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Report No. 05-INTEL-10
May 13, 2005
Infrastructure and Environment

**DEPARTMENT OF DEFENSE
OFFICE OF INSPECTOR GENERAL**



DEPUTY INSPECTOR GENERAL FOR INTELLIGENCE

**National Security Agency Data Call Submissions
and Internal Control Processes for Base
Realignment and Closure 2005**

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Acronyms

BRAC	Base Realignment and Closure
COBRA	Cost of Base Realignment Actions
DoD OIG	DoD Office of Inspector General
ICP	Internal Control Plan
JCSG	Joint Cross-Service Group
NSA	National Security Agency
OSD	Office of the Secretary of Defense



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May 13, 2005

MEMORANDUM FOR DIRECTOR, NATIONAL SECURITY AGENCY

SUBJECT: Report on National Security Agency Data Call Submissions and Internal Control Processes for Base Realignment and Closure 2005
(Report No. 05-INTEL-10)

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. We considered management comments on a draft of this report in preparing the final report. The complete text of the comments is in the Management Comments section of the report.

Comments on the draft of this report conformed to the requirements of DoD Directive 7650.3 and left no unresolved issues. Therefore, no additional comments are required.

We appreciate the courtesies extended to the staff. Questions should be directed to (b)(6) at (703) 604-(b)(6) (DSN 664-(b)(6)) or (b)(6) at (703) 604-(b)(6) (DSN 664-(b)(6)). 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-10

May 13, 2005

(Project No. D2004-DINTEL-0073.000)

National Security Agency 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 National Security Agency management personnel should read this report. The report discusses the validity, integrity, and supporting documentation of the data provided by the National Security Agency 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 the data calls as of April 2005, for the National Security Agency BRAC 2005 process.

The National Security Agency, located in Fort Meade, Maryland, is America's cryptologic organization, it coordinates, directs, and performs highly specialized activities to protect the United States information systems and produce foreign intelligence information. The National Security Agency 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 National Security Agency submitted for the capacity

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analysis, Military value, and scenario specific data calls. The National Security Agency BRAC 2005 data collection was generally not fully supported. The National Security Agency collected and submitted responses to 17 questions during the capacity analysis data call, 7 of which were partially supported and 2 unsupported. The National Security Agency collected and submitted responses to 11 questions during the Military value data call, 8 of which were partially supported. We also reviewed the National Security Agency compliance with the Office of the Secretary of Defense and National Security Agency internal control plans. The National Security Agency internal control plan properly incorporated and supplemented the Office of the Secretary of Defense internal control plan. However, the data collection processes generally did not comply with the National Security Agency and Office of the Secretary of Defense internal control plans. Policies, procedures and management of the data collection were not followed. Responses were not certified as accurate and complete by responders and nondisclosure agreements were not signed and maintained. In addition, several BRAC 2005 documents used to support responses were not marked with the appropriate warnings in both the header and footer, and data collection requirements were not followed. The lack of adequate supporting documentation for the capacity analysis, Military value, scenario specific data calls and identified noncompliances with the internal control plans could impact the reliability and integrity of data that the National Security Agency provided for the BRAC 2005 analysis.

Management Comments. Although no comments were required, the National Security Agency generally agreed with the overall report. However, regarding the problems identified, National Security Agency stated that this was the first time that intelligence functions were included in BRAC and there was a steep learning curve. Specifically, they agreed that BRAC documents were not properly marked and that some question were not fully supported. However, the National Security Agency disagreed with the tone of the report, and felt that that no additional supporting documentation could have been provided. In addition, National Security Agency felt that all nondisclosure agreements and certifications were signed by individuals involved in the BRAC process. See the Finding section of the report for a discussion of management comments and the Management Comments section for the complete text of the comments.

Audit Response. We agree with the National Security Agency that the BRAC 2005 process was new to the Intelligence Community. However, the Office of the Secretary of Defense and the National Security Agency internal control procedures were not being followed which resulted in policies, procedures and management of the data collection not being effectively implemented and executed.

We played a pro-active role with the National Security Agency prior to validating the data calls. We visited the National Security Agency prior to our validation of data to discuss, and give examples of adequate supporting documentation for each question. During our validation of the data calls, we recognized that some data was not available; however, we identified instances where additional supporting documentation, detailed methodologies or amendments to data could have fully supported some National Security Agency responses. During numerous visits and discussions with management little or no additional documentation was provided.

