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Report No. 05-INTEL-08  
May 13, 2005  
Infrastructure and Environment

DEPARTMENT OF DEFENSE  
OFFICE OF INSPECTOR GENERAL



DEPUTY INSPECTOR GENERAL FOR INTELLIGENCE

**Counterintelligence Field Activity Data Call Submissions  
and Internal Control Processes for Base  
Realignment and Closure 2005**

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~~BRAC-related reports are exempt from release under section 552(b)(5), title 5, United States Code, "Freedom of Information Act," and DoD Directive 5400.7, "DoD Freedom of Information Act Program," September 1998 (Exemption Number 5, paragraph C3.2.1.5).~~

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### **Acronyms**

BRAC	Base Realignment and Closure
CIFA	Counterintelligence Field Activity
COBRA	Cost of Base Realignment Actions
DoD OIG	DoD Office of Inspector General
ICP	Internal Control Plan
JCSG	Joint Cross-Service Group
OSD	Office of the Secretary of Defense



INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
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May 13, 2005

MEMORANDUM FOR DIRECTOR, COUNTERINTELLIGENCE FIELD ACTIVITY

SUBJECT: Report on Counterintelligence Field Activity Data Call Submissions and Internal Control Processes for Base Realignment and Closure 2005 (Report No. 05-INTEL-08)

We are providing this report for information and use. We performed the audit in response to a request from the Under Secretary of Defense for Acquisition, Technology, and Logistics. No written response to this report was required, and none was received. Therefore, we are publishing this report in final.

We appreciate the courtesies extended to the staff. Questions should be directed to [redacted] at (703) 604-[redacted] (DSN 664-[redacted]) or [redacted] at (703) 604-[redacted] (DSN 664-[redacted]). See Appendix C for the report distribution. The team members are listed inside the back cover.

Shelton R. Young  
Assistant Inspector General  
for Intelligence

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**Department of Defense Office of Inspector General**

**Report No. 05-INTEL-08**  
(Project No. D2004-DINT01-0227.000)

**May 13, 2005**

**Counterintelligence Field Activity Data Call Submissions  
and Internal Control Processes for Base  
Realignment and Closure 2005**

**Executive Summary**

**Who Should Read This Report and Why?** Office of the Secretary of Defense personnel responsible for deciding the realignment or closure of military installations based on the Base Realignment and Closure (BRAC) data calls and Counterintelligence Field Activity management personnel should read this report. The report discusses the validity, integrity, and supporting documentation of the data provided by the Counterintelligence Field Activity to assist the Secretary of Defense in BRAC 2005 recommendations.

**Background.** BRAC 2005 is the formal process outlined in Public Law 101-510, "Defense Base Closure and Realignment Act of 1990," as amended, under which the Secretary of Defense may realign or close military installations inside the United States and its territories. As part of BRAC 2005, the Under Secretary of Defense for Acquisition, Technology, and Logistics issued, "Transformation Through Base Realignment and Closure (BRAC 2005) Policy Memorandum One-Policy, Responsibilities, and Procedures," April 16, 2003, which stated that the DoD Office of Inspector General would review the accuracy of BRAC data and the certification process.

The BRAC 2005 process was mandated for the United States and its territories and was divided into the following data calls – capacity analysis, supplemental capacity, Military value, Cost of Base Realignment Actions, Joint Process Action Team Criterion Number 7, and scenario specific. The Intelligence agencies' collection process was divided into the following data calls – capacity analysis, Military value, and scenario specific. We issued site memorandums for the capacity analysis data call and Military value data call to summarize the results of the site visits. This report summarizes data calls as of April 2005, for the Counterintelligence Field Activity BRAC 2005 process.

The Counterintelligence Field Activity, headquartered in Arlington, Virginia, mission is to produce a common Defense Department counterintelligence operational picture, and deliver unique and actionable information to key decision makers in federal, state, and local governments. The Counterintelligence Field Activity was required to perform only the capacity analysis, Military value, and scenario specific data calls.

