Administration's Coral Reef Conservation Program (NOAA/CRCP), and Interior's Office of Insular Affairs (Interior/OIA) monitoring efforts for climate-related activities in Bangladesh, Fiji, Palau, Papua New Guinea, and American

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<sup>1</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

Samoa adhered to these key practices. In 2023, we identified 13 key practices that agencies can use to plan for results, assess and build evidence, use evidence, and foster a culture of learning and continuous improvement.<sup>2</sup> From these 13 key practices, we focused on six key practices that can help agencies monitor implementation and performance at the activity level.

In selecting the four countries and one U.S. territory for in-depth review of agencies' climate-related activities we considered the following factors, among others: the number, type, duration, award amount, and geographic distribution of the activities. We conducted in-person audit work in Palau, Papua New Guinea, and American Samoa, and virtual audit work in Bangladesh and Fiji. During audit work in these countries and territory, we interviewed U.S., foreign, and territorial governments, and implementing partner officials to discuss the implementation of U.S. climate-related activities in these locations. In Palau and Papua New Guinea we also conducted visits to activity sites to view and discuss activity design and implementation with these officials and beneficiaries.

We selected the four federal agencies based on the number of climate-related activities in the selected locations; whether these activities were funded by the agency and were direct climate-activities; type of activity (we excluded activities, for example, that were primarily for conducting webinars or developing guidance); and funding amount.

Following our location and agency selection, we then selected a nongeneralizable sample of 17 climate-related activities: eight USAID activities, four implemented in Bangladesh and four implemented in a combination of Palau, Papua New Guinea, and Fiji; five State/OES activities implemented in a combination of Palau, Papua New Guinea, and Fiji; two Interior/OIA activities implemented in American Samoa; and two NOAA/CRCP activities that covered American Samoa. We selected these activities based on several factors that we determined relevant for our review: (1) direct connection of the activities to addressing climate change, as identified by the agencies; (2) highest award value to either the specific country or U.S. territory in the case of single location activities or to the entire group of countries or U.S. territories in the case of multi-

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<sup>2</sup>GAO, *Evidence-based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

location activities; and (3) implementation for a sufficient period to generate documents for review.

We assessed the agencies' monitoring of the 17 selected climate-related activities against the six key practices for evidence-based policymaking and performance management. We reviewed documents to determine the extent to which USAID, State/OES, NOAA/CRCP, and Interior/OIA followed the six key practices for each of the 17 activities in our sample. Specifically, for each selected activity, we requested activity planning documents that included objectives, performance measures, targets, results, timeframes, and risk assessments; 1 year of performance reports for the most recent year of performance; site visits reports or other documentation of how the agency validated activity performance; name and title of the responsible official, documentation of that assignment and that they were qualified to monitor the activity. We reviewed available documents as they related to each key practice to determine the extent to which the agencies had taken steps to follow and document the key practice for each activity. We also interviewed officials from the four agencies to understand their monitoring policies and processes.

From our review of each activity, we assessed whether the six key practices were "generally followed," "partially followed," or "not followed." We rated the extent to which the agency followed the key practice as "generally followed" if we received evidence that all critical elements of the key practice were conducted and documented to a large or full extent; "partially followed" if we received evidence that some, but not all, critical elements of the key practice were conducted and documented to some extent but a critical element of the practice was not conducted or documented; and "not followed" if we did not receive evidence that any of the critical elements of the key practice were conducted and documented. To perform these analyses, two analysts reviewed the documents to rate the extent to which each key practice was followed. The analysts worked iteratively, comparing notes and reconciling differences at each stage of the analysis. Where we found deficiencies, we followed up with knowledgeable officials to request additional documentation and to understand the cause for the deficiency, as applicable.

