

**Civil Society Assessment¹
of the Administration Report submitted in compliance with
The Elie Wiesel Genocide and Atrocity Prevention Act**

Prepared for the United States Congress

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Executive Summary

This assessment brings together the input of a wide variety of civil society actors engaged in the field of genocide and atrocity prevention and mitigation to convey their input on the recent [Report by the U.S. Government](#). The assessment addresses the positive developments in U.S. Government responses to preventing and mitigating mass atrocity events as highlighted in the report. It goes on to identify issues addressed by the Report that are welcomed by civil society, but which need further development to fully support the goals of the [Elie Wiesel Genocide and Atrocities Prevention Act](#) (the Act). The assessment then addresses specific areas of concern from the civil society community that the Report did not adequately cover. Finally, it includes a section of recommendations from civil society, some quite involved, others quite simply, which, if implemented, would dramatically improve the efficiency of the U.S. Government in preventing, mitigating, or responding to mass atrocity events and the ability of civil society actors to support those efforts.

This assessment was compiled based on the input received from members of the [Prevention and Protection Working Group](#) (PPWG). PPWG is a coalition of human rights, religious, humanitarian, anti-genocide, and peace organizations dedicated to improving U.S. government policies and civilian capacities to prevent violent conflict, avert mass atrocities, and protect civilians threatened by such crises. The [Friends Committee on National Legislation](#) serves as the working group's coordinator. PPWG members met several times and solicited input from a wide variety of actors to create this assessment.

PPWG wishes to emphasize that the civil society community is not a monolithic entity and, as such, this assessment represents a collection of commonly agreed upon issues, not the full potential response to the information included in the report. Individual and collective members of the civil society community may disagree with some of the elements of this assessment or may wish to highlight additional or different issues under each of the below categories in their own meetings with U.S. Government representatives.

The first section of the assessment addresses the elements of the Report that PPWG members felt represented positive developments in the prevention, mitigation, or response to mass atrocity events by the U.S. Government. These developments include the increased awareness of the need for assessment mechanisms; a focus on multilateral cooperation; the affirmation of the responsibility to protect; increased civil society engagement; the inclusion of specific recommendations for future government actions; the recognition of sanctions as an effective tool; and an expanded emphasis on the training of U.S. Government personnel.

The second section engages with the elements included in the Report that would benefit from further development by the interagency system. These include strengthening the interagency process itself, which alluded to generally in the Report, but not specifically addressed; dedicating time and resources to strengthening international organizations and international financial institutions, a step mandated by the Act which is not sufficiently addressed in the Report; increasing internal government personnel training; identifying institutional gaps, which will greatly increase future effectiveness of government responses; inclusion of detailed recommendations, which will serve as both goals for government personnel as well as an

accountability mechanism for Congress and the public; the identification of consulted entities, and the compliance of administration actions with existing executive orders. These issues represent a significant opportunity for the interagency process to improve its mechanisms and to increase further its efficiency in preventing, mitigating, or responding to mass atrocity events.

The third section raises serious issues of concern brought forward by PPWG members that they felt represented gaps in the Reports coverage of the issue of U.S. Government response to mass atrocity events. These issues are serious and significant enough in scope to warrant the unpleasant task of calling out their absence in this assessment. These areas of concern include the timeliness of the Report, which came 61 days after the congressionally mandated deadline; the assignment of the entire review of at-risk countries to the classified annex, a decision which limits the ability of civil society to support government action and allows countries engaging in detrimental behavior to escape condemnation for their actions; the frequency of meetings of the new Atrocity Early Warning Task Force, which dramatically reduces the frequency of the interagency processes' meetings; the failure to prioritize engagement with local nongovernmental organizations on the ground in at-risk countries; the failure to identify the funding expended in support of atrocity prevention efforts and the institutional constraints faced by the interagency process, a statutory requirement in the report; and the lack of commitment to full staff atrocity prevention offices in the relevant departments and agencies.

