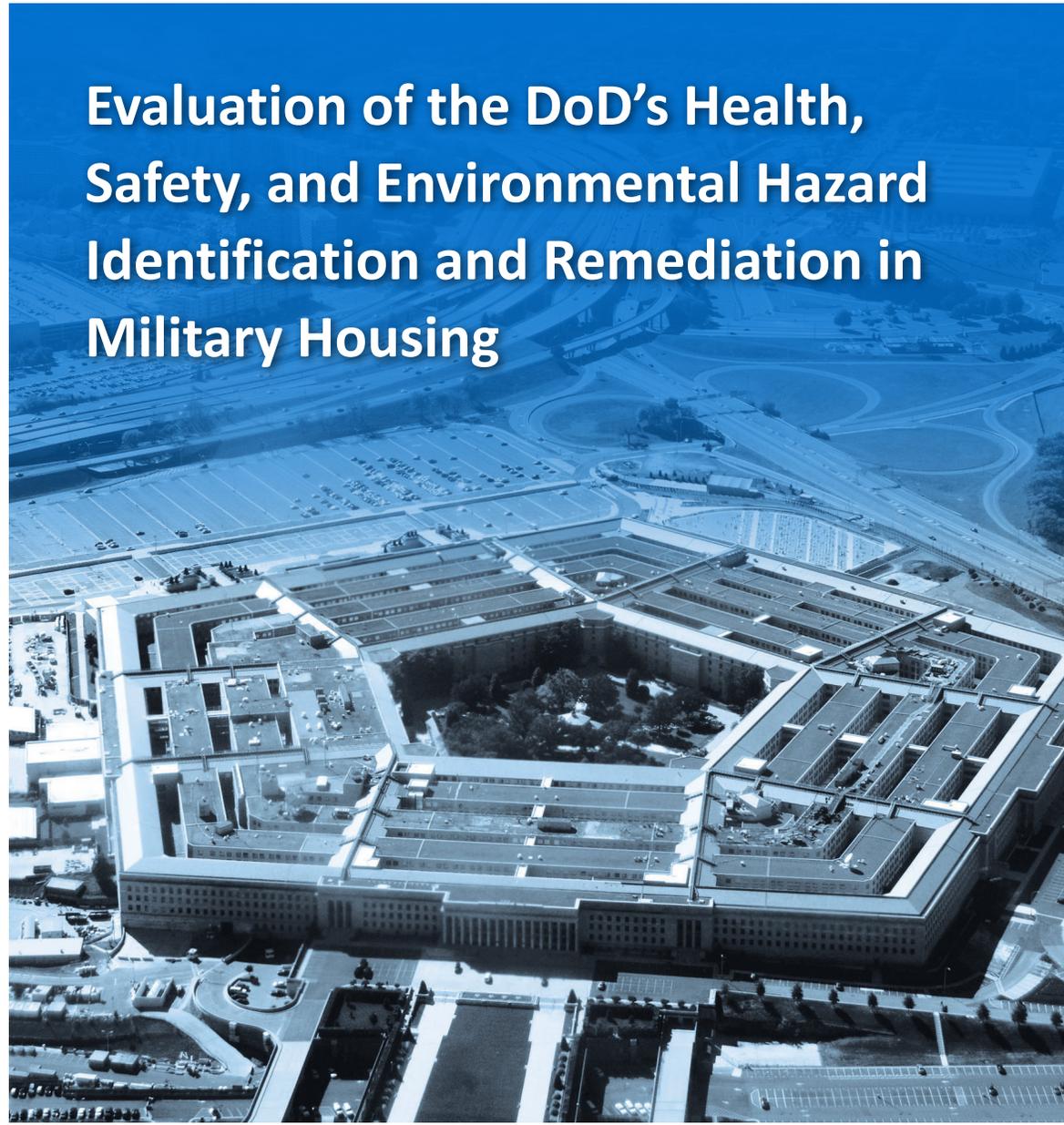




INSPECTOR GENERAL

U.S. Department of Defense

NOVEMBER 20, 2024



Evaluation of the DoD's Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing

INDEPENDENCE ★ INTEGRITY ★ EXCELLENCE ★ TRANSPARENCY





Results in Brief

Evaluation of the DoD's Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing

November 20, 2024

Objective

Our objective was to determine the DoD's compliance with military housing requirements related to health, safety, and environmental hazard identification and remediation in the FY 2020, FY 2021, and FY 2023 National Defense Authorization Acts (NDAA).

Background

This evaluation is the third in a series of three evaluations in response to FY 2020 NDAA section 3044. Additionally, this evaluation is in response to FY 2021 NDAA section 748. Specifically, this evaluation focused on the extent to which the DoD implemented 12 health, safety, and environmental hazard requirements within FY 2020 NDAA sections 3051, 3052, 3053, and 3055, as amended by the FY 2021 and FY 2023 NDAA.

Finding

We determined that DoD officials took actions intended to implement the statutory requirements; however, none of the 12 requirements that we evaluated were fully implemented. This occurred because DoD officials have not developed the processes, issued the policies, or provided the administrative oversight necessary to implement the NDAA requirements. As a result, the DoD's implementation of the statutory requirements for health, safety, and environmental hazard identification and remediation in military housing has not been completed. Additionally,

Finding (cont'd)

the Chief Housing Officer, the Deputy Assistant Secretary of Defense (Housing), Military Department officials, and installation officials were unable to determine whether the improvements intended by Congress were achieved.

We walked through privatized family housing units and government-owned and government-controlled (GO-GC) unaccompanied housing buildings across the three installations we visited in person. We found instances of GO-GC unaccompanied housing that were not well-maintained and did not meet the minimum adequacy standards of DoD Manual (DoDM) 4165.63 at two of the three visited installations.

The inadequate living conditions in some GO-GC unaccompanied housing occurred because maintenance, repair, and construction funding for GO-GC unaccompanied housing is not separate from the funding for other installation mission requirements. Funds for GO-GC unaccompanied housing are combined with other Operations and Maintenance (O&M) funds, and MILDEP officials told us that installation officials prioritize their limited O&M funds for their other mission requirements.

Additionally, the inadequate living conditions in some GO-GC unaccompanied housing occurred because DoD officials were focused on taking actions for the military housing types specified in the majority of the statutory requirements: privatized family housing, privatized unaccompanied housing, and GO-GC family housing. Specifically, the statutory requirements did not uniformly apply to GO-GC unaccompanied housing. For example, FY 2020 NDAA sections 3051 and 3055 do not apply to GO-GC unaccompanied housing.

As a result, residents of GO-GC unaccompanied housing at the locations visited during this evaluation were exposed to health, safety, and environmental hazard risks, such as mold. Additionally, DoD officials told us that the current living conditions in GO-GC unaccompanied housing jeopardize the recruitment of new military members and the retention of those currently serving.



Results in Brief

Evaluation of the DoD's Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing

Recommendations

We recommend that the Under Secretary of Defense for Acquisition and Sustainment:

- direct the Chief Housing Officer to develop a plan of action and milestones to correct the specific implementation deficiencies in the FY 2020, FY 2021, and FY 2023 NDAs discussed in this report; and
- update the appropriate DoD 4165 series policies to address policy changes related to the reform requirements in the FY 2020, FY 2021, FY 2023, and FY 2024 NDAs, and incorporate and codify the requirements from outdated memorandums.

Additionally, we recommend that the Chief Housing Officer direct the Deputy Assistant Secretary of Defense (Housing):

- in coordination with the Military Departments, to perform an assessment and document the feasibility of extending the implementation of military housing oversight requirements to GO-GC unaccompanied housing;
- in coordination with the Military Departments and the DoD Comptroller, to develop a plan of action and milestones to correct deficiencies in the condition of GO-GC unaccompanied housing; and
- in coordination with the Military Departments and the DoD Comptroller, to perform an assessment and document the feasibility of alternatives for the future management of funding for GO-GC unaccompanied housing.

Management Comments and Our Response

The Under Secretary of Defense for Acquisition and Sustainment agreed to all of the recommendations presented in the report, and management comments addressed the specifics of the recommendations. Therefore, the recommendations are resolved and open. We will close the recommendations once we verify that all agreed-upon actions have been completed.

Please see the Recommendations Table on the next page for the status of recommendations.

Recommendations Table

Management	Recommendations Unresolved	Recommendations Resolved	Recommendations Closed
Under Secretary of Defense for Acquisition and Sustainment	None	1,2	None
Chief Housing Officer	None	3,4,5	None

Please provide Management Comments by February 18, 2025.

Note: The following categories are used to describe agency management’s comments to individual recommendations.

- **Unresolved** – Management has not agreed to implement the recommendation or has not proposed actions that will address the recommendation.
- **Resolved** – Management agreed to implement the recommendation or has proposed actions that will address the underlying finding that generated the recommendation.
- **Closed** – The DoD OIG verified that the agreed upon corrective actions were implemented.





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

November 20, 2024

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION
AND SUSTAINMENT
UNDER SECRETARY OF DEFENSE FOR PERSONNEL
AND READINESS
AUDITOR GENERAL, DEPARTMENT OF THE ARMY
AUDITOR GENERAL, DEPARTMENT OF THE NAVY
AUDITOR GENERAL, DEPARTMENT OF THE AIR FORCE
INSPECTOR GENERAL, DEPARTMENT OF THE AIR FORCE

SUBJECT: Evaluation of the DoD's Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing (Report No. DODIG-2025-045)

This final report provides the results of the DoD Office of Inspector General's evaluation. We previously provided copies of the draft report and requested written comments on the recommendations. We considered management's comments on the draft report when preparing the final report. These comments are included in the report.

The Under Secretary of Defense for Acquisition and Sustainment agreed to address all of the recommendations presented in the report; therefore, we consider the recommendations resolved and open. Although the recommendations are resolved, we request additional management comments on Recommendations 4 and 5. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Therefore, within 30 days please provide us your response clarifying the timelines for completing corrective actions for Recommendations 4 and 5. Send your response to either [REDACTED] if unclassified or [REDACTED] if classified SECRET.

We will close the recommendations when you provide us documentation showing that all agreed-upon actions to implement the recommendations are completed. Therefore, within 90 days please provide us your response concerning specific actions in process or completed on the recommendations. Send your response to either [REDACTED] if unclassified or [REDACTED] if classified SECRET.

If you have any questions, please contact [REDACTED]. We appreciate the cooperation and assistance received during the evaluation.

FOR THE INSPECTOR GENERAL:

A handwritten signature in black ink, appearing to read "Randolph R. Stone", is written over a white background.

Randolph R. Stone
Assistant Inspector General for Evaluations
Space, Intelligence, Engineering, and Oversight

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Acronyms and Abbreviations

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Introduction

Objective

The objective of this evaluation was to determine the extent of the DoD's compliance with military housing oversight requirements related to health, safety, and environmental hazard identification and remediation in the FY 2020, FY 2021, and FY 2023 National Defense Authorization Acts (NDAAAs).¹

Background

On December 20, 2019, the FY 2020 NDAA added and amended sections in title 10 of the United States Code, including requirements related to military housing directed to the Secretary of Defense (SecDef) and the Military Departments (MILDEPs).² This report is the third in a series of three reports in response to FY 2020 NDAA section 3044.³ The FY 2020 NDAA section 3044 requires the DoD Office of Inspector General (OIG) to conduct three reviews of the DoD's privatized military housing oversight, including at least three military installations per review.

Additionally, this report is the second in a series of two reports in response to FY 2021 NDAA section 748, enacted January 1, 2021.⁴ Among other things, the FY 2021 NDAA section 748 requires the DoD OIG to review the process under section 3053 of the FY 2020 NDAA, including whether the process will adequately address resolution of environmental health hazards identified during the inspections and assessments conducted as a result of sections 3051(b) and 3052(b) of the FY 2020 NDAA.

This evaluation focused on the extent to which the DoD implemented the health, safety, and environmental hazard requirements from 12 specific FY 2020 NDAA subsections and paragraphs within FY 2020 NDAA sections 3051, 3052, 3053, and

¹ Public Law 116-92, the S.1790 National Defense Authorization Act for Fiscal Year 2020 (FY 2020 NDAA), was enacted on December 20, 2019. On January 1, 2021, Public Law 116-283, the H.R. 6395-William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 (FY 2021 NDAA), amended the language of some FY 2020 NDAA requirements within the scope of this evaluation. Additionally, on December 7, 2022, Public Law 117-263, the H.R. 7776-James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (FY 2023 NDAA), amended the language of some FY 2020 NDAA requirements within the scope of this evaluation. For example, the requirements in section 3051 of Public Law 116-92 were amended by section 2818 of Public Law 116-283.

² The Military Departments, created by the National Security Act of 1947, are the Army, Navy, and Air Force. In this report, we also discuss the Military Services within the MILDEPs: the Army, the Marine Corps, the Navy, the Air Force, and the Space Force.

³ The first report in the series is Report No. DODIG-2022-004, and the second report in the series is Report No. DODIG-2022-139. Since 2014, the DoD OIG has published 13 reports on the condition of military housing. The DoD OIG reports highlighted the need for DoD officials to take action to improve their oversight of the management of health and safety hazards in military housing. See Appendix B for a summary of the 13 prior DoD OIG reports. As of July 2024, there are 18 recommendations open from these reports that are also related to the findings in this report.

⁴ The DoD OIG announced two projects to address this requirement. The first report in the series is an audit report, Report No. DODIG-2022-078.

3055, as amended. The following FY 2021 and FY 2023 NDAA sections amended sections of the FY 2020 NDAA discussed in this report.

- FY 2021 NDAA section 2818 amended FY 2020 NDAA section 3051 by expanding the requirements for privatized military housing to include other types of military housing.
- FY 2023 NDAA section 2807 amended FY 2020 NDAA section 3012 to expand the privatized military housing responsibilities of the Chief Housing Officer (CHO) to include oversight of all military housing.

For consistency, we refer to the NDAA sections, as amended, by their FY 2020 NDAA section number throughout this report. See Table 1 in Appendix A for a summary of the requirements that we selected for our evaluation.

In order to determine the extent to which DoD officials implemented the 12 selected FY 2020, FY 2021, and FY 2023 NDAA requirements, we evaluated whether:

- the responsible officials first created and standardized policies and processes;
- the policies and processes directly correlated with the NDAA requirements;
- the policies and processes were then communicated to the MILDEPs and installation officials;
- the policies and processes were carried out at the MILDEP and installation levels to achieve improvements in military housing; and
- the feedback necessary for measuring and reporting was collected.

Our report describes the status of the DoD's implementation of the requirements in Table 1 through June 2024.

Description of Military Housing

According to DoD Manual (DoDM) 4165.63, military housing is divided into two broad categories: government-owned and government-controlled (GO-GC) and privatized.⁵ Specifically, GO-GC military housing is owned, managed, or maintained by the DoD.

Privatized military housing is owned, operated, and maintained by private-sector companies. Throughout this report, we use the term "landlords" to describe the private-sector companies that own, operate, and maintain privatized military housing.

⁵ DoD Manual 4165.63, "DoD Housing Management," October 28, 2010 (Incorporating Change 2, August 31, 2018).

Military housing is further divided into family housing and unaccompanied housing.⁶ Family housing is military housing for military members, DoD civilians, or DoD-sponsored civilians and their dependent family members. Unaccompanied housing is military housing, such as dormitories and barracks, for military members who either do not have or are geographically separated from dependent family members. See Appendix C for more details on military housing, including the inventory of military housing worldwide.

We conducted our evaluation at the DoD, MILDEP, and installation levels to determine the extent of the DoD's implementation of the health, safety, and environmental hazard requirements. Specifically, we evaluated the DoD's implementation of NDAA requirements for GO-GC family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing, which we collectively refer to as military housing throughout this report.

For NDAA requirements that do not apply to all of these types of military housing, we evaluated only the applicable types of military housing. Specifically, according to the FY 2020 NDAA:

- section 3051, as amended, applies to GO-GC family housing, privatized family housing, and privatized unaccompanied housing;
- sections 3052 and 3053 apply to GO-GC family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing; and
- section 3055 applies to privatized family housing and privatized unaccompanied housing.

To validate the implementation of the requirements, we evaluated a nonstatistical sample of military installations, as required by the FY 2020 NDAA. We selected six installations for our evaluation based on factors such as geographic location and number of family housing units and unaccompanied housing beds.⁷ We physically visited Fort Belvoir, Virginia; Marine Corps Base Quantico (MCBQ), Virginia;

⁶ Military housing also includes other types of housing, such as leased housing. However, the scope of this evaluation includes only GO-GC family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing.