To address our third objective, we reviewed relevant laws including the Inflation Reduction Act of 2022, Infrastructure Investment and Jobs Act, and an executive order related to climate-related assistance to countries and U.S. territories in the Indo-Pacific region, and Office of Management

and Budget guidance.<sup>3</sup> We also reviewed guidance, memoranda, and fact sheets describing strategies and action plans on climate change in the Indo-Pacific region, such as the Indo-Pacific Strategy of the United States, and the Intergovernmental Panel on Climate Change Working Group II Sixth Assessment Report on Impacts, Adaptation and Vulnerability Fact Sheets.<sup>4</sup>

In addition, we interviewed officials from the 12 federal agencies within the scope of our review and the three U.S. territories in the Indo-Pacific region—American Samoa, Guam and CNMI—that we visited in person, as described in the first objective, to better understand the provision and use of federal assistance to address climate risks in the Indo-Pacific region as well as their perspectives on such assistance from fiscal years 2017 through 2023. We developed, based on these interviews, a set of semi-structured questions on challenges that included both closed- and open-ended questions. Subsequently, we used these questions to obtain the 12 federal agencies' and three U.S. territories' written responses on challenges that have affected the provision and use of federal assistance to address climate risks in the Indo-Pacific region as well as the federal agencies' efforts to address these challenges. During interviews in selected countries of Bangladesh, Fiji, Palau, and Papua New Guinea, as described in the second objective, we also used the open-ended questions on challenges to obtain perspectives of federal and foreign government officials as well as implementing partners and beneficiaries on the provision and use of federal climate-related assistance, and any actions federal agencies have undertaken or plan to undertake to address these challenges.

After receiving the written and site visit interview responses to the closed- and open-ended questions on challenges from the 12 federal agencies, the U.S. territories, and the selected countries, we reviewed these responses to identify and group them based on recurrent themes. These recurrent themes explicitly or implicitly illustrated challenges, actions taken or to be taken by federal agencies to address these challenges, and suggested actions that federal agencies can take to address these

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<sup>3</sup>Pub. L. No. 117-169, 136 Stat. 1818 (2022); Pub. L. No. 117-58, 135 Stat. 429 (2021); and Exec. Order No. 14008, 86 Fed. Reg. 7619 (Feb. 1, 2021), *Tackling the Climate Crisis at Home and Abroad*; and *Interim Implementation Guidance for the Justice40 Initiative*, M-21-28.

<sup>4</sup>White House, *Indo-Pacific Strategy of the United States* (Washington, D.C.: Feb. 2022) and Intergovernmental Panel on Climate Change, *Introduction to WGII AR6 Fact Sheets* (Cambridge, U.K. and New York, N.Y.: 2022).



challenges. To perform this review, three analysts reviewed the responses to identify and group the recurrent themes. The analysts worked iteratively, comparing notes and reconciling differences. We also followed up with relevant officials when additional clarifications were needed. The results from the written and site visit interview responses are specific to the perspectives of this diverse set of federal agencies, U.S. territories, and countries in our review and cannot be generalized. We believe, however, that these responses provide important context and insights into the challenges on the provision and use of federal assistance to address climate risks in the Indo-Pacific region and actions federal agencies have undertaken or plan to undertake to address these challenges.

We conducted this performance audit from September 2022 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding 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.

# Appendix II: Examples of Activity Goals and Performance Measures for Climate-Related Activities

This appendix provides examples of activity goals and performance measures for the 17 climate-related activities we selected for review from the Department of the Interior’s Office of Insular Affairs, the National Oceanic and Atmospheric Administration’s Coral Reef Conservation Program, the Department of State’s Bureau of Oceans and International Environmental and Scientific Affairs, and the U.S. Agency for International Development.

We reviewed these activities under six key practices for evidence-based policymaking and performance management identified by GAO, one of which indicates that agencies should define goals and identify long-term outcomes and short-term measurable results to help the organization understand the results that it is trying to achieve. Table 6 does not provide an exhaustive list of activity goals and performance measures for each activity but includes examples to illustrate these elements of activity planning.