The recommendations in the fourth section represent specific and achievable actions the PPWG believes the U.S. Government can undertake to further enhance its atrocity prevention, mitigation, and response efforts. These recommendations address the need for increased multilateral engagement; identification of all interagency actors involved in these efforts; the prioritization and use of flexible and rapid funding mechanisms; increased civil society engagement; public distribution of the contact information for the point person at each relevant government agency or department; increased cooperation on training curriculum for government personnel; reports on the implementation of specific recommendations in future Reports; increased awareness of atrocity prevention activities within agencies and departments outside of the designated atrocity prevention staff; and improved public education and engagement.

Finally, PPWG calls on Congress to remain actively engaged in its oversight role of U.S. Government agency and department efforts to prevent, mitigate, and respond to mass atrocity events. The leadership that Congress demonstrated in passing the Elie Wiesel Genocide and Atrocities Prevention Act does not complete its obligation to continue to work on behalf of the American people to ensure that our nation takes a leadership role in addressing these critical issues.

1. Positive Developments

The administration submitted the Report in response to the requirements of the Act. The Act represents a significant commitment on the part of the legislative and executive branches to limit the loss of human life from mass atrocity and genocidal acts through the coordination of interagency mitigation, prevention, and response efforts and to fulfill the government's atrocity prevention obligation under the [1949 Genocide Convention](#). There are several elements of the Report that civil society find to be valuable and constructive contributions to global efforts to mitigate, prevent, and respond to mass atrocities and genocide. We wish to recognize those elements and convey our appreciation for the U.S. Government staff who put in the time and effort to undertake these activities and to include them in the Report.

- A. *Assessment Mechanisms*: Recent studies and reports from various international, regional, governmental, and non-governmental organizations have all highlighted the growing awareness that there are numerous factors that may reflect a state entering an "at-risk" status or tipping over into an actual mass atrocity event. We welcome the U.S. Government's recognition that there is "no single approach to measuring risk, and indicators must be adaptable to local contexts." We strongly support the Report's assertion that the U.S. Government will continue to evaluate and refine its "early-warning models and data collection methods" and its commitment to "identify gaps in existing diplomatic and programmatic activities" in addressing identified at-risk states.
- B. *Multilateral Cooperation*: The challenges posed by ongoing mass atrocity events and the regions at risk for future such events are a global issue for which all nations of the world bear responsibility. The civil society community welcomes the U.S. Government's commitment to undertake a leadership role in addressing these challenges. PPWG is also encouraged by the Administration's acknowledgement that states acting together through bilateral and multilateral institutions can do more to address these issues than when they act alone.
- C. *Affirmation of Responsibility to Protect*: PPWG welcomes this Administration's decision to continue its positive view of the doctrine of the [Responsibility to Protect](#), and endorses its assertion that "each individual state has the responsibility to protect its populations from genocide, war crimes, ethnic cleansing, and crimes against humanity" while also calling for a re-engagement with the international community's obligation to prevent such acts.
- D. *Civil Society Engagement*: The engagement by U.S. Government agencies with the civil society community in the lead up to the Report has been robust. The community welcomes further such engagement and commits to working with our U.S. Government colleagues as we cooperatively try to address these complex issues.
- E. *Targeted Recommendations*: We believe that specific recommendations with identifiable outcomes and measurable impacts are a critical tool in mitigating and prevention efforts. While we seek the inclusion of more specific and targeted recommendations in future reports, we welcome the introduction of general objectives for the Atrocity Early Warning Task Force (the Task Force) and look forward to working with our U.S. Government colleagues to contribute to the efforts to achieve these goals.

- F. *Recognition of Sanctions as an Effective Tool:* The use of targeted sanctions against individuals, including through tools like the [2016 Global Magnitsky Human Rights Accountability Act](#) and the U.S. Department of the Treasury's [Financial Action Task Force](#), represents a uniquely effective method for addressing the financial foundations that allow actors to fund mass atrocity events. Recognizing when corruption runs the risk of fueling atrocity activities and denying funding to bad actors can be a very effective tool in the U.S. Government's toolbox. The coordination between the Departments of State, Defense, and Treasury as well as USAID to address such financial and corruption-based contribution to mass atrocity events is a welcome addition to the conversation by U.S. Government actors.
- G. *Training:* We continue to believe that proactive training of U.S. Government employees stationed in country can create one of the most powerful tools for effective mitigation and preventative measures. PPWG strongly welcomes the Report's inclusion of "standardized atrocity prevention training for U.S. Government personnel" without regard to the minimum standard required by the Act.