⁷ We initially selected 10 installations. However, because we observed consistency among the six installations described in Table 2, we determined that additional site visits were not warranted at Eielson Air Force Base, Alaska; Joint Base San Antonio, Texas; Naval Air Station Corpus Christi, Texas; and Vandenberg Air Force Base, California. According to the FY 2020 NDAA, the term "housing unit" may be used to refer to a unit of family housing or unaccompanied housing. However, the DoD and landlords provide family housing and unaccompanied housing in various configurations, such as single-family homes or apartments for family housing and shared or private bedrooms for unaccompanied housing. Therefore, we refer to family housing in terms of units, each of which houses a single family. Additionally, because some unaccompanied housing configurations have shared bedrooms, we refer to unaccompanied housing in terms of beds. We refer to the military housing inventory in this way to provide context regarding the number of Service members potentially affected by the deficiencies identified in this report.

and Joint Base Anacostia–Bolling (JBAB), D.C. During our in-person site visits, we walked through privatized family housing units and GO-GC unaccompanied housing buildings.

We conducted virtual site visits at Joint Base Lewis–McChord (JBLM), Washington; Naval Base San Diego (NBSD), California; and Wright–Patterson Air Force Base (AFB), Ohio.⁸ The military housing at these installations represents each of the military housing types, and each of the three MILDEPs, as shown in Appendix A, Table 2.

Military Housing Oversight Policy, Roles, and Responsibilities

According to DoD Instruction (DoDI) 4165.63, the Office of the Secretary of Defense (OSD) is required to manage military housing, and the MILDEPs are required to manage military housing within their respective jurisdictions.⁹ Additionally, DoDM 4165.63 states that adequate military housing must provide safe and comfortable living places that meet “minimum standards for...condition, health, and safety” and be well-maintained and structurally sound.¹⁰ According to DoDM 4165.63, the management of military housing includes program and financial management, accounting, and reporting. Additionally:

- in the FY 2023 NDAA, Congress designated the Assistant Secretary of Defense (Energy, Installations, and Environment) (ASD[EI&E]) as the Chief Housing Officer (CHO), who is responsible for the creation and standardization of policies and processes across all military housing and for the oversight of their administration;
- the Deputy Assistant Secretary of Defense (Housing) (DASD[H]) supports the CHO to create and standardize policies and processes for all military housing in coordination with the MILDEPs and other OSD organizations; and
- the MILDEPs support and direct installation officials, who carry out policies and processes for military housing.

Therefore, we determined that the CHO is responsible for the policies, processes, and administrative oversight of the NDAA requirements directed to the SecDef. Specifically, the CHO, with the support of the DASD(H), is responsible for creating and standardizing policies and processes necessary to implement 10 of the

⁸ To perform our virtual site visits, we relied on teleconferences, interviews, questionnaires, and data calls to collect testimonial and documentary evidence to verify information. The virtual site visits did not include virtual walk-throughs of the housing.

For this report, NBSD includes military housing located at NBSD, Point Loma, Coronado, and the Navy Medicine Readiness and Training Center.

⁹ DoD Instruction 4165.63, “DoD Housing,” July 21, 2008 (Incorporating Change 2, August 31, 2018).

¹⁰ DoD Manual 4165.63, “DoD Housing Management,” October 28, 2010 (Incorporating Change 2, August 31, 2018).

12 requirements we selected and for the oversight of their implementation.¹¹ Additionally, the FY 2020 NDAA directed one requirement we selected to the SecDef in coordination with the MILDEPs. Furthermore, the MILDEPs are responsible for one requirement we selected.

Office of the Secretary of Defense

The ASD(EI&E) serves as the principal advisor to the Under Secretary of Defense for Acquisition and Sustainment (USD[A&S]) for a number of matters, including military housing. Specifically, the ASD(EI&E) serves as the program manager for all military housing and is the designated CHO.¹² According to FY 2020 NDAA section 3012, the duties of the CHO include the:

- “creation and standardization of policies and processes regarding housing units;” and
- “oversight of the administration of any Department of Defense-wide policies regarding housing units.”

Additionally, DoDM 4165.63 states that the ASD(EI&E) must:

- communicate congressional requirements regarding housing programs to the MILDEPs; and
- communicate and coordinate regularly with the MILDEPs on topics such as housing policy, annual budgets, housing issues, and performance of Military Housing Privatization Initiative (MHPI) projects.

Within the Office of the ASD(EI&E), the DASD(H) implements the CHO’s policy and direction.¹³ Additionally, the Office of the DASD(H) (ODASD[H]) coordinates with other OSD organizations, such as the Office of the Under Secretary of Defense for Personnel and Readiness (OUSD[P&R]), for matters that are not strictly housing. For example, ODASD(H) officials coordinate with the Assistant Secretary of Defense (Readiness) (ASD[R]) for matters related to environmental health hazards.

Military Departments and Installations

The OSD, specifically the ASD(EI&E) as the CHO with the support of the DASD(H), and the MILDEPs share oversight roles and responsibilities for military housing. Each of the MILDEPs has its own Secretary and structure for housing management.

¹¹ See Table 1 in Appendix A for a description of the 12 requirements we selected and the responsible DoD officials.

¹² The USD(A&S) was formerly the Under Secretary of Defense for Acquisition, Technology, and Logistics. Section 3012 of the FY 2020 NDAA required the SecDef to designate a CHO to oversee privatized military housing for the DoD. Section 2807 of the FY 2023 NDAA expanded this role to include GO-GC military housing.

¹³ Throughout this report, we refer to the official taking action at the time of the action. During this evaluation, the ASD(EI&E) and DASD(H) changed. The current ASD(EI&E) was confirmed in January 2023 and the DASD(H) was appointed in March 2024.

The Secretaries of the MILDEPs have delegated some roles and responsibilities for military housing to their installation commanders. On behalf of installation commanders, installation military housing office (MHO) officials perform the day-to-day oversight of privatized military housing at DoD installations. Accordingly, MHO officials serve as the primary liaison between occupants of privatized military housing and the landlords. Additionally, MHO officials perform the day-to-day management of GO-GC family housing at DoD installations, including interactions with occupants.

Day-to-day management of GO-GC unaccompanied housing at DoD installations varies across the MILDEPs. For example, MHO officials manage GO-GC unaccompanied housing at Air Force installations, and installation logistics officials manage GO-GC unaccompanied housing at Marine Corps installations.

Furthermore, installation MHO officials are required to track and document implementation of the FY 2020 NDAA oversight requirements related to health, safety, and environmental hazards in the enterprise Military Housing (eMH) information management system, which is hosted by the Navy.¹⁴ We refer to the eMH information management system as eMH throughout this report.

¹⁴ In April 2014, the Under Secretary of Defense for Acquisition, Technology, and Logistics issued a policy memorandum that required the MILDEPs to use eMH for operations and inventory management of military housing. Under Secretary of Defense for Acquisition, Technology and Logistics memorandum, "Enterprise Military Housing Information Management System," April 16, 2014. According to the 2014 memorandum, the Navy is the eMH owner and the eMH program management office is part of the Commander, Navy Installations Command. The current eMH user organizations include each of the MILDEPs.

Finding

Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing Lack Direction

We evaluated the DoD's implementation of 12 health, safety, and environmental hazard identification and remediation requirements for military housing in FY 2020 NDAA sections 3051, 3052, 3053, and 3055, as amended.¹⁵ We determined that, since the FY 2020 NDAA became law, DoD officials took actions intended to implement the statutory requirements; however, those actions did not meet the NDAA requirements. We determined that none of the 12 requirements that we evaluated were fully implemented. Specifically:

- the Secretary of Defense (SecDef) did not develop a uniform code of basic housing standards for military housing, as required by FY 2020 NDAA section 3051(a);¹⁶
- the SecDef did not submit to Congress a DoD plan to contract and conduct inspections and assessments for privatized family housing, privatized unaccompanied housing, and government-owned, government-controlled (GO-GC) family housing, as required by FY 2020 NDAA section 3051(b);
- the Military Departments (MILDEPs) established multi-million-dollar contracts for inspections and assessments of privatized family housing, privatized unaccompanied housing, and GO-GC family housing, but have not completed all inspections and assessments, as required by FY 2020 NDAA section 3051(c)(1);
- the SecDef did not submit to Congress a report on inspections and assessments of privatized family housing, privatized unaccompanied housing, and GO-GC family housing, as required by FY 2020 NDAA section 3051(c)(2);
- the SecDef developed a hazard assessment tool for military housing, as required by FY 2020 NDAA section 3052(a)(1), but the tool did not align with all the hazards described in FY 2020 NDAA section 3052 (a)(2);
- the SecDef did not gather public input specific to the hazard assessment tool from military housing occupants, as required by FY 2020 NDAA section 3052(a)(3);

¹⁵ As shown in Table 1 in Appendix A, the FY 2020 NDAA directed 10 of the 12 selected requirements to the SecDef, 1 requirement to the SecDef in coordination with the MILDEPs, and 1 requirement to the MILDEPs.

¹⁶ For NDAA requirements applicable to GO-GC family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing, we refer to these four types of military housing collectively as military housing. For NDAA requirements that do not apply to all of these types of military housing, we individually list the applicable types of military housing.

- the SecDef did not submit a report to Congress on the hazard assessment tool, as required by FY 2020 NDAA section 3052(a)(4);
- the SecDef did not complete hazard assessments of military housing with the hazard assessment tool and provide results of hazard assessments to military housing occupants, as required by FY 2020 NDAA sections 3052(b)(1) and 3052(b)(2);
- the SecDef, in coordination with the MILDEPs, did not complete the development of a process to identify, record, and resolve environmental health hazards in military housing, as required by FY 2020 NDAA sections 3053(a) and 3053(b);
- the SecDef reported to Congress on a process for environmental health hazards in military housing, as required by FY 2020 NDAA section 3053(d), but the report did not address all requirements described in FY 2020 NDAA section 3053(b); and
- the SecDef did not submit a report to Congress on minimum credentials for health and environmental inspectors of privatized family housing and unaccompanied housing, as required by FY 2020 NDAA section 3055.

The lack of full NDAA implementation occurred because the officials who act on behalf of the SecDef for military housing—the Chief Housing Officer (CHO) and the Deputy Assistant Secretary of Defense (Housing) (DASD[H])—have not developed the processes, issued the policies to MILDEP officials, or provided the administrative oversight necessary to implement the NDAA requirements. Additionally, the CHO and the DASD(H) did not ensure that DoD actions intended to implement the 12 requirements directly correlated to the language in the NDAA.

As a result, the DoD's implementation of the 12 selected requirements for health, safety, and environmental hazard identification and remediation has not been completed. Additionally, the CHO, the DASD(H), MILDEP officials, and installation officials were unable to determine whether the improvements intended by Congress were achieved to overhaul and reform DoD housing. Without a plan that directly correlates actions to the NDAA language, DoD officials lack a clear method to measure their progress toward implementing the NDAA requirements. Therefore, health, safety, and environmental hazard risks may remain in military housing despite the time and money spent by DoD officials.

Additionally, we walked through privatized family housing units and GO-GC unaccompanied housing buildings across the three installations we visited in person. We found instances of GO-GC unaccompanied housing that were not well-maintained and did not meet the minimum adequacy standards of DoD Manual (DoDM) 4165.63 at two of the three visited installations. Specifically, DoDM 4165.63 states that for military housing, including GO-GC unaccompanied housing, to be adequate, it must provide safe and comfortable living places that meet “minimum standards for ... condition, health, and safety” and be well-maintained and structurally sound. However, during our walk-throughs of GO-GC unaccompanied housing we observed various apparent health and safety hazards. For example, we observed GO-GC unaccompanied housing where evidence of mold was apparent in hallways, rooms, and ceilings, and we observed one location with holes in the wall where the inside space was overwhelmed with mold. In another example, we observed instances of support infrastructure and equipment in poor condition, such as inoperable heating, ventilation, and air conditioning units.

The inadequate living conditions in some GO-GC unaccompanied housing occurred because—unlike privatized family housing, privatized unaccompanied housing, and GO-GC family housing—maintenance, repair, and construction funding for GO-GC unaccompanied housing is not separate from the funding for other mission requirements. Funds for GO-GC unaccompanied housing are combined with other Operations and Maintenance (O&M) funds, and MILDEP officials told us that installation officials must prioritize limited funds for their mission requirements.

Additionally, the inadequate living conditions in some GO-GC unaccompanied housing occurred because DoD officials were focused on taking actions for the military housing types specified in the majority of the statutory requirements: privatized family housing, privatized unaccompanied housing, and GO-GC family housing. Specifically, the 12 selected NDAA requirements did not uniformly apply to GO-GC unaccompanied housing.

As a result, residents of GO-GC unaccompanied housing at the installations we visited were exposed to health, safety, and environmental hazard risks, such as mold. DoD officials told us that the current living conditions in GO-GC unaccompanied housing jeopardize the recruitment of new military members and the retention of those currently serving.

DoD Officials Took Actions, but Did Not Meet the NDAA Health, Safety, and Environmental Hazard Requirements

We evaluated the DoD's implementation of 12 health, safety, and environmental hazard identification and remediation requirements for military housing in FY 2020 NDAA sections 3051, 3052, 3053, and 3055, as amended. We determined that, since the FY 2020 NDAA became law, DoD officials took actions intended to implement the statutory requirements; however, those actions did not meet the NDAA requirements. Ultimately, we determined that none of the 12 requirements that we evaluated were fully implemented. Additionally, none of the 12 requirements were implemented within the timelines set by Congress in the FY 2020 NDAA, as amended.¹⁷

The CHO and DASD(H) Did Not Develop a Uniform Code of Basic Housing Standards

We determined that the CHO and the DASD(H), on behalf of the SecDef, did not develop a uniform code of basic housing standards. FY 2020 NDAA section 3051(a) required that, no later than February 1, 2021, the SecDef:

establish and implement a uniform code of basic housing standards for safety, comfort, and habitability for privatized military housing, which shall meet or exceed requirements informed by a nationally recognized, consensus-based, model property maintenance code.¹⁸

Although the FY 2020 NDAA originally applied to privatized family housing and privatized unaccompanied housing, FY 2021 NDAA section 2818 directed the SecDef to expand the requirement to GO-GC family housing.

However, neither the CHO nor the DASD(H) issued guidance about developing a uniform code of basic housing standards by February 1, 2021. Instead, on January 21, 2022, the CHO issued a memorandum stating:

In furtherance of its legal obligations under [FY 2020 and FY 2021 NDAA] sections 3051 and 2818, the Department developed a uniform code of basic housing standards for safety, comfort, and habitability modeled off of the International Property Maintenance Code (IPMC); and an inspection checklist and mechanism to document the required housing inspections using the enterprise Military Housing (eMH) system.¹⁹

¹⁷ See Table 1 in Appendix A for the implementation timelines set by Congress for each requirement.

¹⁸ A consensus-based code is a code developed by subject matter experts who come to a consensus on a subject, such as property maintenance.

¹⁹ CHO memorandum, "Inspections and Assessment of Housing," January 21, 2022.

According to the January 2022 CHO memorandum, "The IPMC is a nationally recognized, consensus-based, model code currently used by more than 600 jurisdictions across the United States as well as some military services."

Additionally, on March 31, 2022, the DASD(H) testified at a congressional hearing on the Military Housing Privatization Initiative.²⁰ During the hearing, the DASD(H) stated that the DoD “issued policy establishing a uniform code of basic housing standards for safety, comfort, and habitability.” According to the DASD(H):

The DASD(Construction) worked with the Military Departments and International Code Council (ICC) to arrive at the Department’s uniform code of basic housing standards, which is modeled off of the International Property Maintenance Code (IPMC).

The IPMC, developed by the ICC, is known as a consensus-based, model property maintenance code.²¹ The ICC does not have any authority to impose its codes, including the IPMC, on any jurisdiction, and it does not have the authority to enforce its codes. Instead, the requirement to comply with any consensus-based code and the power to enforce its use must come from another entity having authority, such as the DoD. Additionally, model codes require the entity that is adopting the code, such as the DoD, to customize the specifics of the code.

