

Using Targeted Sanctions to Help Prevent Mass Atrocities

Results from Interviews with Experienced Practitioners

SUMMARY REPORT JANUARY 2023



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FOR THE PREVENTION OF GENOCIDE

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Contributors: Tallan Donine, Kyra Fox, Daniel Solomon, Alex Vandermaas-Peeler, and Lawrence Woocher.

Cover: Man puts a stamp on sanctions list document
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CONTENTS

Executive Summary	1
Introduction	2
Describing the Interview Respondents	2
Results	3
Discussion and Conclusion	9
Appendix A: Methodology	11
Appendix B: Definitions of Key Concepts	13
Appendix C: Targeted Sanctions Interview List	14
Appendix D: Summary of Respondents' Professional Backgrounds	15
Appendix E: Practitioner Interview Questions and Guide	16
Endnotes	21

Executive Summary

Background: As part of our “Lessons Learned in Preventing and Responding to Mass Atrocities” project, the Simon-Skjoldt Center for the Prevention of Genocide conducted semi-structured interviews with individuals who have substantial experience working on targeted sanctions in the US government. Targeted sanctions refer primarily to “coercive economic measures taken against a target to bring about a change in behavior,”¹ which may include “individual, diplomatic, financial, commodity, and sectoral measures to target individuals, corporate entities, regions, or economic and political activities.”² These interviews aimed to summarize experiential knowledge about the use of targeted sanctions to help prevent mass atrocities, as a complement to our survey of the research literature.

Interview respondents: We interviewed 15 people, including multiple former senior sanctions officials at the Department of Treasury. Respondents had an average of 9.5 years of experience working on sanctions policy in the US government, and collectively, they worked in every presidential administration from George H. W. Bush through Donald Trump and in seven US federal agencies.

Results:

Cross-cutting themes: (1) Targeted sanctions can help prevent mass atrocities in multiple ways; (2) Each mass atrocity crisis poses unique and complex policy challenges; (3) Sanctions practitioners should address potential unintended negative consequences; (4) The effectiveness of targeted sanctions in helping prevent mass atrocities in the near term is one of multiple considerations that informs policy decisions.

Average effects: When asked to think of cases in which targeted sanctions were used to help prevent mass atrocities, most respondents said that they were “*sometimes*” effective.

Factors that influence the effectiveness of targeted sanctions: At least two-thirds of practitioners identified the following factors as being associated with greater effectiveness of targeted sanctions in helping prevent mass atrocities: (1) the target’s exposure to the international system, (2) the commitment of the sanctions implementer, (3) international support or coordination around the sanctions policy, and (4) clear communication about the sanctions policy.

Conclusions: The interviews affirmed one of the key premises for our project: that the effectiveness of atrocity prevention tools depends largely on a set of factors regarding the context in which they are used and the manner in which they are designed and implemented. The factors that respondents cited most commonly as shaping the effectiveness of targeted sanctions in preventing mass atrocities appear to align with more general insights about sanctions effectiveness. Although we cannot say whether the results from these interviews represent views of the full universe of experienced practitioners, they can help identify topics for future research and provide practitioners with a set of ideas that should inform future action.

Introduction

The Simon-Skjoldt Center’s “lessons learned” project aims to understand better how policy makers, across all levels of government, can take effective action to prevent mass atrocity crimes and protect civilian populations in situations where they face serious threats of group-targeted, systematic violence. We have sought to identify, distill, and organize insights on a range of policy tools—ranging from “naming and shaming” to sanctions to prosecutions—which are sometimes used to help prevent or respond to mass atrocities.

To complement our review of the empirical research literature on the use of targeted sanctions, we conducted interviews with people who had substantial policy or operational experience working in the US government on targeted sanctions prior to 2021. The premise for the interviews is that experienced practitioners have important insights about when and how targeted sanctions can be most effective in helping prevent mass atrocities.³ While one can find many ideas about how to use targeted sanctions most effectively, none that we are aware of are: (1) focused specifically on the use of targeted sanctions for mass atrocity prevention and (2) based on the collective perspectives of a set of experienced practitioners.

This report summarizes the results of the interviews with experienced targeted sanctions practitioners. Details on the methods employed and the interview respondents are presented in appendices.

Describing the Interview Respondents

We completed interviews with 15 people between August and October 2021. Eight people whom we invited to participate did not respond and one declined to be interviewed. All respondents agreed to having their names listed as someone we had interviewed; see Appendix C for the list of respondents.

During the interviews, we collected information about respondents’ professional experiences. We summarize respondents’ professional experiences in Appendix D. In general, respondents had a long tenure working on sanctions policy in multiple US government departments or agencies, across multiple presidential administrations.