2. Areas for Improvement

There are several topics addressed by the Report where further action by the U.S. Government could greatly enhance the fulfillment of the technical requirements of the Act as well as its purpose and intent. The issues raised below represent activities or objectives that we believe would greatly enhance the effectiveness of the U.S. Government's efforts to mitigate or prevent mass atrocity events.

A. *Increased Interagency Engagement:* The report identifies several entities within the U.S. Government structure that engage in work related to or directly addressing genocide and atrocity prevention. However, it does not describe specific steps to ensure that these entities will work together through the Task Force. Simply asserting that the Task Force will convene the "relevant Federal departments and agencies" does not represent the level of forward planning necessary to overcome the understandable challenges of sharing information and coordinating action across institutional barriers. We encourage the Task Force to take up specific guidelines for interagency cooperation on atrocity prevention efforts at its first convening and to obtain the sign-off on these guidelines by both deputies and principals within the relevant departments and agencies.

U.S. Department of Defense personnel represent a valuable resource in this area and the Task Force should strongly encourage Defense principals to convey to the [Combatant Commanders \(COCOMMS\)](#), their staffs, and the responsible Pentagon offices and entities the important role they can have in identifying and deescalating at-risk regions.

The [Federal Bureau of Investigation's International Human Rights Unit \(IHRU\)](#) performs significant work in identifying, investigating, and prosecuting "perpetrators of mass atrocities and human rights violations" found to be within the United States' jurisdiction or ensuring the appropriate foreign judicial systems hold these perpetrators to account. The Report should specifically reference the IHRU, with details on the cases it has brought and the investigations currently underway included.

B. *Strengthening International Organizations and International Financial Institutions:* The Act specifically calls for the Report to include recommendations to strengthen "the role of international organizations and international financial institutions in conflict prevention, mitigation, and response." The Report highlights U.S. Government engagement with a limited number of international entities, such as the United Nations, and some foreign domestic governments, such as Cameroon. However, the engagement with these entities does not fulfill the Act's requirement that the Report address efforts to improve these institutions. As highlighted in Section 3.B. *infra*, effective atrocity prevention and mitigation necessitates working across borders to address global issues, sometimes in regions of the world where it would be politically sensitive and challenging for the U.S. Government to act alone. Further enhancing participation in and strengthening the international tools and institutions that permit states to work together to accomplish atrocity prevention activities is critical to lasting and effective success in this field. Future reports should specifically address the steps being taken by the U.S. Government to improve the international tools and institutions that all states can use to prevent and mitigate mass atrocity events.

- C. *Additional Training*: PPWG greatly values the expansion of the anticipated atrocity prevention training for U.S. Government employees beyond the statutory minimum. However, as identified in Section V of the Report, employees of the Treasury and Homeland Security Departments play a growing role in supporting atrocity prevention efforts using targeted sanctions and domestic investigations and prosecutions. Training these employees on the impact that such efforts can have on at-risk communities, preventing bad actors from using funds obtained illicitly or through corruption to lay the groundwork for or actually perpetrate mass atrocity events, and the role of domestic investigations and prosecutions in promoting accountability is critical. We encourage the Treasury and Homeland Security Departments to work with their State, Defense, and USAID colleagues to create a training program for sanctions-implementing and investigating employees.

In addition, civil society actors represent a wealth of expertise on very specific implementation of atrocity prevention measures and lessons-learned from a variety of in-country situations. U.S. Government entities should engage directly with civil society actors when designing the training curriculum for employees and should affirmatively reach out to civil society actors regularly to identify areas of needed change or adjustment to current curricula.

- D. *Identifying Institutional Gaps*: Preventing and mitigating atrocity events is not a small task and we recognize the challenges it poses. That does not mean we should not try our best to undertake these efforts and the Act represents an affirmation of the will of the American people, as realized through bipartisan support in Congress, that the U.S. Government undertake this effort. While the Report lays out several ways in which the Administration is currently engaged on this issue, we do not believe that the Administration itself or the constituent departments and agencies involved in these efforts would assert that there is no room for improvement. In this particular field, bureaucratic barriers and ineffective programs can result in situations where lives are lost which could have been saved. Acknowledging the failures in the current system to address past or current mass atrocity events, identifying the institutional gaps that led to those failures, and affirmatively creating a plan of action to correct the situation is essential to preventing a repeat of these mistakes.