Therefore, a model code becomes a requirement and enforceable when it is customized and adopted by a governing entity, such as the DoD.²² If the DoD adopts a model code, then all applicable DoD properties must comply with the code. DoD officials could have customized and adopted the IPMC. However, we found that DoD officials did not customize and adopt the IPMC as the DoD’s uniform code of basic housing standards.

Throughout our evaluation, we asked Office of the Assistant Secretary of Defense (Housing) (ODASD[H]) officials for a copy of the DoD’s uniform code of basic housing standards described in the January 2022 CHO memorandum. During our site visits, we also asked installation MHO officials for a copy of the DoD’s uniform code of basic housing standards. All of the installation MHO officials we met told us that they were not provided with a uniform code of basic housing standards.²³

²⁰ The DASD(H) made a statement on the Military Housing Privatization Initiative at a hearing before the U.S. House Committee on Appropriations Subcommittee on Military Construction, Veterans Affairs, and Related Agencies on March 31, 2022.

²¹ According to the ICC website, council members who develop the IPMC include industry experts with decades of knowledge and experience in property maintenance.

²² ICC guidance states that if a governmental agency or authority having jurisdiction over code adoption wishes to adopt a model code for legislative or regulatory purposes, it should enact an ordinance, regulation or law (collectively “law”) to incorporate by reference the relevant code. The enacting law should also include the full text of any changes or amendments enacted by the legislative body of the authority having jurisdiction.

²³ One installation MHO official told us that a working group of DoD officials met to develop a uniform code of basic housing standards. Specifically, the installation MHO official told us that they were involved with a uniform code development initiative that lasted for several months but the working group ultimately abandoned the effort to develop a uniform code of basic housing standards. Instead, the group decided to use an existing “move-in move-out inspection checklist.”

In September 2023, ODASD(H) officials provided us with a written response to our request for a copy of the DoD’s uniform code of basic housing standards coordinated with officials from the Office of the Deputy Assistant Secretary of Defense (Construction) (ODASD[Con]).²⁴ The ODASD(Con) response stated that “there is no separate standalone [uniform code] document” According to ODASD(Con) officials, the eMH housing inspection checklist referenced in the January 2022 CHO memorandum is:

the representation of the DoD uniform code ... modeled off the International Property Maintenance Code (IPMC) ... [and] also incorporates aspects from other sources to fully meet DoD’s needs.”²⁵

Figure 7 in Appendix D is a copy of the eMH housing inspection checklist. Installation MHO officials use the eMH housing inspection checklist to determine whether a housing unit has deficiencies during routine management activities, such as during change of occupancy maintenance. As shown in Figure 7 in Appendix D, the eMH housing inspection checklist includes:

- a list of questions about various aspects of the housing unit, such as general safety, lead-based paint, and moisture control, that require installation officials to answer yes, no, not applicable, or unknown;
- a section for rating the condition of the exterior of the unit and each room of the unit with “component ratings,” such as good, fair, and poor; and “condition codes,” such as “needs to be cleaned” and “needs repair”;
- a list of potential follow-up actions, such as “none” or “created service log”; and
- “overall unit inspection results,” which includes choices for “pass,” “pass with non-health or safety condition,” or “fail.”

As previously discussed, ODASD(Con) officials told us that the eMH housing inspection checklist was the “representation of the DoD uniform code.” We reviewed and compared the eMH housing inspection checklist to the IPMC and other DoD criteria, such as Unified Facilities Criteria (UFC).²⁶ Based on our review, we determined that the eMH housing inspection checklist is not equivalent to a uniform code of basic housing standards, such as a nationally recognized,

²⁴ Although the CHO and DASD(H) were acting on behalf of the SecDef, the DASD(H) testified before the House Committee on Appropriations, Subcommittee on Military Construction, Veterans Affairs, and Related Agencies that the DASD(Con) created a uniform code of basic housing standards.

²⁵ As previously discussed, eMH is the DoD enterprise information technology system for the operations and inventory management of military housing and includes a housing inspection checklist.

²⁶ The DoD’s UFC Program unifies all technical criteria and guide specifications pertaining to planning, design, construction, and operation and maintenance of real property facilities. The program streamlines the military criteria system by eliminating duplication of information, increasing reliance on private-sector standards, and creating a more efficient criteria development and publishing process. The DoD’s UFC Program includes criteria documents that provide planning, design, construction, sustainment, restoration, and modernization criteria applicable to the MILDEPs.

consensus-based, model property maintenance code. The eMH housing inspection checklist does not set basic housing standards or provide the same level of detail as the IPMC.²⁷

For example, the IPMC requires maintenance of fire barriers, such as fire doors, to prevent the passage of fire and provide unobstructed paths of egress or escape.²⁸ Specifically, the IPMC describes procedures to determine whether a fire door is in working order, such as proper signage and how to check the door operation.²⁹ However, the eMH housing inspection checklist, provided by the DASD(H) in October 2022, provides only a checkbox for whether fire doors are unlocked and in working order. The eMH housing inspection checklist does not provide standards to determine if the fire door is in working order, provide maintenance or repair standards, or provide references for additional details.

In another example, the eMH housing inspection checklist does not clearly indicate which questions are related to the health and safety condition of the unit. Additionally, the eMH housing inspection checklist does not clearly indicate or provide a description of pass or fail parameters for a health and safety condition. Therefore, we determined that installation officials using the eMH housing inspection checklist would need additional policy and guidance to accurately and consistently assess housing units against an established uniform code of basic housing standards.

Additionally, we found discrepancies between the eMH housing inspection checklist, the IPMC, and other DoD criteria. For example, the water heating facilities section of the IPMC requires hot water to be no less than 110 degrees Fahrenheit and requires shower valves that limit the maximum setting to 120 degrees Fahrenheit.³⁰ Conversely, the eMH housing inspection checklist provided by the DASD(H) in October 2022 provides only a checkbox for whether the hot water is less than 120 degrees Fahrenheit. The eMH housing inspection checklist does not describe the source requirements or reasoning for ensuring that the hot water temperature is less than 120 degrees Fahrenheit and does not mention a lower temperature

²⁷ For context, the eMH housing inspection checklist is 6 pages. The IPMC is more than 70 pages.

²⁸ The IPMC refers the user to National Fire Protection Agency 80, "Standard for Fire Doors and Other Opening Protectives," which states that fire door assemblies should be inspected and tested not less than annually, and a written record of the inspection should be signed and kept for inspection by the authority having jurisdiction. National Fire Protection Agency 80 lists a number of inspection and maintenance requirements that should be verified for multiple types of fire door hardware. For example, integrity of the door surfaces, operation, field modifications, and clearances, among many other requirements.

²⁹ The IPMC also refers to other consensus-based codes for additional details, including National Fire Protection Agency codes, the International Building Code, and the International Fire Code.

³⁰ The IPMC also refers to a specific International Plumbing Code for additional details related to the plumbing systems. Specifically, International Plumbing Code section 412.3 provides the requirements for maximum water heating settings. The lower temperature limit protects against bacterial growth in the hot water distribution system, while the upper limit protects against scalding at the shower fixture.

limit. Therefore, the eMH housing inspection checklist does not provide complete basic standards, does not align with the IPMC, and does not provide references for additional details.

In another example, the IPMC states that smoke alarms must be wired and interconnected, but provides an exception for pre-existing, standalone, battery-operated smoke alarms that are not wired and interconnected as long as the housing unit is not undergoing alterations, repairs, or construction.³¹ Conversely, since 2010, UFC 3-601-02 has required installation officials to replace standalone, battery-operated smoke detectors in military family housing units with wired and interconnected smoke detectors during resident change of occupancy, regardless of whether the housing unit is undergoing alterations, repairs, or construction.³² The eMH housing inspection checklist includes a question for installation officials to indicate whether smoke alarms are in “working order” or not. However, the eMH housing inspection checklist does not reference a requirement for smoke alarms to be wired and interconnected. Therefore, we concluded that installation officials using the eMH housing inspection checklist, which does not provide basic standards, could miss opportunities to ensure that military housing units meet required health and safety conditions, such as fire safety conditions.³³

The CHO and DASD(H) Did Not Submit a DoD Plan to Contract and Conduct Inspections and Assessments of Housing

We determined that the CHO and the DASD(H), acting on behalf of the SecDef, did not submit to Congress a DoD plan to conduct thorough inspections and assessments before directing MILDEPs to begin contracting with qualified home inspectors. FY 2020 NDAA section 3051(b) required that, no later than February 1, 2020, the SecDef submit to Congress a:

Department of Defense plan to contract with qualified home inspectors to conduct a thorough inspection and assessment of the structural integrity and habitability of each unit of privatized military housing. The plan shall include the implementation plan for the uniform code to be established under [FY 2020 NDAA section 3051(a)].

Although the FY 2020 NDAA originally applied to privatized family housing and unaccompanied housing, FY 2021 NDAA section 2818 directed the SecDef to expand the requirement to GO-GC family housing.

³¹ Hard-wired, interconnected smoke alarms operate such that when one smoke alarm sounds, they all sound without the reliance on battery power or wireless connectivity. Interconnected smoke alarms are more likely to alert occupants of a fire anywhere in the building.

³² UFC 3-601-02, “Fire Protection Systems Inspection, Testing, and Maintenance,” October 7, 2021.

³³ Since DoD officials did not customize and adopt the IPMC as the DoD’s uniform code of basic housing standards, we determined that the requirements of UFC 3-601-02 apply to military housing.

The January 2022 CHO memorandum directed the MILDEPs to “submit within 90 days a resource informed plan” to the DASD(H) in order for them “to provide an integrated DoD inspection and assessment plan” to Congress. However, the January 2022 CHO memorandum did not tell MILDEP officials what elements of information to include in their resource informed plans, such as timeline, cost, and reporting requirements. In response, ODASD(H) officials told us that MILDEP officials requested funding resources to contract for the inspections and assessments but did not specifically detail their inspection plans.

We asked ODASD(H) officials for a copy of the integrated DoD inspection and assessment plan described in the January 2022 CHO memorandum and whether they submitted the plan to Congress. The ODASD(H) officials told us that they did not submit to Congress a DoD plan to contract and conduct inspections and assessments. Therefore, as of May 2024, the CHO and the DASD(H), acting on behalf of the SecDef, did not submit to Congress an integrated DoD plan for inspections and assessments as required by the FY 2020 and FY 2021 NDAA. Meanwhile, MILDEP officials are conducting inspections and assessments without an integrated DoD plan.

The Military Departments Contracted for and Began Conducting Inspections and Assessments of Housing Units, but Have Not Completed All Inspections and Assessments

We determined that the MILDEPs contracted for and began conducting inspections and assessments of housing units but have not completed all inspections and assessments. In accordance with FY 2020 NDAA section 3051(c)(1), no later than February 1, 2021, MILDEP officials must:

commence conducting inspections and assessments ... pursuant to the plan submitted under [FY 2020 NDAA section 3051(b)] to identify issues and ensure compliance with applicable housing codes, including the uniform code established under [FY 2020 NDAA section 3051(a)].

Although FY 2020 NDAA section 3051(c)(1) originally applied to privatized family housing and unaccompanied housing, FY 2021 NDAA section 2818 directed the SecDef to expand the requirement to GO-GC family housing. However, inspections and assessments of GO-GC unaccompanied housing were not required by FY 2020 NDAA section 3051(c)(1) or any subsequent NDAA within the scope of this evaluation.

The January 2022 CHO memorandum directed MILDEP officials to complete contracted inspections and assessments by September 30, 2024. MILDEP officials told us that they were awarding multi-million-dollar contracts for inspections and assessments of privatized family housing, privatized unaccompanied housing, and

GO-GC family housing in a phased approach to meet the deadline. Specifically, according to our interviews with MILDEP officials and documentation we reviewed, each MILDEP that contracted for and began conducting inspections and assessments used the following approaches.

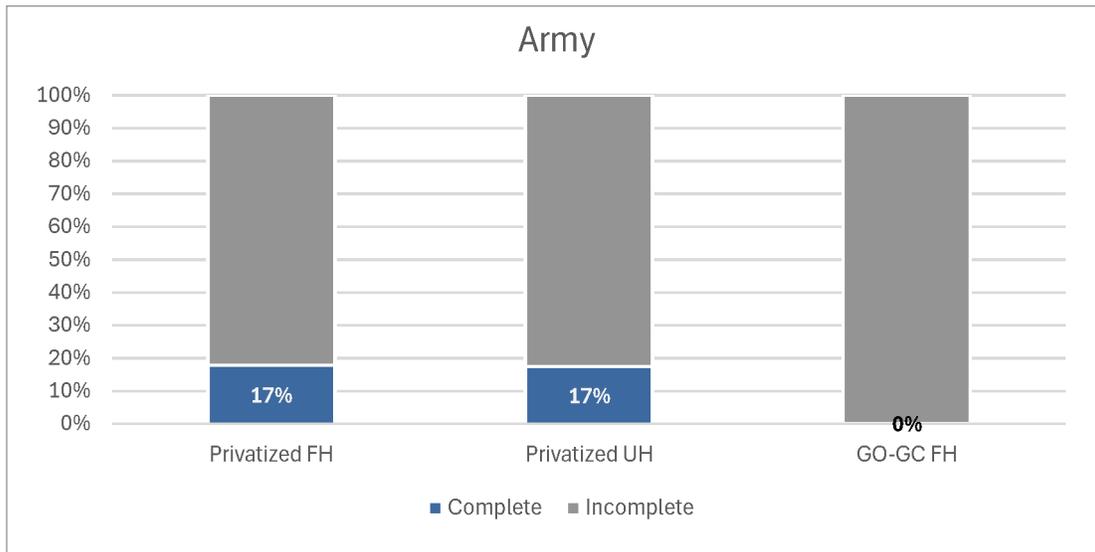
- Army officials conducted a pilot program for inspections and assessments that was completed in FY 2021 at one installation. Army officials expanded the pilot program to an additional installation in FY 2022. Army officials started to conduct inspections and assessment of all privatized family housing, privatized unaccompanied housing, and GO-GC family housing in FY 2023 with completion expected in FY 2025.
- Navy officials developed a three-phased approach: Phase 1 for privatized family housing started in FY 2021, Phase 2 for GO-GC family housing started in FY 2023, and Phase 3 for privatized unaccompanied housing was planned to start in FY 2024. Navy officials developed a two-phased approach for the Marine Corps: Phase 1 for privatized family housing started in FY 2021, and Phase 2 for GO-GC family housing was planned to start in FY 2024. Additionally, Phase 1 consisted of a pilot program in FY 2022 and a contract for 60 percent of privatized family housing in FY 2022. Marine Corps officials expected that contracts for the remainder of privatized family housing would occur as funds became available.
- Air Force officials developed a five-phased approach for Air Force and Space Force housing units: Phase 1 for privatized family housing started in FY 2022, Phase 2 for privatized family housing started in FY 2023, Phase 3 for privatized family housing started in FY 2024, and Phases 4 and 5 for GO-GC family housing were planned to start in FY 2024.

Additionally, Army officials told us that they are not going to meet the deadline in the January 2022 CHO memorandum due to the large number of military housing units in their inventory. However, Navy and Air Force officials told us that they are on track to complete inspections and assessments of privatized family housing, privatized unaccompanied housing, and GO-GC family housing by the September 30, 2024 deadline.

As shown in Figure 1, data provided by the ODASD(H) in May 2024 showed the Army had:

- completed 17 percent of inspections and assessments of privatized family housing units;
- completed 17 percent of inspections and assessments of privatized unaccompanied housing; and
- not completed any inspections and assessments of GO-GC family housing.