Years of experience: Respondents had an average of 9.5 years of experience working on targeted sanctions policy for the US government, with a minimum of 2.5 and a maximum of 21. Respondents had an average of 5 years of experience working on targeted sanctions policy outside the US government, with a minimum (greater than zero) of 2 and a maximum of 14.

Experience by administration: Respondents had professional experience in all five presidential administrations from George H. W. Bush to Donald Trump, with most having experience across multiple administrations. The largest number of respondents had experience working under the Obama administration; the smallest number of respondents, in the George H. W. Bush administration.

Experience by agency: Respondents had professional experience in seven US federal agencies: the Department of Treasury, the White House (National Security Council), the Department of Justice, the US Mission to the United Nations, the Department of State, the Central Intelligence Agency, and the

Department of Homeland Security. The largest number of respondents had experience working in the Department of Treasury; the smallest number, in the Department of Homeland Security.

Results

Cross-cutting themes

Although the interview questions focused mainly on identifying specific factors that respondents believed to be associated with the effectiveness of targeted sanctions in helping prevent mass atrocities, we also identified in their responses a set of cross-cutting themes.

1. ***Targeted sanctions can help prevent mass atrocities in multiple ways.***

Illustrative responses:⁴

- We can limit the money [perpetrators] can access, so even if they don't change their behavior, [targeted sanctions] make it more difficult to access resources. Even if they don't stop or prevent atrocities, they can make them not become bigger in scale.
- Sanctions can scare other countries away from funding the organizations/states by threatening secondary sanctions.
- Sanctions can contribute to prevention by sending a signal to the next bad guy.

2. ***Each mass atrocity crisis poses unique and complex policy challenges.***

Illustrative responses:

- It is very hard to come up with a formula for what to do in advance ... [there are] thousands of contextual factors.
- There are so many factors it's very difficult to say, "Here is a playbook that is going to work."
- It's so hard to generalize [about what works]. ... Each case is so different.

3. ***Sanctions practitioners should address potential unintended negative consequences.***

Illustrative responses:

- Sanctions [should be] balanced with efforts to get humanitarian relief on the ground.
- To ensure the success of sanctions, you need to see around these corners and have visibility for what else may be impacted. [The sanctions should include] provisions to allow for humanitarian assistance to avoid collateral impacts.
- Targeting the head of state presents a thorny diplomatic situation, often considered tantamount to calling for regime change.

4. ***The effectiveness of targeted sanctions in helping prevent mass atrocities in the near term is one of multiple considerations that informs policy decisions.***

Illustrative responses:

- Sanctions contribute to the policy framework to stop atrocities.

- The level of our deterrence is not as great as we would like. We need to increase it. ... I would do it even if we couldn't prove it would be effective.
- Sometimes the targeted sanctions take place to alert people of the mass atrocities, not stopping or preventing them, but maybe preventing others. [They can be] used to raise awareness of unjust activities at that time.

Effectiveness of targeted sanctions across cases

To assess practitioners' views about the average effectiveness of targeted sanctions in helping prevent mass atrocities, we asked the following question: "Targeted sanctions are sometimes used to help prevent mass atrocities. In those cases, how often does it succeed?" We did not define "succeed," but when asked by respondents, we clarified that success could include instances in which atrocities continued but at a lower level than would have been the case in the absence of targeted sanctions.

Figure 1 displays the distribution of responses. Most respondents (8 of 15) indicated that targeted sanctions "sometimes" succeed in helping to prevent mass atrocities, while four respondents indicated that they "rarely" succeed and two indicated that they "never" succeed. One respondent declined to respond to the question.

The preponderance of "sometimes" responses underscores the importance of identifying the specific factors that make targeted sanctions more or less likely to succeed in helping prevent mass atrocities.