A valuable tool for the various agencies involved would be the creation of a procedure for personnel to consult when evaluating how to respond to developing crises to prevent genocide and mass atrocities. There is no single appropriate response that would work for all situations, but one can envision a procedural approach that would assist the appropriate personnel in identifying how best to respond. Knowing which questions to ask, the correct interagency process to pursue, and the available tools and resources that they can call on can greatly decrease the response time involved and improve efficiency and coordination between the relevant departments and agencies.

The Report references, at various points in Section V, that the U.S. Government will undertake actions in “response” to atrocity events. We would encourage future reports to more fully clarify what response options are being considered. While not every situation would receive the same response, knowing the range of options that under consideration by the U.S. Government would allow civil society to provide expert input on the likely impact of certain options in specific situations.

Creating a vision of affirmative atrocity prevention and mitigation and a culture within the relevant agencies and departments will ensure that these efforts happen from the “ground up” and that leadership can count on their personnel to take these issues seriously, while also ensuring that the personnel in-country know that leadership support and defend their efforts to address these issues.

- E. *Presentation of Detailed Recommendations:* Civil society actors welcome the inclusion of the four specific recommendations provided to the White House and their inclusion in the approach of the Task Force to compliance with the Act’s requirements. However, the U.S. Government faces significant challenges, on very specific issues within the atrocity prevention field, which would benefit from targeted and detailed recommendations. Not only does the exercise of drafting detailed and targeted recommendations by the interagency mechanism further entrench the importance such cooperation across government agencies and departments, it ensures that the U.S. Government is actively engaging the appropriate communities within its own framework and bringing in the voices who can speak to the specific implementation of such efforts. Detailed recommendations also create the opportunity to measure internally the efficacy of those approaches and improve or fine-tune the methods adopted. In addition, specific recommendations for future actions provides a level of accountability that the U.S. Government should welcome and which Congress will seek in evaluating the Administration’s compliance. Civil society remains ready and willing to engage with our U.S. Government colleagues to work towards these recommendations, while recognizing that the final formulation of these objectives must come from within the relevant agencies and departments.
- F. *Identification of Consulted Entities:* The act requires that the Report include “identification of the Federal agencies and civil society, academic, and nongovernmental organizations and institutions consulted.” While this may seem a small matter, it is actually invaluable for both government personnel and civil society actors, as well as Members of Congress. For government personnel who were not involved in the creation of the Report, a detailed list of academic, civil society, and non-governmental organizations represents a “rolodex” of entities who can be called on in situations where additional information is needed from highly specialized and expert actors. The detailed listing of the consulted entities also provides these same entities with the opportunity to identify when a critical voice is missing from the conversation. We do not hold ourselves out to be the entirety of the civil society community working on these issues, and we hold in high regard our many academic and NGO colleagues we have who may also have significant contributions to make to this discussion. Ensuring that the list of consulted entities is specific and robust allows for identification of any gaps in the conversation, while also allowing Congress to evaluate effectively the Administration’s compliance with the Act’s requirements.
- G. *Reference to Executive Order:* The Obama Administration’s Executive Order (EO) on a [Comprehensive Approach to Atrocity Prevention and Response](#) has not been overturned by the Trump Administration. PPWG believes that this means the EO still applies to U.S. Government departments and agencies and that the Task Force should follow its guidelines.

3. Issues of Concern

We welcome the Administration's engagement on this issue and Sections 1 and 2 of this assessment reflect our belief that the Administration and U.S. Government personnel genuinely care about the role the United States can play to reduce and prevent the loss of life from mass atrocity events. However, there are several issues of concern which we feel need to be specifically addressed, either because they represent areas where the Act called for specific action which the Report did not discuss or because they are elements fundamental to the actual achievement of the goals of the Act that were not raised by the Report.

