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Inspector General
United States Department of Defense

Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies

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Acronyms and Abbreviations

BUB	Battle Update Brief
CIO	Chief Information Officer
COMMEX	Communications Exercise
DSCA	Defense Support of Civil Authorities
JCCC	Joint Command, Control, Communications, and Computers (C4) Coordination Center
JISCC	Joint Incident Site Communications Capability System
JROC	Joint Requirements Oversight Council
NAWCAD SCR	Naval Air Warfare Center Aircraft Division-Special Communications Requirements Division
NG	National Guard
NGB	National Guard Bureau
POR	Program of Record
RTI	193rd Regiment Regional Training Institute
SOP	Standard Operating Procedure
TR	Trouble Report

INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500

July 1, 2013

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR POLICY
COMMANDER, U.S. NORTHERN COMMAND
ASSISTANT SECRETARY OF THE AIR FORCE
(FINANCIAL MANAGEMENT AND COMPTROLLER)
CHIEF, NATIONAL GUARD BUREAU
DIRECTOR, JOINT STAFF
NAVAL INSPECTOR GENERAL
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies (Report No. DODIG-2013-102)

We are providing this report for your information and use. National Guard Bureau officials did not always ensure that DoD communications equipment was available, maintained, staffed, or ready for use during a domestic emergency. As a result, DoD may experience reduced communications during domestic emergencies, which may adversely affect rescue and relief efforts and increase the risk of physical and economic damages and human casualties.

We considered management comments on a draft of this report when preparing the final report. The Director, NG-J6/Chief Information Officer, National Guard Bureau, responded on behalf of the Chief, National Guard Bureau. Comments from the Director, NG-J6/Chief Information Officer, conformed to DoD Directive 7650.3. Therefore, we do not require additional comments.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-8866 (DSN 664-8866).

Alice F. Carey
Assistant Inspector General
Readiness, Operations, and Support

Results in Brief: Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies

What We Did

Our objective was to determine whether DoD communications equipment was available, maintained, staffed, and ready for use to ensure interoperability during a domestic emergency. National Guard (NG) personnel are the military first responders for most domestic emergencies. The National Guard Bureau (NGB) fielded 97 Joint Incident Site Communications Capability systems (JISCCs) to NG units across 54 states, territories, and Washington, D.C. (locations) to address the lack of interoperable communications capabilities identified after the September 11th terrorist attacks and Hurricane Katrina. NG units used the JISCC to communicate with first responders and Federal and state agencies through high-frequency radio, telephone, video, and satellite.

What We Found

NGB officials did not always ensure that interoperable communications equipment was available, maintained, staffed, or ready for use during a domestic emergency. Specifically, NGB officials fielded JISCCs, but did not always ensure that NG units:

- processed 44 (27.0 percent) of 163 Trouble Reports active more than 30 days from November 2011 through September 2012 (average delay: 78.3 days) in a timely manner;
- prepared 5 JISCCs for scheduled information assurance assessments between June and September 2012;
- sent a sufficient number of JISCC operators to NGB-authorized JISCC training in 35 (64.8 percent) of 54 locations, of which 12 (22.2 percent) locations sent no operators since the course inception in July 2008; or
- completely and accurately reported critical elements of JISCC readiness, including underreporting the length of JISCC outages in at least 32 instances.

These conditions occurred because NGB officials did not have adequate oversight procedures in place to monitor sustainment of JISCCs provided to NG units. As a result, DoD may experience reduced communications when coordinating with Federal, state, and local first responders during future domestic emergencies, which may adversely affect rescue and relief efforts and increase the risk of physical and economic damages and human casualties.

What We Recommend

Among other recommendations, we recommend that the Chief, National Guard Bureau, establish oversight procedures, including performance metrics, to verify that National Guard units resolve repair and troubleshooting actions for the Joint Incident Site Communications Capability system in a timely manner.

Management Comments and Our Response

The Director, NG-J6/Chief Information Officer, National Guard Bureau, responded on behalf of the Chief, National Guard Bureau and agreed with the recommendations. Comments were responsive. Please see the Recommendations Table on page ii.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Chief, National Guard Bureau		1, 2, 3, and 4

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Introduction

Objective

Our original objective was to determine whether DoD satellite communications services and equipment were interoperable during a national emergency. During our planning phase, we identified and focused our audit on specific equipment fielded to address interoperability preparedness for domestic emergencies. Additionally, we clarified terminology related to national/domestic emergencies in the objective. Our revised objective was to determine whether DoD communications equipment was available, maintained, staffed,[1] and ready for use to ensure interoperability during a domestic emergency. According to National Guard Bureau (NGB) officials, National Guard (NG) personnel are the military first responders for most domestic emergencies. During our fieldwork phase, we focused on the Joint Incident Site Communications Capability system (JISCC), a specific type of DoD equipment fielded to, and routinely employed by NG personnel during domestic emergencies to achieve interoperability and facilitate information exchange. See Appendix A for a discussion of the scope, methodology, and prior coverage.

Background

DoD Directive 3025.18, "Defense Support of Civil Authorities (DSCA)," December 29, 2010, establishes authorities and responsibilities for DSCA missions. DoD provides DSCA through active military forces (primarily under the command and control of the U.S. Northern Command), DoD Component assets, and NG units,[2] when requested by civil authorities or by qualifying entities,[3] or when directed by the President or approved by the appropriate DoD officials. According to NG Regulation 500-1, "Domestic Operations," June 13, 2008, Army NG and Air NG units (primarily under the command and control of the Governor) are the first military responders onsite when a domestic emergency occurs. In addition, disaster response operations fall within DoD's Homeland Defense and Civil Support mission. An August 2006 Joint Requirements Oversight Council (JROC) memorandum states that the NGB, Command, Control, Communications, and Computers Directorate, identifies and delivers communications capabilities required to support Homeland Defense and Civil Support disaster response operations. According to the NG news archives, NG's largest response to a domestic emergency was Hurricane Katrina in August 2005.

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[1] For the purposes of this audit, "staffing" is defined as NG unit personnel trained to operate and maintain a JISCC. According to NGB JISCC Standard Operating Procedures, no personnel are currently assigned to the JISCC through DoD formal means and, therefore, staffing for the JISCC operations and maintenance comes from existing units and organizations within states, territories, and Washington D.C.

[2] For the purposes of this audit, NG units include Joint Forces Headquarters-State.

[3] A qualifying entity is a nongovernmental organization that DoD may assist during special events by virtue of statute, regulation, policy, or other approval by the Secretary of Defense (or authorized designee).

Hurricane Katrina caused death and destruction throughout the Southeastern United States, particularly in Louisiana and Mississippi. The hurricane left more than 2,500 dead or missing and, according to a National Hurricane Center report, caused an estimated $108 billion in total damages. Hurricane Katrina also caused complete failure of communications infrastructure in the affected area. The hurricane rendered all telephone capabilities inoperable. Lack of interoperable communications capabilities initially hampered communications between NG units, local police and fire departments, other civilian agencies, and active duty forces and precluded the rapid deployment of assets from nearby states. NGB officials noted that the NG employed more than 55,000 personnel from nearly all states or territories and deployed multiple communication assets to support Hurricane Katrina rescue and relief efforts. However, there were still far too few communications capabilities available for a disaster of this magnitude. NGB officials concluded that the lack of adequate interoperable communications and integrated operational processes greatly impeded planning, situational awareness, and unity of effort among all responders within the disaster area. For example, NG unit personnel contacted their headquarters when they needed to coordinate with local law enforcement. Next, the unit headquarters personnel contacted the local law enforcement headquarters. Then, the local law enforcement headquarters contacted the local squad car. Commanders also used runners to relay orders to NG units.