Figure 1. Completion of Contracted Inspections and Assessments of Army Military Housing, Based on Data Provided in May 2024



LEGEND

FH Family Housing

UH Unaccompanied Housing

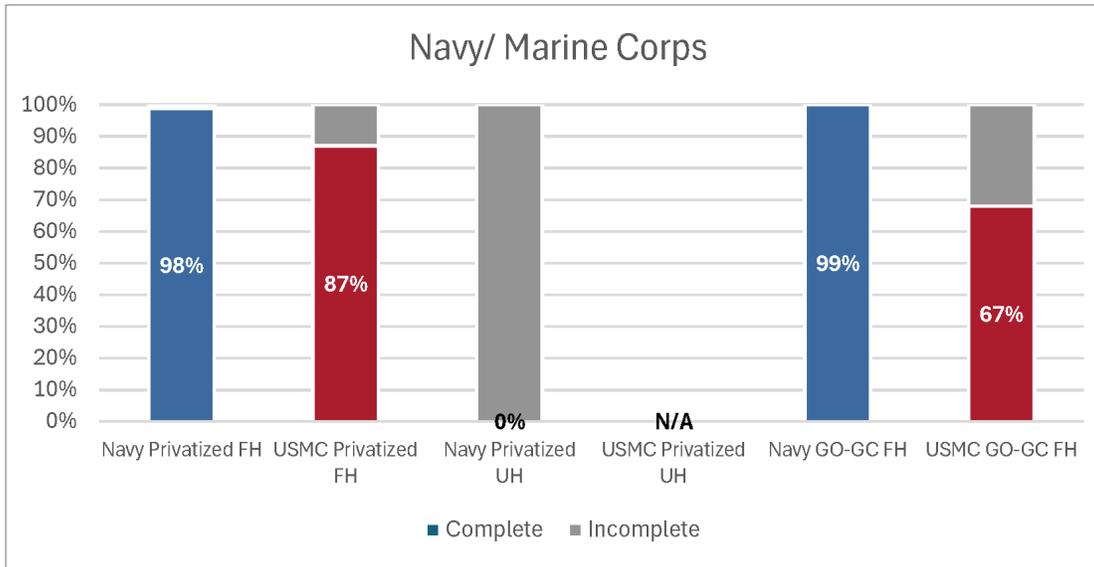
(U) Source: The DoD OIG, compiled by the ODASD(H) from data provided by the Services.

As shown in Figure 2, data provided by the ODASD(H) in May 2024 showed the Navy and Marine Corps had:

- completed 98 percent and 87 percent of inspections and assessments of privatized family housing units, respectively;
- not completed any inspections and assessments of privatized unaccompanied housing;³⁴ and
- completed 99 percent and 67 percent of inspections and assessments of GO-GC family housing, respectively.

³⁴ The Army and the Navy are the only Services with privatized unaccompanied housing.

Figure 2. Completion of Contracted Inspections and Assessments of Navy and Marine Corps Military Housing, Based on Data Provided in May 2024



LEGEND

FH Family Housing

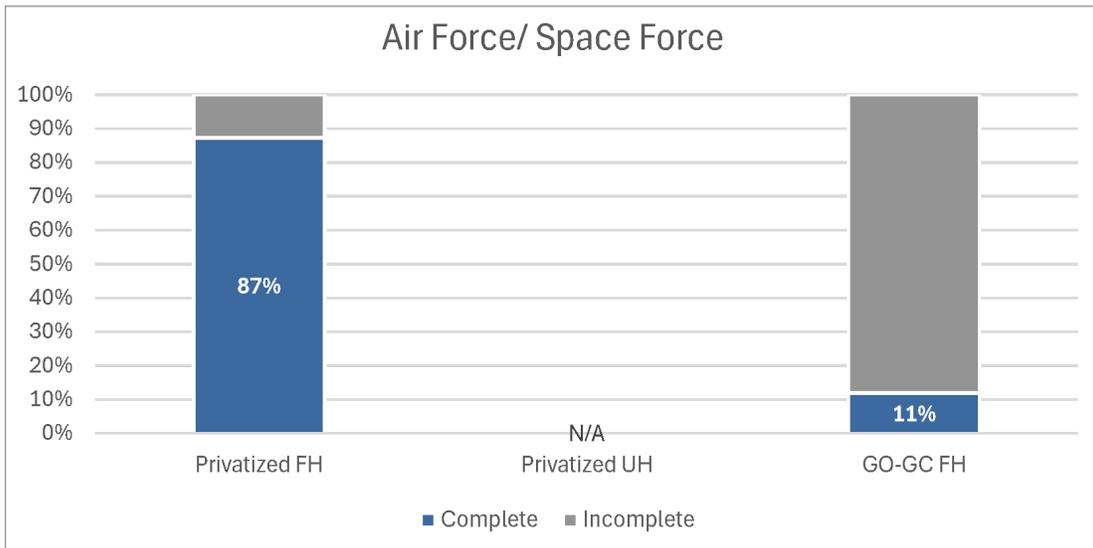
UH Unaccompanied Housing

(U) Source: The DoD OIG, compiled by the ODASD(H) from data provided by the Services.

As shown in Figure 3, data provided by the ODASD(H) in May 2024 showed the Air Force had:

- completed 87 percent of inspections and assessments of Air Force and Space Force privatized family housing units; and
- completed 11 percent of inspections and assessments of Air Force and Space Force GO-GC family housing.

Figure 3. Completion of Contracted Inspections and Assessments of Air Force and Space Force Military Housing, Based on Data Provided in May 2024



LEGEND

FH Family Housing

UH Unaccompanied Housing

(U) Source: The DoD OIG, compiled by the ODASD(H) from data provided by the Services.

As previously discussed, the eMH housing inspection checklist is not a uniform code of basic housing standards. Additionally, the CHO and the DASD(H) did not submit to Congress a DoD plan to conduct thorough inspections and assessments. Despite the lack of a DoD plan or uniform code of basic housing standards, the DASD(H) told us that MILDEP officials contracted inspections and assessments for approximately \$1,000 per military housing unit.

Based on our review of MILDEP documentation and input from MILDEP officials, we determined that contractors were required to use the eMH housing inspection checklist for their inspections and assessments. We also determined, based on our review of documentation and input from MILDEP officials, that each contract required inspections to be completed by “qualified home inspectors.” However, contract requirements did not align with respect to the minimum requirements for what constituted “qualified home inspectors.” Specifically, Army officials provided documentation demonstrating that the contract required qualified home inspectors to hold credentials from the International Association of Certified Home Inspectors (InterNACHI) or the applicable state, country, or region. The Air Force and Navy contracts required qualified home inspectors to hold credentials from the applicable state and did not define credentials for states or regions that have no requirements for credentials, such as Washington, D.C., or Georgia.

FY 2020 NDAA section 3051(c)(1) required the inspections and assessments “to identify issues and ensure compliance with applicable housing codes, including the uniform code established under [FY 2020 NDAA section 3051(a)].” Ultimately, without an integrated DoD plan for the inspections and assessments or a uniform code of basic housing standards, we could not determine whether the MILDEP-contracted inspections and assessments will align across the DoD or meet the NDAA requirements.

The CHO and DASD(H) Did Not Submit a Report on Housing Inspections and Assessments

We determined that the CHO and the DASD(H), acting on behalf of the SecDef, did not submit to Congress a report on housing inspections and assessments. The FY 2020 NDAA section 3051(c)(2) required that, no later than March 1, 2021, the SecDef submit to Congress a “report on the findings of the inspection and assessments conducted under” section 3051(c)(1).

The January 2022 CHO memorandum directed MILDEP officials to complete contracted inspections and assessments by September 30, 2024. Additionally, the January 2022 CHO memorandum stated:

A separate task will be issued at a later date to gather the results of the inspections of their government-owned/controlled and privatized housing inventory in order for our office to complete the required report to Congress required under section 3051(c).

However, in March 2023, MILDEP officials told us that they had not received guidance from ODASD(H) officials on how to provide their results or what specific information to provide to ODASD(H) officials once the inspections and assessments are completed.

The CHO and the DASD(H), on behalf of the SecDef, did not submit to Congress a DoD plan to conduct thorough inspections and assessments before directing MILDEPs to begin contracting with qualified home inspectors. Additionally, not all MILDEPs expect to complete the contracted inspections and assessments by the CHO-established deadline of September 30, 2024. Specifically, the Army plans to complete inspections in FY 2025. An ODASD(H) official told us that they intend to submit a report to Congress after the inspections and assessments are complete. However, as of May 2024, ODASD(H) officials had not issued a task directing MILDEP officials to gather the results of the inspections.

eMH Program Officials Developed a Hazard Assessment Tool, but the Tool Did Not Align with the NDAA

We determined that eMH program officials developed a hazard assessment tool, but the tool did not align with all the hazards listed in the FY 2020 NDAA. In accordance with FY 2020 NDAA section 3052(a)(1), no later than June 17, 2020, the SecDef must “develop an assessment tool, such as a rating system or similar mechanism, to identify and measure health and safety hazards” in all military housing. According to FY 2020 NDAA section 3052(a)(2):

The assessment tool shall provide for the identification and measurement of:

- A) Physiological hazards, including dampness and mold growth, lead-based paint, asbestos and manmade fibers, radiation, biocides, carbon monoxide, and volatile organic compounds;
- B) Psychological hazards, including ease of access by unlawful intruders, and lighting issues;
- C) Infection hazards; and
- D) Safety hazards.

Throughout our evaluation, we repeatedly asked ODASD(H), MILDEP, and installation officials about the hazard assessment tool developed to meet the FY 2020 NDAA. During our initial meetings and our site visits with ODASD(H), MILDEP, and installation officials, we found that only ODASD(H) officials; officials from the eMH program office, who developed the tool; and Naval Facilities Engineering Systems Command (NAVFAC) officials could tell us which hazard assessment tool had been developed to meet the FY 2020 NDAA. MILDEP and MHO officials we spoke with did not know which hazard assessment tool had been developed to meet the FY 2020 NDAA. In February 2023, an eMH program official told us that the hazard assessment tool developed to meet the FY 2020 NDAA is the Environmental Health and Safety (EHS) module within eMH.

Specifically, the eMH program official stated that the eMH program office started receiving questions about a tool to satisfy FY 2020 NDAA section 3052(a)(1) from MILDEP officials after the FY 2020 NDAA was signed into law. Subsequently, the eMH program official worked with an eMH EHS working group including MILDEP officials to develop the hazard assessment tool. According to the eMH program official, an old module in eMH could be updated to meet the FY 2020 NDAA requirements.³⁵ In February 2023, eMH program officials provided a historical

³⁵ According to officials in the eMH program office, in 2006, the eMH program office deactivated a Navy health and safety module that was not getting enough use. It was this module that the eMH EHS working group decided to reactivate.

timeline of the development of the EHS module. In that timeline, eMH program officials stated that they reactivated the old module in June 2020. Subsequently, eMH program officials completed and released EHS module updates to eMH users in March 2021, August 2021, and June 2022.

In May 2023, the DASD(H) confirmed that the EHS module within eMH is the hazard assessment tool developed to meet the FY 2020 NDAA. The eMH program official told us that they completed the EHS module on June 24, 2023 by releasing version 3.0 to eMH users.

Documentation provided by eMH program officials of the EHS module within eMH includes reference documents related to health and safety hazards in housing, dashboards to track risks identified in housing, and the “manual data input component.” Figure 8 in Appendix E is an excerpt of an EHS module housing unit report exported from eMH.

Our review of the hazards identified and included in the manual data input component determined that it did not fully align with the FY 2020 NDAA section 3052(a)(2) list of health and safety hazards. Specifically, we found that the manual data input component did not appear to include:

- all of the physiological hazards listed in section 3052(a)(2), such as radiation, biocides, and volatile organic compounds (VOCs);
- all of the psychological hazards listed in section 3052(a)(2), such as lighting; or
- infection hazards.

An eMH program official told us that, during the eMH EHS working group meetings, DoD officials focused on identifying hazard categories to include in the EHS module. However, the DASD(H) told us that the eMH EHS working group had trouble defining some of the FY 2020 NDAA section 3052(a)(2) hazards for the EHS module. Furthermore, documentation we reviewed confirmed the eMH EHS working group had trouble defining at least one of the hazards.

Although the FY 2020 NDAA did not define some of the listed health and safety hazards, we determined that there were resources available to DoD officials to help define the health and safety hazards. For example, we reviewed the U.S. Department of Housing and Urban Development (HUD) Healthy Home Rating System (HHRS).³⁶ As shown in Figure 4, the HUD HHRS identifies 29 specific health

³⁶ HUD is the Federal agency responsible for programs concerned with the Nation’s housing needs. According to the HUD website, the Healthy Homes program “addresses multiple childhood diseases and injuries in the home. The Initiative takes a comprehensive approach to these activities by focusing on housing-related hazards in a coordinated fashion, rather than addressing a single hazard at a time.” The HUD Healthy Home Rating System is at https://www.hud.gov/program_offices/healthy_homes/hhrs.

and safety hazards in housing across 4 categories: physiological, psychological, infection, and safety. These four categories directly align with the FY 2020 NDAA section 3052(a)(2) health and safety hazard categories. We compared the HUD HHRS to the EHS module to better understand how the EHS groups compared to the four sections in section 3052(a)(2).

Figure 4. HUD HHRS Categories And Sub-Categories

Physiological	Psychological	Infection	Safety
1. Dampness & Mold Growth	11. Crowding and Space	15. Domestic Hygiene, Pests, and Refuse	19. Falls in baths etc.
2. Excess Cold	12. Entry by Intruders	16. Food Safety	20. Falls on the level
3. Excess Heat	13. Lighting	17. Personal Hygiene	21. Falls on stairs etc.
4. Asbestos and man-made fibers	14. Noise	18. Water Supply	22. Falls from windows etc.
5. Biocides			23. Electrical hazards
6. Carbon Monoxide			24. Fire hazards
7. Lead-based paint			25. Hot surfaces etc.
8. Radiation			26. Collision/Entrapment
9. Un-combusted fuel			27. Ergonomics
10. Volatile organic compounds			28. Explosions
			29. Structural collapse

Note: Health and safety hazards highlighted in yellow directly correlate to health and safety hazards included in the “manual data input component” of the EHS module in eMH.

Source: HUD, modified by the DoD OIG.

Although FY 2020 NDAA section 3052(a)(2) describes four categories, the EHS module included three EHS groups: environment, health, and safety. We were unable to determine whether the FY 2020 NDAA section 3052(a)(2) categories and EHS groups could fully align. For example, we found that the manual data input component of the EHS module includes questions related to some physiological hazards, which are grouped under health hazards in the EHS groups, including mold, asbestos, and lead-based paint. Further, the EHS module does not appear to include questions related to all hazards identified in the FY 2020 NDAA. For example, the manual data input component of the EHS module does not include questions related to volatile organic compounds. In another example, the manual data input component of the EHS module does not appear to include questions related to psychological hazards, such as lighting.

Furthermore, we repeatedly asked ODASD(H) officials about the guidance they issued to the MILDEPs about the EHS module, including any guidance explaining that the EHS module within eMH is the hazard assessment tool developed to meet the FY 2020 NDAA. ODASD(H) officials told us that they have issued multiple policies that direct MILDEP and installation officials to use eMH, including a 2014 eMH

memorandum adopting eMH as the military housing management system and a February 2022 memorandum from the Assistant Secretary of Defense (Readiness) (ASD[R]) providing guidance for managing environmental health hazards in military housing that we discuss later in this report.³⁷ However, we found that:

- the April 2014 eMH memorandum issued by the Under Secretary of Defense for Acquisition, Technology, and Logistics was not publicly available and was not incorporated in any military housing policy, such as DoDI 4165.63 or DoDM 4165.63; and
- the February 2022 ASD(R) memorandum was published in response to FY 2020 NDAA section 3053. Although the February 2022 ASD(R) memorandum mentions eMH, it neither mentions the EHS module nor provides specific requirements to use it. Instead, the February 2022 ASD(R) memorandum states that “all DoD housing data related to [environmental health] hazards will be documented in the eMH database by the MHO in accordance with DoD housing policy.”³⁸

In May 2023, the DASD(H) told us that the ODASD(H) officials were drafting a memorandum to “foot stomp” that MILDEPs are required to use the EHS module within eMH to clarify any confusion for installation officials. Additionally, in May 2024, ODASD(H) officials provided us with a written response stating:

No formal guidance or documentation on the Hazard Assessment Tool has been issued from OSD. It is OSD’s intent to capture requirements regarding use of this tool in both the overarching enterprise Military Housing policy update and the Environmental Health and Safety in DoD Housing policy, both targeted for release later in CY 2024.

The CHO and DASD(H) Did Not Gather Public Input Specific to the Hazard Assessment Tool

We determined that the CHO and the DASD(H), acting on behalf of the SecDef, did not gather public input specific to the hazard assessment tool from military housing occupants. FY 2020 NDAA section 3052(a)(3) required that the SecDef must “provide for multiple public forums [to] receive input with respect to [the hazard] assessment tool from occupants of housing.”

³⁷ Under Secretary of Defense for Acquisition, Technology, and Logistics memorandum, “Enterprise Military Housing Information Management System,” April 16, 2014.

