THE CINC’S JOINT INTERAGENCY COORDINATION GROUP (JIACG) – ESSENTIAL TO WINNING THE WAR ON TERRORISM

by

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The contents of this paper reflect my own personal views and are not necessarily endorsed by the Naval War College or the Department of the Navy.

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Abstract:
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The Secretary of Defense (SECDEF) and the Chairman of the Joint Chiefs of Staff (CJCS) have declared that the new war on terrorism, a dissimilar war against a non-state enemy that functions within worldwide terrorist networks, demands closer coordination by U.S. government agencies and the military in the diplomatic, economic, intelligence, law enforcement and military domains. The thesis of this paper is that Joint Interagency Coordination Groups (JIACGs) must be established in geographic combatant commanders’ (theater CINCs) headquarters and employed at the operational level to enable the coordination and integration that is critical for agencies, military forces, and coalition nations to effectively fight in this new war.

The current process to coordinate and integrate agencies with military forces to fight together across a CINC’s AOR is cumbersome and inefficient. This paper reveals the gap in military–agency planning and integration caused by fundamental differences in their cultures, hierarchies, and insufficient guidance that makes synchronizing the military, agencies and coalition nations problematic. Further, this paper identifies requirements that bridge this gap to enable the CINC to effectively coordinate and integrate the full capabilities of agencies and military forces.

Finally, a JIACG model is proposed illustrating Command Control (C2), describing the divisions, components and the process for the theater CINC staffs to draw from. Armed with the requirements to effectively coordinate and integrate agencies and the military, a JIACG employed from the CINC’s headquarters, under an umbrella of military-agency commitment, will enable the synchronization and unity of effort that is crucial.
Introduction

As long as international terrorists command, control, and communicate in modern global networks, threatening U.S. vital interests, the war on terrorism will involve U.S. and foreign nations’ militaries and government agencies worldwide. Further, CJCS, General Myers asserts that “the U.S is involved in a new kind of war where the military may not be the decisive force…instead bankers, diplomats, intelligence operatives, law enforcement and custom officials have important roles to play.” Moreover, SECDEF has declared that the campaign against terrorism will require U.S. government agencies to work more closely with the military to fight this war. Consequently, this is a different kind of war against a different kind of enemy. What is different is the untried mandate to fight a broad based, long term, sustained effort at home and overseas, not against a nation, or single state-sponsored terrorist group, but instead against an enemy of several thousand non-state actors, organized and functioning within a worldwide network that finances, recruits, transports, and trains Islamic extremists to a core mission to kill US citizens --civilian or military-- and their allies worldwide. Also, this new war demands that the military work closer than in previous conflicts with many diverse U.S. government agencies and coalition nations, to not only destroy terrorist networks, but also investigate terrorist organizations, shut down their financial, recruitment and transport networks, and capture and bring terrorists to justice.

The U.S. government agencies, interagency, and military staffs are not organized to efficiently accomplish these tasks together. Currently, the process to coordinate and integrate U.S. government agencies with military forces across a CINC’s Area of Responsibility (AOR) is cumbersome and inefficient. The thesis of this paper is that JIACGs must be established in the CINC’s headquarters and employed at the operational level. JIACG employment is essential to
enable the coordination and integration that is critical for U.S. government agencies and military forces, combined with coalition nations, to effectively fight this new war.

The need for military, interagency, and U.S. government coordination and integration is well understood. Namely, the SECDEF emphasizes that the campaign against terrorism requires U.S. intelligence, financial and law enforcement agencies to work more closely with the military to deny terrorist any support or haven. Likewise, CJCS stresses that coordination between these diverse agencies in the diplomatic, economic, intelligence, law enforcement and military domains is crucial to victory. Also, CJCS points out that the U.S. has learned to focus these elements via an interagency process, and that the military must push this type of cooperation to the theaters . . . better liaison with the Treasury, FBI, State Department and others. For instance, the U.S Southern Command, U.S Central Command, U.S. Pacific Command and U.S. European Command – all four theater combatant commanders, have asked that FBI and Treasury Department agents be assigned to their staffs to improve coordination between the military and civilian agencies in the global war against terrorism.