Figure 1. Satellite View of Hurricane Katrina

Source: www.noaa.gov

Efforts to Improve Communications Interoperability During Domestic Emergencies

In response to the communications problems that NG and Federal responders experienced in the aftermath of the September 11th terrorist attacks and Hurricane Katrina, NGB officials accelerated efforts to field a rapid response communications solution tailored to the unique requirements of the multiplayer operating environment at an incident site. NGB JISCC Standard Operating Procedures (SOPs), January 2009, provides historical background. In the post-September 11th era, the NG commissioned analyses of its new mission environment and readiness to respond to domestic incidents. An NGB system development document states that one analysis identified interoperability as a major communications need. Additionally, during the 2005 hurricane season, NG units deployed a prototype JISCC and interim interoperable communications packages, the JISCC's predecessor, to the affected states. After Katrina and several other hurricanes

Figure 2. World Trade Center on September 11, 2001

Source: http://osd.dtic.mil

in 2005, Congress authorized additional funds, so NGB could deploy interoperable communications equipment to 54 states, territories, and Washington, D.C. (locations).

In 2006, NGB submitted a brief to the JROC, recommending changes to the interoperable communications architecture among DoD Components and other Federal, state, and local first responders. The JROC responded with a memo, accepted the recommendations, and appointed NGB as the proponent for joint development, with primary responsibility to establish, design, and maintain deployable communications in each state. According to the JROC memo, these deployable communications were to support active and reserve forces as far forward as the incident site. Meanwhile, NGB continued fielding a refined version of the JISCC. In January 2008, the JROC issued another memo and agreed with the jointly developed communications architecture (which included the JISCC predecessor). According to NGB records, as of November 2012, NGB and NG units fielded 97 JISCCs to 54 locations. As of March 22, 2013, NG units had operational control of the JISCCs.

Solution for Communicating With First Responders and Federal and State Agencies

NG units use the JISCC as the primary communications bridge between first responders and other Federal, state, and local agencies during a domestic emergency. The JISCC can communicate through high-frequency radio, telephone, video, and satellites with first responders, and Federal and state agencies' communications equipment. According to purchase documents, the JISCC costs approximately $500,000 per unit (approximately $48.5 million for 97 units) and consists of five modules: Reach Back Communications, Voice Interoperability, On-Scene Command Post Integration, Incident Site Communications, and Support Equipment. These modules deliver services to the incident site and can accommodate between 1 and 80 users. If additional users require access, NG units deploy a second JISCC to the incident site. Most of the JISCC equipment is contained in suitcase-type wheeled cases or two-man lift cases that provide increased mobility at the incident site. The JISCC contains its own external power sources and environmental control unit to ensure that even in the harshest environments, the system will be able to support first responders. The 5.5 tons of electronic equipment is transported in a C-130 aircraft deployable trailer that can be unpacked and deployed within 1 hour of arriving at an incident site. NGB JISCC SOPs recommend between 6 and 10 personnel to support and operate a JISCC. Additionally, NGB tasked Naval Air Warfare Center Aircraft Division-Special Communications Requirements Division (NAWCAD SCR) with providing JISCC sustainment support through a memorandum of agreement and annual statements of work. NAWCAD SCR performs life cycle sustainment management, configuration

Figure 3. JISCC

Source: www.gko.mil

management, hardware and software maintenance, parts inventory management, and engineering sustainment for the JISCCs.[4] In 2012, NGB funded $4.8 million for JISCC sustainment.

Review of Internal Controls

DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses related to interoperable communications capabilities. This occurred because NGB officials did not have adequate oversight procedures in place to monitor sustainment of JISCCs provided to NG units. We will provide a copy of the report to the senior official responsible for internal controls in the NGB.

[4]NAWCAD SCR personnel stated that NG units in Texas and Michigan separately purchased, operated, and maintained four JISCCs. NAWCAD SCR personnel stated that they provided limited support to these units when requested.

Finding. Interoperable Communications Equipment Was Not Always Available, Maintained, Staffed, or Ready for Use

NGB officials did not always ensure that interoperable communications equipment was available, maintained, staffed, or ready for use during a domestic emergency. Specifically, NGB officials fielded JISCCs, but did not always ensure that NG units:

- processed 44 (27.0 percent) of 163 Trouble Reports (TRs) active more than 30 days from November 2011 through September 2012 (average delay: 78.3 days) in a timely manner;
- prepared 5 JISCCs for scheduled information assurance assessments between June and September 2012;
- sent a sufficient number of JISCC operators to NGB-authorized JISCC training in 35 (64.8 percent) of 54 locations, of which 12 (22.2 percent) locations sent no operators since the course inception in July 2008; or
- completely and accurately reported critical elements of JISCC readiness, including underreporting the length of JISCC outages in at least 32 instances.

These conditions occurred because NGB officials did not have adequate oversight procedures in place to monitor sustainment of JISCCs provided to NG units. As a result, DoD may experience reduced communications when coordinating with Federal, state, and local first responders during future domestic emergencies, which may adversely affect rescue and relief efforts and increase the risk of physical and economic damages and human casualties.

Availability Concerns Addressed Through Communications Equipment Fielding

NGB officials fielded JISCCs to address communications equipment interoperability concerns. NGB, along with NG units in Michigan and Texas, invested approximately $48.5 million fielding 97 JISCCs to ensure that a deployable interoperable communications unit was available at each location. NGB intended for JISCCs to provide NG units with the capability to better coordinate response efforts between DoD, Federal, state, and local first responders. In 2004, NGB fielded interim interoperable capabilities to 11 states to support the presidential election and the upcoming hurricane season. NGB JISCC SOPs state that the interim interoperable capability resulted in a significantly improved readiness posture and provided a means to validate incident response requirements. In 2005, NGB fielded a prototype JISCC to the South Carolina NG. Using lessons learned from the hurricane season and the prototype, NGB developed a fielding plan to distribute additional JISCCs in support of other state and territory requirements. NGB upgraded the interim sets to JISCCs and fielded the additional JISCCs in phases from 2006 through 2008. As of November 2012, JISCCs were fielded to 54 locations. NGB officials stated that since Hurricane Katrina in 2005, they

successfully used the JISCC for numerous national special security events, natural disasters, and exercises and the JISCC's availability average was 97 percent. However, NGB officials did not ensure that NG units always processed repairs in a timely manner, prepared the JISCC for scheduled information assurance assessments, trained operators, or reported readiness critical elements.

Communications Equipment Repairs Delayed

NG units did not process JISCC repairs in a timely manner, which delayed communications equipment repairs. As part of its tasking to perform JISCC life cycle sustainment management, NAWCAD SCR was required to perform specialized repairs of faulty JISCC parts on behalf of the Army NG and Air NG. NAWCAD SCR officials stated that NG units were responsible for the unit-level maintenance of JISCCs. This includes basic troubleshooting of JISCC problems. Generally, when an NG unit initiated a request for a JISCC repair action, the NG unit or NAWCAD SCR would generate a TR. NAWCAD SCR tracked TRs that were active more than 30 days and reported these to NGB as part of NAWCAD SCR's monthly sustainment report. From November 2011 through September 2012, NG units or NAWCAD SCR generated 660 TRs, of which 163 TRs were active more than 30 days.[5] For 44 of the 163 TRs, NG units caused 47 separate delays of more than 30 days. Specifically, NG units delayed:

- 37 TRs by not taking action to provide NAWCAD SCR with troubleshooting information or initiate action with outside vendors (average delay: 84.7 days),
- 6 TRs by not returning loaned parts or turning in defective parts for repair to NAWCAD SCR (average delay: 75.7 days), and
- 4 TRs by not providing confirmation of test results on parts repaired by NAWCAD SCR or outside vendors (average delay: 60.0 days).

NG unit delays of long running TRs adversely affected JISCC mission capability and mission readiness. For example, an NG unit delayed a TR (initiated to repair the JISCC's environmental control unit) by 262 days. The environmental control unit ensures the JISCC is not subject to temperature extremes or high humidity. In another example, an NG unit delayed a TR (initiated to connect the JISCC to the central information server network) by 180 days. This extended the timeframe that the JISCC went without the latest Windows and third party software updates. NGB was aware of these delays, but did not take sufficient actions to address the causes of the delays. These delays were in addition to delays caused by other factors, such as vendor wait times and awaiting purchase of nonstocked parts.