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If as stated by National Security Agency, that all nondisclosure agreements and certification statements have been signed; we are pleased with the corrective action taken. However, during our validation, we identified and National Security Agency stated that several individuals who had knowledge of the BRAC process did not sign nondisclosure agreements. In addition, individuals with substantial involvement in the preparation and submissions of information did not provide certification statements at their level as required in the National Security Agency internal control plan. The lack of adequate oversight, noncompliance with the internal control plan written by National Security Agency, and the lack of adequate supporting documentation are the basis for questioning the reliability and integrity of the data.

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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.¹
- 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 for Criterion Number 7. 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 National Security Agency (NSA) 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 NSA prepared "National Security Agency 2005 Base Realignment and Closure (BRAC) Internal Control Plan (ICP)" on February 4, 2004, to comply with the OSD requirement.

NSA. The NSA, located in Fort Meade, Maryland, is America's cryptologic organization, it coordinates, directs, and performs highly specialized activities to protect the United States information systems and produce foreign intelligence

¹ 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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information. The NSA 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 NSA collected and submitted for the BRAC 2005 process. In addition, we evaluated whether the NSA complied with the OSD and NSA 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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National Security Agency Base Realignment and Closure 2005 Data Call Submissions and Internal Control Processes

The responses provided by NSA for the BRAC 2005 data calls were generally not fully supported. The NSA collected and submitted responses to 17 questions during the capacity analysis data call, 7 of which were partially supported and 2 unsupported. The NSA collected and submitted responses to 11 questions during the Military value data call, 8 of which were partially supported. This occurred because the NSA provided inconsistent and inadequate supporting documentation.

The data collection processes for the capacity analysis, Military value, and scenario specific data calls generally did not comply with applicable ICPs as follows.

- Policies, procedures and management of the data collection were not followed.
- Individuals with substantial involvement in the preparation and submissions of information did not provided certification statements.
- Nondisclosure agreements were not signed and maintained.
- BRAC documents were not marked properly.
- Data collection requirements were not followed.

The lack of adequate supporting documentation for the capacity analysis, Military value, scenario specific data calls, and identified noncompliances with the ICPs could impact the reliability and integrity of data that NSA provided for the BRAC 2005 analysis.

NSA BRAC 2005 Data Call Submissions

The BRAC 2005 data call responses provided by the NSA for the capacity analysis, Military value, and scenario specific data calls were generally not fully supported. The NSA headquarters forwarded all data call questions and collected the supporting documentation for each of its sites. We evaluated the validity and

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integrity of the supporting documentation at the NSA headquarters. Specifically, for the capacity analysis, Military value, and scenario specific data calls, we compared responses to supporting documentation. As we identified problems with data submissions, we worked with management to correct the data.

Capacity Analysis Data Call. The NSA collected and responded to 17 questions for the capacity analysis data call, 7 of which were partially supported and 2 unsupported. The NSA identified 16 of 17 questions that applied to its office. We concluded that questions 1, 2, 4, 6, 9, 10, and 11 were supported, questions 7, 8, 12, 13, 14, 15, and 17 partially supported, and questions 3 and 5 were unsupported (see Appendix B for details on those questions). In addition, we reviewed the one question that NSA determined was "Not Applicable" and agreed with the NSA conclusion. Based on our review and discussions with NSA management, we recommended that NSA provided additional supporting documentation and methodology to correct the issues. However, NSA management stated that no additional supporting documentation would be provided.

Military Value Data Call. The NSA collected and responded to 11 questions for the Military value data calls, 8 of which 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 23, 25, and 28 were supported and questions 18 through 22, 24, 26, and 27 were partially supported (see Appendix B for details on those questions). Based on our review and discussions with NSA management, we recommended that NSA provided additional supporting documentation and methodology to correct the issues. However, NSA management stated that no additional supporting documentation would be provided.

Scenario Specific Data Call. The NSA scenario data call provided inadequate supporting documentation to validate the responses. We reviewed one scenario specific data call at NSA; each scenario contained 9 screens (Tables of data). We evaluated the responses and supporting documentation at NSA and identified 2 of the 9 screens 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 NSA management, we recommended that NSA provided additional supporting documentation and methodology to correct the issues. However, NSA management stated that no additional supporting documentation would be provided.