**Results.** We evaluated the validity, integrity, and supporting documentation of BRAC 2005 data calls that the Counterintelligence Field Activity submitted for the

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capacity analysis, Military value, and scenario specific data calls. The Counterintelligence Field Activity BRAC 2005 data collection was generally not fully supported. The Counterintelligence Field Activity collected and submitted responses to 17 questions during the capacity analysis data call, 6 of which were partially supported. The Counterintelligence Field Activity collected and submitted responses to 11 questions during the Military value data call, 6 of which were partially supported. We also reviewed the Counterintelligence Field Activity compliance with the Office of the Secretary of Defense and Counterintelligence Field Activity internal control plans. The Counterintelligence Field Activity internal control plan properly incorporated and supplemented the Office of the Secretary of Defense internal control plan. The data collection processes generally complied with the Counterintelligence Field Activity and Office of the Secretary of Defense internal control plans. However, we identified two noncompliances with the internal control plan during the capacity analysis data call. The lack of adequate supporting documentation for the capacity analysis, Military value, and scenario specific data calls could impact the reliability of data that Counterintelligence Field Activity provided for the BRAC 2005 analysis. (See the Finding section of the report.)

**Management Comments.** We provided a draft of this report on May 5, 2005 to the Director, Counterintelligence Field Activity. No written response to this report was required, and none was received. Therefore, we are publishing this report in final form.

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## Background

**Base Realignment and Closure 2005.** Public Law 101-510, "Defense Base Closure and Realignment Act of 1990," as amended, establishes the procedures under which the Secretary of Defense may realign or close military installations inside the United States and its territories. The law authorizes the establishment of an independent Commission to review the Secretary of Defense recommendations for realigning and closing military installations. The Secretary of Defense established and chartered the Infrastructure Executive Council and the Infrastructure Steering Group as the Base Realignment and Closure (BRAC) 2005 deliberative bodies responsible for leadership, direction, and guidance. The Secretary of Defense must submit BRAC recommendations to the independent Commission by May 16, 2005.

**Joint Cross-Service Groups.** A primary objective of BRAC 2005, in addition to realigning base structure, is to examine and implement opportunities for greater joint activity. The Office of the Secretary of Defense (OSD) established seven Joint Cross-Service Groups (JCSG)—Education and Training, Headquarters and Support Activities, Industrial, Intelligence, Medical, Supply and Storage, and Technical—to address issues that are common business-oriented support functions, examine functions in the context of facilities, and develop realignment and closure recommendations based on force structure plans of the Armed Forces and on selection criteria. To analyze the issues, each JCSG developed data call questions to obtain information about the functions that they reviewed.

**BRAC Data Calls.** The BRAC 2005 data collection process was mandated for the United States and its territories. The collection process was divided into the following data calls – capacity analysis, supplemental capacity, Military value, Cost of Base Realignment Actions (COBRA), Joint Process Action Team Criterion Number 7 and scenario specific. The supplemental capacity analysis, Military value, COBRA, and Joint Process Action Team Criterion Number 7 data calls are collectively known as the second data call. The Services, Defense agencies, and Defense-wide Organizations used either automated data collection tools or a manual process to collect data call responses. Each data call had a specific purpose as follows.

- The capacity analysis data call gathered data on infrastructure, current workload, surge requirements, and maximum capacity.
- The supplemental capacity data call clarified inconsistent data gathered during the initial capacity analysis data call.
- The Military value data call gathered data on mission requirements, survivability, land and facilities, mobilization, and contingency.



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- The COBRA data call gathered data to develop costs, savings, and payback (formerly known as return on investment) of proposed realignment and closure action.
- The Joint Process Action Team Criterion Number 7 data call gathered data to assess the community's ability to support additional forces, missions, and personnel associated with individual scenarios.<sup>1</sup>
- The scenario specific data call questions gathered data related to specific scenario conditions for realignment or closure.