ASD(R) memorandum, “Standards and Guidance for Managing Environmental Health Hazards in Department of Defense Housing,” February 01, 2022.

³⁸ The eMH database includes many modules; therefore, we determined that this sentence was not sufficiently clear to provide MILDEP officials guidance on how to use eMH to meet NDAA requirements and to explain that the EHS module is the hazard assessment tool developed to meet the FY 2020 NDAA.

We asked the DASD(H) about the public forums to receive input on the hazard assessment tool from military housing occupants. The DASD(H) did not host any specific public forums to receive input for the hazard assessment tool from military housing occupants. Instead, the DASD(H) told us that military housing residents have the opportunity to voice housing concerns in yearly surveys, town halls, and resident councils. However, the opportunities described by the DASD(H) for residents to voice concerns did not specifically address the hazard assessment tool. Additionally, officials from the MILDEPs, MHOs, and eMH program office, who developed the hazard assessment tool, told us that they had not been part of any public forum specifically discussing the hazard assessment tool. Therefore, we determined that DoD officials did not gather public input specific to the hazard assessment tool as required by the FY 2020 NDAA.

The CHO and DASD(H) Did Not Submit a Report on the Hazard Assessment Tool

We determined that the CHO and the DASD(H), on behalf of the SecDef, did not submit to Congress a report on the hazard assessment tool. FY 2020 NDAA section 3052(a)(4) required that, no later than July 17, 2020, the SecDef submit to Congress a “report on the assessment tool.” We asked ODASD(H) officials whether they prepared a report on the hazard assessment tool. On May 31, 2024, ODASD(H) officials provided us with a draft report on the hazard assessment tool and stated that the draft report is “currently in formal coordination within OUSD(A&S) Goal is to submit to Congress in June 2024.” On August 12, 2024, ODASD(H) officials provided an update stating that they “expect submission [to Congress] this upcoming week.”

MILDEP Officials Did Not Complete Hazard Assessments with the Hazard Assessment Tool and Provide Results of Hazard Assessments to Occupants

We determined that the MILDEPs did not complete hazard assessments of military housing with the hazard assessment tool and provide results of hazard assessments to occupants. FY 2020 NDAA section 3052(b)(1) required the SecDef to use the hazard assessment tool developed under FY 2020 NDAA section 3052(a)(1) to complete a hazard assessment for all military housing no later than December 20, 2020. Additionally, FY 2020 NDAA section 3052(b)(2) required the SecDef to provide the results of the hazard assessments to each occupant “as soon as practicable after the completion of the hazard assessment.”

As previously discussed, ODASD(H) officials identified the EHS module within eMH as the hazard assessment tool. ODASD(H) officials told us that MILDEP officials are responsible for completing the hazard assessments within the hazard assessment tool. We asked eMH program officials how many hazard assessments were performed in the EHS module. According to eMH program officials, as of August 2023, the Navy had completed hazard assessments in only 264 (0.17 percent) of 157,522 Navy military housing units in the EHS module, and the Army and Air Force had not completed any hazard assessments in the EHS module.³⁹

Additionally, we asked MILDEP and installation officials whether they were aware of the hazard assessment tool and completed hazard assessments using the hazard assessment tool. Although Navy officials completed some hazard assessments in the EHS module, as previously discussed, we determined that most MILDEP and installation MHO official did not know what specific tool was the hazard assessment tool.

Specifically, when we asked MILDEP and installation officials what the DoD's hazard assessment tool is to meet the FY 2020 NDAA requirements, they identified various things as the hazard assessment tool, such as the entire eMH, the eMH housing inspection checklist, and other Service-specific tools.⁴⁰ For example, in a meeting with Naval Base San Diego MHO officials, one MHO official stated that the hazard assessment tool is the eMH housing inspection checklist, shown in Figure 7 in Appendix D. Another MHO official stated that the EHS module within eMH is the hazard assessment tool. One of the MHO officials stated that they could only make assumptions about what was the hazard assessment tool, because they had not received any clear guidance. Conversely, in a meeting with Fort Belvoir MHO officials, one official stated that the tool was the eMH housing inspection checklist along with testing equipment that is provided to quality inspectors. Ultimately, MILDEP and installation MHO officials could not consistently identify the hazard assessment tool that the FY 2020 NDAA required the SecDef to develop.

Because MHO officials were not provided guidance on the hazard assessment tool, and the Navy completed only 0.17 percent of the required hazard assessments in the EHS module as of August 2023 and the Army and Air Force did not complete

³⁹ According to eMH program officials, the Navy completed the hazard assessments in OCONUS GO-GC unaccompanied housing. We could not gain access to eMH and could not verify that the hazard assessments were fully completed. Our calculations of the total number of MILDEP military housing units is the sum of family housing units and unaccompanied housing beds from Tables 3 and 4 in Appendix C.

⁴⁰ The eMH information management system includes multiple modules for DoD housing management, such as the EHS module, the family housing module, the unaccompanied housing module, and the privatized portfolio management module. Because the eMH includes various modules, including modules that do not address health and safety hazard management, we determined that the entire eMH cannot be the hazard assessment tool.

any, we determined that MHO officials could not have been providing the results of the hazard assessments to occupants. As of May 2024, ODASD(H) officials had not issued guidance on the hazard assessment tool. According to ODASD(H) officials, they planned to issue overarching eMH policy that addressed the use of the EHS module by the end of 2024. In May 2024, ODASD(H) officials told us that the MILDEPs had made progress completing hazard assessments.

DoD Officials Did Not Complete Development of a Process to Identify, Record, and Resolve Environmental Health Hazards

We determined that DoD officials did not complete development of a process to identify, record, and resolve environmental health hazards in military housing. FY 2020 NDAA section 3053(a) required that, no later than June 17, 2020, the SecDef, in coordination with the MILDEPs, develop a process to “identify, record, and resolve environmental health hazards” in a timely manner in military housing. FY 2020 NDAA section 3053(b) required that the process include certain elements. Specifically, according to FY 2020 NDAA section 3053(b):

The process ... shall provide for the following with respect to each identified environmental health hazard:

- 1) Categorization of the hazard.
- 2) Identification of health risks posed by the hazard.
- 3) Identification of the number of housing occupants potentially affected by the hazard.
- 4) Recording and maintenance of information regarding the hazard.
- 5) Resolution of the hazard, which shall include—
 - a) the performance by the Secretary of Defense (or in the case of privatized housing, the landlord) of hazard remediation activities at the affected facility; and
 - b) follow-up by the Secretary of Defense to collect information on medical care related to the hazard sought or received by individuals affected by the hazard.

As previously discussed, on February 1, 2022, the Assistant Secretary of Defense (Readiness) (ASD[R]) issued a memorandum providing guidance for the FY 2020 NDAA section 3053 requirements and to manage environmental health hazards in military housing. The February 2022 ASD(R) memorandum also provides additional procedures for managing four environmental health hazards: mold and moisture, lead-based paint, radon, and asbestos.

ODASD(H) officials told us that the February 2022 ASD(R) memorandum is the process that satisfies “a portion” of the requirements in FY 2020 NDAA section 3053. Additionally, the DASD(H) told us that they planned to issue supplemental policy

“emphasizing eMH” and its use within the process. On May 18, 2023, the DASD(H) told us that they expected to release this supplemental policy by July 31, 2023. On May 31, 2024, ODASD(H) officials provided us with a written response stating that “[t]he overarching enterprise Military Housing policy update and the Environmental Health and Safety in DoD Housing policy are both still in development. Both are targeted for release later in CY 2024.”

Our analysis of the February 2022 ASD(R) memorandum determined that the memorandum included guidance regarding who should perform hazard resolution in accordance with FY 2020 NDAA section 3053(b)(5)(a). Specifically, the February 2022 ASD(R) memorandum states:

[T]he MHO is the functional lead to identify, record, investigate, coordinate, track, mitigate and resolve any [military] housing conditions and related health and safety hazards reported by a [military] housing resident. Environmental health and safety staff are available to support the MHO, when requested, to provide technical consultative assistance with identifying, investigating, and determining an appropriate mitigation plan.

However, the February 2022 ASD(R) memorandum did not directly correlate to the rest of the FY 2020 NDAA section 3053 requirements to “categorize, identify, record, and resolve” environmental health hazards. Specifically, the February 2022 ASD(R) memorandum does not:

- define the term “environmental health hazard,” which is necessary to “categorize, identify, and resolve” environmental health hazards;
- provide or reference any other policy or guidance that defines or categorizes environmental health hazards;
- identify or provide guidance on how to identify the number of tenants potentially affected by environmental health hazards;
- provide guidance on how to record environmental health hazards in eMH, even though the memorandum states that the environmental hazards will be documented in eMH; and
- provide guidance on how to resolve other hazards beyond those included in the memorandum or to collect information on medical care received by individuals affected by the hazard.

Therefore, we determined that DoD officials did not develop a process to “identify, record, and resolve” environmental health hazards that fully meets the requirements of FY 2020 NDAA sections 3053(a) and 3053(b). Additionally, the February 2022 ASD(R) memorandum only discussed four environmental

health hazards but excludes other environmental health hazards discussed in other sections of the NDAA, such as biocides, carbon monoxide, and volatile organic compounds.⁴¹

Furthermore, the February 2022 ASD(R) memorandum states that “these processes, standards, and guidance will be incorporated into DoD Instructions 6055.01 and 6055.05.”⁴² We previously recommended in DODIG-2020-082 that officials:

collaboratively establish or revise appropriate DoD policy(s) to address health and safety hazards—including lead-based paint, asbestos-containing material, radon, fire and electrical safety, drinking water quality, window fall prevention, mold, carbon monoxide, and pest management—in military family housing to manage health, safety, and environmental risks to acceptable levels for military family housing residents.

OUSD(A&S) and OUSD(P&R) officials partially agreed with the recommendation and stated that they would work together to review existing DoD policies to ensure that the policies address health and safety hazards. However, as of May 2024, over 4 years later, DoD officials have not updated any DoD policies for mold and moisture, lead based paint, radon, and asbestos, and other health and safety hazards.⁴³

DoD Officials Reported on a Process Developed for Environmental Health Hazards, but the Report Did Not Address All NDAA Requirements

We determined that USD(P&R) officials, acting on behalf of the SecDef, reported on a process developed for environmental health hazards; however, the report did not address all of the NDAA requirements. FY 2020 NDAA section 3053(d) required the SecDef to submit to Congress a report on the process to identify, record, and resolve environmental health hazards no later than July 17, 2020.

The USD(P&R) issued a report on November 9, 2022, that stated its intent was to summarize the DoD’s process to identify, record, and resolve environmental health hazards in military housing. Based on our analysis of the November 2022 report, we determined that the report described the status of DoD efforts to develop a process to identify, record, and resolve environmental health hazards at the time of the report, including the February 2022 ASD(R) memorandum.

⁴¹ Biocides are a broad range of products, such as disinfectants and insecticides, that are used to kill or control the spread of harmful organisms in the home. Volatile organic compounds are organic chemicals, such as formaldehyde, that are gaseous at room temperature and found in a wide variety of materials in the home.

⁴² DoDI 6055.01, “DoD Safety and Occupational Health (SOH),” October 14, 2014 (Incorporating Change 3, April 21, 2021). DoDI 6055.05, “Occupational and Environmental Health (OEH),” November 11, 2008 (Incorporating Change 2, August 31, 2018).

⁴³ DoDI 6055.01 was last updated on April 21, 2021, and DoDI 6055.05 was last updated on August 31, 2018.

However, as discussed in the previous section, DoD officials have not completed the development of a process to “identify, record, and resolve” environmental health hazards that meets the specific requirements of FY 2020 NDAA sections 3053(a) and 3053(b). Therefore, we determined that this reporting requirement is not complete, because the process is not fully defined.

The CHO and DASD(H) Did Not Submit a Report on Minimum Credentials for Health and Environmental Inspectors

We determined that the CHO and the DASD(H), acting on behalf of the SecDef, did not submit to Congress a report on minimum credentials for health and environmental inspectors. FY 2020 NDAA section 3055(a) required that, no later than February 1, 2020, the SecDef submit to Congress a:

report that contains a standard for minimum credentials to be used throughout the Department of Defense for all inspectors of health and environmental hazards at privatized military housing, including inspectors contracted by the Department.

Throughout our evaluation, we asked ODASD(H) officials for a copy of this report. During an October 31, 2022 meeting, the DASD(H) told us that they were trying to develop a draft for this report. We requested a copy of this draft, but we did not receive it. However, during a May 18, 2023 meeting, the DASD(H) told us that the draft they were trying to develop that was discussed during our October 2022 meeting was a “concept draft” but not a “pen-to-paper draft.” On May 31, 2024, ODASD(H) officials provided us with a written response stating that the minimum credentials for health and environmental inspectors are still under development. Therefore, the report has not been drafted and is more than 4 years late.

The CHO and DASD(H) Did Not Develop Processes, Issue Policies, or Provide Administrative Oversight to Implement NDAA Requirements

We determined that the lack of NDAA implementation occurred because the officials who act on behalf of the SecDef for military housing—the CHO and the DASD(H)—have not developed the processes, issued the policies to MILDEP officials, or provided the administrative oversight necessary to implement the 12 NDAA requirements we evaluated. Additionally, the CHO and the DASD(H) did not ensure that DoD actions intended to implement the 12 requirements directly correlated to the language in the NDAA.

As previously discussed, the CHO is the program manager for all military housing and the DASD(H) implements the CHO's policy and direction. The title "CHO" was created in accordance with the FY 2020 NDAA, and the FY 2023 NDAA designated the Assistant Secretary of Defense (Energy, Installations, and Environment) (ASD[EI&E]) as the CHO. However, since July 21, 2008, DoDI 4165.63 has stated that the ASD(EI&E) must "serve as the DoD Housing Management program manager for all housing, whether DoD-owned or privatized." Furthermore, since October 28, 2010, DoD Manual 4165.63 has clarified the ASD(EI&E) role and required the ASD(EI&E) to develop processes, issue policies, and provide administrative oversight for military housing. Therefore, we determined that the ASD(EI&E) was responsible for developing processes, issuing policies, and providing administrative oversight for military housing long before they were assigned the title of CHO.

Since 2014, the DoD OIG has conducted 13 evaluations on the condition and management of military housing, including two previous evaluations of the implementation of FY 2020 NDAA requirements related to military housing.⁴⁴ In total, the evaluations led to 109 recommendations related to health, safety, and environmental hazard identification and remediation in military housing.⁴⁵ Throughout this history of reporting, we repeatedly found that policy, processes, and administrative oversight of military housing needed improvement. Similarly, during this evaluation, we determined that the CHO and the DASD(H) did not provide policy, processes, and administrative oversight regarding military housing, including the FY 2020 NDAA requirements, as amended, to the Office of the Secretary of Defense (OSD) and MILDEP officials. Specifically, we determined that the CHO and DASD(H) consistently did not:

- create, maintain, and update policies related to military housing;
- provide a strategy, plan of action, or direction on how their intended actions will meet and correlate to the NDAA requirements; or
- provide administrative oversight over NDAA implementation.

Our review of both the DoD housing policies and the memorandums DoD officials issued with the intent of meeting NDAA requirements determined that a lack of direction and oversight for military housing extends beyond the 12 selected FY 2020 NDAA requirements implementation. DoDI 5025.01 outlines the DoD's responsibility for the development, coordination, approval, publication, and

⁴⁴ See Appendix B for a summary of prior coverage. As previously discussed, this report is the third in a series of three reports in response to FY 2020 NDAA section 3044, enacted December 20, 2019.

⁴⁵ As of July 2024, there are 18 recommendations open from these reports that are also related to the findings in this report. All three of the open recommendations for USD(A&S) and USD(P&R) are related to policy updates.

review of issuances.⁴⁶ Specifically, DoDI 5025.01 provides guidance for DoD issuances including DoD Directives, DoDIs, DoD Manuals (DoDMs), directive-type memorandums (DTMs), and Administrative Instructions.

All of the policies and guidance provided by DoD officials regarding the implementation of FY 2020 NDAA requirements were issued as memorandums. Of the types of issuances described in DoDI 5025.01, the memorandums most closely resemble DTMs. However, according to DoDI 5025.01, DTMs

must be issued only for time-sensitive actions... and only when time constraints prevent publishing a new issuance or incorporating a change to an existing issuance They will be effective for no more than 12 months from the date signed, unless an extension is approved.