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Internal Control Processes

The NSA generally did not comply with the NSA ICP during the capacity analysis, Military value, and scenario specific data calls. We evaluated whether the NSA ICP properly incorporated and supplemented the OSD ICP and determined that it properly incorporated and supplemented the OSD ICP. We evaluated the NSA compliance with the NSA ICP for all BRAC data calls. Specifically, we evaluated whether sites completed nondisclosure agreements and properly collected, marked, safeguarded, certified and maintained BRAC data.

Completeness of ICP. The NSA BRAC 2005 ICP provides a uniform set of controls designed to provide accountability information and analysis used in the BRAC 2005 process. The NSA ICP establishes organizational responsibilities that ensure the accuracy and completeness of data collection, analyses, and control mechanisms to safeguard the BRAC information. Specifically, the NSA ICP provides guidance on the responsibilities of NSA organizations, and direction on documentation requirements to address responses.

Compliance with ICPs. The NSA data collection and certification processes for the capacity analysis, Military value, and scenario specific data calls generally did not comply with the NSA and OSD ICPs policies, procedures, and management of data collection. The NSA ICP identified key roles and responsibilities to be carried out by the Alternate BRAC Representative, which included exercising oversight and authority for implementation and adherence to the NSA ICP. The NSA did not designate the Alternate BRAC Representative; as a result, the NSA ICP was not effectively implemented and executed during the capacity analysis, Military value, and scenario specific data calls. Also, individuals with substantial involvement in the preparation and submissions of information did not provide certification statements.

During the capacity analysis and scenario specific data calls some nondisclosure agreements were not signed and maintained with the master file. BRAC documents used to support answers were not properly marked in the header or footer with the "Deliberative Document – For Discussion Purposes Only – Do Not Release Under FOIA." In addition, requirements listed in the NSA ICP, "NSA Data Collection Plan," which included listing the sources of data, methods of collection, and titles of individuals who collected the data were not included with the responses.

Conclusion

The responses provided by NSA for the BRAC 2005 data calls were generally not fully supported. The NSA collected and submitted responses to 17 questions

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during the capacity analysis data call, 7 of which were partially supported and 2 unsupported. The NSA collected and submitted responses to 11 questions during the Military value data call, 8 of which were partially supported. The data collection processes for the capacity analysis, Military value, and scenario specific data calls generally did not comply with applicable ICPs. During the capacity analysis, Military value, and scenario specific data calls we identified noncompliances with the OSD and NSA ICPs.

We discussed our findings with NSA management after each data call. NSA management concurred with the findings, but stated that no additional supporting documentation would be provided.

We believe that the lack of adequate supporting documentation for the data calls and identified noncompliances with ICPs could impact the reliability and integrity of data that NSA provided for the BRAC 2005 analysis.

Management Comments and Audit Response

NSA Comments. The Director, NSA generally agreed with the overall report. However, regarding the problems identified, NSA stated that this was the first time that intelligence functions were included in BRAC and there was a steep learning curve. Specifically, NSA agreed that BRAC documents were not properly marked and that some question were not fully supported. However, the NSA disagreed with the tone of the report, and felt that that no additional supporting documentation could have been provided. In addition, NSA stated that all nondisclosure agreements and certifications statements were signed by all individuals involved in the BRAC process.

Audit Response. We agree with the NSA that the BRAC 2005 process was new to the Intelligence Community. However, the OSD and the NSA internal control procedures were not being followed which resulted in policies, procedures and management of the data collection not being effectively implemented and executed.

The DoD OIG played a pro-active role with the NSA prior to validating the data calls. We visited the NSA prior to our validation of data to discuss, and give examples of adequate supporting documentation for each question. During our validation of the data calls, we recognized that some data was not available; however, we identified instances where additional supporting documentation, detailed methodologies or amendments to data could have fully supported some NSA responses. During numerous visits and discussions with management little or no additional documentation was provided.

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If as stated by NSA, that all nondisclosure agreements and certification statements have been signed; we are pleased with the corrective action taken. However, during our validation, we identified and NSA stated that several individuals who had knowledge of the BRAC process did not sign nondisclosure agreements. In addition, individuals with substantial involvement in the preparation and submissions of information did not provide certification statements at their level as required in the NSA ICP. The lack of adequate oversight, noncompliance with the internal control plan written by NSA, and the lack of adequate supporting documentation are the basis for questioning the reliability and integrity of the data.