This paper will not argue whether U.S. government agencies are adequately structured to coordinate with theater CINCs, nor who should have the lead or where it should be directed from. Both civilian and military leadership hierarchies agree that to effectively fight this new war will require a combined effort of the diplomatic, economic, intelligence, law enforcement and military entities. Instead, this paper proposes ways and means for a JIACG to assist the theater CINC, as the vital link, in coordinating military, U.S. government and coalition nations’ agencies, in order to achieve a synergistic effect and enhance unity of effort.
The Gap in Military-Agency Warfighting

A review of the current process to coordinate and integrate U.S. government agencies with military forces in this new war reveals a gap in military and agency planning and in integrating agency efforts with joint military forces at the operational level. This gap negatively impacts the synergism and unity of effort crucial for successful military-agency operations, which is key to effectively combat global terrorist networks. This variance is caused by differences in military and agency cultures, hierarchies, and lack of adequate guidance.

Who’s in charge? U.S. military culture and doctrine produces a formal command structure with assigned responsibilities and accountability for exercising authority in a vertical hierarchy, regardless the number of, or diversity of, military commands involved. Further, the military routinely exercises a deliberate and crisis action planning system to plan and execute the orders of these military commanders designated in charge. In contrast, U.S. government agencies may exercise a vertical hierarchy internally, but routinely do not use that same vertical command structure in the planning and execution of operations involving their sister agencies, i.e. Departments of State, Treasury, Justice, Transportation, and CIA. Instead, integration and coordination between agencies, and in some cases with the military, is more lateral, based on partnership, cooperation and an association that seeks consensus. Also, most U.S. government agencies lack a strategic or crisis action planning system that develops courses of action and phased operations similar to the military’s, hence, agencies tend to rely on the military to lead in the planning and execution of operations involving both. Even when assigned lead agency by the National Security Council (NSC), designation as lead has not carried with it the operational authority to enjoin cooperation.
For example, the executive and legislative branches do not routinely provide the interagency lead along with direct control over the resources necessary for interagency operations. 7

**Insufficient guidance.** Although Joint Doctrine publications describe command structures, doctrine, and detailed procedures for deliberate and crisis action planning and execution in a joint military environment, these publications lack specifics on the mechanisms for coordinating with government agencies. While Joint Publication 3-08, *Interagency Coordination During Joint Operations Vol I*, identifies the need for interagency coordination, and describes in great detail the what and why, it lacks specifics on the how. 8 For instance, “it tells the CINC and Joint Task Force (JTF) Commander that it is imperative to coordinate operations with the other instruments of national power, but does not suggest the mechanism with which to accomplish it.” 9 Additionally, *Joint Operation Planning and Execution System Volume II* (JOPES Vol II), the instructions for preparing Operational, Contingency and Functional Plans assigned by SECDEF and CJCS, provides guidance on when to include interagency in planning and execution, but lacks specifics on the method. Finally, Joint Publication 5-00.1, *Joint Doctrine for Campaign Planning*, published in January 2002, only echoes the guidance provided by JOPES VOL II for interagency participation.

On the U.S agency side, there is a lack of formal national procedures governing cooperation to fight terrorism. The Presidential Decision Directive (PDD) is the primary tool to promulgate national procedures, designate lead agencies and direct cooperation between supporting government agencies. *PDD 56: Managing Complex Contingency Operations* contributes to providing some of the “how” in joint/interagency coordination. Written in 1997 to improve joint/interagency coordination in recognition of the lessons learned from Panama, Somalia, Haiti, Iraq and the former Yugoslavia, PDD 56 does recognize the requirement for a fully coordinated
pol-mil plan to achieve unity of effort. It also recognizes that “civilian components of an operation must be integrated closely with the military components to maximize effect.” However, PDD-56 defines “complex contingency operations” as peace operations and foreign humanitarian operations, and specifically states that PDD-56 does not apply to counter-terrorism military operations and international armed conflict, thus combat operations. Moreover, regardless of applicability, PDD readership is geared at the interagency strategic level. PDDs are not routinely referenced by CINC staff who conduct deliberate or crisis action planning at the operational level.