[5] We excluded seven TRs initiated for repair work on NAWCAD SCR spare parts, the test JISCC located at NAWCAD SCR, and the JISCC located in Guam because of the timeframe needed to ship spare parts.

Systems Were Not Prepared for Scheduled Information Assurance Assessments

NG units did not prepare five JISCCs for scheduled information assurance assessments between June 2012 and September 2012. NAWCAD SCR stated that NG units are responsible for preventive maintenance of JISCCs. In addition, NGB's fielding and maintenance agreements required NG units to maintain configuration control of the JISCCs, subject to NGB approval. In 2011, NGB tasked NAWCAD SCR with overall JISCC configuration management. To assess the risk level for the JISCC, NAWCAD SCR conducted onsite visits at five NG units between June 2012 and September 2012. Specifically, NAWCAD SCR tested five JISCCs, each a different variant, to assess the information assurance risk and to collect data needed to complete the triennial DoD Information Assurance Certification and Accreditation Process for JISCCs. During the onsite visits, NAWCAD SCR found that NG units did not perform regular preventive maintenance on the JISCCs. Specifically, NAWCAD SCR found the following.

- None of the five JISCCs were updated with the latest Windows and third party software (including antivirus). NAWCAD SCR attempted to update the five JISCCs with the latest software, but because of the volume of updates needed, they were unable to complete work at two sites.
- Two of the five JISCCs were not fully operational when NAWCAD SCR arrived at the site. Therefore, NAWCAD SCR performed "significant" troubleshooting and operational repairs on the two JISCCs.

NAWCAD SCR also found that NG units did not adequately maintain configuration control of the JISCCs. Specifically, NAWCAD SCR officials found that two of the five JISCCs were not properly configured to use Windows Server Update Service patches at the unit level. In addition, NAWCAD SCR monthly sustainment reports identified at least 12 other instances between November 2011 and September 2012 where other NG units reported problems connecting to, configuring, or synchronizing JISCCs to Windows Server Update Service servers. As a result, NAWCAD SCR issued three technical directives to all NG units, two with instructions to ensure that NG units regularly update JISCCs with the latest Windows and third party software, and one with instructions on how to install and configure Windows Server Update Service servers.

Insufficient Number of Communications Equipment Operators Sent to NGB-Authorized System Training

NG units did not send a sufficient number of JISCC operators to NGB-authorized JISCC training in 35 (64.8 percent) of 54 locations. According to DoD Directive 5105.77, "National Guard Bureau," May 21, 2008, the Chief, NGB, must prescribe the training discipline and training requirements for the Army NG and Air NG and provide for the allocation of Federal funds for the training of both. NGB JISCC SOPs state that each unit should have at least six people to deploy and set up each JISCC. To address these requirements, NGB and 193rd Regiment Regional Training Institute (RTI) officials stated that NGB authorized and provided funds to the RTI to conduct JISCC training. However, since the course inception in July 2008, RTI's records showed that NG units in 35

(64.8 percent) of the 54 locations had an insufficient number of operators who received NGB-authorized JISCC training. Of the 210 minimum recommended personnel[6] (35 states multiplied by 6 personnel), these 35 states only trained 52 personnel from 2008 through 2012. In addition, RTI training records showed that 12 of the 35 locations had no NGB-authorized trained operators, and 7 states had only 1. See Appendix B for the list of states with an insufficient number of personnel who received JISCC training through RTI. Instead, these NG units relied on other forms of JISCC training that was not as adequate. As an example, an RTI official stated that every state received new equipment training during the initial fielding of the JISCC, but the new equipment training was basic in nature and not equivalent in depth and scope to RTI's JISCC training. NGB officials acknowledged that they did not track or plan to track JISCC operator training attendance, but they will continue to encourage NG unit participation.

RTI training records showed that 12 of the 35 locations had no NGB-authorized trained operators, and 7 states had only 1.

Readiness Reporting Procedures Were Error Prone and Incomplete

NG units did not completely or accurately report critical elements of JISCC readiness, including underreporting the length of JISCC outages in at least 32 instances, between November 2011 and July 2012. Further, information in NGB's informal reporting processes contained errors and did not capture all of the critical elements necessary to assess readiness. Chairman of the Joint Chiefs of Staff Instruction 3401.02B, "Force Readiness Reporting," May 31, 2011, establishes the readiness reporting elements that DoD Components must assess (including personnel, equipment, and training) and outlines how DoD Components should measure these elements. NGB officials tasked their Joint Command, Control, Communications, and Computers (C4) Coordination Center (JCCC) with "routinely being cognizant of the JISCC resource status in all states and territories." NGB officials noted that the JCCC accomplishes this using several methods, including daily NGB JCCC Battle Update Briefs (BUBs) and the 2012 JISCC Communications Exercise (COMMEX).[7] However, both the BUBs and COMMEX included several errors and did not capture all critical elements of readiness assessments.

[6] This represents the minimum number of personnel necessary to operate one JISCC in each of the 35 states. Some states have more than one JISCC.

[7] The other methods used included sustainment reports and trouble tickets. Both the sustainment reports and trouble tickets tracked maintenance concerns already captured in the BUBs.

Readiness Reporting Errors

The BUB and COMMEX used to track JISCC readiness were prone to errors. For example, we reviewed 37 of 248 NGB BUBs[8] published between November 2011 and July 2012 and identified the following errors:

- 51 (46.8 percent) of 109 JISCC outages in which the BUB incorrectly reported the length of the outage and 32 system outages (29.4 percent) were at least 3 days more than reported in the BUB;
- 4 instances in which a BUB listed JISCCs as being both mission capable and nonmission capable in different sections of the same brief; and
- 1 BUB reported four nonmission capable JISCCs, five nonmission capable JISCCs, and six nonmission capable JISCCs in different sections of the same brief.

Additionally, the 2012 JISCC COMMEX did not accurately portray NG unit readiness. Specifically, NGB delayed reporting NG units' participation in the COMMEX until 4 months after the exercise completion deadline. NGB issued a letter of instruction in December 2011 that required NG units to conduct a COMMEX on all 97 JISCCs. The instruction required NG units to test and report on the video teleconference, data, voice, radio, and interoperability readiness of each JISCC before June 1, 2012. The purpose of the COMMEX was to ensure readiness before the beginning of the Atlantic hurricane season, which is from June 1 through November 30. Instead of reporting results as of June 1, 2012, NGB summarized the COMMEX results through September 30, 2012 (when the season was 66.7 percent over), documenting that 88 (90.7 percent) of 97 JISCCs were successfully tested. However, the BUB dated May 31, 2012, showed that by June 1, 2012, only 72 (74.2 percent) of 97 JISCCs were successfully tested.

NGB delayed reporting NG units' participation in the COMMEX until 4 months after the exercise completion deadline.

Incomplete Readiness Reporting

The BUB and COMMEX used to track JISCC readiness were incomplete because they only tracked JISCC equipment status and did not track the other essential readiness assessment elements, such as training and personnel. Further, the 2012 COMMEX was essentially a checklist that only verified equipment operational status and was not a reliable test of unit readiness. While the purpose of the COMMEX was to help establish and assess JISCC mission readiness, the COMMEX instruction did not clarify whether mission readiness referred to equipment, personnel, or both. Instead, NGB provided NG

[8] NGB developed at least one BUB daily with few exceptions. Generally, there were only minor changes from 1 day to the next, so we selected BUBs prepared on specific dates at weekly intervals from November 8, 2011, through July 17, 2012. See Appendix A for additional information on the selection of BUBs.

units a list of the JISCC's components and operational capabilities and instructed them to verify that the JISCC could perform each function. For example, NG units had to verify that:

- the JISCC could connect to the internet, place a phone call, and initiate a video teleconference;
- radios and interoperability equipment functioned; and
- generators provided an uninterrupted power supply.