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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 NSA BRAC 2005 data. Specifically, we performed the following audit steps during the capacity analysis, Military value, and scenario specific 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 NSA ICP to determine whether the NSA 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 NSA 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, NSA as accurate and complete.
- Reviewed NSA's responses to the combined scenario HSA-0099.
- Worked with management to correct identified problems to data call responses.

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

Capacity Analysis Data Call. The NSA headquarters received the capacity analysis data call questions 1 through 17 from the Intelligence JCSG. NSA headquarters then forwarded all questions to each of its sites and collected supporting documentation and responses at NSA headquarters. All supporting

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documentation was maintained at headquarters for validation. We reviewed all data call questions and responses at NSA headquarters for accuracy, appropriate markings, and adequacy. We issued one capacity analysis site memorandum to summarize the site visit results. Specifically, we reviewed the following responses and supporting documentation.

Capacity Analysis Data Call Questions Reviewed

NSA Site	Question Number	
	Answered	Not Applicable
NSA headquarters	1-15 and 17	16

Military Value Data Call. The NSA headquarters received Military value data call questions 18 through 28 from the Intelligence JCSGs. Most Military value questions had multiple parts. The NSA then forwarded all questions to each of its sites and collected supporting documentation and responses at NSA headquarters. All supporting documentation was maintained at headquarters for validation. We reviewed the data call questions and responses at NSA 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. NSA headquarters received scenario and COBRA data call questions from the Intelligence JCSGs. Specifically, we reviewed one scenario specific data call for NSA. We reviewed the data call responses at NSA headquarters for reasonableness and supporting documentation. Specifically, we reviewed NSA responses to the combined scenario HSA-0099.

We performed this audit from February 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 NSA management control program because its provisions did not apply to the one-time data collection process; however, we evaluated the NSA internal controls for preparing, submitting, documenting, and safeguarding information associated with the BRAC 2005 data calls, as directed by the OSD and NSA ICPs, to determine whether the NSA complied with the ICPs. Specifically, we evaluated the procedures that NSA used to develop, submit, and document its data call responses. Internal controls were generally inadequate 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 NSA BRAC 2005 data call submissions and internal control processes.

Site Memorandums

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

DoD IG Memorandum, "Audit on the Capacity Analysis Data Call Submission from National Security Agency Headquarters for Base Realignment and Closure 2005," September 21, 2004

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Appendix B. BRAC 2005 Data Call Questions Not Fully Supported

Capacity Analysis Data Call. For the capacity analysis data call, NSA 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 3 was unsupported. The questions required the NSA to provide personnel by subfunction and attribute. The NSA did not provide adequate methodologies to track documentation to the responses. The NSA did not provide documentation to validate contracting personnel. In addition, the responses NSA provided did not agree with the documentation provided.
- The response to question number 5 was unsupported. The question required the NSA to provide authorized personnel at the Pentagon by subfunction and attribute. The NSA provided a summary sheet, without supporting documentation to support the answers provided. In addition, the responses NSA provided did not agree with the documentation provided.
- The response to question 7 was partially supported. The question required work years for management activities by building. The NSA provided the responses in total by location.
- The response to question 8 was partially supported. The question required accounting and finance transactions by building. The NSA provided the responses in total by location.
- The response to question 12 was partially supported. The question required the number of personnel serviced by Headquarters Human Resources by building. The NSA provided the responses in total by location.
- The response to question 13 was partially supported. The question required the NSA to provide new hire processing information. The NSA did not provide complete supporting documentation to support responses to applicants hired and resumes received.

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- The response to question 14 was partially supported. The question required the NSA to provide training and education information. The NSA did not provide supporting documentation for several locations.
- The response to question 15 was partially supported. The question required the NSA to provide student training counts and completions. The NSA did not provide supporting documentation to support e-learning population.
- The response to question 17 was partially supported. The question required the NSA to list projected student population totals for FY 2004 through FY 2009 by building. The NSA did not respond to the BRAC question by location.

Military Value Data Call. For the Military value data call, NSA 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 NSA to document the facility capabilities. The NSA did not provide adequate supporting documentation to support parking space counts. The NSA did not provide complete documentation to support generator power usage.
- The response to question 19 was partially supported. The question required the NSA to list the facility condition. The NSA did not provide documentation to support several NSA buildings.
- The response to question 20 was partially supported. The question required the NSA to provide responses to survivability and force protection responses. Several NSA locations did not provide supporting documentation to support responses. In addition, the NSA did not provide adequate methodologies to track documentation to the responses.
- The response to question 21 was partially supported. The question required the NSA to identify the type of specialized equipment at each building. The NSA provided supporting documentation based on physical observation only and not verifiable data. Also, the NSA did not provide supporting documentation for several locations.
- The response to question 22 was partially supported. The question required the NSA to report sensitive compartmented intelligence facility space. The NSA did not provide adequate and reasonable

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documentation to support responses. The NSA provided accreditation letters generated during our review.