Additionally, DoDI 5025.01 states that all “other DoD publications ... must be converted into either DoDIs or DoDMs when they are reissued.”

DoDI 5025.01 also states:

OSD Components must maintain an accurate policy framework within their functional area of responsibility that is updated to reflect changes as they occur to ensure that effective and efficient functioning of the DoD and its components. [...] Whether developing or coordinating on issuances, DoD Components must place high priority on processing issuances that codify policy or provide guidance as directed ... in new or amended statutes.

Since 2014, the DoD OIG has published 10 reports with recommendations related to military housing, including recommendations related to military housing policy.⁴⁷ Our review of military housing policy determined that DoDI 4165.63 and DoDM 4165.63 were originally published on July 21, 2008, and October 28, 2010, respectively. In FY 2017 and FY 2020, our reports included recommendations for DoD officials to update military housing policy and incorporate information from various policy memorandums. DoD officials agreed or partially agreed with these recommendations.

⁴⁶ DoDI 5025.01, “DoD Issuances Program,” August 1, 2016 (Incorporating Change 4, June 7, 2023).

⁴⁷ As previously discussed, since 2014, the DoD OIG has published 13 reports related to military housing. Of these reports, 10 included recommendations.

Our review of DoDI 4165.63 and DoDM 4165.63 shows that the policies were updated in 2018.⁴⁸ However, the updates did not include any guidance related to our recommendations made in FY 2017.⁴⁹ Additionally, the policies have not been updated since 2018 to include our 2020 recommendations.⁵⁰ Therefore, we determined that the CHO, supported by DASD(H), did not maintain an accurate policy framework within their functional area, as required by DoDI 5025.01.

During the last three evaluations, we repeatedly asked ODASD(H) officials for their plan or process to satisfy the requirements of the FY 2020 NDAA, as amended. We received:

- a “phased path” document in August 2021 listing a three-phased approach for FY 2020 NDAA implementation;⁵¹ and
- various spreadsheets from November 2020, July 2021, August 2021, July 2023, and August 2023.

Our review of the documentation determined that each varied significantly in its level of detail. Overall, we could not verify the implementation status of the FY 2020 NDAA requirements or track the DoD’s progress over time from the spreadsheets we received because they were not aligned and comparable.

Throughout our evaluation, we repeatedly asked ODASD(H) officials to explain the implementation strategy and status of the NDAA provisions. However, ODASD(H) officials were unable to consistently explain their approach to implement the FY 2020 NDAA requirements. Additionally, the ODASD(H) officials were unable to

⁴⁸ The summary of change section of each policy states that the updates only address the reassignment of “the office of primary responsibility for [the] manual to the Under Secretary of Defense for Acquisition and Sustainment in accordance with the July 13, 2018 Deputy Secretary of Defense Memorandum”

⁴⁹ DODIG-2017-004 recommended that the Under Secretary of Defense for Acquisition, Technology, and Logistics “establish permanent policy for the sustainment of facilities, including standardized facility inspections.” The recommendation stated that the policy update should incorporate the requirements set forth in the September 10, 2013 “Standardizing Facility Condition Assessments” and in the April 29, 2014 “Facility Sustainment and Recapitalization Policy” memorandums. The Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment, responding for the Under Secretary of Defense for Acquisition, Technology, and Logistics, agreed, stating that the two memorandums “will be included in a new DoD Instruction which is being drafted for estimated publication in Fiscal Year 2017.” However, the August 31, 2018 update to DoDI 4165.63 and DoDM 4165.63 did not include any updates for these policies. Therefore, the recommendation remains open.

⁵⁰ DODIG-2020-082 recommended that “the Under Secretary of Defense for Acquisition and Sustainment and the Under Secretary of Defense for Personnel and Readiness collaboratively establish or revise appropriate DoD policy(s) to address health and safety hazards—including lead-based paint, asbestos-containing material, radon, fire and electrical safety, drinking water quality, window fall prevention, mold, carbon monoxide, and pest management—in military family housing to manage health, safety, and environmental risks to acceptable levels for military family housing residents.” In summarizing management’s response to the recommendation, DODIG-2020-082 continued that both partially agreed with the recommendation. Specifically, the Acting Assistant Secretary, responding on behalf of the USD(A&S), agreed that both the USD(A&S) and the USD(P&R) should review existing DoD policies. However, the Acting Assistant Secretary stated that “the DoD should not establish policies in areas where there is no Federal standard (such as mold), as the DoD is not the regulatory agency responsible for setting standards for environmental, health, or safety hazards.” The Official Performing the Duties of the Under Secretary of Defense for Personnel and Readiness, stated that USD(P&R) “will provide a subject matter expert to review policies under the responsibility of the USD(A&S), such as DoDI 4165.63 and other policies for environmental management. Additionally, the USD(P&R) will issue policy for health and safety hazards which have been determined to fill a gap and falls within the scope of DoDI 6055.01.” This recommendation remains open because we have not received any draft military housing policy update that address health and safety hazards management in military housing.

⁵¹ We previously reported about this three-phase approach in DODIG-2022-004.

consistently describe the implementation status of the FY 2020 NDAA requirements. Furthermore, ODASD(H) officials were unable to explain how actions taken by the DoD satisfied FY 2020 NDAA requirements.

In sum, we determined that the lack of policies, processes, and administrative oversight hampered the implementation of these NDAA requirements and impeded other actions that DoD officials have taken to implement them.

Inadequate Living Conditions Exist in Some GO-GC Unaccompanied Housing

We walked through privatized family housing units and GO-GC unaccompanied housing buildings across the three installations we visited in person. We found instances of GO-GC unaccompanied housing that were not well-maintained and did not meet the minimum adequacy standards of DoDM 4165.63 at two of the three visited installations.

According to DoDM 4165.63, it is DoD policy to:

[e]nsure that eligible personnel ... have access to affordable, quality housing facilities and services consistent with grade and dependent status and generally reflecting contemporary community living standards.

Specifically, in addition to minimum standards for configuration and privacy, DoDM 4165.63 states that for unaccompanied housing to be suitable for assignment, it should also:

have no serious health-safety hazards, be furnished, have food service options, be structurally sound, and have adequate utility systems and services (electrical, gas, potable water, sewer, trash collection, television, Internet, telephone, and where required by climate conditions, heating, ventilation and air-conditioning).

During our in-person site visits, we conducted walk-throughs of GO-GC unaccompanied housing ranging from newly renovated to historic units. At a renovated GO-GC unaccompanied housing building, we observed a unit that appeared to have no serious health and safety hazards, was furnished, was structurally sound, and had adequate utility systems and services, as required by DoDM 4165.63. However, during walk-throughs of other GO-GC unaccompanied housing we observed various apparent health and safety hazards. Specifically, as depicted in Figure 5, we observed GO-GC unaccompanied housing in one building at Marine Corps Base Quantico (MCBQ) with:

- evidence of mold that was apparent in the hallways, rooms, and ceilings; and
- holes in the wall where the inside space was overwhelmed with mold.

Additionally, as depicted in Figure 6, we observed support infrastructure and equipment in poor condition, such as inoperable heating, ventilation, and air conditioning units at Joint Base Anacostia–Bolling (JBAB).

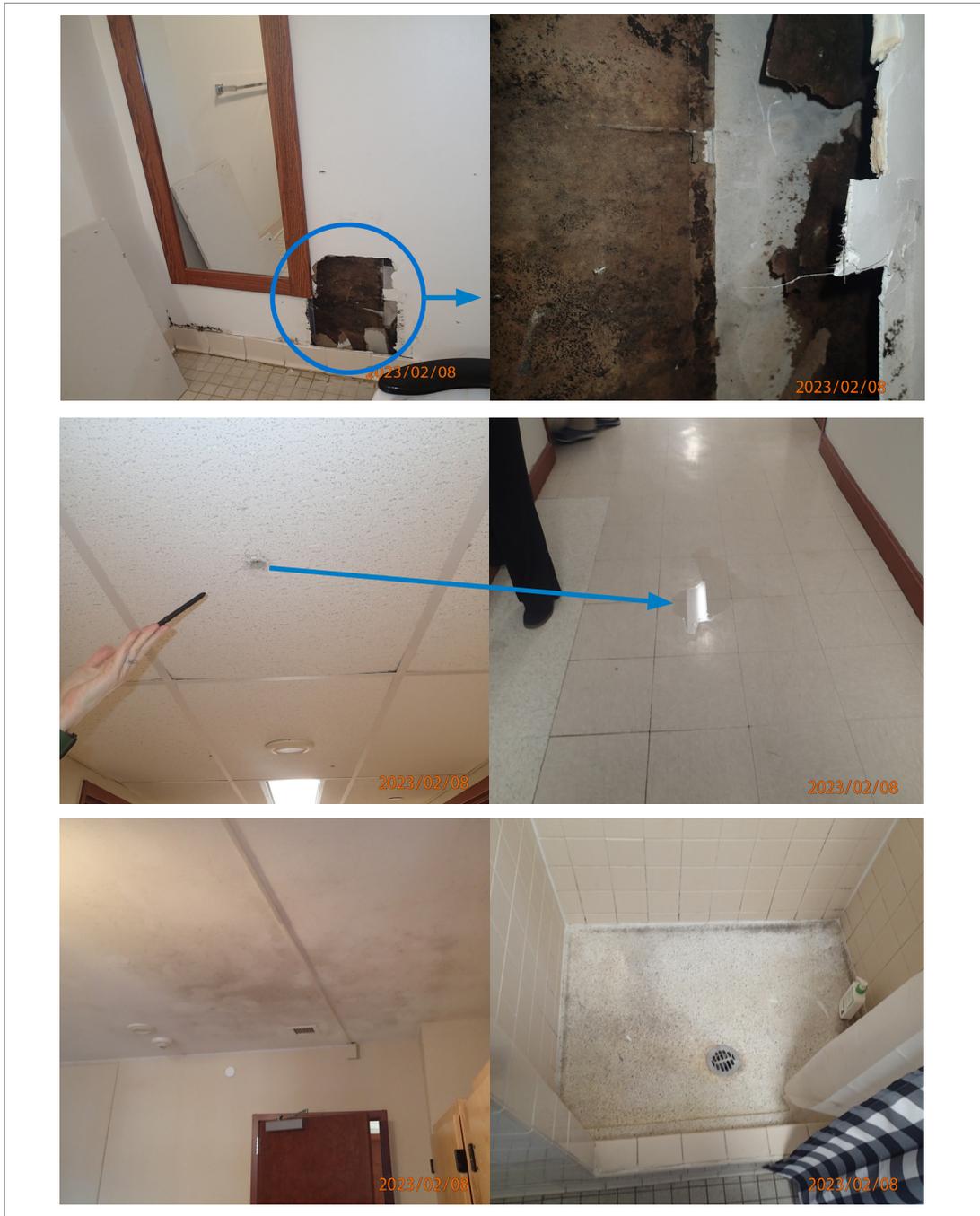


Figure 5. Examples of Health and Safety Issues in GO-GC Unaccompanied Housing
Source: The DoD OIG, February 2023.

Note: The top left and right pictures show a hole in a wall overwhelmed with mold inside. The middle left and right pictures show a hole in the ceiling leaking water onto the floor and the resulting puddle in the middle of the hallway. The bottom left picture shows a room with mold on the ceiling. The bottom right picture shows mold in a shower.



Figure 6. Examples of Poor Conditions in GO-GC Unaccompanied Housing Support Infrastructure
Source: The DoD OIG, February 2023.

Note: The picture on the left shows a GO-GC unaccompanied housing boiler room with poor conditions, such as standing water and rusty pump housing. The picture on the right shows an electrical panel that controls pumps with improper lockout and tagout. The blue circle shows the on/off switch in the off position; however, without a lock, the switch could be energized and turn on the pump. Additionally, the tag indicates that the electrical panel has been out of service since November 2021.

DoD Officials Did Not Prioritize Adequate Living Conditions in GO-GC Unaccompanied Housing

The inadequate living conditions in GO-GC unaccompanied housing occurred in part because—unlike privatized family housing, privatized unaccompanied housing, and GO-GC family housing—maintenance, repair, and construction funding for GO-GC unaccompanied housing is not separate from the funding for other mission requirements. Funds for GO-GC unaccompanied housing are combined with other Operations and Maintenance (O&M) funds, and MILDEP officials told us that installation officials must prioritize limited O&M funds for their other mission requirements.

Additionally, the inadequate living conditions in some GO-GC unaccompanied housing occurred because DoD officials, including the CHO, the DASD(H), and MILDEP officials, were focused on taking actions for the military housing types specified in the majority of the statutory requirements: privatized family housing,

privatized unaccompanied housing, and GO-GC family housing. Specifically, the statutory requirements did not uniformly apply to GO-GC unaccompanied housing. For example, the requirements for third-party inspections and assessments in FY 2020 NDAA section 3051 originally applied to privatized family housing and unaccompanied housing, and was expanded to include GO-GC family housing in FY 2021 NDAA section 2818. However, the requirements for third-party inspections and assessments was not expanded to include GO-GC unaccompanied housing.

We asked the CHO, the DASD(H), MILDEP officials, and installation officials about the conditions in GO-GC unaccompanied housing and their challenges with maintaining the conditions in GO-GC unaccompanied housing.⁵² Each level of military housing management told us that they were aware that poor conditions existed in some GO-GC unaccompanied housing and described issues that contributed to the poor conditions in some GO-GC unaccompanied housing. The CHO told us that they believe the problem is a result of both the lack of standards and the lack of separate funding for GO-GC unaccompanied housing. The DASD(H) told us that MILDEP officials told them that “a vast majority of their facilities funding goes to new missions.” Additionally, the CHO told us that at each installation they visited, they have been very frustrated with what they see in GO-GC unaccompanied housing. The CHO also told us that they believe the issues with GO-GC unaccompanied housing are a result of both a lack of standards and funding. Furthermore, the CHO told us that “it is a matter of other things being prioritized. We have a \$140 million Facility Sustainment, Restoration, and Modernization backlog on installations and have been underinvesting for years.”

Furthermore, during our June 9, 2023 meeting with OASD(EI&E) officials, including the CHO, we asked what conditions should cause installation officials to make their unaccompanied housing unavailable. The Principal Deputy ASD(EI&E) told us “each installation has a duty to provide safe living quarters.” The PDASD(EI&E) cited an example where over 1,000 Soldiers were moved from Army GO-GC unaccompanied housing at Fort Liberty. Specifically, the PDASD(EI&E) told us that a senior leader visiting Fort Liberty observed poor conditions in some unaccompanied housing and ordered their closure.⁵³ We asked why it took the attention of a senior leader to act upon the poor conditions at Fort Liberty. The PDASD(EI&E) official told us that it should not require the attention of a senior leader to address the poor conditions.

⁵² As previously discussed, we physically visited Fort Belvoir, Marine Corps Base Quantico (MCBQ), and Joint Base Anacostia–Bolling (JBAB). We conducted virtual site visits at Joint Base Lewis–McCord (JBLM), Naval Base San Diego (NBSD), and Wright–Patterson Air Force Base (AFB).

⁵³ According to a media report, “beds and bags were covered and destroyed by mold, and photos showed walls and ceilings covered with black fuzz” at Fort Liberty, formerly Fort Bragg. Another media report states that senior leaders who visited Fort Liberty found “higher than normal moisture levels ... and quality of life concerns.”

Based on the conditions we observed in some GO-GC unaccompanied housing, DoD officials' descriptions of the prioritization of sustainment, restoration, and modernization funds, and the known issues described by DoD officials, we determined that GO-GC unaccompanied housing is not prioritized like privatized family housing, privatized unaccompanied housing, and GO-GC family housing and may not be sufficiently funded for DoD officials to maintain adequate DoD housing standards.

The FY 2024 NDAA added and amended sections in title 10 of the United States Code, including requirements related to unaccompanied housing directed to the SecDef and the MILDEPs.⁵⁴ Although the FY 2024 NDAA included various requirements for the improvement of unaccompanied housing, it did not amend the FY 2020 NDAA sections 3051 and 3055 or expand the health, safety, and environmental hazard requirements discussed in this report to GO-GC unaccompanied housing.