Country versus regional focus. In the theater CINC’s AOR, military-agency coordination is greatest between foreign nations’ U.S. Ambassadors (USAMB) and the CINCs. U.S. interagency structure within foreign countries involve the USAMBs and their country teams - U.S. Defense Attache (DAO, supporting the Defense Intelligence Agency) and embassy staff assigned from Department of State, Department of Justice - Federal Bureau of Investigation (FBI), and other supporting agencies. The USAMB and the CINC share similar security cooperation strategies and goals, and their staffs consistently communicate and coordinate to synchronize the execution of tasks, which results in a military-agency unity of effort in that country. However, while these teams synchronize effectively within a single country, the theater CINC’s military mission to fight terrorism extends beyond any single country, instead it is inherently regional. CINCs are tasked by the SECDEF to look at their AORs across borders, in a regional sense. It is highly likely a theater CINC’s orders to combat terrorism will encompass an entire region of his/her AOR and possibly extend into an adjacent CINC’s AOR. Currently, USAMBs and their country teams are not structured or manned sufficiently to synchronize and coordinate regional efforts. Moreover, there is
no U.S. national government agency structured internally or empowered regionally to coordinate interagency activities within a theater CINC’s command in peacetime or in crisis.12

These fundamental differences in military and agency cultures and hierarchies, combined with insufficient guidance negatively impact unity of effort and make synchronizing the military, U.S. government and coalition nations’ activities more difficult. Further, only the theater CINC maintains responsibility, accountability and the authority to support both national and military strategic and operational objectives on a regional basis. Also, the CINCs active participation in interagency planning via the Joint Staff, drives U.S. government agencies to rely on the military’s systematic planning process for regional contingencies. Thus, the CINC’s regional focus, combined with the CINC-USAMB close contact, and the CINC staff’s regular contact with various agencies in each embassy in the AOR, places the theater CINCs in the unique position to provide the necessary leadership to coordinate the military, agencies, and coalition nations actions, regionally, throughout the AOR.

**Bridging the Gap – Requirements for Successful Coordination and Integration**

Having identified a gap and shortfalls, what is needed to bridge the gap? Specifically, what are the requirements that will enable the U.S. to engage the full capabilities of our government agencies and synchronize their actions with U.S. military actions and those of coalition nations?

First, to guide and assist theater CINCs, Joint Pub 3-08 reveals nine steps that serve as a partial list of these requirements – to include: (1) Identify all agencies that should be involved in the operation; (2) define the objective; (3) define courses of action for both military operations and agency activities, (4) solicit from each agency a clear understanding of the role that each plays; (5)
identify potential obstacles to the collective effort arising from conflicting agency priorities; (6)
identify resources of each agency to reduce duplication and increase coherence in the collective
effort; (7) define end state and exit criteria; (8) maximize the mission’s assets to support long term
goals; and (9) establish interagency assessment teams.  Although this list reveals many
requirements to enhance military-agency efforts, additional requirements that provide ways and
means to synchronize and integrate their actions are vital.  Moreover, the requirements must impact
more than just a single mission, event, or assigned objective.  They must be relative to continuous
coordination at the operational level between agencies and the military –coordination that extends
far beyond just planning and execution of any action.  In particular, a theater CINC’s staff should
continuously engage in interagency and U.S. government agency coordination and establish working
relationships to build mutual trust long before any crisis action planning is required.

Further examination suggests four additional requirements as ways and means to
synchronize and integrate agencies efforts with the military:

(1) CINC identify U.S. government agencies that military forces must integrate in and
coordinate with to successfully execute the CINC’s strategy to combat terrorism in the AOR; and
disseminate this list to supporting military commanders via the chain of command and to U.S.
government agencies via the interagency.  Disseminating a list of team members promotes the
establishment of relationships to build mutual trust, and reveals the level of synchronization necessary
for effective coordination.

(2) Compare CINC’s strategic concept, intent, mission and objectives for combating
terrorism with those of participating agencies.  Comparing these articles enables agencies to be alert
to those entities that can achieve policy objectives for their own agencies.  By determining mutual
needs between the CINC’s mission/goals and those of agencies, common ground can be discovered. The aim is to persuade the military and agencies to rely on each other to achieve common objectives and build mutual trust.\textsuperscript{15} This promotes unity of effort and encourages agency participation and support.