- The response to question 24 was partially supported. The question required the NSA to identify the type of continuity of operations planning at each building. No supporting documentation was provided to support NSA site responses.
- The response to question 26 was partially supported. The question required the NSA to provide personnel intellectual expertise. The NSA did not provide documentation to support Military and contractor data.
- The response to question 27 was partially supported. The question required the geographic and professional relationship to NSA. The NSA provided inconsistent and duplicate responses for colleges, universities and commercial firms located near the NSA 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, National Security Agency

Non-Defense Federal Organization

Government Accountability Office *

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

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National Security Agency Comments



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NATIONAL SECURITY AGENCY

FORT GEORGE G. MEADE, MARYLAND 20758-6000

12 May 2005

MEMORANDUM FOR DEPUTY ASSISTANT INSPECTOR GENERAL FOR INTELLIGENCE EVALUATIONS

SUBJECT: (U) *CLOSE HOLD* DoD IG Report on NSA Data Call Submissions and Internal Control Processes for BRAC 2005 – Comments to IG

(U) Four problem areas in the BRAC 2005 Capacity Analysis Data Call are identified by the subject draft IG report: improper document markings, unsigned/un-maintained Non-Disclosure Agreements (NDAs), missing responder certifications, and unsupported data. We agree with the auditors that some hardcopy pages are incorrectly marked or are not marked. Great effort was expended to ensure 100% compliance in this area and the volume of paper plus the last minute flurry of replacement pages contributed to the less than 100% conformance. None of the *data* pages were unmarked, but a few certification sheets or NDAs can be found without the proper or complete BRAC disclaimer. The initial NDA and Certification Forms we received from DoD were not properly marked and proliferated in the system. We did not track down everyone who had signed an early version to have them re-sign a newer form. Nor did we achieve 100% success by stamping the original forms.

(U) We have signed certifications from responders for each of the 16 Capacity Analysis Data Call questions NSA answered. Individuals who participated in vetting the Data Call information signed the certifications forms. Perhaps these certification statements were provided subsequent to the auditor's last review day and that is why the report states there are missing certifications for some questions.

(U) We did as thorough a job as possible to secure all the NDAs that NSA employees/service members signed. When the DoD originally initiated the BRAC 2005 Intelligence Capacity Analysis Data Call, NDAs for NSA employees were signed and retained by the DoD-designated Group Leads for Sources & Methods, C2A2, and Headquarters Management. To our knowledge those NDAs are still in their possession. NSA has NDAs for all the NSA/CSS individuals whom we believe participated in the Capacity Analysis Data Call. Persons whom we queried about data or the existence of data, but were not informed why or for what purpose the data was needed were not asked to sign NDAs. We are unaware of any individuals who actively participated in this phase of BRAC who did not sign at least one NDA.

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(U) The final problem area is the most problematic to address – Data Supportability. Of the 17 Capacity Analysis Data Call questions, NSA found that 16 were applicable. Of those 16 the auditors found 7 *fully supported*, 7 *partially supported*, and 2 *unsupported*. In addition, the auditors found that the hardcopy data did not always agree with the data entered by Oracle into the DoD Intell database.