**Table 6: Examples of Activity Goals and Performance Measures for Selected Climate-Related Activities**

Activity Name	Country/U.S. Territory	Award <sup>a</sup> (in dollars)	Examples of Activity Goals	Examples of Activity Performance Measures
<b>U.S. Agency for International Development (USAID)</b>				
Bangladesh Advancing Development and Growth through Energy	Bangladesh	17,216,509	Improved energy security and resilience through better access to affordable, reliable, and sustainable energy systems and transparent and efficient energy markets	Number of people trained in clean energy fields supported by U.S. government assistance
Community Partnerships to Strengthen Sustainable Development	Bangladesh	10,000,000	To strengthen natural resource management through enabling and integrating community and institutions’ capacity, adopting alternative livelihoods and youth employment in the selected areas of Bangladesh	Number of people trained in sustainable landscapes supported by U.S. government assistance
Enhanced Coastal Fisheries in Bangladesh	Bangladesh	25,000,000	Improved social and ecological resilience of coastal fisheries securing equitable food, nutrition, and income benefits for fisheries communities	Number of hectares of biologically significant areas under improved natural resource management as a result of U.S. government assistance
USAID Ecosystems/Protibesh Activity	Bangladesh	20,499,087	Improved ecosystem conservation in and around targeted key biodiversity areas of Bangladesh	Greenhouse gas emissions, estimated in metric tons of carbon dioxide equivalent, reduced, sequestered, or avoided through sustainable landscapes activities supported by U.S. government assistance

**Appendix II: Examples of Activity Goals and Performance Measures for Climate-Related Activities**

Pacific American Fund	Fiji, Palau, Papua New Guinea (and others)	34,999,999	Enhanced resilience and reduced vulnerability to climate change	Number of people trained in climate change adaptation supported by U.S. government assistance
Pacific Climate Ready	Fiji, Palau, Papua New Guinea (and others)	23,903,456	Capacity of Pacific Island Countries increased to adapt to negative impacts of climate change	Number of laws, policies, strategies, plans, or regulations addressing climate change (mitigation or adaptation) officially proposed, adopted, or implemented as a result of U.S. government assistance
Papua New Guinea Sustainable Landscapes Activity	Papua New Guinea	16,000,000	Improve forest governance, increase the environmental sustainability of the forest industry, and protect the land and resource rights of communities to reduce greenhouse gas emissions, enhance carbon sequestration and increase the sustainability of natural resource management	Number of people trained in sustainable landscapes with U.S. government assistance
USAID-Papua New Guinea Electrification Partnership	Papua New Guinea	56,974,990	Facilitate household connections in on-grid and off-grid areas including developing viable off-grid electrification models using clean energy sources through partnerships with the government and the private sector	Greenhouse gas emissions, estimated in metric tons of carbon dioxide equivalent, reduced, sequestered, or avoided through clean energy activities supported by U.S. government assistance
<b>Department of State</b>				
EPA Support for the Partnership for Resilient Infrastructure Investment in Pacific Island Countries	Palau (and others)	1,300,000	Improve disaster preparedness and response, to increase prosperity, and safeguard economic security in the Pacific region	Number of people trained in climate change adaptation supported by U.S. government assistance
NOAA Support for the Partnership for Resilient Infrastructure Investment in Pacific Island Countries	Fiji, Palau (and others)	5,200,000	Utilize U.S. expertise, technology, and technical capacity to increase preparedness and resilience to natural disasters in the Pacific Island Countries	Number of people trained in climate change adaptation supported by U.S. government assistance
EPA Transparency Accelerator	Fiji (and others)	9,360,300	To help to ensure that major developing countries have the capacity to use the greenhouse gas reporting standards as the United States	Number of people assisted or trained in sustainable landscapes supported by U.S. government assistance
USFS Climate Fellows	Fiji, Palau	4,392,600	Help developing countries develop capacity to report emissions data according to the same standards as the United States	Number of people trained in sustainable landscapes supported by U.S. government assistance

**Appendix II: Examples of Activity Goals and Performance Measures for Climate-Related Activities**

Island Led Resilience 2030	Fiji, Palau, Papua New Guinea (and others)	9,895,996	Strengthen long-term leadership of small island developing states in the Pacific and Caribbean on climate, sustainable development, and resilience	Number of people trained in climate change adaptation supported by U.S. government assistance
<b>Department of the Interior</b>				
Aunu'u Island 100% Renewable Energy Initiative–PV Solar Project with Battery Storage System	American Samoa	1,247,400	Replace the existing diesel generation system on the Island of Aunu'u to an alternate renewable generation system. Aunu'u is to be powered by 100% renewable energy	Procurement Process (Bidding, Award, Delivery), Installation
LBJTMC – EIC Solar MicroGrid and LED Lighting Project	American Samoa	1,000,000	Improve the quality of patient care through renewable energy, improve energy generation infrastructure, and training and education regarding energy efficiency and conservation, among other outcomes	Purchase, install, and fully operate the solar microgrid, LED lighting, and cooling towers
<b>National Oceanic and Atmospheric Administration (NOAA)</b>				
Coral Reef Watch	American Samoa (and others)	7,779,198	Utilize satellite, modeled, and in situ data to provide decision support products that users apply worldwide to prepare for and effectively respond to coral reef ecosystem environmental stressors	Number of new or enhanced tools implemented to improve management preparedness and response to climate change and ocean acidification
Enhancing Reef Resilience through Process Investigations	American Samoa (and others)	1,620,000	Operationalize repeat photomosaic surveys to develop robust approaches for modelling coral colony-level vital rates	Report on best practices, survey recommendations, and pilot error rate estimates