**BRAC Intelligence Agencies' Data Calls.** The Intelligence agencies' collection process was divided into the following data calls – capacity analysis, Military value, and scenario specific. The scenario specific data call included COBRA data. The Joint Process Action Team collected the data for Criterion Number 7, which the Intelligence JCSG used to develop its scenario specific data calls. The National Geospatial-Intelligence Agency was the only intelligence agency required to collect its own data. The Intelligence agencies used a manual process to collect data call responses.

**DoD Office of Inspector General Responsibility.** The Under Secretary of Defense for Acquisition, Technology, and Logistics' memorandum, "Transformation Through Base Realignment and Closure (BRAC 2005) Policy Memorandum One-Policy, Responsibilities, and Procedures," April 16, 2003, required the DoD Office of Inspector General (DoD OIG) to provide advice and review the accuracy of BRAC data and the certification process. This report summarizes issues related to the Counterintelligence Field Activity (CIFA) BRAC 2005 process.

**Internal Control Plans.** Before the BRAC data calls were released to the Service and Defense agencies, OSD required the Services and the Defense agencies to prepare internal control plans (ICPs) that incorporated and supplemented the OSD ICP. The OSD ICP was issued in the "Transformation Through Base Realignment and Closure (BRAC 2005) Policy Memorandum One-Policy, Responsibilities, and Procedures." The CIFA prepared "Counterintelligence Field Activity Base Realignment and Closure 2005 Internal Control Plan" on February 04, 2004, and updated it on November 4, 2004, to comply with the OSD requirement.

**CIFA.** Headquartered in Arlington, Virginia, the CIFA mission is to produce a common Defense Department counterintelligence operational picture, and deliver unique and actionable information to key decision makers in federal, state, and

<sup>1</sup> A scenario is a description of one or more potential closure or realignment actions identified for formal analysis by either a JCSG or a Military Department.

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local governments. The CIFA was required to submit data for the capacity analysis, Military value, and scenario specific data calls.

## Objectives

The overall objective of the audit was to evaluate the validity, integrity, and supporting documentation of data that the CIFA collected and submitted for the BRAC 2005 process. In addition, we evaluated whether CIFA complied with the OSD and CIFA ICPs. This report is one in a series on data integrity and internal control processes for BRAC 2005. See Appendix A for a discussion of the scope and methodology and prior coverage related to the audit objectives.

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## Counterintelligence Field Activity Base Realignment and Closure 2005 Data Call Submissions and Internal Control Processes

The CIFA collected and submitted BRAC 2005 data that were generally not fully supported. The CIFA collected and submitted responses to 17 questions during the capacity analysis data call, 6 of which were partially supported. The CIFA collected and submitted responses to 11 questions during the Military value data call, 6 of which were partially supported. The CIFA ICP properly incorporated and supplemented the OSD ICP. The CIFA data collection processes for the capacity analysis, Military value, and scenario specific data calls generally complied with applicable ICPs. However, during the capacity analysis data call BRAC data was not certified as accurate and complete, but the CIFA provided all certifications to correct the noncompliance. In addition, CIFA did not develop and maintain a description of how CIFA policies, input to analyses, and recommendations were made for BRAC 2005 as required by the CIFA ICP. The lack of adequate supporting documentation for the capacity analysis, Military value, and scenario specific data call could impact the reliability of data that CIFA provided for the BRAC 2005 analysis.

### CIFA BRAC 2005 Data Call Submissions

The BRAC 2005 data reported by the CIFA were generally not fully supported. The CIFA headquarters forwarded all data call questions and collected the supporting documentation for each of its sites. We evaluated the validity and integrity of the supporting documentation at the CIFA headquarters. Specifically, for the capacity analysis, Military value, and scenario specific data calls, we compared responses to supporting documentation. In addition, for the capacity analysis and Military value data calls we reviewed "Not Applicable" responses to determine whether the CIFA responses were reasonable. As we identified problems with data submissions, we worked with management to correct the data.