These procedures could have demonstrated operator proficiency if NG units had completed them independently. However, NG units were not required to complete them on their own. NGB help desk and NAWCAD SCR personnel were available throughout the exercise to answer operator questions, troubleshoot, and resolve problems with completing the COMMEX. Finally, adequate JISCC readiness reporting procedures might have revealed to NGB the extent of the training and maintenance deficiencies identified in our audit.

Improved Oversight Needed for the Repair and Maintenance Processes

NGB officials did not have adequate oversight procedures in place to monitor NG unit responsibilities for JISCC repair and maintenance processes. JROC Memorandum, "Joint Force Headquarters–State Doctrine, Organization, Training, Materiel, Leadership and Education, Personnel and Facilities Change Recommendation," August 28, 2006, appoints NGB as the overall lead agency to ensure that a deployable communications unit (what eventually became the JISCC) was not only established and designed, but also maintained in each state to support active or reserve component forces. Army Regulation 750-1, "Army Material and Maintenance Policy," September 9, 2007, applies to Army NG units and states that equipment repairs are to be resolved immediately and that equipment, components, and systems are to be routinely checked, adjusted, and changed in accordance with specifications. In addition, Air Force Instruction 21-101, "Aircraft and Equipment Maintenance Management," July 26, 2010, applies to Air NG units and states that all levels of supervision must place emphasis on safety, quality, and performing timely maintenance, and to the greatest extent possible, maintenance should be accomplished on a pre-planned, scheduled basis. However, NGB personnel did not ensure that NG units responded to resolve JISCC repair actions in a timely manner. NGB officials stated that they monitored outstanding JISCC repairs active more than 30 days and contacted NAWCAD SCR and NG units as needed to resolve JISCC related problems. However, NGB officials did not address the causes of the delays. Specifically, NGB did not have measurable performance metrics to not only ensure NG units took timely actions to resolve JISCC TRs active more than 30 days, but also to ensure that these delays did not reoccur. In addition, NGB personnel did not ensure that NG units performed regular, preventive maintenance on JISCCs. NGB officials stated that they relied upon NG unit commanders

NGB personnel did not ensure that NG units performed regular, preventive maintenance on JISCCs.

to determine routine maintenance schedules and maintenance requirements for JISCCs in accordance with the JISCC SOPs, but NGB officials did not prescribe or communicate maintenance requirements or schedules specific to the JISCC that would ensure NG units applied consistent maintenance practices. Further, NGB officials did not ensure adequate configuration management of JISCCs. NGB's agreements with NG units to field and maintain the JISCCs required NGB to maintain central configuration control of JISCCs, and to approve NG unit configuration changes to the JISCCs. However, from November 2011 through September 2012, at least 14 NG units did not have JISCCs properly configured.

The deficiencies in NG unit repairs and maintenance processes adversely affected JISCC readiness and sustainability. NAWCAD SCR personnel stated that there were five variants of JISCCs, each variant having legacy components at or near their obsolescence. Because of this, it is critical that NG units follow through more timely to resolve JISCC repair actions active more than 30 days, perform routine and preventative maintenance of JISCCs, and coordinate with NGB to ensure adequate configuration management. NGB's configuration management plan, once completed, may address configuration management problems, but NGB did not provide the draft plan for our review. Therefore, the Chief, NGB, should establish oversight procedures to verify that NG units resolve repair and troubleshooting actions in a timely manner and perform regular preventive maintenance procedures for JISCCs.

Better Oversight of Training Requirements Needed

NGB officials did not provide adequate oversight of JISCC training. Specifically, NGB officials did not ensure that NG units followed uniform training requirements for JISCCs. Section 10503, title 10, United States Code, "Functions of National Guard Bureau: charter," states that the NGB is responsible to:

- prescribe the training discipline and training requirements for the Army NG and Air NG;
- ensure that units and members of the Army NG and Air NG are trained by the states; and
- monitor and assist the states in organizing, maintaining, and operating NG units to provide well-trained and well-equipped units capable of augmenting the active forces in time of national emergency.

NGB authorized JISCC training through RTI, but did not ensure JISCC operators attended the training. Specifically, an NGB official stated that they worked with RTI to establish and fund a JISCC training program. However, NGB did not prescribe the JISCC training requirements for, monitor, or ensure NG units participation in the RTI training. NGB officials stated that they encouraged the states to send personnel to RTI for JISCC training; however, states make their own personnel training decisions after considering multiple factors to include current deployments and availability of training funds. NGB expected NG unit commanders to ensure that personnel were qualified to operate the JISCC and received NGB-authorized JISCC training.

Further, NGB officials stated that most JISCC operators have technical knowledge of the JISCC's individual electronic components because of their general training in information technology. However, RTI officials stated that they teach NG unit personnel to operate the JISCC with other DoD and non-DoD participants in "real event" scenarios. In addition, RTI officials stated that NG unit funding and workload requirements for mission essential tasks and other training limited opportunities[9] for operators to participate in NGB-authorized JISCC training. Had NGB performed better oversight of the training by identifying the JISCC operator training requirements and monitoring the states' participation, NGB might have established another JISCC training program, such as computer-based training more suited to the schedules of the JISCC operators. In an environment where most NG personnel are part-time forces who do not participate in NG unit daily operations, the Chief, NGB, should establish oversight procedures to verify that appropriate NG unit personnel receive NGB-authorized JISCC training.

Readiness Reporting Practices Needed Improvement

NGB did not have formal procedures in place to monitor JISCC readiness and the informal procedures used were incomplete, error prone, and could provide a misleading picture of NG units' readiness to respond to a domestic emergency. Although NGB officials stated that the NG units are not required to routinely report JISCC readiness, the NGB should refer to the reporting guidance in Chairman of the Joint Chiefs of Staff Instruction 3401.02B as a best practice to monitor and ensure the mission readiness of the JISCC. Because emergencies could occur at any time, NG units must be ready to provide support at a moment's notice. To ensure JISCCs are available for use and that NG units can respond with as little delay as possible, it is critical that NGB accurately tracks not only equipment operational status of each JISCC, but also the length of any JISCC outages as well as the availability and training of JISCC operators and maintainers. The goal of readiness reporting is to ensure personnel and equipment availability during crises. Without adequate readiness reporting of the elements described in DoD guidance, NGB had little assurance that NG units' primary communications interoperability tool, and its operators, could effectively respond to the next domestic emergency. Therefore, the Chief, NGB, should establish oversight procedures to verify that NG units report the readiness status of personnel and equipment for JISCCs in a timely manner.

NGB Strategy for Communications Equipment Sustainment

NGB officials stated that the NGB's long-term JISCC strategy is to continue to work with the Army and the Air Force to integrate JISCC capabilities into existing Service programs of record (PORs) and institutionalize the JISCC capability in NG organizations, so the JISCC shares the same status as any other mission asset. In a January 14, 2008, memorandum, the JROC requested that the Army and Air Force integrate the JISCC program into existing Service PORs; however, implementation of this request was delayed. While NGB officials stated that they are working with the Army to incorporate

[9] RTI officials stated that the NG receives 15 training days annually.

the JISCC requirements into an existing POR by FY 2018, they noted that as of April 2013, the Air Force did not provide the Air NG with timelines and a funding resources plan for integrating the JISCC capability into an Air Force POR.

In the interim, NGB officials stated that their JISCC oversight and sustainment strategy included:

- establishing a formal memorandum of agreement with each state or territory specifying state or territory responsibilities related to JISCC ownership,
- working with RTI to establish and fund a JISCC Training Program,
- contracting with NAWCAD SCR to provide JISCC sustainment support through a memorandum of agreement and annual statements of work, and
- conducting an annual COMMEX where operators tested JISCCs by completing a comprehensive checklist provided by NGB.