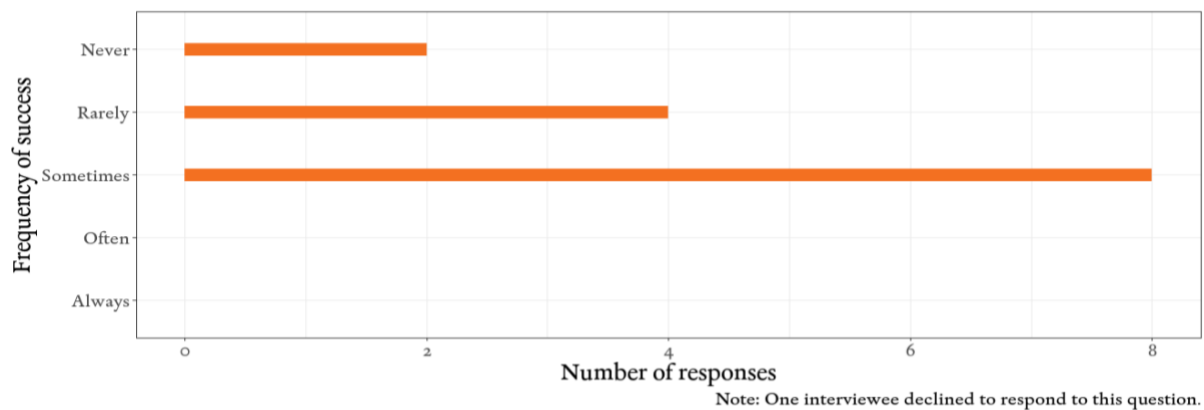


Figure 1: Responses to the question: "Targeted sanctions are sometimes used to help prevent mass atrocities. In those cases, how often do they succeed?"

Contextual factors

We asked practitioners to identify the contextual factors that shape the effectiveness of targeted sanctions in preventing mass atrocities. In Table 1, we describe the three contextual factors that more than one practitioner identified during their interviews.

One factor—the *international exposure of the target*—was cited by 12 out of 15 respondents. We provide illustrative responses from practitioners who cited this factor. Respondents’ conception of “exposure” was fairly broad, including a sanctions target’s financial ties or commercial involvement in the international system, but also having family living abroad or an interest in traveling abroad. Multiple practitioners described this factor as a prerequisite for effective sanctions. One-third of respondents also cited a closely related factor—that *sanctions targets prioritize their reputation*. These practitioners noted that sanctions are most effective in helping prevent mass atrocities when the target’s international exposure or concern for reputation provide sanctions implementers with potential leverage to influence the target’s decisions.

Table 1: Contextual factors influencing the effectiveness of targeted sanctions in helping prevent mass atrocities

CONTEXTUAL FACTOR	DESCRIPTION	NUMBER OF RESPONDENTS
International exposure of the target	The target has ties to the international financial system and/or family living abroad.	12/15 (80%)
	Illustrative responses:	
	<ul style="list-style-type: none"> • ... the extent that the target wants to be integrated into the outside world. • Sanctions work when the actor has something to lose: they want to travel, move money around. • Types of individuals listed will make a big difference. Janjaweed in Darfur, no impact since they have no assets/plans to leave. More senior/wealthy elites, potentially see greater impact. • If you sanction someone with no connection to the financial system, people might care less, could be seen as a badge of honor. • Boko Haram doesn’t care, and they might enjoy being sanctioned because it elevates their system, they don’t want to be a part of the international system. 	
Target prioritizes reputation	The target cares about their reputation among domestic and international audiences.	5/15 (33%)
Target is a severe human rights violator	The target has committed an extensive number of human rights violations in the conflict in which mass atrocities or closely-related outcomes are occurring.	3/15 (20%)

Design factors

We also asked practitioners to identify the design factors that impact the effectiveness of targeted sanctions in preventing mass atrocities. In Table 2, we describe the 13 design factors that more than one practitioner identified during their interviews. Three factors were cited by more than 10 out of 15 respondents. First, respondents referenced the commitment of the sanctions implementer. Second, respondents referenced international support or coordination. Third, respondents noted the importance of clear communication about the sanctions policy. In the below table, we provide illustrations from our approximate transcripts of interviews in which practitioners cited these factors.

Table 2: Design factors influencing the effectiveness of targeted sanctions policy in helping prevent mass atrocities

DESIGN FACTOR	DESCRIPTION	NUMBER OF RESPONDENTS
Committed implementer	The sanctions implementer has a high level of commitment, resolve, or credibility, or has committed a great deal of resources toward use of sanctions.	13/15 (87%)
	Illustrative responses:	
	<ul style="list-style-type: none"> The United States as a sanctioning body can make any sanction stick if they decide they want it to stick. The question is where it falls on the list of priorities. Have to have the resources, dedicated resources, dedicated human beings, intelligence, all of that stuff If you don't have someone with their foot on it, those resources can easily get switched to other priorities. Are you issuing penalties against foreign/American actors/companies for violating the sanctions? If you don't have an enforcement approach, it can weaken effectiveness because people think they can violate without getting caught. 	
International support or coordination	There is a high degree of international support for the use of sanctions, or the sanctions implementer coordinates with other international actors on the use of sanctions.	13/15 (87%)
	Illustrative responses:	
	<ul style="list-style-type: none"> Most important to build a coalition in advance, may not be the UN for obvious reasons. Could build a coalition anyways ... not just banks, but corporations in general Making sure you're not associated with mass atrocities. 	