**Capacity Analysis Data Call.** The CIFA capacity analysis data call was generally not fully supported; specifically of 17 questions, 4 responses were fully supported and 6 were partially supported. The CIFA identified 10 of 17 questions that applied to its office. We concluded that questions 1, 12, 13, and 14 were fully supported and questions 2, 3, 7, 15, 16, and 17 were partially supported (see Appendix B for details). We also reviewed the 7 questions that the CIFA sites determined were "Not Applicable" and we agreed with the CIFA conclusion. The

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CIFA trusted agent concurred with the results, but stated that no additional documentation could be provided for the capacity data call.

**Military Value Data Call.** The CIFA Military value data call was generally not fully supported; specifically of 11 questions, 5 responses were fully supported and 6 were partially supported. The Military value data call consisted of 11 questions with multiple parts; if one segment of the question was not supported, the overall question would be partially supported. We relied on the agency responses when they answered "no," "zero," and "unknown" to applicable questions because all BRAC data were certified as accurate and complete to the best of the certifiers knowledge and belief. We concluded that questions 21, 23, 24, 25, and 28 were fully supported and questions 18, 19, 20, 22, 26, and 27 were partially supported (see Appendix B for details). The trusted agent concurred with the results, but stated that no additional supporting documentation could be provided.

**Scenario Specific Data Call.** The CIFA scenario data call provided inadequate supporting documentation to validate the responses. We reviewed two scenario specific data calls (INT-0013 and INT-0072) at CIFA; each scenario contained 9 screens (Tables of data). We evaluated the responses and supporting documentation at CIFA and identified 3 of the 9 screens in INT-0013 and 3 screens in INT-0072 that lacked reasonable supporting documentation and methodology that would allow us to reconstruct the cost and contractor responses. Based on our review and discussions with CIFA management, we recommended that CIFA provided additional supporting documentation and methodology to correct the issues. However, CIFA management stated that no additional supporting documentation would be provided.

## Internal Control Processes

The CIFA data collection process generally complied with the CIFA and the OSD ICPs for capacity analysis, Military value, and scenario specific data calls. We reviewed the completeness of the CIFA ICP and determined that it properly incorporated and supplemented the OSD ICP. In addition, we reviewed CIFA compliance with the CIFA ICP data collection process and determined whether CIFA personnel completed nondisclosure agreements and properly collected, marked, safeguarded, and maintained data, and certified that the data were accurate and complete to the best of the certifier's knowledge and belief.

**Completeness of ICP.** The CIFA BRAC 2005 ICP provides a uniform set of controls designed to provide accountability for each sub-element of information and analysis used in the BRAC process. The CIFA ICP establishes organizational responsibilities that ensure the accuracy and completeness of data collection, analyses, and control mechanisms to safeguard the CIFA BRAC information.

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Specifically, the CIFA ICP included direction for resubmitting and recertifying BRAC responses.

**Compliance with ICPs.** Although the capacity analysis, Military value, and scenario specific data calls generally complied with applicable ICPs, the CIFA had two noncompliances during the capacity analysis data call. BRAC data was not certified as accurate and complete by the certifying official and the CIFA did not develop and maintain a description of how CIFA policies, input to analyses, and recommendations were made for the BRAC 2005 as required by the CIFA ICP. CIFA personnel provided the signed certification statement to correct the noncompliance.

## Conclusion

The CIFA collected and submitted BRAC 2005 data that were generally not fully supported. The CIFA collected and submitted responses to 17 questions during the capacity analysis data call, 6 of which were partially supported. The CIFA collected and submitted responses to 11 questions during the Military value data call, 6 of which were partially supported. The CIFA data collection process generally complied with OSD and CIFA ICPs. However, during the capacity analysis data call we identified two noncompliances with the OSD and CIFA ICPs. We believe that the lack of supporting documentation could impact the reliability of data that CIFA provided for the BRAC 2005 analysis.