- A. *Timeliness of the Report:* The Act mandated that the Report be presented to Congress within 180 days of the date of enactment, which was January 14, 2019. 180 days would have been Friday, July 13. While we understand that the preparation of the initial report of any new act is beset by challenges related to the creation of an inaugural document, we feel it is important to highlight that the Report's publication on September 12, 61 days after that deadline, was a violation of the Act's requirements. There will always be competing obligations that any administration will bear that could justify "slight delays" in the preparation of reports. The nature of the work of the Atrocity Early Warning Task Force is such that the reporting entity should prioritize these obligations alongside, not subordinate to, national security interests. If government personnel observe that any administration views its obligations under the Act so lightly as to see delay of the congressionally mandated report as an inconsequential matter, then their opinion of the importance of their obligations to assist in identifying contributing factors to and early warning signs of mass atrocity events will suffer a similar disregard.
- B. *Classified Annex:* The Act not only provides for the inclusion of a classified annex in the Report, it is also an element welcomed by civil society. Civil society greatly values the contributions that the intelligence community can make to government personnel in understanding the current at-risk states and contributing factors they have identified. However, the current Report completely leaves out any discussion of ongoing atrocities, at-risk countries, or the identification of "specific risk factors, at-risk groups, and likely scenarios in which atrocities would occur" as required by the Act. While some of the information included in these required analyses may necessitate their relegation to the classified annex, there is no conceivable formulation in which all of the current atrocity situations and all at-risk nations would need to be included in that annex. It is critical, both for substantive engagement and for accountability reasons, that the Administration carefully observe the language of the Act, which requires that such descriptions be included in the classified annex only "if necessary." Making public the states that the U.S. Government is monitoring under the Act's obligations may also have a chilling effect on potential perpetrators, as past willingness of the U.S. Government to call out atrocities and genocidal acts has demonstrated.

In addition, the requirement of a prioritization of countries for whom intervention at an early stage may represent significant opportunities for de-escalation and prevention is essential. Part of the value of providing such a list is the effect it can have in mobilizing public opinion and global response to issues. Putting this designation and prioritization behind a classification barrier defeats many of the external benefits of creating such a list. Congress should request a

declassified version of the Annex that all Members could review and would be available to release for public education and engagement. (See recommendation 4.J).

- C. *Name of Task Force, Frequency of Meetings, and Composition:* The civil society community reacted to the renaming of the Atrocity Prevention Board (APB) to the Atrocity Early Warning Task Force with mixed perspectives. Perhaps the most nebulous, but also potentially the most significant, concern is that removing the word “prevention” from the body changes the nature of the entity in a substantive way. We believe that the individuals who participated in the APB interagency process prior to the name change took the “prevention” portion of their efforts seriously. Removing that word from the official name for the interagency cooperation mechanism may send the wrong signal to the U.S. Government personnel assigned to support its operations.

The Report also specifies that the Task Force will meet at a decreased rate compared to the APB. The APB met monthly, at least, with Deputy level meetings twice a year and Principals meetings once a year. The “sub-APB,” as it was known, met weekly to ensure the interagency actors were all aware of and maintaining a focus on potential prevention and mitigation actions. The new Task Force, which is the equivalent of the sub-APB, will meet only four times a year. This represents a stark decrease (92%) in the frequency of engagement by U.S. Government personnel on these critical issues and creates the risk of a situation that the Task Force has been monitoring moving from “at risk” to actual loss of life between meetings.

The entire premise of the interagency cooperation mechanism is that departments and agencies have exceedingly large demands on their time. The delay between such meetings increases the risk that the drive to address these issues as a regular part of the daily responsibilities of staff will understandably be subsumed by other pressing obligations, drifting only to the fore when the Task Force is due to meet once more.

The removal of a specific Deputy-level meeting means that those actors in the participating agencies most likely to have the ability to effectively maneuver resources and attention within a department to address a breaking situation may not be fully apprised of the surrounding issues or the need to act. The Report does reference an intent to coordinate between the Task Force and other “regional and country decision-making bodies in the White House” to ensure that issues are addressed, but frames that adjustment in the context of “eliminate[ing] duplication of effort and improve[ing] coordination at the policy-making level.” This emphasis of eliminating duplication raises concerns that the Administration is deprioritizing the need to be able to address, rapidly and effectively, developing events that might lead to mass atrocities.