DESIGN FACTOR	DESCRIPTION	NUMBER OF RESPONDENTS
	<ul style="list-style-type: none"> Sanctions are multilateral: Doesn't just provide additional leverage but can help prevent asset flight. The more plugs by being multilateral, the more successful because actors have less room for evasion. Multilateral (EU linkages, working through UN or in some sort of multilateral context, principally with the EU) in these cases is critical to ensure the sanctions have a tangible impact over the symbolic measure. 	
Clear communication	<p>The sanctions implementer clearly communicates the actions that would trigger the imposition or lifting of sanctions and rules for complying with sanctions.</p> <p>Illustrative responses:</p> <ul style="list-style-type: none"> Clear communication about when the sanctions would be lifted or about red lines after which the sanctions will not be lifted ... Create a framework; "if you cross this line, there will be massive and consequential sanctions on those responsible." In order for sanctions to be effective, there needs to be an understanding that they are not permanent. If there is a change in behavior, further atrocities/violence are withheld, there is an off-ramp to being subjected to sanctions. The hardest possible question: are you really going to give an incentive for someone to stop an atrocity? 	10/15 (67%)
Broad authorities	Sanctions are applied in a broad way or based on broad authorities. ⁵	8/15 (53%)
Concurrent use of multiple tools	The sanctions implementer or other actors are simultaneously implementing other tools that are consistent with the goals of the sanctions.	7/15 (47%)
Sanctions target salient interests	The sanctions focus on a salient interest of the target, such as assets or ability to operate in the international financial system.	5/15 (33%)

DESIGN FACTOR	DESCRIPTION	NUMBER OF RESPONDENTS
Well-informed implementer	The sanctions implementer is well-versed in the political and social context in which the conflict is occurring, or has credible information about the intentions or capabilities of the target.	4/15 (27%)
Clear policy objectives	The implementer's objectives in using sanctions are clear.	2/15 (13%)
High-status target	The target is a top leader or has high status.	2/15 (13%)
Experienced implementer	The sanctions implementer was previously involved in efforts to use sanctions in the conflict in which mass atrocities are occurring.	2/15 (13%)
Humanitarian exemptions	The targeted sanctions exempt humanitarian operations from restrictions on trade or financial exchanges.	2/15 (13%)
Implementer has strong leverage	The sanctions implementer (1) has a significant degree of relative power in the international system, (2) is a member of the "Permanent Five" (P5) countries on the UN Security Council, or (3) has significant leverage over the conflict parties	2/15 (13%)
Legally authorized	The targeted sanctions have a strong legal basis and/or impose binding legal obligations.	2/15 (13%)

Discussion and Conclusion

In the interviews that we summarize above, we set out to gather experiential knowledge from practitioners of targeted sanctions about how this tool can be used most effectively to help prevent mass atrocities. We conclude here with three broad observations about the results, two limitations of this research, and brief implications for research and policy practice.

First, our practitioner interviews affirmed one of the key premises for our project, which our review of the research literature also underscored: that the effectiveness of atrocity prevention tools depends largely on a set of factors about the context in which they are used and the manner in which they are designed and implemented. Most practitioners said that targeted sanctions are “sometimes” successful in helping prevent mass atrocities and identified several factors that influence the outcomes of any particular case. In addition to these responses, differences across cases and the complexity of each case were common themes; in the words of one practitioner, “each case is so different.”

Second, the factors that respondents cited most commonly as shaping the effectiveness of targeted sanctions in preventing mass atrocities appear to align with more general insights about sanctions effectiveness. For example, several points in the [2021 Department of Treasury Sanctions Review](#) (e.g., need for a clear policy objective, desirability of multilateral coordination, need to mitigate unintended consequences) were also cited by our interview respondents. This suggests that sanctions practitioners believe that, while helping prevent mass atrocities might be a particularly difficult objective, decision makers can rely on what has been learned about how to use sanctions effectively in pursuit of other policy objectives.

Third, respondents drew greater attention to design factors—characteristics of policy design—than to contextual factors. Two or more respondents referenced 13 different design factors that impact effectiveness, compared to three contextual factors. Respondents’ emphasis on design factors is unsurprising given that design and implementation questions are the overwhelming focus of most sanctions professionals in government. The imbalance in favor of design questions might also reflect the near-routine use of targeted sanctions across vastly different contexts. As the Treasury Sanctions Review described, targeted sanctions have become “a tool of first resort to address a range of threats to the national security, foreign policy, and economy of the United States.”