We discussed our findings with CIFA management after each data call. CIFA management stated that the noncompliance with the ICP would be corrected; however, no additional supporting documentation would be provided.

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## Appendix A. Scope and Methodology

We evaluated the validity and integrity of all data call responses and the associated supporting documentation of CIFA BRAC 2005 data. Specifically, we performed the following audit steps during the capacity analysis and Military value data calls.

- Interviewed the personnel responsible for preparing and certifying the responses to the data calls.
- Reviewed all data call responses and associated supporting documentation.
- Compared the adequacy of responses to the supporting documentation.
- Reviewed "Not Applicable" question responses to determine whether they were reasonable.
- Reviewed the CIFA ICP to determine whether the CIFA incorporated and supplemented the OSD ICP and established and implemented procedures and processes to disseminate, collect, safeguard, and maintain supporting documentation. In addition, we reviewed whether the CIFA designated the appropriate personnel to certify that data and information collected were accurate and complete to the best of the certifier's knowledge and belief.
- Relied on Military value responses when they answered "no," "zero," or "unknown" to applicable questions because all BRAC data were certified by the Director, CIFA as accurate and complete.
- Worked with management to correct identified problems to data call responses.

We could not validate that the CIFA was consistent in reporting all sites during the capacity analysis data call. Also, because of time constraints, we validated only the CIFA COBRA and scenario data calls for potential candidate recommendations that were approved by the Infrastructure Steering Group.

**Capacity Analysis Data Call:** The CIFA headquarters received the capacity analysis data call questions 1 through 17 from the Intelligence JCSG. CIFA headquarters then forwarded all questions to each of its sites and collected supporting documentation and responses at CIFA headquarters. All supporting documentation was maintained at headquarters for validation. We reviewed all data call questions and responses at CIFA headquarters for accuracy, appropriate markings, and adequacy. We issued one capacity analysis site memorandum to

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summarize the site visit results. Specifically, we reviewed the following responses and supporting documentation.

### Capacity Analysis Data Call Questions Reviewed

CIFA Site	Question Number	
	Answered	Not Applicable
CIFA headquarters	1, 2, 3, 7, 12, 13, 14, 15, 16, and 17	4, 5, 6, 8, 9, 10, and 11

**Military Value Data Call.** The CIFA headquarters received Military value data call questions 18 through 28 from the Intelligence JCSGs. Most Military value questions had multiple parts. The CIFA then forwarded all questions to each of its sites and collected supporting documentation and responses at CIFA headquarters. All supporting documentation was maintained at headquarters for validation. We reviewed the data call questions and responses at CIFA headquarters for accuracy, appropriate markings, and adequacy for each site. We issued one Military value site memorandum to summarize the site visit results.

**Scenario Specific Data Call.** CIFA headquarters received scenario and COBRA data call questions from the Intelligence JCSGs. We reviewed two scenario specific data calls for CIFA: We reviewed the data call responses at CIFA headquarters for reasonableness and supporting documentation. Specifically, we reviewed CIFA responses to scenario INT-0013 and INT-0072.

We performed this audit from September 2004 through April 2005 in accordance with generally accepted government auditing standards.

**Reliability of Computer-Processed Data.** We did not test the accuracy of the computer-processed data used to support an answer to a data call question. Potential inaccuracies in the data could affect the results. However, all BRAC data were certified as accurate and complete to the best of the certifier's knowledge and belief.

**Government Accountability Office High-Risk Areas.** The Government Accountability Office has identified several high-risk areas in DoD. This report provides coverage of the DoD Support Infrastructure Management and Federal Real Property high-risk areas.



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## Management Control Program Review

We did not review the CIFA management control program because its provisions did not apply to the one-time data collection process; however, we evaluated the CIFA internal controls for preparing, submitting, documenting, and safeguarding information associated with the BRAC 2005 data calls, as directed by the OSD and CIFA ICPs, to determine whether the CIFA complied with the ICPs. Internal controls were generally adequate as they applied to the audit objective (see the Finding section for additional details).