(3) **Integrate agencies in the CINC’s planning process.** As SECDEF and CJCS assert, the new war on terrorism demands closer military-agency coordination. A way to enhance this coordination is to include the agencies in both the CINC’s deliberate and crisis action planning aimed at terrorism. Specifically, include agencies in each phase of JOPES Deliberate and Crisis Action Planning. For the military to effectively coordinate with and integrate agencies in military plans, agency roles, capabilities and resources must be learned. This is achieved by agency participation in planning missions. For example, in planning a Maritime Intercept Operation (MIO) to seize shipments of goods supporting terrorist networks, key U.S. government agencies (Department of State, Justice, Commerce, Transportation, and Treasury) contribute resources to support this mission. What resources? Capabilities? How should they be employed? Military planners need the agencies to provide the expertise on how, where, and when to employ agency resources and their capacities to accomplish tasks. Furthermore, agency participation in planning enables a CINC’s Joint Planning Group (JPG) and the agencies to gain consensus for assignment of tasks generated by the planning process. This ensures essential tasks are assigned to the agency or military units with the most effective capacity to accomplish those tasks. Agency participation also serves to eliminate compartmentalized planning, or “stovepipe” planning, thus eliminating duplication in the assignment of resources and tasks resulting from the military and agencies being assigned
similar missions. Furthermore, inviting agency participation increases civilian/military familiarization, easing the cultural reluctance of civilian agencies to communicate and coordinate with the military.

(4) Assign agency liaison officers (LNOs) to CINC staffs. For the CINC staff to successfully plan and coordinate a combined military-agency effort against terrorism, the roles and relationships among the agencies, military, coalition governments, and country teams must be clearly understood. LNOs provide critical insight to their agency’s, philosophy, practices, skills, resources and capacities that the CINC staffs lack. Also, LNOs bring agency powers that the military does not have. For example, FBI agents may have the authority to arrest terrorists in a CINC’s AOR, where military forces do not. Additionally, LNOs provide timely insight during critical planning phases and execution. For example, a Department of Treasury LNO can coordinate with a coalition nation to reveal banking that is linked to maritime shipping companies identified as principal sources of funding for terrorist operations and weapon purchases. A Department of Commerce LNO can then solicit a coalition government’s participation to determine the shipper’s primary port and container locations. This information is then provided to a JTF conducting MIO in the AOR, which in turn, seizes the shipment. These coordinated actions contribute to the U.S. national strategy to freeze assets, block funds and shut down the terrorists financial networks. Furthermore, LNOs provide a single channel to agency headquarters in Washington, D.C., thus increasing the timeliness of requests from their agencies or from the CINC, and facilitating interagency decision making. To illustrate, U.S. soldiers in Bosnia detained suspected terrorists but experienced delays waiting for FBI agents to interrogate the suspects due to cumbersome procedures between the military and the Justice Department in Washington. Had an
FBI liaison officer been assigned to Headquarters, U.S. European Command in Stuttgart, Germany, that agent could have cut through the red tape and interrogations could have been set up much faster. Finally, agency LNOs bring experience working with foreign government authorities and are able to reveal the cultural differences in a host nation agency’s interests, goals, and procedures, thereby enhancing U.S. coordination with coalition nations.

**Providing the Means – JIACG**

Armed with the requirements to enhance military-agency efforts, what mechanism best enables the CINC to coordinate and integrate U.S. government agencies and military efforts?

Figure 1 is a suggested JIACG model and C2 with following text describing recommended divisions, branches, components and the process. Given that CINC war fighting requirements are unique to each AOR, it is expected JIACG structures will vary according to each CINC’s staff structure and procedures to meet their respective requirements. The following model provides a foundation for theater CINC staffs to draw from:
JIACG COMMAND AND CONTROL STRUCTURE

JIACG Mission - Direct the coordination, communication and integration of CINC staff, interagency, U.S. government agencies, country teams and coalition nations engaged in planning and execution of military-agency coordinated operations against global terrorism in the CINC’s AOR; to deconflict tasks at the operational level, enable rapid dissemination of military-agency information, and create synergy and unity of effort among agencies, military forces and coalition nations.

Figure 1
JIACG Director - (J Code Director-level civilian, 0-7/0-8 military equivalent; recommend the Senior Executive Service (SES) representative on CINC’s staff) Responsible to the CINC for the coordination of all JIACG activities and serves as CINC’s senior representative to the interagency, U.S government agencies and coalition nations.18

JIACG Deputy - (Military flag level billet) Responsible for providing planning guidance, establishing suspenses, deconflicting issues and tasks between the military and agencies; to ensure efficient exchange of critical information.19 Additionally, the Deputy is the CINC’s primary assistant to ensure U.S. government agencies and interagency efforts to combat terrorism concur with the CINC’s strategy.