Two limitations of our interviews bear noting. First, although we are confident that our respondents represent a diverse assortment of policy experiences, we make no claim that the views of these 15 respondents represent the full universe of experienced sanctions practitioners. The number of respondents is relatively small, we identified potential respondents in a non-random manner, and people we invited to participate but who never responded might have meaningfully different views. That said, our respondents include multiple people who served in particularly relevant government positions across multiple administrations. Whether or not their views are broadly representative, we believe they are noteworthy. Second, for the sake of brevity and simplicity, we relied on respondents’ ability to identify important factors in the abstract. It is possible that using less direct interview methods, such as narrating a hypothetical sanctions policy response to a potential mass atrocity scenario, would have highlighted different factors.⁶

Finally, our findings have implications for both research and policy practice about targeted sanctions.

Future policy-relevant research should focus on factors where there is a relatively high level of practitioner consensus but relatively low levels of systematic research. For example, more than two-thirds of respondents indicated that targeted sanctions involving clear communication by the sanctions implementer were generally more effective; it would be useful for researchers to explore this contention systematically across a large number of cases.

For practitioners, the collective perspectives of our interview respondents should inform future action. Two-thirds or more of our respondents cited the following four factors as being associated with greater effectiveness of targeted sanctions in helping prevent mass atrocities: (1) the target's exposure to the international system, (2) the commitment of the sanctions implementer, (3) international support or coordination around the sanctions policy, and (4) clear communication about the sanctions policy. Given the strong consensus on these factors, practitioners can reasonably conceive of them as basic guidelines for maximizing the effectiveness of new and ongoing sanctions. While respondents were clear that there is no checklist or single path to effective use of targeted sanctions, practitioners should nevertheless pay attention to the factors they identified as being important.

Appendix A: Methodology

Identifying respondents

We developed an initial list of potential respondents who had at least several years of policy or operational experience working on targeted sanctions, excluding people who were serving in government at that time. Specifically, our initial list included former Department of Treasury officials who served as the under secretary for terrorism and financial intelligence, the director of the Office of Foreign Assets Control, and officials who supported the interagency Atrocities Prevention Board or the Atrocity Early Warning Task Force.

We expanded the pool of potential respondents by asking each interviewee to share the names of individuals with relevant experience working on targeted sanctions.

Interview structure

We provided the practitioners with the project description, relevant definitions, and survey questions before the interview. One staff member conducted the interview while one staff member took notes capturing complete responses. To encourage candor, we did not record the interviews and agreed that no responses would be attributed to any individual; as a result, the illustrative responses we provide in this report are anonymized and approximate, not necessarily verbatim quotations.

Using a semi-structured interview format, we first asked respondents to list specific factors (divided into sections focusing on contextual and design factors) that they believed impact the effectiveness of targeted sanctions in helping prevent mass atrocities.⁷

If practitioners did not specify whether factors they identified related to context or design, we sorted the factors into these categories after the interview, or sought clarification during the interview where necessary.

Because we had an interest in probing practitioner views on specific factors that were supported by research, we prompted respondents with a list of factors on which we had found relatively strong evidence in our review of the research literature on targeted sanctions.⁸ This consisted of just one factor: commitment on the part of the sanctions implementer. We assume that providing a prompt for that factor increased respondents' likelihood of endorsing its importance. This would have been problematic had we been seeking to elicit practitioner views completely independent of findings from empirical research. Rather, we assume that practitioner views are already partially informed by research findings, and we had an interest in identifying specific factors that were supported by research and endorsed by the largest proportion of practitioners.

The interviewer also asked the respondent about the average effectiveness of targeted sanctions at helping prevent mass atrocities across cases.

At the end, practitioners had the opportunity to add insights that did not fit within the structured questions. On average, the interviews lasted approximately 30 minutes each.

The interview guide is available in Appendix E.

Analytic strategy

Because we sought to summarize the collective perspective of experienced practitioners, we grouped similar responses to open-ended questions into categories. The results section above is organized around these categories, with illustrative individual responses presented for the most frequently cited factors. Where applicable, we used categories that we had already established from the review of research on targeted sanctions.

We highlight the proportion of respondents citing each factor as a measure of the degree of consensus across the set of respondents. For our “Tools for Atrocity Prevention” website, we use this measure to indicate the “strength of practitioner evidence,” as an analogue to the “strength of research evidence.” We translate the numerical measure to qualitative descriptions as follows:

- Less than or equal to 1/3 of respondents citing a factor equates to “weaker”;
- Greater than 1/3 and less than or equal to 2/3 of respondents citing a factor equates to “moderate”;
- Greater than 2/3 of respondents citing a factor equates to “stronger.”