Health, Safety, and Environmental Hazard Risks May Remain in Military Housing

The DoD's implementation of the 12 selected requirements in the FY 2020 NDAA for health, safety, and environmental hazard identification and remediation in military housing, as amended, is incomplete. As a result, the CHO, the DASD(H), MILDEP officials, and installation officials are unable to determine whether the improvements intended by Congress to overhaul and reform DoD housing are achieved. Without a plan that directly correlates actions to the NDAA language, DoD officials lack a clear method to measure their progress toward implementing the NDAA requirements. Therefore, health, safety, and environmental hazard risks may remain in military housing despite the time and money spent by DoD officials to contract for and start inspections and assessments of DoD housing.

Additionally, residents of GO-GC unaccompanied housing at the locations visited during this evaluation were exposed to health, safety, and environmental hazard risks. DoD officials told us that the current living conditions in GO-GC unaccompanied housing jeopardize the recruitment of new military members and the retention of those currently serving.

⁵⁴ Public Law 118-31, the H.R.2670-National Defense Authorization Act for Fiscal Year 2024 (FY 2024 NDAA), was enacted on December 22, 2023.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Under Secretary of Defense for Acquisition and Sustainment direct the Chief Housing Officer to develop a plan of action and milestones to correct the specific implementation deficiencies in the Fiscal Year 2020, Fiscal Year 2021, and Fiscal Year 2023 National Defense Authorization Acts discussed in this report including current implementation status, a gap analysis of the remaining military housing oversight requirements, and description of the correlation between Department of Defense actions and the language within the National Defense Authorization Acts' requirements.

Under Secretary of Defense for Acquisition and Sustainment Comments

The Under Secretary of Defense for Acquisition and Sustainment (USD[A&S]) agreed and stated that, no later than September 20, 2024, they will direct the Chief Housing Officer (CHO) to develop a plan of action and milestones to correct the specific implementation deficiencies in the FY 2020, FY 2021, and FY 2023 National Defense Authorization Acts (NDAAs) discussed in this report.

Our Response

Comments from the USD(A&S) addressed the specifics of the recommendation; therefore, the recommendation is resolved and open. We will close the recommendation once we verify that the USD(A&S) directed the CHO to develop a plan of action and milestones and we review the plan of action and milestones.

Recommendation 2

We recommend that the Under Secretary of Defense for Acquisition and Sustainment update the appropriate Department of Defense 4165 series policies to address policy changes related to the reform requirements in the Fiscal Year 2020, Fiscal Year 2021, Fiscal Year 2023, and Fiscal Year 2024 National Defense Authorization Acts, and incorporate and codify the requirements from outdated memorandums, such as the Under Secretary of Defense, Acquisition, Technology and Logistics Memorandums issued on September 10, 2013, April 16, 2014, and April 29, 2014.

Under Secretary of Defense for Acquisition and Sustainment Comments

The USD(A&S) agreed and stated that, no later than June 30, 2025, they will update the appropriate DoD series policies to address policy changes related to the reform requirements in the FY 2020, FY 2021, FY 2023, and FY 2024 NDAs, including incorporating and codifying requirements from outdated memorandums.

Our Response

Comments from the USD(A&S) addressed the specifics of the recommendation; therefore, the recommendation is resolved and open. We will close the recommendation once we receive the updated DoD series policies and verify that they address policy changes related to the reform requirements in the FY 2020, FY 2021, FY 2023, and FY 2024 NDAs and incorporate and codify requirements from the outdated memorandums.

Recommendation 3

We recommend that the Chief Housing Officer direct the Deputy Assistant Secretary of Defense (Housing), in coordination with the Military Departments, to perform an assessment and document the feasibility of extending the implementation of military housing oversight requirements in the Fiscal Year 2020, Fiscal Year 2021, and Fiscal Year 2023 National Defense Authorization Acts to government-owned and government-controlled unaccompanied housing where those requirements were not included in the Fiscal Year 2024 National Defense Authorization Act.

Under Secretary of Defense for Acquisition and Sustainment Comments

The USD(A&S), responding for the CHO, agreed and stated that, no later than December 13, 2024, the CHO and the Deputy Assistant Secretary of Defense (Housing) (DASD[H]), in coordination with the Military Departments (MILDEPs), will perform an assessment and document the feasibility of extending the implementation of military housing oversight requirements in the FY 2020, FY 2021, and FY 2023 NDAs to government-owned and government-controlled (GO-GC) unaccompanied housing where those requirements were not already included in the FY 2024 NDAA.

Our Response

Comments from the USD(A&S) addressed the specifics of the recommendation; therefore, the recommendation is resolved and open. We will close the recommendation once we verify that the CHO and the DASD(H), in coordination with the MILDEPs, performed an assessment and we review the documentation for the feasibility of extending the implementation of military housing oversight requirements in the FY 2020, FY 2021, and FY 2023 NDAs to GO-GC unaccompanied housing where those requirements were not already included in the FY 2024 NDA.

Recommendation 4

We recommend that the Chief Housing Officer direct the Deputy Assistant Secretary of Defense (Housing), in coordination with the Military Departments and the Department of Defense Comptroller, to develop a plan of action and milestones to correct deficiencies in the condition of Department of Defense government-owned and government-controlled unaccompanied housing, including a comprehensive assessment of the condition of Department of Defense government-owned and government-controlled unaccompanied housing and identification of resources necessary to correct deficiencies in the condition of Department of Defense government-owned and government-controlled unaccompanied housing.

Under Secretary of Defense for Acquisition and Sustainment Comments

The USD(A&S), responding for the CHO, agreed and stated that, no later than December 13, 2024, the CHO will direct the DASD(H), in collaboration with the MILDEPs and the DoD Comptroller, to develop a plan of action and milestones to correct deficiencies in the condition of GO-GC unaccompanied housing. According to the USD(A&S) comments and documentation provided, the Assistant Secretary of Defense (Energy, Installations, and Environment) created a DoD unaccompanied housing Tiger Team on January 29, 2024. Comments from the USD(A&S) stated that the plan of action and milestones to correct deficiencies in the condition of GO-GC unaccompanied housing will build upon the Tiger Team's progress in developing new policies and standards to address the quality of life for Service members living in barracks and dormitories.

Our Response

Comments from the USD(A&S) addressed the specifics of the recommendation; therefore, the recommendation is resolved and open. We request that the USD(A&S) provide additional comments within 30 days clarifying the timeline for preparation of the relevant plan of action and milestones. We will close the recommendation once we review the plan of action and milestones that the CHO directed the DASD(H), in coordination with the MILDEPs and the DoD Comptroller, to develop to correct deficiencies in the condition of GO-GC unaccompanied housing, including a comprehensive assessment of the condition of GO-GC unaccompanied housing and identification of resources necessary to correct deficiencies in the condition of GO-GC unaccompanied housing.

Recommendation 5

We recommend that the Chief Housing Officer direct the Deputy Assistant Secretary of Defense (Housing), in coordination with the Military Departments and the Department of Defense Comptroller, to perform an assessment and document the feasibility of alternatives for the future management of funding for government-owned and government-controlled unaccompanied housing, such as the expansion of unaccompanied housing privatization, separate appropriations, and funding targets with accountability standards.

Under Secretary of Defense for Acquisition and Sustainment Comments

The USD(A&S), responding for the CHO, agreed and stated that, no later than September 20, 2024, the CHO will direct the DASD(H), in coordination with the MILDEPs and the DoD Comptroller, to perform an assessment and document the feasibility of alternatives for the future management of funding for GO-GC unaccompanied housing.

Our Response

Comments from the USD(A&S) addressed the specifics of the recommendation; therefore, the recommendation is resolved and open. We request that the USD(A&S) provide additional comments within 30 days clarifying the timeline for completion. We will close the recommendation once we verify that the CHO directed the DASD(H), in coordination with the MILDEPs and DoD Comptroller, to perform an assessment and we review documentation for the feasibility of alternatives for the future management of funding for GO-GC unaccompanied housing.

Appendix A

Scope and Methodology

We conducted this evaluation from August 2022 through June 2024 in accordance with the “Quality Standards for Inspection and Evaluation,” published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we adequately plan the evaluation to ensure that objectives are met and that we perform the evaluation to obtain sufficient, competent, and relevant evidence to support the findings, conclusions, and recommendations. We believe that the evidence obtained was sufficient, competent, and relevant to lead a reasonable person to sustain the findings, conclusions, and recommendations.

We conducted our evaluation at the DoD, MILDEP, and installation levels to determine the extent of the DoD’s compliance with military housing oversight requirements related to health, safety, and environmental hazard identification and remediation in the FY 2020, FY 2021, and FY 2023 National Defense Authorization Acts (NDAAAs). Table 1 provides a summary of the requirements from 12 specific FY 2020 NDAA subsections and paragraphs within FY 2020 NDAA sections 3051, 3052, 3053, and 3055, as amended, that we selected for our evaluation. Table 1 also provides the short description we use to refer to each requirement and the timelines that Congress included in the FY 2020 NDAA for the implementation of each requirement.

Table 1. FY 2020 NDAA Requirements Related to Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing, as Amended

FY 2020 NDAA Reference		Short Description	Summary
1	3051(a)	Establish Uniform Code of Basic Housing Standards	Not later than February 1, 2021, the SecDef must establish a uniform code of basic housing standards for safety, comfort, and habitability.
2	3051(b)	Plan to Contract to Conduct Inspections and Assessments	Not later than February 1, 2020, the SecDef must submit to Congress a “DoD plan” to contract with qualified home inspectors to conduct thorough inspections and assessments.
3	3051(c)(1)	Conduct Inspections and Assessments	Not later than February 1, 2021, the MILDEPs must commence conducting inspections and assessments in accordance with the section 3051(b) plan to identify issues and ensure compliance with applicable housing codes, including the code established in section 3051(a).

Table 1. FY 2020 NDAA Requirements Related to Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing, as Amended (cont'd)

FY 2020 NDAA Reference		Short Description	Summary
4	3051(c)(2)	Report on Inspections and Assessments Conducted	Not later than March 1, 2021, the SecDef must submit to Congress a report of the inspections and assessments findings.
5	3052(a)(1) and 3052(a)(2)	Develop Hazard Assessment Tool	Not later than June 17, 2020, the SecDef must develop a hazard assessment tool, such as a rating system to identify and measure health and safety hazards. The assessment tool must provide for the identification and measurement of: <ul style="list-style-type: none"> • Physiological hazards, including dampness and mold growth, lead-based paint, asbestos and manmade fibers, radiation, biocides, carbon monoxide, and volatile organic compounds; • Psychological hazards, including ease of access by unlawful intruders and lighting issues; • Infection hazards; and • Safety hazards.
6	3052(a)(3)	Public Input to Hazard Assessment Tool	The SecDef must provide multiple public forums to receive input on the assessment tool.
7	3052(a)(4)	Report on Hazard Assessment Tool	Not later than July 17, 2020, the SecDef must submit to Congress a report on the assessment tool.
8	3052(b)(1)	Complete Hazard Assessments	Not later than December 20, 2020, the SecDef must complete a hazard assessment using the assessment tool developed under section 3052(a)(1).
9	3052(b)(2)	Provide Results of Hazard Assessments to Occupants	The SecDef must provide to each individual who leases or is assigned to a housing unit in the facility a summary of the results of the assessment as soon as practicable after the completion of the hazard assessment conducted for a housing facility under section 3052(b)(1).
10	3053(a) and 3053(b)	Develop Process to Identify, Record, and Resolve Environmental Health Hazards	Not later than June 17, 2020, the SecDef, in coordination with the MILDEPs, must develop a process to identify, record, and resolve environmental health hazards in a timely manner.* The process must provide the following to each identified environmental health hazard: <ul style="list-style-type: none"> • Categorization of the hazard; • Identification of the health risks; • Identification of the number of tenants potentially affected; • Recording and maintenance of hazard information; and • Resolution of the hazard.

Table 1. FY 2020 NDAA Requirements Related to Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing, as Amended (cont'd)

FY 2020 NDAA Reference		Short Description	Summary
11	3053(d)	Report on the Process Developed for Environmental Health Hazards	Not later than July 17, 2020, the SecDef must submit to Congress a report on the process.
12	3055(a)	Report on Minimum Credentials for Health and Environmental Inspectors	Not later than February 1, 2020, the SecDef must submit to Congress a report that contains a standard for minimum credentials to be used throughout the DoD for all inspectors of health and environmental hazards at privatized military housing, including inspectors contracted by the Department.

* According to DoDI 6055.01, a hazard is “any real or potential condition that can cause injury, illness, or death to personnel or damage to or loss of equipment or property, mission degradation.” According to the Occupational Safety and Health Administration (OSHA), health hazards include “chemical hazards (solvents, adhesives, paints, toxic dusts, etc.), physical hazards (noise, radiation, heat, etc.), biological hazards (infectious diseases), and ergonomic risk factors (heavy lifting, repetitive motions, vibration).” A legal definition of a safety hazard is any mechanical, electrical, chemical, or other feature that can cause injury or constitute an immediate or imminent risk to life, health, or property. According to the Centers for Disease Control and Prevention (CDC), an environmental health hazard is a natural or human-made chemical, physical, or biological factor in our environment that can have negative impacts on short- or long-term health.

Source: The DoD OIG.

We evaluated the DoD’s implementation of NDAA requirements for the following military housing types: government-owned and government-controlled (GO-GC) family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing. According to the FY 2020 NDAA:

- section 3051, as amended, applies to GO-GC family housing, privatized family housing, and privatized unaccompanied housing;
- sections 3052 and 3053 apply to GO-GC family housing, GO-GC unaccompanied housing, privatized family housing, and privatized unaccompanied housing; and
- section 3055 applies to privatized family housing and privatized unaccompanied housing.

Criteria

We reviewed the FY 2020, FY 2021, and FY 2023 NDAA’s and DoD directives, instructions, manuals, and policy memorandums. The following criteria were most pertinent to the analysis and conclusions in this report.

National Defense Authorization Acts

- Public Law 116-92, the S.1790-National Defense Authorization Act for Fiscal Year 2020, enacted on December 20, 2019
- Public Law 116-283, the H.R. 6395-William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, enacted on January 1, 2021
- Public Law 117-263, the H.R. 7776-James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, enacted on December 23, 2022
- Public Law 118-31, the National Defense Authorization Act for Fiscal Year 2024, enacted on December 22, 2023

DoD Directives, Instructions, Manuals, and Memorandums

- DoDI 4165.63, “DoD Housing,” July 21, 2008 (Incorporating Change 2, August 31, 2018)
- DoDM 4165.63, “DoD Housing Management,” October 28, 2010 (Incorporating Change 2, August 31, 2018)
- DoDI 5025.01, “DoD Issuances Program,” August 1, 2016 (Incorporating Change 4, June 7, 2023)
- DoDI 6055.01, “DoD Safety and Occupational Health (SOH) Program,” October 14, 2014 (Incorporating Change 3, April 21, 2021)
- DoDI 6055.05, “Occupational and Environmental Health,” November 11, 2008 (Incorporating Change 2, August 31, 2018)
- Under Secretary of Defense, Acquisition, Technology and Logistics Memorandum, “Facility Sustainment and Recapitalization Policy,” April 29, 2014
- Under Secretary of Defense, Acquisition, Technology and Logistics Memorandum, “Standardizing Facility Condition Assessments,” September 10, 2013
- Assistant Secretary of Defense (Readiness), “Standards and Guidance for Managing Environmental Health Hazards in Department of Defense Housing,” February 1, 2022
- Under Secretary of Defense for Acquisition, Technology and Logistics Memorandum, “Enterprise Military Housing Information Management System,” April 16, 2014

Interviews with Officials

We met and interviewed individuals at the following organizations.

- Office of the Assistant Secretary of Defense (Energy, Installations, and Environment)
- Office of the Deputy Assistant Secretary of Defense (Housing)

- Office of the Assistant Secretary of Defense (Readiness)
- Office of the Assistant Secretary of the Army (Installations, Energy and Environment)
- Office of the Deputy Chief of Staff, G-9 (Installations)
- Army Materiel Command
- Office of the Assistant Secretary of the Navy (Energy, Installations and Environment)
- Commander, Navy Installations Command
- Naval Facilities Engineering Command
- Office of the Assistant Secretary of the Air Force (Installations, Environment, and Energy)
- Air Force Medical Readiness Agency
- Air Force Civil Engineer Center
- Enterprise Military Housing (eMH) Program Office
- Installation Military Housing Offices
- Installation Safety and Industrial Hygiene Offices, Logistics Departments, Public Works Departments, and Civil Engineer Squadrons
- Landlords and landlord representatives

Site Visits

The FY 2020 NDAA required us to visit no less than three installations for our evaluation. In order to validate the implementation of the requirements we selected across all military housing types, we non-statistically selected 10 installations. We made our nonstatistical site selection using the following considerations.