NGB officials further clarified that the JISCC oversight and sustainment strategy was shaped and constrained by the NG's dual mission (state and Federal) and the fact that NGB has no formal authority over the NG units. Operating and sustaining commercial off-the-shelf, non-POR assets like the JISCC are additional responsibilities that NGB and NG units must generally accomplish on a time available basis. In contrast, Service PORs established performance metrics, oversight controls, and logistical and funding support as required by DoD Directive 5000.01, "The Defense Acquisition System," May 12, 2003 and DoD Instruction 5000.02, "Operation of the Defense Acquisition System," December 8, 2008. POR status ensures that systems procured have plans for maintenance, training, and readiness reporting.

NGB officials stated that under a POR, the JISCC program would benefit from:

- permanently assigned personnel,
- standardized training track requirements,
- mandated readiness reporting in the Defense Readiness Reporting System, and
- stabilized sustainment funding.

The NGB's JISCC oversight and sustainment strategy appeared to optimize JISCC availability but not JISCC sustainment and readiness. JISCCs are in all 54 locations, but NGB has no assurance that the JISCC will be ready to deploy (operational) to an incident site when needed. The deficiencies identified in this report, if not corrected, could adversely affect the sustained availability and readiness of the JISCCs. NGB personnel should provide proper oversight to improve JISCC repair and maintenance, training, and readiness reporting because of the 5-year timeline for NGB to integrate JISCCs for the Army NG into an existing POR and the Air Force delays in integrating their JISCCs into a POR.

Conclusion

Hurricane Katrina's destruction of the communications infrastructure and lack of satellite-based interoperable communications capabilities greatly hampered communications between responding NG units, local police and fire departments, other civilian agencies, and active duty military forces. In this environment, NG units were limited to using indirect communications to communicate with local police departments and even resorted to using runners to relay orders to NG units. Delays caused by these types of indirect communications may mean the difference between life and death for incident victims and responders. To address this issue, NGB, along with NG units in Michigan and Texas, invested approximately $48.5 million to field JISCCs. Additionally, the Army and Air NG funded $4.8 million in 2012 for JISCC sustainment to better coordinate response efforts and promote situational awareness at man-made and natural disaster sites. However, without formally reporting, tracking, and resolving maintenance and training concerns, NG units may be unprepared for the next domestic emergency.

Management Comments on the Finding and Our Response

Comments on the Finding

The Director, NG-J6/Chief Information Officer (CIO), NGB, responded on behalf of the Chief, NGB and agreed that more formalized, detailed, and accurate monitoring and validation processes are required for tracking maintenance timeliness, training support, and readiness status of JISCC assets. He stated that NGB's long-term strategy is to transition the JISCC from a commercial-off-the-shelf package to an equivalent Army and Air Force POR capability. However, he acknowledged delays presented significant challenges that must be addressed in the near term to ensure sustainment of the JISCC inventory. Therefore, within a framework of available authorities in relation to NG state or territory organizations, the Director stated that NGB would formally implement a comprehensive strategy to improve visibility, timeliness, and accuracy of JISCC sustainment actions and reporting. The timelines for the strategy are outlined in his comments on the recommendations.

Our Response

The Director's comments are responsive to the conditions identified in the finding.

Recommendations, Management Comments, and Our Response

We recommend that the Chief, National Guard Bureau, establish oversight procedures, including performance metrics, to verify that National Guard units:

1. Resolve repair and troubleshooting actions for the Joint Incident Site Communications Capability system in a timely manner.

National Guard Bureau Comments

The Director, NG-J6/CIO, NGB, responded on behalf of the Chief, NGB and agreed with the recommendation. The Director stated that NGB worked with NAWCAD SCR on a daily basis to address JISCC maintenance concerns and established spare parts inventories and "risk kits." Typically, these capabilities and processes collectively contribute to minimal non-availability of JISCC systems as spare parts inventory assets are quickly forwarded to the state/territory to restore the JISCC, even as the original parts are under repair. However, he acknowledged that process improvements could improve visibility of repair status, increase state or territory NG responsiveness to maintenance action requirements, and reduce average repair times for parts. The Director stated that NGB would review all processes for potential improvements and develop, publish, and distribute a JISCC maintenance plan that institutionalizes processes, timelines, and organizational responsibilities for required maintenance actions by September 1, 2013. In addition, he stated that the JCCC would track and report compliance with the JISCC maintenance plan and NG-J6/CIO Directorate staff would work with NAWCAD SCR and their subcontractors to shorten the repair cycle of major parts.

2. Perform regular preventive maintenance procedures for the Joint Incident Site Communications Capability system.

National Guard Bureau Comments

The Director, NG-J6/CIO, NGB, agreed with the recommendation, but stated that the JISCC design is based on a concept of removal and replacement of inoperable components and the state or territory NG organizations are responsible for information assurance requirements. The Director also stated that NGB has no directive authority over state or territory NG organizations, but acknowledged the challenges this has caused with ensuring timely compliance by state or territory organizations to perform preventive maintenance and information assurance updates for JISCCs. Therefore, the Director stated that NGB would distribute JISCC SOPs that detail preventative maintenance procedures and information assurance updates to state or territory NG organizations by July 1, 2013. He also stated that by the first quarter of FY 2015, NGB would implement a comprehensive JISCC technology refreshment plan that includes capabilities allowing NGB to remotely monitor compliance and facilitate implementation of information assurance update requirements.

3. Receive National Guard Bureau-authorized Joint Incident Site Communications Capability system training.

National Guard Bureau Comments

The Director, NG-J6/CIO, NGB, agreed with the recommendation, but stated that authorities did not allow NGB to mandate the RTI JISCC training course as a prerequisite to serving on a JISCC team. He also stated that NGB did not formally provide training guidelines or historically track JISCC training status for state or territory NG personnel under the JISCC training construct. The Director acknowledged that more proactive measures and engagement in JISCC training would enhance JISCC team preparedness

and responsiveness in supporting emergency operations. He stated that beginning July 1, 2013, the JCCC would track, on a quarterly basis, the number of trained JISCC operators available in each state or territory NG organization with assigned JISCC assets. He reiterated that NGB will continue to monitor JISCC operator proficiency during evaluations, exercises, and other events that employ JISCC assets. Additionally, he stated that NGB would develop, publish, and distribute a JISCC training guide that establishes recommended minimum requirements for skill sets and training guidelines to state or territory NG organizations by September 1, 2013. Finally, he stated that NGB planned to work with NAWCAD SCR to create and distribute JISCC computer-based training by December 1, 2013.

4. Report the readiness status of personnel and equipment for the Joint Incident Site Communications Capability system in a timely manner.

National Guard Bureau Comments

The Director, NG-J6/CIO, NGB, agreed with the recommendation. The Director stated that because the JISCC program is not a POR, NGB could not compel state or territory NG organizations to report JISCC status as they do with Service-assigned mission assets. However, he acknowledged that processes for reporting JISCC readiness include inconsistencies and conflicting information and stated process improvements would increase accuracy, consistency, and utility. The Director stated that the JCCC would publish and distribute an updated SOP for reporting on the JISCC system to state or territory NG organizations by September 1, 2013. Additionally, he stated that the JCCC would continue to track equipment status on a daily basis, but would now also track personnel and training status on a quarterly basis.

Our Response

Comments from the Director were responsive. No further comments are required.

Management Comments on the Review of Internal Controls and Our Response

Comments on the Review of Internal Controls

The Director, NG-J6/CIO, NGB, stated that NGB established and evolved a range of overlapping management actions and redundant checking processes that were specifically designed to ensure JISCC systems operate as intended and are optimally available to support mission requirements. The Director stated that because of these management actions and redundant checking processes, there has never been a single mission delayed or otherwise impacted by JISCC failure. However, he agreed that inadequately documented processes and institutionalized metrics could potentially result in long-term sustainability issues and NGB needed to address these issues.

Our Response

Overall, we agree with comments from the Director. However, the Director stated, "because of these management actions and redundant checking processes, there has never been a single mission delayed or otherwise impacted by JISCC failure." We believe, without full implementation of our recommendations, the likelihood that NGB will experience mission delays or other impacts will increase.