Appendix B: Definitions of Key Concepts

The following definitions of key concepts were shared with respondents in advance of interviews:

Mass atrocities: “large-scale, systematic violence against civilian populations.”⁹

Targeted sanctions: “context-specific individual, diplomatic, financial, commodity, and sectoral measures to target individuals, corporate entities, regions, or economic and political activities.”¹⁰ Targeted sanctions can include financial sanctions, targeted trade restrictions, travel restrictions, and arms embargoes.¹¹

Contextual factors: characteristics related to the context in which an atrocity prevention tool is used. Contextual factors can include the type of conflict in which mass atrocities take place, the characteristics of the regime or group responsible for mass violence against civilians, and the pre-existing relationship between the tool implementer and that regime or group.

Design factors: characteristics related to the manner in which an atrocity prevention tool is designed and implemented. Examples of design factors include public and private communication, timing, and the extent to which the tool is implemented or coordinated multilaterally.

Appendix C: Targeted Sanctions Interview List

Name	Selected relevant former government position¹²	Date interviewed
Brad Brooks-Rubin	Former Special Advisor for Conflict Diamonds, State Department	24 August 2021
Hagar Chemali	Former Spokesperson for Terrorism and Financial Intelligence, Department of Treasury	17 September 2021
Julia Friedlander	Former Senior Policy Advisor, Office of Terrorism and Financial Intelligence, Department of Treasury	10 September 2021
Sean Kane	Former Deputy Assistant Director for Policy, Office of Foreign Assets Control, Department of Treasury	23 September 2021
Stuart Levey	Former Under Secretary for Terrorism and Financial Intelligence, Department of Treasury	14 October 2021
Sigal Mandelker	Former Under Secretary for Terrorism and Financial Intelligence, Department of Treasury	12 October 2021
David Mortlock	Former Deputy Coordinator for Sanctions Policy, Department of State	30 August 2021
Brian O'Toole	Former Senior Advisor to the Director, Office of Foreign Assets Control, Department of Treasury	19 August 2021
Peter Piatetsky	Former Senior Policy Advisor, Office of Terrorist Financing and Financial Crimes, Department of Treasury	1 October 2021
Adam M. Smith	Former Senior Advisor to the Director, Office of Foreign Assets Control, Department of Treasury	16 August 2021
John Smith	Former Director, Office of Foreign Assets Control, Department of Treasury	8 September 2021
Adam Szubin	Former Acting Under Secretary for Terrorism and Financial Intelligence, Department of Treasury	6 October 2021
Matthew Tuchband	Former Deputy Chief Counsel, Office of Foreign Assets Control, Department of Treasury	23 September 2021
Howard Wachtel	Former Acting Coordinator for Sanctions Policy, Department of State	19 August 2021
Joshua White	Former Chief for Human Rights and Corruption, Office of Foreign Assets Control, Department of Treasury	23 August 2021

Appendix D: Summary of Respondents' Professional Backgrounds

Table D-1: Number of respondents by years of professional experience working on targeted sanctions

Years	Number of respondents	
	In government	Out of government
0 - 5	1	6
5 - 10	8	7
10 - 15	4	1
15 - 20	1	0
> 20	1	0

Note: Each respondent was asked to report experience in government and out of government.

Table D-2: Number of respondents by experience in different presidential administrations

Administration	Number of respondents
HW Bush	1
Clinton	2
GW Bush	8
Obama	14
Trump	8

Note: These categories are not mutually exclusive.

Table D-3: Number of respondents by experience in different executive agencies

Agency	Number of respondents
Treasury	13
White House	5
Justice	4
US/UN	3
State	2
CIA	2
Homeland Security	1

Note: These categories are not mutually exclusive.

Appendix E: Practitioner Interview Questions and Guide

Last updated 1 December 2021

Interview protocols:

- Read out loud all text below that is not in orange [in black-and-white, gray].
- When respondents give a long, wordy answer, rephrase what they've said into a simpler contextual or design factor (ideally one that has appeared in other parts of the project) and confirm with them that that is what they mean where necessary.
- Record answers and comments in a separate notes document.

Section 1: Contextual Factors

Section 2: Design Factors

Section 3: Other factors

Section 4: Effectiveness across Cases

Section 5: Demographic Information

The mandate of the Simon-Skjoldt Center is to alert the United States' national conscience, influence policy makers, and stimulate worldwide action to prevent and work to halt acts of genocide or related crimes against humanity, and advance justice and accountability. This interview is part of a multi-year research effort at the Center entitled "Lessons learned in preventing and responding to mass atrocities." This project aims to improve atrocity prevention strategies by strengthening their linkages to an expanding and increasingly accessible body of policy-relevant knowledge.