Source: GAO analysis of agencies' documentation. | GAO-25-106236

<sup>a</sup>For this report, the total award value includes awards identified by agencies as climate-related activities in the Indo-Pacific region that may also include other countries in the same award that are outside of the region.

# Appendix III: Comments from the Department of Commerce



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

November 14, 2024

Ms. Latesha Love-Grayer  
Director  
International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Love-Grayer:

Thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report entitled: *CLIMATE CHANGE – Improved Data and Performance Management Would Strengthen U.S. Support to the Indo-Pacific* (GAO-25-106236).

The Department of Commerce agrees with GAO's recommendation directed to the National Oceanic and Atmospheric Administration. Enclosed is our response to the draft report.

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

**JEREMY PELTER** Digitally signed by JEREMY PELTER  
Date: 2024.11.14 15:31:09 -05'00'

Jeremy Pelter  
Deputy Assistant Secretary for  
Administration, Performing  
the non-exclusive Functions and Duties  
of the Chief Financial Officer and  
Assistant Secretary for Administration

Enclosure

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**Appendix III: Comments from the Department  
of Commerce**

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**Department of Commerce  
National Oceanic and Atmospheric Administration  
Response to the GAO Draft Report Entitled:  
*CLIMATE CHANGE – Improved Data and Performance Management  
Would Strengthen U.S. Support to the Indo-Pacific*  
(December 2024)**

**General Comments**

The National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to review the Government Accountability Office’s (GAO) draft report on improved data and performance management that would strengthen U.S. support for climate change in the Indo-Pacific. NOAA reviewed the draft report and concurs with GAO’s recommendation. Responses to the recommendation, as well as some recommended changes to factual/technical information, are provided below.

**NOAA Response to GAO Recommendations**

**Recommendation:** The Administrator of NOAA should ensure that the Director of the CRCP establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies (Report Recommendation 6).

**NOAA Response:** NOAA concurs. The NOAA Coral Reef Conservation Program (CRCP), through its National Coral Reef Strategy and now its Draft National Coral Reef Resilience Strategy, has already identified various institutional management capacity-related factors that can affect achieving CRCP’s programs results – as well as goal, strategies, and objectives to mitigate these challenges. CRCP is also cognizant of the external factors beyond its control that could affect achieving results, primarily the availability of funding and its statutory authority under the reauthorized Coral Reef Conservation Act. Dependent upon future funding, a project selection, and the extent of its authority, the Director of the Coral Reef Conservation Program will consider establishing additional procedures for CRCP officials, who manage the performance of climate-related capacity development activities, to develop risk assessment plans that identify the external or internal factors that could affect achieving results and associated mitigation strategies. These procedures may be integrated into future project plans of the CRCP, should CRCP fund any future climate-related capacity development projects.

**Recommended Changes for Factual/Technical Information**

*Page 33, 1st Paragraph, Sentence 5:*  
“Commerce officials” should be changed to “NOAA officials”.

*Page 33, 1st Paragraph, Sentence 6:*  
This sentence should be revised to: “These officials noted that the uncoordinated way in which

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**Appendix III: Comments from the Department  
of Commerce**

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agencies provide countries with assistance, coupled with cumbersome reporting requirements from funding agencies, sometimes disincentivizes the technical experts from doing their work.”