- D. *Consultation with Local Nongovernmental Organizations:* The Report references the Administration’s engagement with the international community on atrocity prevention efforts. We strongly encourage this practice and remain committed to furthering these connections. One area of development needed to address the Government’s efforts to “refine its early-warning models and data-collection methods” is engagement with local nongovernmental organizations. While international NGOs and institutions are important parts of this effort, it is critical that voices from the communities most at risk and most impacted by the prevention activities of the U.S. Government be included in the conversation, especially marginalized

groups outside of the official streams of engagement. PPWG offers its services in connecting our U.S. Government colleagues with our friends and colleagues from around the world who work day-to-day in at-risk communities and who can offer perspectives that reflect the needs and understanding of the local community to these discussions.

- E. *Funding Expended and Institutional Constraints:* The Act specifically requires that the Report include details on the “funding expended by relevant Federal departments and agencies on atrocities prevention activities, including appropriate transitional justice measures and the legal, procedural, and resource constraints faced.” While the Report includes references to some funding expenditures utilized on behalf of atrocity prevention efforts, there are no details of which accounts contributed funds to support these activities.

There is no discussion of what, if any, efforts to support transitional justice mechanisms in post-conflict settings have been undertaken, or of any legal, procedural, or resource constraints the Administration has faced. No one assumes that the U.S. Government systems and programs as currently instituted are perfect in how they address atrocity prevention issues. These systems and programs, for the most part, were not designed to even consider these questions, let alone take on the significant challenge of trying to engage in mitigation or prevention. The Report should lay out expenditures made, funding sources used, and existing hurdles encountered by the relevant agencies and departments in their efforts to comply with the Act. Successful achievement of the goals of the Act depends on clearly identifying barriers to compliance so that Congress can respond to remove such limitations.

- F. *Administration Staffing Levels:* No matter how well designed the interagency coordination procedures are, the actual effectiveness of such efforts is depending upon there being sufficient staff in place to address these issues. PPWG remains concerned about the staffing levels of atrocity prevention teams in the various agencies in departments and encourages the administration to bring these teams up to full staffing levels. Understaffed teams lead to gaps in atrocity prevention processes and decrease the efficiency of the U.S. Government response.

4. Recommendations

We include below some specific recommendations in regard to the Report, with an eye toward future reports and compliance with the Act, to ensure that Congress, the American people, and civil society actors can recognize the contributions of the Administration to the efforts of atrocity prevention, mitigation, and response, collaborate to improve those efforts, and hold ourselves to account in this important endeavor.

- A. *Increase Multilateral Engagement:* The challenges represented by states at risk of mass atrocity events are complex and often highly politicized. It is not, nor should it be the policy of the United States to undertake the burden of addressing these issues alone. Working alongside its natural allies and engaging with international institutions is critical to maximizing U.S. efforts in this field. We encourage the interagency process to continue to address the issue of atrocity prevention and mitigation through the lens of cooperative responses at the regional and international level, and we strongly recommend that the U.S. Government increase its engagement with international organizations, international financial institutions, and transitional justice mechanisms. Future reports should also specifically address the steps undertaken by the U.S. Government to improve the international tools and institutions that all states can use to prevent and mitigate mass atrocity events. (See Section 2.B.)
- B. *Interagency Identification:* Future reports should include all U.S. Government agencies and departments working on issues related to atrocity prevention and mitigation, not just those referenced in past reports, and should detail specific actions undertaken. (See Section 2.A.).
- C. *Flexible and Rapid Funding Response Mechanisms:* There is a higher chance that imminent or ongoing violent conflict can be deescalated if the response to early warning signs is rapid, targeted, and deployed in the places where it can do the most good. Funding mechanisms for atrocity prevention and mitigation efforts should include “relief valves” that allow it to be disbursed in a more flexible method in such situations. Frequently the funding needed to make a significant impact in an immediate response situation is much smaller than typical grant amounts. Millions spent on programs that take place long after a tipping point or moment of opportunity have passed are far less effective than a few thousand dollars can be, if they are able to be provided quickly to the right actors. Smaller amounts of funds deployed rapidly can make all the difference in crises prevention and response. We recommend the implementation of disbursement mechanisms designed to facilitate these rapid and targeted disbursement allocations.
- D. *Civil Society Engagement:* We strongly encourage the interagency Atrocity Early Warning Task Force to consult with the civil society community, which is constantly evaluating and engaging with local communities and organization who have unique perspectives and insights into potential risk factors. Detailing the efforts undertaken by the Task Force and the relevant departments and agencies to engage with civil society is a mandate of the Act and should be included in future reports. Regular engagement with civil society community members, as mandated by the Act (no less than twice per year), should be scheduled well in advance and, if possible, occur in the lead up to Task Force meetings, so that civil society input can be included in such discussions. (See Section 2.F.).