In addition to summarizing academic and policy research, we are reaching out to experienced practitioners like you to gather their perspectives about the effects of targeted sanctions on mass atrocities. We will be asking you questions about the types of contexts in which targeted sanctions work better at preventing¹³ mass atrocities, ways to design targeted sanctions to maximize their effectiveness, and the effectiveness of targeted sanctions across cases. We expect the survey to take about 30 minutes.

We'd like to start with your views on which factors make targeted sanctions more or less likely to prevent atrocities.

Section 1: Contextual Factors

First, we'd like to ask about "contextual factors."¹⁴ We will ask about ways to design and implement the targeted sanctions next. [PAUSE FOR QUESTIONS]

Some respondents might resist doing this in two separate sections and prefer to just tell us what factors they think make a difference. If that happens, adapt to that preference instead of forcing them to follow this structure. We can sort the factors people volunteer into context or design, or if we're unsure, ask them to clarify if they think of a particular factor as something that is more or less fixed or in control of policy makers.

1. Which characteristics of the context in which targeted sanctions are used do you think make them more or less likely to prevent mass atrocities?

If the respondent is struggling to identify contextual factors, you can prompt them with the following:

Some examples of categories to consider include domestic context, conflict dynamics, international dynamics, target characteristics, and implementer characteristics.

2. Does the presence of the first contextual factor you listed make targeted sanctions more or less likely to prevent mass atrocities?
 - a. More
 - b. Less

[REPEAT for each contextual factor listed]

3. Here is a list of contextual factors that appeared in our review of existing research. Please take a minute to review the list and state any factors that you did not originally mention but you think are important.

If we interview by video, screen share. If we interview by phone, read out the list.

If asked why the list is short or if these were the only factors we found in our research, explain that to keep the interview to a reasonable length, we presented only factors from existing research with relatively strong evidence.

4. Does the presence of the first contextual factor on the list make targeted sanctions more or less likely to prevent mass atrocities?
 - a. More
 - b. Less

In most cases, it will be clear from the prior response whether they think the factor makes sanctions more or less likely to prevent mass atrocities. In that scenario, record it without asking explicitly.

[REPEAT for each contextual factor]

Section 2: Design Factors

Now we'd like to ask about "design factors." [PAUSE FOR QUESTIONS]

5. What characteristics of the *design* and *implementation* of targeted sanctions do you think make them more or less likely to prevent mass atrocities? Please list out these characteristics.
If the respondent is struggling to identify design factors, you can prompt them with the following:

Some examples of categories to consider include timing, communication, coordination, and scope of tool.

6. Does the presence of the first design factor you listed make targeted sanctions more or less likely to prevent mass atrocities?
 - a. More
 - b. Less

[REPEAT for each design factor listed]

No design factors that were supported by strong evidence actually appeared in our research on targeted sanctions, so now we'll move onto the next section.

Section 3: Other Factors

7. Please list out any other factors that you think influence the effectiveness of targeted sanctions in preventing mass atrocities.
8. Does the presence of the first factor you listed make targeted sanctions more or less likely to prevent mass atrocities?
 - a. More
 - b. Less

[REPEAT for additional other factors]

Section 4: Effectiveness across Cases

Lastly, we want to ask you about the effectiveness of targeted sanctions at preventing mass atrocities across cases.

9. Targeted sanctions are sometimes used to help prevent mass atrocities. In those cases, how often do they succeed?
 - a. Never
 - b. Rarely
 - c. Sometimes
 - d. Often
 - e. Always
10. We're done with the structured questions. Before we move on to concluding questions, I just want to pause in case you have other insights that you think are important to share about the effectiveness of targeted sanctions at preventing mass atrocities.

Section 5: Demographic Information

Now I'm going to ask a few questions about your background, for statistical purposes only.

Don't read out the response options. If asked, these questions should enable us to describe the sample of respondents, but it is unlikely we'll have enough participants to analyze responses according to any of these categories.

11. Gender:
 - a. Nonbinary
 - b. Female
 - c. Male
12. Are you of Hispanic, Latino, or Spanish origin?¹⁵

- a. Yes
- b. No

13. Race:¹⁶

- a. White
 - b. Black or African American
 - c. American Indian or Alaska Native
 - d. Chinese
 - e. Filipino
 - f. Asian Indian
 - g. Vietnamese
 - h. Korean
 - i. Japanese
 - j. other Asian
 - k. Native Hawaiian
 - l. Samoan
 - m. Chamorro
 - n. other Pacific Islander
 - o. other race
 - p. Prefer not to respond
14. Agency affiliation(s): *please confirm (not mutually exclusive)*
- a. White House
 - b. State Department
 - c. Treasury
 - d. USAID
 - e. Department of Defense
 - f. US Mission to the UN
 - g. Other
- When possible, say "To confirm, you served in X and X?"*

15. Presidential administration(s): *please confirm (not mutually exclusive)*

- a. Clinton
- b. GW Bush
- c. Obama
- d. Trump
- e. Other

16. For about how many years did you work on targeted sanctions in government?

17. For about how many years have you worked on targeted sanctions out of government?

Conclusion

Thank you so much for sharing your expertise with us. We really appreciate your taking the time to assist us in our research. As a reminder, all of your responses will be anonymized or used to generate summary measures.