Appendix A. Scope and Methodology

We conducted this performance audit from April 2012 through April 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our original objective was to determine whether DoD satellite communications services and equipment were interoperable during a national emergency. During our planning phase, we identified and focused our audit on specific equipment fielded to address interoperability preparedness for domestic emergencies. Additionally, we clarified terminology related to national/domestic emergencies in the objective. Our revised objective was to determine whether DoD communications equipment was available, maintained, staffed, and ready for use to ensure interoperability during a domestic emergency.

To accomplish the objectives, we used the standards, procedures, and metrics in the following guidance to assess the interoperable DoD communications equipment.

- Section 10503, title 10, United States Code, "Functions of the National Guard Bureau: Charter," states that NGB is responsible for NG training requirements and the monitoring of the state NG units ability to augment active forces in an emergency.

- DoD Directive 3025.18, "Defense Support of Civil Authorities (DSCA)," December 29, 2010, establishes authorities and responsibilities for DSCA missions.

- DoD Directive 5105.77, "National Guard Bureau," May 21, 2008, directs the Chief, NGB to implement DoD, Army, and Air Force guidance on the structure, strength, and other resources of the NG, and to prescribe training requirements and allocation of Federal funds for training NG personnel.

- DoD Directive 5000.01, "The Defense Acquisition System," May 12, 2003, along with DoD Instruction 5000.02, provides management principles and mandatory policies and procedures for managing all acquisition programs.

- DoD Instruction 5000.02, "Operation of the Defense Acquisition System," December 8, 2008, establishes a management framework for translating capability needs into stable, affordable, and well-managed acquisition programs to achieve cost, schedule, and performance goals for DoD Components.

- Chairman of the Joint Chiefs of Staff Instruction 3401.02B, "Force Readiness Reporting," May 31, 2011, establishes the readiness reporting elements DoD Components must assess and outlines how DoD Components should measure these elements.

- Army Regulation 750-1, "Army Material and Maintenance Policy," September 9, 2007, applies to Army NG units and states that equipment repairs are to be resolved immediately and that equipment, components, and systems are to be routinely checked, adjusted, and changed in accordance with specifications.

- Air Force Instruction 21-101, "Aircraft and Equipment Maintenance Management," July 26, 2010, applies to Air NG units and states that all levels of supervision must place emphasis on safety, quality, and performing timely maintenance, and to the greatest extent possible, maintenance should be accomplished on a pre-planned, scheduled basis.

- NG Regulation 350-1, "Army National Guard Training," August 4, 2009, states the Chief, NGB, will provide program and budget oversight in support of Army NG training requirements.

- NG Regulation 500-1, "National Guard Domestic Operations," June 13, 2008, states that the Chief, NGB, acts as the channel of communication to the state Adjutants Generals, but has no authority to command the NG. However, the Chief, NGB, may direct the NG on matters, including force structure, training, and appropriations.

- Air NG Instruction 36-2001, "Management of Training and Operational Support Within the Air National Guard," October 19, 2009, states that the Air NG is responsible for implementing and administering approved NGB policies for the Air NG.

We also reviewed agreements between NGB and NG units and between NGB and NAWCAD SCR to ascertain roles and responsibilities for repairs and maintenance, staff training, and readiness reporting. In addition, we obtained, reviewed, and analyzed the following documentation to determine whether NGB provided adequate oversight of JISCC operations:

- repairs and maintenance – NAWCAD SCR sustainment reports covering the period November 2011 to September 2012,[*] and the NAWCAD SCR JISCC Risk Assessment Plan. Specific to the monthly sustainment reports, we reviewed summaries of JISCC repair actions active more than 30 days and JISCC sustainment engineering and information assurance status.

[*] NAWCAD SCR provided sustainment reports starting in November 2011.

- staff training – RTI training records from 2008 through 2012 and training records from nonstatistically selected NG units located in Austin, Dallas, and Round Rock, Texas; Charleston and Kingwood, West Virginia; North Smithfield, Rhode Island; and Columbia and Greenville, South Carolina; and

- readiness reporting – NGB used BUBs to track JISCC readiness and outages. NGB published at least one BUB almost every day and often published more than one. From November 8, 2011, to July 17, 2012, NGB produced 248 BUBs. We reviewed BUBs between November 14 and November 17, 2011, and determined that there was very little difference in JISCC operational status on a day-to-day basis. Therefore, based on auditor judgment, we chose to review BUBs at weekly intervals from November 8, 2011, to July 17, 2012, selecting one BUB each week for 37 weeks. If NGB did not publish a BUB on a selected date, we selected a BUB from either the day before or the day after. Several dates selected for review included multiple BUBs published at different times throughout the day. We visually compared multiple sets of slides for several dates. We determined differences between the versions did not materially affect our results and reviewed only one version per the select date.

We conducted site visits to U.S. Northern Command, Colorado Springs, Colorado; the 166th Air Wing, Air NG, New Castle, Delaware; and RTI, Bethany Beach, Delaware. We interviewed NGB, U.S. Northern Command, RTI, and NAWCAD SCR subject matter experts. We also observed JISCCs in operation at the 166th Air Wing, Air NG, New Castle, Delaware, and RTI, Bethany Beach, Delaware.

Use of Computer-Processed Data

NAWCAD SCR personnel provided computer-processed data consisting of monthly sustainment reports generated using the Maintenance Action Reporting System from November 2011 through October 2012. Monthly sustainment reports summarized maintenance actions (technical service actions) active more than 30 days. We interviewed NAWCAD SCR personnel about system operations and controls. We reviewed technical service action status or category codes (codes) where resolving or continuing maintenance processes required NG unit personnel to participate in the process or act in some manner. We compared codes in sustainment reports with notes in subsequent reports to determine whether expected changes in codes occurred, indicating NG unit follow through. Technical service actions reported elapsed days in ranges of 30 or more days. We determined that errors of even several days were unlikely to affect ranges consisting of at least 30 days. We concluded that the data were sufficiently reliable for purposes of our analyses and findings.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO) issued five reports discussing National Guard interoperable communications while supporting homeland defense and DSCA. Unrestricted GAO reports can be accessed over the Internet at http://www.gao.gov.

GAO

GAO Report No. 12-114, "Homeland Defense and Weapons of Mass Destruction: Additional Steps Could Enhance the Effectiveness of the National Guard's Life-Saving Response Forces," December 7, 2011

GAO Report No. 10-386, "Homeland Defense: DoD Can Enhance Efforts to Identify Capabilities to Support Civil Authorities During Disasters," March 30, 2010

GAO Report No. 10-364, "Homeland Defense: DoD Needs to Take Actions to Enhance Interagency Coordination for Its Homeland Defense and Civil Support Missions," March 30, 2010

GAO Report No. 09-849, "Homeland Defense: U.S. Northern Command Has a Strong Exercise Program, but Involvement of Interagency Partners and States Can Be Improved," September 9, 2009

GAO Report Number 08-311, "Homeland Security: Enhanced National Guard Readiness for Civil Support Missions May Depend on DoD's Implementation of the 2008 National Defense Authorization Act," April 16, 2008

Appendix B. States With Insufficient Numbers of Trained Personnel

State	Number of Personnel Trained						Additional Trained Personnel Needed*
	2008	2009	2010	2011	2012	Total	
Alaska						0	6
Arkansas		1				1	5
Connecticut						0	6
District of Columbia						0	6
Georgia			1	2		3	3
Guam						0	6
Hawaii		1				1	5
Illinois		1				1	5
Indiana			2			2	4
Iowa				1		1	5
Kansas				3		3	3
Kentucky			1		1	2	4
Louisiana		1		1		2	4
Massachusetts				2		2	4
Mississippi				3		3	3
Montana			2	2		4	2
Nebraska		2				2	4
Nevada			1	1	1	3	3
New Hampshire		4			1	5	1
New Jersey						0	6
New Mexico				1	1	2	4
North Carolina					4	4	2
North Dakota	1					1	5
Oklahoma						0	6
Oregon				1		1	5

State	Number of Personnel Trained						Additional Trained Personnel Needed*
	2008	2009	2010	2011	2012	Total	
Puerto Rico						0	6
Rhode Island						0	6
South Carolina						0	6
South Dakota		1				1	5
Texas						0	6
Virgin Islands						0	6
Vermont			3			3	3
West Virginia						0	6
Wisconsin			1		1	2	4
Wyoming			1		2	3	3
Sub-Total	**1**	**11**	**12**	**17**	**11**	**52**	**158**
Grand Total							**210**

* The minimum number of personnel required to operate a JISCC is six.