- E. *U.S. Government Contact Information:* As the various departments and agencies seek to engage with civil society actors, a list of designated contacts for atrocity prevention issues at each member of the interagency group would greatly facilitate these interactions. Such a list would demonstrate a willingness by the U.S. Government to receive information from not just those civil society organizations participating in the PPWG, but actors from outside that working group that may have important information or insights to convey.
- F. *Future Training:* The Task Force should affirmatively engage with the relevant agencies and departments as to their ongoing curricular design and redesign of atrocity prevention training. Agencies and departments identified in the Report (and future reports) without dedicated atrocity prevention training should be encouraged to create appropriate training systems. Such training systems should include specific guidance for attendees on how to respond in their position and portfolio, identifying the practical methods of engagement each government employee has in their respective department or agency. Wherever possible, departmental and agency trainings should be made publicly available and curricular design efforts should engage with civil society actors beyond those contracted for the specific service. (See Section 2.C).
- G. *Recognition of U.S. Government Personnel:* We strongly recommend the implementation of civil service awards and recognitions for personnel who appropriately follow their training and provide information deemed valuable by the Task Force. Creating positive reinforcement for the identification, proper reporting, and implementation of atrocity mitigation and prevention procedures will result in a culture of compliance and engagement on these issues.
- H. *Implementation Status of Report Recommendations:* The Act requires that future reports include information on the implementation status of the recommendations contained in the previous reports. To this end, we reiterate our call for targeted and detailed recommendations, as that will greatly increase the ability of the Administration to report on the status of these recommendations, along with specific challenges to implementation. (See Section 2.E.).
- I. *Internal Agency Conversations:* The creation of an interagency process for addressing atrocity prevention issues is fundamental to improving the ability of the U.S. Government to identify, prevent, and mitigate mass atrocity events. However, the interagency process cannot be the sole mechanism for engagement by U.S. Government personnel. The members of the interagency process should be encouraged to interact with and educate their colleagues on the role that their home agencies and departments play in this critical task. Increasing awareness of the importance of these issues beyond the designated interagency representatives will increase the capacity and effectiveness of the various agencies and departments whose work influences these critical issues.
- J. *Public Education and Engagement:* The APB suffered from an ongoing challenge of lack of communication to civil society actors and the public at large. The efforts undertaken by the U.S. Government to prevent, mitigate, and respond to mass atrocity events are in the noblest traditions of the American ideal. Providing as much information to the public as possible serves to not only ensure transparency of government actions on these issues, but also to educate as to the importance of preventing mass atrocity events or responding appropriately as they arise.

K. *Congressional Oversight*: PPWG strongly recommends that the United States Congress remain actively engaged in its oversight role on the implementation of the Elie Wiesel Genocide and Atrocity Prevention Act. Congress exercised significant leadership in its passage of the Act, but its role has not completed. Recent events in Syria and Turkey demonstrate the need for the legislative branch of the United States Government to remain actively engaged on foreign policy issues that implicate core moral values of the United States of America. Our nation's commitment to the concept of "never again" requires that Congress continue to require the agencies and departments of the U.S. Government tasked with preventing, mitigating, and responding to mass atrocity events to report their efforts and be held accountable.

5. Conclusion

The Elie Wiesel Genocide and Atrocity Prevention Act represents a significant step forward in institutionalizing the U.S. Government's response to the worst acts of atrocity and genocide. There are no easy answers in these efforts and we recognize that all of the players in this field, from international organizations down to the smallest of nongovernmental actors, can be doing more and doing it better.

The civil society community greatly appreciates the willingness of the Administration to take seriously its obligations under the Act and looks forward to continuing to work with U.S. Government personnel in achieving these goals.