(U) A bit of background is necessary to understand the difficulty both NSA and the auditors encountered trying to determine data supportability. In the Fall of 2003 DoD requested that Defense Intelligence agencies participate in working groups to create questions and attributes for the Intelligence portion of BRAC 2005. This was the first time that Intelligence functions were included in BRAC and there was a steep learning curve. In addition, the rest of the DoD had been working on their BRAC data call for some 9 months before it was determined that Intelligence would participate, so there was much to do in a compressed time frame. The Intelligence Working Groups (Sources & Methods, C2A2, and Headquarters Management) labored for two months crafting questions and attributes for the Capacity Data Call. At the end of CY2003 DoD determined that the data call would use traditional BRAC questions resulting in the 17 Capacity Analysis Data Call Questions. That was fine except that it was also determined that the attributes identified by the groups (that *only* were relevant to their original questions) would also be used. The logic fell apart quickly and it was truly an apples and oranges exercise in many cases. Here is one example. Capacity Analysis Data Call Question #3, which was audited as “unsupported”, required NSA to provide personnel position data by subfunction (e.g. Sources & Methods) and personnel position data by attribute (e.g. Levying Intel Collection Requirements – Requirements Validation and Prioritization Long term, Levying Intel Collection Requirements – Requirements Validation and Prioritization Short Term). This meant that NSA needed to be able to look at its table of distribution and identify how many positions levy Intelligence collection requirements *short term* and how many positions levy Intelligence collection requirements *long term*. The apples and oranges flavor should have become clear by now. In this example, NSA doesn't differentiate its positions based upon whether the position is dealing with a long or short term collection requirement. The data call was fraught with these problems. In order to provide the information NSA rolled the attributes up to the Sub-Function level and attempted to report the position data that way. It was not a perfect solution as the auditors have noted. That said the auditors have agreed that 87.5% of all questions were supported completely or partially by data. In those cases where we could not put a round peg into a square aperture, we described the

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methodologies and deductions used to obtain the result. NSA is confident that all data is accounted for and could be used to support the overarching objectives of this Capacity Data Call.

(U) The auditors are correct that discrepancies exist between the data call documented in hardcopy and the Oracle Database. The reason for this is the Oracle Contractors were using software with which they were unfamiliar. The software was not adequately documented and the contractors learned how it worked by trial and error. As they attempted to load our data they would encounter problems with format, naming conventions or special character limitations. The contractors then advised NSA when and how we had to change the data to make it load into the database. The changes in the main did not change the data. In each case NSA provided an errata sheet with each new Compact Disc indicating how the softcopy data differed from the hardcopy. Perhaps the auditors were not able to review that information.

(U) Several times throughout the draft IG report the following wording is used: "Based on our (the auditors) review and discussions with NSA management, we recommended that NSA provide additional supporting documentation and methodology to correct the issues. However, NSA management stated that no additional supporting documentation would be provided." While these words are true, they do not explain the basis for NSA not providing additional information. NSA did not provide additional supporting data because we had no way to do so. As stated above in order to answer several of the questions NSA had to aggregate data instead of using the attributes that had become artificial constructs. While NSA documented the assumptions and methods used to perform the calculations, clearly the auditors are correct that there was not explicit supporting data. The data resulted from arithmetic calculations and distribution assumptions. The report conveys the impression that NSA *could* have provided additional supporting documentation but just chose not to. That is far from the case. NSA worked diligently to provide supporting data, but as explained above the data was unknowable.

(U) Problem areas in the BRAC 2005 NSA Military Value Data Call submission are identified in the subject draft IG report. The report identifies several questions that were not fully supported. Although the auditors and the NSA Military Value Team reviewed and discussed the auditors' findings at the end of the audit, the report does not clearly explain the inability of NSA to provide additional supporting documentation to partially supported responses. The auditors reviewed the 11 questions to which NSA responded. These 11 Military Value questions broke

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down into 51 individual data responses. Three questions were fully supported, leaving 8 questions partially supported.

(U) As was the case in the Capacity Analysis data call, what the report does not do is explain the basis for NSA not providing additional information for supporting documentation. NSA did not provide additional supporting data because it was non-existent. Several questions in the Military Value Data Call required supporting documentation that is not tracked or recorded in the format required to answer the questions. While NSA provided as much supporting documentation as it could for each question as well as the methodologies for all of the data, it was impossible to provide supporting documentation that was acceptable to the auditors. For example, the report states NSA did not provide supporting documentation for parking space counts (question 18). But the auditors could not accept a specific, physical count of the spaces as supporting documentation, making the response only partially supported. Question 19 was partially supported because not all buildings had been surveyed to provide the facilities conditions.

(U) The NSA BRAC team members spent many long hours and went to great lengths obtaining all existing data necessary to answer the data call. NSA agrees with the auditors that each question was not answered and supported 100%. However, the report conveys the impression that NSA *could* have provided additional supporting documentation but just chose not to. That is far from the case. NSA worked diligently to provide supporting data, but as explained above, the data was non-existent.

(U) We appreciate the time the auditors spent working with us at NSA and the patience and information they provided to us in an attempt to meet a 100% supportable submission. Thank you for the opportunity to comment on this draft report.


WILLIAM B. BLACK, JR.
Acting Director

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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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(b)(6)

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