18. Would you be willing to have us list your name as someone we interviewed for this project? (if so, ask/confirm which current/former affiliation to use)
19. Do you know of anyone with relevant experience with targeted sanctions that might be willing to speak with us?

Endnotes

¹ “Economic Sanctions: Overview for the 117th Congress,” Congressional Research Service, January 15, 2021, p. 1, <https://sgp.fas.org/crs/row/IF11730.pdf>.

² Biersteker, Thomas J., Sue E. Eckert, Marcos Tourinho, and Zuzana Hudáková. “UN targeted sanctions datasets (1991–2013),” *Journal of Peace Research* 55, no. 3 (2018): 404–412.

³ Using a semi-structured interview format, we asked respondents to list specific factors (divided into sections focusing on contextual and design factors) that they believed shape the effectiveness of targeted sanctions in helping prevent mass atrocities. See Appendix A for more details on our methodology.

⁴ To encourage candor, we did not record the interviews and agreed that no responses would be attributed to any individual; as a result, the illustrative responses we provide in this report are anonymized and approximate, not necessarily verbatim quotations. See Appendix A for more details on our methodology.

⁵ Respondents cited breadth with respect to the types of sanctions (e.g., restricting commerce and banning entry into the United States in addition to freezing assets) and the list of targets (e.g., extending sanctions to networks of individuals and corporate entities).

⁶ M. Granger Morgan, “Use (and Abuse) of Expert Elicitation in Support of Decision Making for Public Policy,” *Proceedings of the National Academy of Sciences of the United States of America* 111, no. 20 (May 20, 2014): 7176–84, <https://doi.org/10.1073/pnas.1319946111>.

⁷ We also asked practitioners to gauge their confidence in their statements about the influence of each factor, but we found that the question confused many respondents, extended interview durations, and almost never varied across factors for individual respondents. As a result, we did not use these data and dropped the confidence questions from the interviews about other atrocity prevention tools.

⁸ Because we conducted practitioner interviews while we were completing and refining the research review, the list represented the factors supported by the strongest evidence at the time of the interview.

⁹ Scott Straus, *Fundamentals of Genocide and Mass Atrocity Prevention* (Washington, DC: US Holocaust Memorial Museum, 2016), 31.

¹⁰ Biersteker, Thomas J., Sue E. Eckert, Marcos Tourinho, and Zuzana Hudáková. “UN targeted sanctions datasets (1991–2013),” *Journal of Peace Research* 55, no. 3 (2018): 404–412.

¹¹ Based on practitioner feedback, we decided to use a different definition for the Tools for Atrocity Prevention website; see here: <https://preventiontools.ushmm.org/targeted-sanctions/>. Note we also reviewed evidence on arms embargoes separately due to the depth of research on the use and effects of this tool specifically.

¹² Most respondents served in multiple positions that are relevant to targeted sanctions policy. We list just one for each individual based on publicly available information.

¹³ This project defines prevention as discouraging or disabling specific, identified actors from committing mass atrocities. This can include both preventing mass atrocities before they occur or reducing mass atrocities that are already occurring.

¹⁴ “Contextual factors” include the characteristics of the world in which the policy is implemented, but which policy makers themselves cannot control. These include factors such as the type of conflict in which mass atrocities take place, the characteristics of the regime or group responsible for mass violence against civilians, and the relationship between the sanctioning government and that regime or group.

¹⁵ Source: 2020 US Census, <https://2020census.gov/en/about-questions.html>.

¹⁶ Source: 2020 US Census, <https://2020census.gov/en/about-questions.html>.

Acknowledgements

Tallan Donine, Kyra Fox, and Lawrence Woocher conducted interviews with practitioners. Kyra Fox and Alex Vandermaas-Peeler drafted the interview protocol. Daniel Solomon, Tallan Donine, and Lawrence Woocher drafted the summary report. We are grateful to the interview respondents (listed in Appendix C) for sharing their insights and reviewing a draft of this report. We also thank Ashleigh Landau and other Simon-Skjodt Center colleagues for their comments on earlier drafts.

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100 Raoul Wallenberg Place, SW Washington, DC 20024-2126 ushmm.org