National Guard Bureau Comments*

NATIONAL GUARD BUREAU
111 SOUTH GEORGE MASON DRIVE, AH2
ARLINGTON, VA 22204-1373

NG-J6/CIO 29 May 2013

MEMORANDUM FOR: Department of Defense Inspector General (DoD IG), 4800 Mark Center, Alexandria, Virginia, 22350-1500

SUBJECT: Management Comments in Response to DoD IG Report, Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies (Project No. D2012-D000LA-0152.000)

1. Reference DoD IG Report, subject as above, dated 30 April 2013

2. I have reviewed the recommendations in subject report and concur; NGB appreciates the opportunity to improve processes. The following provides the NGB command response to the finding, actions to be taken to address the four recommendations, and comments on the review of internal controls.

3. **FINDING:** "NGB officials did not ensure that interoperable communications equipment was always available, maintained, staffed, or ready for use during a domestic emergency….These conditions occurred because NGB officials did not have adequate oversight procedures in place to monitor sustainment of JISCCs provided to NG units. As a result, DoD may experience reduced communications when coordinating among Federal, state, and local first responders during future domestic emergencies…"

Management Comments: NGB concurs that more formalized, detailed, and accurate monitoring and validation processes are required for tracking maintenance timeliness, training support, and readiness status of JISCC assets. NGB's long-term strategy remains transition of the current Commercial-Off-The-Shelf (COTS) JISCC package to an equivalent Army and Air Force Program of Record (POR) capability as validated and formally requested of the Services by JROC Memorandum 011-08, 14 Jan 2008. This will ensure DoD/Service-sponsored maintenance and training support is continuously available for all systems procured. Additionally, Service-validated readiness criteria and standard reporting tools can then be routinely applied to measure capability readiness as with any formally assigned mission asset. However, NGB also acknowledges that current Service delays of at least 5 years to achieve this long-term objective will present significant challenges that must be addressed in the near-term to ensure sustainment of the current JISCC inventory during this extended interim period.

Action Taken or Planned: Within a framework of available authorities in relation to National Guard (NG) State/Territory organizations, NGB will formally implement a comprehensive strategy to improve visibility, timeliness, and accuracy of JISCC sustainment actions and reporting (see paragraph 4, *RECOMMENDATIONS*, for specific actions to be taken and timelines). NGB will:

- Review and modify current NGB JISCC maintenance management and tracking processes to improve visibility and timeliness of repair actions and accuracy of reporting
- Publish and distribute to States/Territory NG organizations detailed processes and recommended guidelines for JISCC maintenance, training, and reporting
- Complete ongoing JISCC technology refreshment initiatives and leverage technologies that allow remote monitoring and execution of Information Assurance (IA) updates and maintenance actions

~~*FOR OFFICIAL USE ONLY*~~

*NGB initially provided comments marked "For Official Use Only;" however, NGB later provided an updated Security Classification Review form indicating the comments were unclassified because no Freedom of Information Act exemption applied.

- Continue to work with Army and Air Force to achieve JISCC transition to Service Programs of Record as soon as possible in accordance with provisions of JROCM 011-08.

4. **RECOMMENDATIONS:** "Establish oversight procedures, including performance metrics, to verify that NG units:"

a. **Recommendation 1:** "Resolve repair and troubleshooting actions for the Joint Incident Site Communications Capability (JISCC) system in a timely manner."

Management Comments: Concur. NGB currently supports all JISCC sustainment actions under an MOA with Naval Air Warfare Center Aircraft Division—Special Communications Requirements Division (NAWCAD SCR), and NGB staff work with NAWCAD SCR on a daily basis to monitor and prioritize JISCC maintenance actions. NGB has also established a common spare parts inventory at NAWCAD SCR that is used to support validated maintenance actions, and fielded a spare parts "risk kit" with each JISCC asset that includes parts such as cables and connectors that may fail during deployments. Typically, these capabilities and processes collectively contribute to minimal non-availability of JISCC systems as spare parts inventory assets are quickly forwarded to the State/Territory to restore the JISCC, even as the original parts are under repair. However, NGB acknowledges that process improvements could improve visibility of repair status, increase State/Territory NG responsiveness to maintenance action requirements, and reduce average repair times for parts.

Action Taken or Planned: NGB will review all current processes for potential improvements, and subsequently develop, publish, and distribute to NAWCAD SCR as well as State/Territory NG organizations a JISCC Maintenance Plan that institutionalizes processes, timelines (and other metrics), and organizational responsibilities for required maintenance actions. The NGB Joint C4 Coordination Center (JCCC) will track and report JISCC Maintenance Plan compliance, and NG-J6/CIO staff will work with NAWCAD SCR and their subcontractors to shorten the current repair cycle of major parts.

Estimated Completion Date: JISCC Maintenance Plan – 1 September 2013

b. **Recommendation 2:** "Perform regular preventative maintenance procedures for the JISCC system."

Management Comments: Concur. The JISCC design is based on a concept of removal and replacement of inoperative components. However, State/Territory NG organizations are responsible for requisite IA updates that are necessary to maintain accreditation and authorization to operate through DoD teleports and on DoD networks. NGB has no directive authority over these organizations, but acknowledges past challenges with ensuring timely compliance by State/Territory NG organizations.

Actions Taken/Planned: NGB has already drafted JISCC Standard Operating Procedures (SOP) that detail preventative maintenance procedures and IA update requirements. These SOPs will be distributed to State/Territory NG organizations to provide enhanced visibility of minimal JISCC user maintenance and update requirements. Additionally, NGB is implementing a comprehensive JISCC technology refreshment plan that includes *Solar Winds* and other capabilities that will allow NGB, for the first time, to remotely monitor compliance and facilitate implementation of IA update requirements.

Estimated Completion Date: JISCC SOP Distribution – 1 July 2013
JISCC Technology Refreshment Upgrades – 1st Qtr, FY 15

c. **Recommendation 3:** "Receive National Guard Bureau-authorized JISCC system training."

Management Comments: Concur. NGB has not formally provided guidelines or historically tracked JISCC training status for State/Territory NG personnel. The current JISCC training strategy encompasses a user-friendly design that facilitates operation by personnel with appropriate MOS/AFSC training that imparts the basic IT skills needed, use of On-The-Job-Training (OJT), leveraging a "Train-the-Trainer" construct and, upon request, NGB has provided special JISCC training via JCCC and/or NAWCAD SCR staff. The DENG RTI course was developed and intended as a valuable, but optional, supplement to these primary training constructs. As noted in the report, NGB has highly recommended the DENG RTI JISCC course routinely and, in fact, the DENG RTI Course Manager reported to NGB that 351 students attended the course from 2009-2012. However, current and projected authorities do not allow NGB to mandate this course as a prerequisite to serving on a JISCC team. Nevertheless, NGB acknowledges that more proactive measures and engagement in JISCC training status will enhance JISCC team preparedness and responsiveness in supporting emergency operations.

Actions Taken/Planned: NGB will develop, publish, and distribute a JISCC Training Guide to State/Territory NG organizations that establishes recommended minimum JISCC team member skill set (MOS/AFSC) and training guidelines. It will also strongly encourage, but cannot mandate, attendance at the DENG RTI course, and highlight other available JISCC training options. Additionally, the NGB JCCC will establish processes to track, on a quarterly basis, the number of trained JISCC operators available in each State/Territory NG organization with assigned JISCC assets, and NGB will continue to monitor JISCC operator proficiency during evaluations, exercises, and other events that employ JISCC assets. Finally, NGB is currently working with NAWCAD SCR to create and distribute a Computer-Based-Training JISCC operator program to enhance JISCC operator knowledge and proficiency.