JIACG Division Chief - (Military 0-6) Synchronizes daily JIACG activities. The Division Chief determines and assigns briefing requirements. Also, the Division Chief directs the Info Ops/Public Affairs (PA) branch to identify planned military-agency actions and actions transpired that have media implications, and forward those events to the CINC staff Public Affairs Directorate with recommendations for exploitation and dissemination. Additionally, the Division Chief directs After Action Reviews to capture lessons learned both in the field and at interagency and U.S. government agency headquarters.20

LNO Division – (Civilian, 05/06 military equivalent) Liaison officers from all participating agencies (U.S. Department of State, Justice, Transportation, Commerce, CIA/DIA, Customs etc.) “Their key role is to foster better understanding between participating forces, agencies, and local government.”21 LNOs represent the single point of contact between their agencies and the CINC. LNOs should be language qualified, regionally oriented, and have solid knowledge of the doctrine, capabilities, procedures, goals and culture of their organizations and coalition nations in the region.22
Moreover, LNOs must be experienced enough to recognize their agency’s parochial powers and interests and senior enough to be empowered to make operational level decisions representing their agencies. Additionally, LNOs must be brought into both the deliberate and crisis action planning evolution, therefore they must know what resources and capabilities their agencies bring to an operation and the mechanisms they come in, and their constraints. Also, LNOs from host nations, along with foreign nation LNOs permanently assigned to the CINC’s headquarters, must participate in U.S. planning and current operations to take advantage of their unique foreign insight.

**Plans Division** – (Military 0-5) Coordinates and deconflicts the planning activities of U.S. government agencies, interagency and coalition nation agencies with CINC’s military planners. Plans division works to reduces stovepipe planning between CINCs’ JPGs and lead government agencies. This is accomplished by disseminating the CINC’s strategy, goals, intent and regional objectives in combating terrorism to the interagency via Joint Staff, and to U.S. government and coalition agencies at the operational level via LNOs. The division also compares U.S. government agency, interagency and coalition nation strategies to determine commonalities to enhance unity of effort, and identify conflicting strategies for JPG resolution. Also, the Plans division must ensure U.S. government agencies, via agency LNOs, are integrated in the Commander's Estimate process to enable agency feedback in the development, analysis, selection and execution of Courses of Action (COAs). Additionally, the Plans division determines requirements for rehearsal of plans. Rehearsals are critical to confirm military and agency responsibilities, task assignments, and confirm timing and synchronization necessary for successful execution.23

**Operations Division** – (Military 0-5) Monitors and collates military and agency current operations, projected through a 72 hour window, in the five primary domains to fight terrorism –
diplomatic, economic, intelligence, law enforcement and military. The aim is to enhance communications, coordination, and integration in these five domains, and identify common and conflicting tasks to maintain and enhance military-agency synergy and unity of effort. Also, the Plans division directs LNOs to confirm that their respective agencies are filling their assigned roles, fulfilling their responsibilities, and providing resources and the level of support as directed by the CINC or lead agency. Additionally, the Ops Division is responsible for facilitating the CINC’s requests and tracking approvals for basing rights, over flight rights, MIO rules in national waters, the freezing of financial assets, and detentions of suspected terrorists in host nation countries.

CINC’s Political Advisor (POLAD) and J5 Country Desk Coordination - The CINC’s POLAD and J5 Country Desk Officers (CDOs) are the primary communicators with the USAMB and country teams in the CINC’s AOR. Although not members of the JIACG, both coordinate with the interagency, U.S agencies, and the country teams to provide critical U.S., foreign nation, and regional pol-mil perspectives, as well as U.S. Embassy input and host nation contributions to the planning and execution of military-agency operations. USAMBS and their country teams are keenly aware of factors and considerations that the CINC might apply to develop COAs, and are key to bringing together U.S. national resources within their host country.24 Also, the country team includes U.S. government agents that correlate with each of the JIACG war fighting domains – diplomatic, economic, intelligence, law enforcement, and military - to include: Pol-Mil Counselor, Economic officer, CIA stations chief, FBI special agent in charge, and the DAO.25

The C2 model, divisions and process as described is a broad-brush description for JIACG. A more in-depth analysis, beyond the scope of this paper, is necessary to identify all key components critical to an operational JIACG.
JIACG Challenges – Garnering Military and Agency Commitment