# Appendix IV: Comments from the Department of the Interior



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

Latesha Love-Grayer  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

Dear Director Love-Grayer:

Thank you for providing the Department of the Interior (Department) the opportunity to review and comment on the draft Government Accountability Office (GAO) report titled, "Climate Change: Improved Data and Performance Management Would Strengthen U.S. Support to the Indo-Pacific (GAO-25-106236)." We appreciate GAO's review of Federal agencies' assistance to address climate risks to countries and the United States territories in the Indo-Pacific region. The Department generally agrees with the report's findings and concurs with the recommendations directed to the Office of Insular Affairs (OIA):

- **Recommendation 5:** The Secretary of the Interior should ensure that the Office of Insular Affairs establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies.
- **Recommendation 7:** The Secretary of the Interior should ensure that the Office of Insular Affairs establishes procedures for the officials who manage the performance of climate activities to assess performance reports from implementing partners.

The Department concurs with the two recommendations from GAO as detailed above, and OIA will review its processes and strengthen and implement procedures as needed.

If you have any questions, please contact me by email at [john\\_brewer@ios.doi.gov](mailto:john_brewer@ios.doi.gov) or phone at (202) 208-4736.

Sincerely,

*Basil Ottley* for John Brewer

John Brewer  
Director  
Office of Insular Affairs



# Appendix V: Comments from the Department of State



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

November 8, 2024

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

Dear Ms. Gianopoulos:

We appreciate the opportunity to review your draft report, "CLIMATE CHANGE: Improved Data and Performance Management Would Strengthen U.S. Support to the Indo-Pacific." GAO Job Code 106236.

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

Sincerely,

James A  
Walsh  Digitally signed by James A Walsh  
Date: 2024.11.08 12:24:54 -0500

James A. Walsh

Enclosure:  
As stated

cc: GAO – Latesha Love-Grayer  
OIG - Norman Brown

**Department of State Response to GAO Report  
CLIMATE CHANGE: Improved Data and Performance Management Would  
Strengthen U.S. Support to the Indo-Pacific  
(GAO-25-106236, GAO Code 106236)**

Thank you for the opportunity to comment on the GAO draft report "*Climate Change: Improved Data and Performance Management Would Strengthen U.S. Support to the Indo-Pacific.*"

**Recommendation 1:** The Secretary of State should ensure that all relevant bureaus and offices implement improvements to track award amounts by country for multi-country activities provided to countries in the Indo-Pacific region to address climate risks, when possible.

**Response:** The Department of State agrees with the recommendation. When possible, the Bureau of Oceans and International Environmental and Scientific Affairs (OES), Bureau of Energy Resources (ENR), Bureau of East Asian and Pacific Affairs (EAP), and Bureau of South and Central Asian Affairs (SCA) will implement improvements to track relevant award amounts by country for multi-country activities in the Indo-Pacific region.

**Recommendation 4:** The Secretary of State should ensure that the Bureau of Oceans and International Environmental and Scientific Affairs establishes procedures for the officials who manage the performance of climate activities to develop activity plans that identify external or internal factors that could affect achieving results and associated mitigation strategies.

**Response:** The Department of State agrees with the recommendation. OES climate programs already utilize risk analysis and mitigation approaches for grant agreements as guided by the Department of State's Office of Acquisition Management. OES will add internal and external risk factors and corresponding mitigation plans for climate-funded interagency agreements in the Indo-Pacific region.

# Appendix VI: Comments from the U.S. Agency for International Development



November 6, 2024

Ms. Latesha Love-Grayer  
Director, International Affairs and Trade  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20226

Re: Climate Change: Improved Data and Performance Management Would Strengthen U.S. Support ([GAO-25-106236](#))

Dear Ms. Love-Grayer:

I am pleased to provide the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Climate Change: Improved Data and Performance Management Would Strengthen U.S. Support* (GAO-25-106236). The report has one recommendation for action on behalf of USAID. USAID concurs with this recommendation.

USAID appreciates this recommendation as an excellent way to practice our agency principle of continuous improvement in managing and monitoring programmatic performance in our activities. This principle is embedded in our Collaborating, Learning, and Adapting (CLA) approach to program management and performance monitoring, as articulated in Automated Directive System (ADS) Chapter 201. The Office of Learning, Evaluation, and Research (LER) in the Bureau for Planning, Learning and Resource Management (PLR) will explore practical ways to clarify agency guidance to ensure mitigation strategies are properly planned and documented.