Estimated Completion Date: Begin Quarterly Tracking – 1 July 2013
JISCC Training Guide – 1 September 2013
JISCC CBT Program – 1 December 2013

d. **Recommendation 4:** "Report the readiness status of personnel and equipment for the JISCC system in a timely manner."

Management Comments: Concur. NGB agrees that current reports such as the BUB and COMMEX include inconsistencies and conflicting information. Since the JISCC is a COTS versus a Program of Record system, there are no processes such as in CJCSI 3401.02 that can be mandated, and automated tools such as the Defense Readiness Reporting System (DRRS) cannot be used for JISCC readiness reporting. Therefore, State/Territory NG organizations cannot be compelled to report JISCC status as they are with Service-assigned mission assets. The NGB JCCC's current approach to obtaining data is to leverage direct and frequent contact with State/Territory NG organizations, supplemented by information obtained via the annual COMMEX. However, NGB acknowledges process improvement to formalize and standardize reporting will increase accuracy, consistency, and utility of content.

Actions Taken/Planned: The NGB JCCC will publish and distribute to State/Territory NG organizations an updated SOP that will baseline reporting content, standardize reporting processes, and institutionalize definitions commonly applied to system status such as Fully Mission Capable (FMC), Partially Mission Capable (PMC), and Not Mission Capable (NMC). Within this framework, the NGB JCCC will continue to track equipment status on a daily basis, but will now also track personnel and training status on a quarterly basis.

Estimated Completion Date: NGB JCCC SOP – 1 September 2013

NG-J6/CIO
SUBJECT: Management Comments in Response to DoD IG Report, Improved Oversight of Communications Capabilities Preparedness Needed for Domestic Emergencies (Project No. D2012-D000LA-0152.000) (Cont)

5. **REVIEW OF INTERNAL CONTROLS:** "DoDI 5010.40…. requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses related to interoperable communications capabilities. This occurred because NGB officials did not have adequate oversight procedures in place to monitor sustainment of JISCC's provided to NG units…"

Management Comments:

From the outset of JISCC fielding, NGB established and evolved a range of overlapping management actions and redundant checks (internal controls) specifically designed to ensure JISCC systems operate as intended and are optimally available to support intra- and/or inter-State/Territory mission requirements. In steady-state, NG-J6/CIO and NGB JCCC staff interact with NAWCAD SCR personnel daily to ensure maintenance actions are prioritized and completed. The JCCC also routinely leverages direct contact with State/Territory NG organizations, supplemented annually by snapshot data obtained through the Nationwide COMMEX, to identify and report JISCC availability and readiness issues that require resolution.

During real-world or exercise situations, the NGB JCCC proactively contacts each of the States/Territories directly impacted by the event, and also those other States/Territories most likely to be engaged in support operations, to reconfirm JISCC status information, identify issues, and coordinate corrective action and/or support by JISCC assets available in other States/Territories. NGB has also equipped some States with additional JISCC assets that have expressed a willingness to move forward rapidly in support of other States/Territories, e.g., KYNG and WVNG are equipped with additional JISCC assets and prepared for rapid deployment to coastal hurricane States/Territories when needed.

NGB believes that the effectiveness of these management actions and redundant checking processes is reflected in the fact that, to date, there has never been a single mission delayed or otherwise impacted by JISCC failure, and despite frequent employment of JISCC assets in support of diverse operational activities that encompass National Special Security Events (e.g., G20 Summit, Presidential Convention and Inaugural Support, etc), contingency operations (e.g., West Coast wildfire operations, Hurricane Sandy operations, etc), and exercises (e.g., Vigilant Guard, etc). However, NGB also agrees that inadequately documented processes and institutionalized metrics, as evidenced by the identified inconsistency of tracking and reporting information, could potentially result in long-term sustainability issues, and must be addressed. Therefore, NG-J6/CIO supports subject report recommendations, and is committed to implement the appropriate actions detailed in paragraph 4.

6. Point of contact is [redacted]

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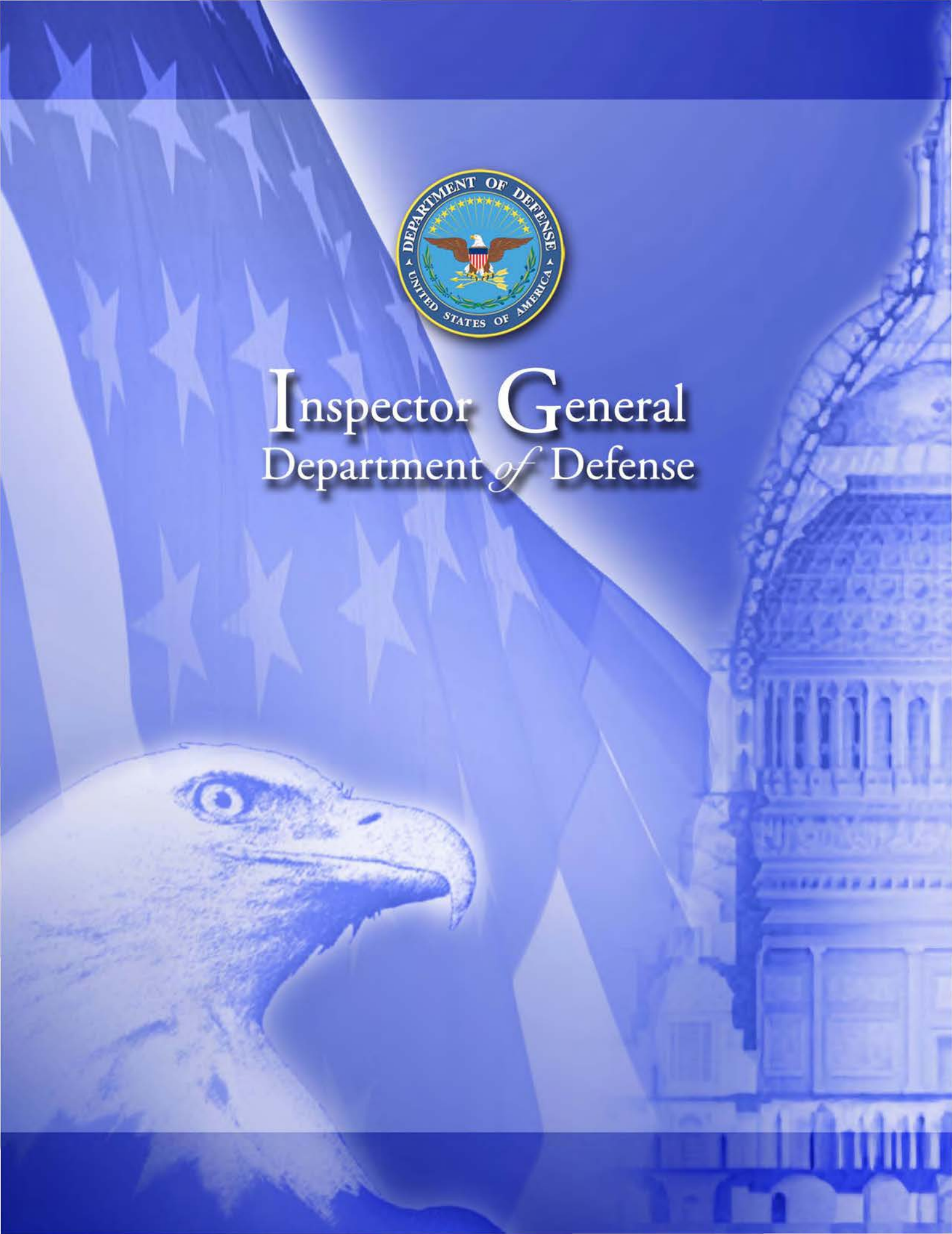
Inspector General
Department of Defense