## Prior Coverage

During the last 5 years, the DoD OIG issued 2 site memorandums discussing the CIFA BRAC 2005 data call submissions and internal control processes.

### Site Memorandums

DoD IG Memorandum, "Audit on the Military Value Data Call Submission from all Counterintelligence Field Activity Sites to the Counterintelligence Field Activity Headquarters for Base Realignment and Closure 2005," March 3, 2005

DoD IG Memorandum, "Audit on the Capacity Analysis Data Call Submission from Counterintelligence Field Activity Sites to Counterintelligence Field Activity Headquarters for Base Realignment and Closure 2005," March 3, 2005

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## Appendix B. BRAC 2005 Data Call Questions Not Fully Supported

**Capacity Analysis Data Call.** For the capacity analysis data call, the CIFA provided data that were generally not fully supported. We identified responses during the capacity analysis data call that did not provide adequate supporting documentation or completely answer the BRAC question.

- The response to question number 2 was partially supported. The questions required the square footage data by subfunction and attribute for all CIFA buildings. The CIFA did not provide adequate methodologies and supporting documentation to validate square footage responses.
- The response to question number 3 was partially supported. The questions required the CIFA sites to provide personnel by subfunction and attribute. No supporting documentation was provided to support the detailee and contractor data.
- The response to question number 7 was partially supported. The question required work years for management activities by building. The CIFA did not provide documentation to validate FY 2001 and FY 2002 work year totals.
- The response to question number 15 was partially supported. The question required the CIFA to provide student training counts and completions. The CIFA did not provide adequate methodology to track supporting documentation to responses.
- The response to question number 16 was partially supported. The question required the number of full time instructors and degrees granted at CIFA. The CIFA did not provide documentation to validate FY 2001 and FY 2002 work year totals.
- The response to question number 17 was partially supported. The question required the CIFA to list projected student population totals for FY 2004 through FY 2009 by building. The CIFA did not provide adequate supporting documentation to validate the base number used to make student population projections.

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**Military Value Data Call.** For the Military value data call, CIFA provided data that were generally not fully supported. We identified responses during the Military value data call that did not provide adequate supporting documentation or completely answer the BRAC question.

- The response to question 18 was partially supported. The question required the CIFA to document the facility capabilities. The CIFA did not provide adequate supporting documentation or detailed methodologies to support network availability, network data storage, parking counts, and electrical power usage and generator power usage.
- The response to question 19 was partially supported. The question required the CIFA to list the facility condition. The CIFA did not provide supporting documentation to validate the facility conditions response for several sites.
- The response to question 20 was partially supported. The question required the CIFA to provide responses to survivability and force protection responses. The CIFA did not provide supporting documentation to validate fire protection and control perimeters for several sites.
- The response to question 22 was partially supported. The question required the CIFA to report sensitive compartmented intelligence facility space. No supporting documentation was provided to support buildings that were built to sensitive compartmented intelligence facility space.
- The response to question 26 was partially supported. The question required the CIFA to provide personnel intellectual expertise. The CIFA did not provide adequate documentation to fully support CIFA personnel and contractor totals.
- The response to question 27 was partially supported. The question required the CIFA to provide geographic and professional relationship to colleges, commercial firms, and federal agencies. The CIFA did not provide adequate documentation to validate the geographic and professional relationship. In addition, no supporting documentation was provided to validate the geographic relationship to CIFA sites.

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## Appendix C. Report Distribution

### Office of the Secretary of Defense

Director, Base Realignment and Closures (Installations and Environment)

### Other Defense Organizations

Director, Counterintelligence Field Activity

### Non-Defense Federal Organization

Government Accountability Office \*

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\* Only Government Accountability Office personnel involved in the BRAC process are to receive the report.

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## Team Members

The Office of the Deputy Inspector General for Intelligence prepared this report. Personnel of the Department of Defense Office of Inspector General who contributed to the report are listed below.

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