I am transmitting this letter and the enclosed comments from USAID for inclusion in the GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement. We appreciate the opportunity to participate in the complete and thorough evaluation of our programming in Bangladesh, Maldives, and the Pacific Islands to address climate risks in the Indo-Pacific.

Sincerely,

*Colleen Allen*

Colleen Allen  
Assistant Administrator  
Bureau for Management

Enclosure: a/s

**COMMENTS BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT ON THE DRAFT REPORT PRODUCED BY THE U.S. GOVERNMENT ACCOUNTABILITY OFFICE (GAO) TITLED, *Climate Change: Improved Data and Performance Management Would Strengthen U.S. Support* (GAO-25-106236)**

The U.S. Agency for International Development (USAID) would like to thank the U.S. Government Accountability Office (GAO) for the opportunity to respond to this draft report. We appreciate the extensive work of the GAO engagement team, and the specific findings that will help USAID achieve greater effectiveness in addressing climate risks throughout the Indo-Pacific.

In the draft report, the GAO recommends that USAID “clarify agency guidance for context monitoring to ensure the officials who manage the performance of climate activities develop mitigation strategies in their activity planning documents to address any identified external or internal factors that could affect achieving the activity results.”

As an agency that takes very seriously our duties and responsibilities as stewards of taxpayer resources on behalf of the people of the United States, we appreciate the findings from the GAO’s in-depth assessment of eight USAID programs addressing climate risks in Bangladesh, Fiji, Palau, Papua New Guinea, and other Pacific island nations. In particular, we appreciate the recognition that only three of the eight programs being implemented in these Indo-Pacific countries from fiscal years 2017-2023 adhered to the key practice of “identifying internal and external factors that could affect goal achievement and defining strategies to address or mitigate these factors” as described in GAO-23-105460.

USAID notes that the assessment team found that “[a]lthough USAID’s planning documentation included factors that could affect the ability of the activities to achieve results, it did not consistently identify strategies to address those factors in all activities.” The specific nature of the finding has helpfully identified which specific point in our program cycle can be improved further as part of our Continuous Improvement principle. We take note and agree that consistent identification of strategies to mitigate external and internal factors that could affect our ability to achieve our objectives across all our activities remains incomplete.

As part of efforts already underway to more consistently apply this key practice, USAID issued a Knowledge Management and Organizational Learning (KMOL) Policy in May 2024. This KMOL Policy builds upon USAID’s long-standing Collaborating, Learning, and Adapting (CLA) approach to program management and performance monitoring, as articulated in Automated Directive System (ADS) Chapter 201. Specifically, ADS 201.3.4.9 “Monitoring, Evaluation, and CLA During Activity Design and Implementation” was revised in May 2024 to expand and elaborate on the use of “context data collected by USAID or third parties, activity-level risk indicators” and other ways to improve the identification of external and internal factors that could affect our ability to achieve our objectives, and to develop strategies for mitigating those factors with potentially detrimental impacts on programmatic performance.

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**Appendix VI: Comments from the U.S. Agency for  
International Development**

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In order to further enhance this ongoing process of Continuous Improvement, USAID intends to have the Office of Learning, Evaluation, and Research (LER) in the Bureau for Planning, Learning and Resource Management (PLR) explore practical ways to more consistently incorporate context monitoring and risk mitigation strategy formulation into activity documentation. For example, an update to our series of CLA Toolkits, How-To Notes, and other techniques may be used to disseminate this latest ADS guidance for implementation across the Agency.

Once again, USAID thanks the GAO team for their thorough review of USAID programs to address climate risks in the Indo-Pacific region and look forward to implementing the recommendation as we further refine our ability to both achieve meaningful development outcomes and serve as responsible stewards of the US taxpayer resources entrusted to us.

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# Appendix VII: GAO Contact and Staff Acknowledgments

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## GAO Contact

Latesha Love-Grayer, (202) 512-4409 or [lovegrayerl@gao.gov](mailto:lovegrayerl@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Joseph Carney (Assistant Director), Su Jin Yon (Analyst-In-Charge), Pedro Almoguera, Ellen Arnold, Gergana Danailova-Trainor, Rachel Girshick, Christopher Keblitis, Samantha Lalisan, Ying Liu, Gabriel Nelson, Aldo Salerno, Joshua Seale, Joseph Thompson, and Kotomi Yokokura made significant contributions to this report.

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