Challenges are expected in changing a military headquarters staff structure and process. Before buying into JIACG, the CINC and U.S. government agencies demand JIACG deliver significant value to the war fighting effort. To gain commitment requires promoting the process through visibility, engagement and education, and training and exercises for the agencies and military forces involved. The aim is to gain military-agency combined interest and confidence that JIACG provides a significant enhancement in military-agency war fighting against terrorism. Suggested ways to garner this support include:

Visibility, Engagement and Education. CINC staffs must urge CINC support and provide CINC talking points and deliverables that aggressively promote JIACG, i.e. CINC Congressional Testimony, Theater Strategy publications, and U.S. and foreign nation senior leader trips and visits. For example, the CINC’s Theater Engagement Plans and J5 Country Campaign Plans must reveal the CINC’s use of JIACG as the primary means for CINC forces to coordinate with the interagency, U.S. government agencies, and coalition governments’ plans and operations against terrorism.

Training. As with any new system, it is critical to raise the level of awareness of the user - the agencies and military - to the JIACG principles, applications and process. Thus, JIACG must be integrated in service schools and similar U.S. government agency and interagency training curricula. To develop the confidence between agencies and the CINC staff necessary for effective communication and coordination, precrisis training is required at the operational level for the agencies, interagency, military forces and coalition nations. Additionally, more school seats must be made available for governmental personnel to attend DoD formal schools that cover military joint
doctrine for Military Operations Other than War (MOOTW). Also, initial training includes exchange tours and seminars.

**Exercises.** Exercises for JIACGs and U.S./coalition agencies provide an essential forum for identifying and assessing agency capabilities and core competencies, identifying procedural disconnects, and attaining synergy and unity of effort. A suggested model to develop JIACG exercises comes from U.S. Southern Command’s Counterdrug Modeling and Simulation System (CMASS). In 1991 Southern Command developed CMASS, a political-military game to address counter drug issues and promote unity of effort among the agencies involved in the war on drugs. From 1991 to 1993, seven CMASS exercises were conducted involving key U.S. and host nation military and agency representatives. CMASS significantly contributed towards interagency cooperation at the policy level both in Washington, and promoted teamwork among U.S and host nation operators in the field. Developing a similar system to address integration and coordination issues among military and agencies combatting terrorism, and incorporating the JIACG process in the exercise scenarios, would be a valuable tool to enhance synergy and unity of effort. Common objectives of a CMASS type game to fight terrorism include:

--Enhance effectiveness of US interagency operations.

--Assist theater CINC and component commanders and staffs to understand the support required by US country teams and agencies.

--Improve regional coordination to increase host nation and law enforcement capabilities to counter terrorism.

--Aid in synchronization of resources; and enhance the planning and operations of interagency players, the country teams and the host nations.
Conclusion

While SECDEF and the CJCS have declared that the new dissimilar war on terrorism requires closer coordination in the diplomatic, economic, intelligence, law enforcement and military domains, the current process for U.S. government agencies and the military to do so is cumbersome and inefficient. The gap in planning and integrating military–agency efforts caused by fundamental differences in their cultures, hierarchies, and insufficient guidance, make synchronizing the military and agency in the current process problematic.

The CINC is in the unique position to coordinate and integrate military and agency actions regionally. A JIACG, employed from the CINC’s headquarters, armed with the requirements to effectively coordinate and integrate the full capabilities of the military and agencies, under an umbrella of military-agency commitment to the JIACG process, will enable the synchronization and unity of effort that is crucial to effectively fight terrorism in the CINC’s AOR.
NOTES


3 Ibid.

4 Garamore, 1.

5 Schmitt, 1.


9 Clark, 15.

10 Ibid.


13 U.S. Joint Chiefs of Staff, ix.

14 Ibid, III-6.

15 Ibid, I-10.

16 Ibid, I-1.
17 Schmitt, 1.


19 Ibid.


21 U.S. Joint Chiefs of Staff, III-20.

22 Ibid.

23 PDD/NSC 56 Managing Complex Contingency Operations, 4

24 U.S. Joint Chiefs of Staff, x.


26 Hamblet and Kline, 97.

27 Dana, 40.


29 Mendel and Bradford, 50.

30 Ibid.
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