- We selected installations from each of the MILDEPs.
- We selected sites that hosted a mix of GO-GC family housing and unaccompanied housing and privatized family housing and unaccompanied housing.
- We considered various sizes of the inventory of military housing across installations.
- We considered installations suggested by the MILDEPs.
- We reviewed available DoD OIG Hotline allegations and considered the extent of prior coverage.

We physically visited Fort Belvoir, Virginia, Marine Corps Base Quantico (MCBQ), Virginia, and Joint Base Anacostia–Bolling (JBAB), D.C. During our in-person site visits, we walked through privatized family housing units and GO-GC unaccompanied housing buildings.

We conducted virtual site visits at Joint Base Lewis–McChord (JBLM), Washington; Naval Base San Diego (NBSD), California; and Wright–Patterson Air Force Base (AFB), Ohio. However, after visiting 6 of the 10 installations, we determined that additional site visits to Eielson AFB, Joint Base San Antonio, Naval Air Station Corpus Christi, and Vandenberg AFB were not warranted because our observations at the first six installations were similar across the MILDEPs. Table 2 summarizes the military housing inventory at the six installations we visited.

Table 2. Installations Included in the DoD OIG Evaluation

Installation and MILDEP	GO-GC FH Units	GO-GC UH Beds	Privatized FH Units	Privatized UH Beds
Fort Belvoir (Army)	None	688	2,143	None
MCBQ (Navy) ¹	None	2,339	1,137	None
JBAB (Air Force) ²	1	1,913	1,002	None
JBLM (Army)	None	9,609	5,159	None
NBSD (Navy)	None	2,275	9,135 ³	2,394
Wright–Patterson AFB (Air Force)	100	406	1,536	None

¹ The Department of the Navy includes both the Marine Corps and the Navy.

² JBAB is an Air Force–led joint base that combined previously established Air Force and Navy military housing under Air Force responsibility. Military housing at JBAB includes privatized family housing. Since the original privatized family housing legal agreements are still active, two separate landlords continue to operate the privatized family housing according to their legal agreements. Specifically, one landlord manages 187 privatized family housing units according to its legal agreement with the Navy, and another landlord manages 815 privatized family housing units according to its legal agreement with the Air Force.

³ According to NBSD MHO personnel, this number includes privatized housing units for the Metro San Diego area to include NBSD, Point Loma, and Coronado.

LEGEND

FH Family Housing

UH Unaccompanied Housing

Source: The DoD OIG, compiled from data provided by the Services.

To perform our virtual site visits, we relied on teleconferences, interviews, questionnaires, and data calls to collect testimonial and documentary evidence to verify information. During both our in-person and virtual site visits, we held discussions with installation officials, including military housing office, public health, logistics, maintenance, environmental, and engineering officials. We also interviewed landlords responsible for privatized military housing. Additionally, we visited and visually assessed individual privatized military family housing units and GO-GC unaccompanied housing units at each of the installations we visited in-person.

Document Collection

We collected and reviewed the following types of documents.

- Facility inventories, such as lists of GO-GC military family housing units
- Maintenance requests and life, health, and safety reports
- Resident handbooks and housing assignment documentation
- eMH reports related to completion of housing inspections and assessments
- Examples of the eMH EHS module contents
- MILDEP housing quarterly programmatic review documentation
- ODASD(H) NDAA implementation trackers
- Draft and submitted FY 2020 NDAA required reports to Congress

Use of Computer-Processed Data

We used computer-processed data to perform this evaluation. We used data provided by ODASD(H) and the MILDEPs describing the landlord Military Housing Privatization Initiative (MHPI) management and the inventory of military housing units by type and location. Specifically, we used data reported by the MILDEPs in their quarterly reviews of the MHPI. To assess the reliability of this data, we compared it to information we collected in a previous evaluation. We determined that the information we obtained was sufficiently reliable to develop a non-statistical sample of installations for our review.

Additionally, we obtained data from ODASD(H) regarding the DoD's progress toward completing inspections and assessments of housing. To assess the reliability of this data, we interviewed MILDEP officials and we compared the data to earlier progress reports we obtained during our evaluation. We determined that the information we obtained was sufficiently reliable to assess the DoD's overall progress.

Furthermore, we obtained data exported from eMH regarding the implementation of the EHS module by Service directly from the eMH Program and System Manager. We could not gain access to eMH and could not verify that hazard assessments were fully completed in EHS. To assess the reliability of this data, we interviewed MILDEP and eMH program officials. Despite our access limitation, we determined that the information we obtained was sufficiently reliable for the purposes of reporting the lack of implementation of the Hazard Assessment Tool.

Appendix B

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO), the Army Audit Agency, and the Air Force Audit Agency issued 8 reports discussing health, safety, and environmental hazard identification and remediation in military housing. Additionally, since 2014, the DoD Office of Inspector General (DoD OIG) has issued 13 reports discussing health, safety, and environmental hazard identification and remediation in military housing.

Unrestricted GAO reports can be accessed at <http://www.gao.gov>. Unrestricted DoD OIG reports can be accessed at <http://www.dodig.mil/reports.html/>. Unrestricted Army Audit Agency reports can be accessed from .mil and gao.gov domains at <https://www.army.mil/aaa>. Naval Audit Service reports are not available over the Internet. Unrestricted Air Force Audit Agency reports can be accessed from <https://www.afaaf.af.mil/> by clicking on Freedom of Information Act Reading Room and then selecting audit reports.

GAO

Report No. GAO-23-105797, “Military Barracks: Poor Living Conditions Undermine Quality of Life and Readiness,” September 2023

The GAO found weaknesses in the DoD’s efforts to maintain and improve the condition of military barracks. Specifically, the DoD does not reliably assess conditions, and some barracks are substandard. Additionally, the DoD does not have complete funding information to make informed decisions. Furthermore, the DoD conducts insufficient oversight. The GAO determined that the DoD could better prioritize investments in barracks to improve living conditions for Service members and help ensure that barracks housing programs across military services are consistently implemented and support quality of life and readiness by developing or clarifying guidance related to these weaknesses.

Report No. GAO-23-105983, “Army Should Improve Inspection Oversight and Long-Term Capital Investment Projections,” July 2023

The GAO determined that the Army conducts an annual sustainability analysis to evaluate financial risk and overall financial health of all Army housing projects, including the six managed by the Army’s privatized housing partner Lendlease. GAO found that the sustainability analysis relies on outdated financial projections for capital investment. Specifically, the Army was not enforcing

a requirement for projects to include financial projections with development plans submitted for review and approval. Without enforcing this requirement, the Army may not have an accurate picture of project-specific development capability and financial health.

Report No. GAO-23-105377, "DOD Can Further Strengthen Oversight of Its Privatized Housing Program," April 2023

The GAO found that the DoD has taken steps to implement statutory requirements from the FY 2020 NDAA designed to increase assistance to residents of privatized housing, ensure the DoD has adequate personnel to conduct oversight activities, and improve the DoD's oversight of the condition of private housing units. However, the GAO found a need for more detailed formal dispute resolution guidance, improved guidance on the role of the tenant advocate, and better oversight of the condition of private housing units. According to the GAO, the DoD could enable personnel to more effectively perform their duties, reduce residents' confusion and frustration, and more fully meet the congressional intent of improving the privatized housing program by addressing these implementation weaknesses.

Report No. GAO-22-105866, "Privatized Military Housing: Update on DOD's Efforts to Address Oversight Challenges," March 31, 2022

The GAO determined that the DOD has taken actions to increase its oversight of privatized housing. Specifically, the DoD has improved oversight of the condition of homes, resident communication, metrics used to measure project performance, and leadership's role in project oversight. Nevertheless, the GAO found that oversight of the privatized family housing program will likely continue to face challenges, in part because the DoD cannot unilaterally make changes to projects without the concurrence of the private-sector companies. The GAO determined that a continued emphasis on oversight is critical to ensure quality housing for Service members and their families.

Report No. GAO-20-281, "Military Housing: DOD Needs to Strengthen Oversight and Clarify Its Role in the Management of Privatized Housing," March 26, 2020

The GAO determined that the DoD conducts some oversight of the physical condition of privatized housing, but the scope of these oversight efforts has been limited. The DoD has not used reliable or consistent data to report on the condition of privatized housing. The GAO also found that military housing offices have not effectively communicated their role as a resource for Service members experiencing challenges with privatized housing. Furthermore,

the GAO determined that the DoD has made progress in developing and implementing initiatives intended to improve privatized housing; however, the DoD may face challenges with timeliness, resources, and the financial risk of improvement initiatives.

DoD OIG

Report No. DODIG-2022-139, "Evaluation of the Department of Defense's Reform of Privatized Military Family Housing Oversight Related to Health, Safety, and Environmental Hazards," September 29, 2022

The DoD OIG determined that DoD officials have taken steps to implement the FY 2020 NDAA provisions related to the health, safety, and environmental hazard provisions within FY 2020 NDAA sections 3011, 3012, 3013, 3014, 3017, 3018, 3019, 3041, 3042, 3056, 3057, and 3058, as amended. However, despite DoD officials' attempts to seek agreement from the landlords, not all landlords have agreed to voluntarily include three FY 2020 NDAA provisions retroactively in existing legal agreements. Additionally, installation officials at certain installations could not track and document their oversight activities in eMH or did not have access to the full functionality of eMH. This occurred because DoD officials did not populate eMH with all privatized military family housing records, which was identified in a previous DoD OIG report.

Report No. DODIG-2022-078, "Audit of Medical Conditions of Residents in Privatized Military Housing," April 2022

Although the DoD OIG could not inspect all 211,826 privatized military housing units to fully determine what percentage were unsafe or unhealthy, 28,759 privatized military housing units had open work orders as of June 30, 2021. The DoD OIG conducted a statistical sample and projected that 58 housing units had a condition that was unsafe or unhealthy. The remaining 183,067 privatized military housing units did not have any open work orders as of June 30, 2021, and therefore did not have any unsafe or unhealthy conditions reported by the private partner companies or the housing residents. Because DoD officials did not have readily available access to sufficient information to connect health and safety incidents to privatized military housing, they were unable to effectively monitor and ensure the health and safety of Service members and their families.

Report No. DODIG-2022-004, "Evaluation of the Department of Defense's Implementation of Oversight Provisions for Privatized Military Housing," October 2021

The DoD OIG determined that the DoD has taken steps to implement some of the FY 2020 NDAA MHPI oversight provisions for privatized military housing. In addition, between 2019 and 2020, the DoD issued MHPI oversight guidance to the Military Departments including a common incentive fee framework, tenant satisfaction survey policy, Universal Lease, Dispute Resolution Process including rent segregation request and tenant displacement guidelines, and move-in and move-out checklists. The DoD OIG determined that, the DoD has not implemented all of the FY 2020 NDAA MHPI provisions to improve the oversight of privatized military housing. For example, the DoD has not: issued comprehensive oversight guidance to the landlords for implementation of all of the rights in the Tenant Bill of Rights; established a publicly available complaint database; developed a uniform checklist for housing management offices to validate completion of all health and safety maintenance work; or submitted a civilian personnel shortage report to Congress.

Report No. DODIG-2020-086, "Evaluation Followup Audit on Department of Defense and Military Department Corrective Actions Taken in Response to Department of Defense Office of Inspector General Reports on Military Housing," June 2020

The DoD OIG determined that additional improvements were needed to ensure that Service members and their families have access to safe housing. The DoD and the Military Departments did not fully implement corrective actions needed for 10 of the 16 recommendations. Overall, the DoD and Military made improvements regarding military housing. However, many agreed-upon recommendations remained uncorrected. Specifically, there were six open recommendations from previous DoD OIG reports related to policies and instructions, preventative maintenance, and environmental health and safety that had not been addressed.

Report No. DODIG-2020-082, "Evaluation of the DoD's Management of Health and Safety Hazards in Government-Owned and Government-Controlled Military Family Housing," April 2020

The DoD OIG found deficiencies in the management of health and safety hazards at each of the eight military installations evaluated. The DoD OIG found systemic deficiencies in the management of lead-based paint, asbestos-containing material, and radon in GO-GC military family housing. Additionally, at two of the installations evaluated, officials did not incorporate fire safety requirements in GO-GC military family housing. At one of the

installations evaluated, officials did not test for all drinking water quality hazards in GO-GC military family housing. The DoD OIG determined that these deficiencies occurred because the DoD's housing policies did not define minimum standards for health and safety management in GO-GC military family housing, did not require an assessment of the condition of housing units to address health and safety hazards, and did not address the management of health and safety hazards in existing military family housing. Furthermore, the Military Services' oversight inspections and audits were not designed to identify deficiencies in the management of health and safety hazards.

Report No. DODIG-2019-056, "Accounting and Financial Reporting for the Military Housing Privatization Initiative," February 12, 2019

The DoD OIG determined that, among other findings, MHPI program and financial management personnel need to improve privatized housing inventory management for MHPI projects. Specifically, MHPI program and financial management personnel did not identify and correct discrepancies between privatized housing inventories or populate the enterprise Military Housing (eMH) system with all privatized housing records. The DoD OIG determined that, these privatized housing inventory deficiencies occurred because MHPI program and financial management personnel lacked adequate oversight, policies, and procedures to maintain complete and accurate private housing inventories. Without effective privatized housing accountability controls, MHPI program management personnel may not be able to efficiently manage and oversee the MHPI program and related projects or obtain necessary MHPI-related information, including information for required reports to Congress.

Report No. DODIG-2017-118, "Followup Evaluation on DoD OIG Report No. DODIG-2014-121, 'Military Housing Inspections–Japan,' September 30, 2014," September 8, 2017

This 2017 report followed up on the 2014 report. The 2014 report discussed the inspection of 15 military housing facilities in Japan and identified 1,057 deficiencies in fire protection, electrical systems, environmental health and safety, and housing management, which posed a risk to the health, safety, and well-being of warfighters and their families. The prior report made various recommendations for corrective action. In the followup evaluation, we determined that the Military Departments had partially implemented the recommendations from the prior report.

Report No. DODIG-2017-104, "Followup on DoD OIG Report No. DODIG-2015-013, "Military Housing Inspections–Republic of Korea," July 20, 2017

This 2017 report followed up on the 2014 report. The 2014 report discussed the inspection of 13 military installations in the Republic of Korea and identified 646 deficiencies for fire protection, electrical systems, environmental health and safety, and housing management, which posed a risk to the health, safety, and well-being of warfighters and their families. The prior report made various recommendations for corrective action. In the followup evaluation, we determined that the Army and Air Force had partially implemented the recommendations from the prior report.

Report No. DODIG-2017-004, "Summary Report–Inspections of DoD Facilities and Military Housing and Audits of Base Operations and Support Services Contracts," October 14, 2016

This 2016 report summarized the results of six previous reports issued from July 2013 to July 2016 related to health and safety inspections of DoD facilities at various locations around the world, which documented 3,783 deficiencies in electrical system safety, fire protection systems, and environmental health and safety. During these inspections, 12 notices of concern were issued, detailing 319 critical deficiencies requiring immediate action at 24 of the 36 installations inspected. Deficiencies in electrical system safety, fire protection systems, and environmental health and safety were pervasive because of a lack of adequate preventative maintenance and inspections being performed at the installations.

Report No. DODIG-2015-181, "Continental United States Military Housing Inspections–Southeast," September 24, 2015

The DoD OIG identified 389 deficiencies that could affect the health, safety, and well-being of warfighters and their families at three installations in the Southeastern region of the continental United States. These electrical system safety, fire protection, and environmental health and safety deficiencies resulted from improper installation, insufficient inspection, and inadequate maintenance of housing facilities.

Report No. DODIG-2015-162, "Continental United States Military Housing Inspections–National Capital Region," August 13, 2015

The DoD OIG identified 316 deficiencies that could affect the health, safety, and well-being of warfighters and their families at both United States Army Garrison (USAG) Fort Belvoir and Joint Base Anacostia–Bolling. The majority of these electrical system safety, fire protection, and environmental health and

safety deficiencies, in both accompanied and unaccompanied housing facilities, resulted from improper installation, insufficient inspection, and inadequate maintenance of housing facilities.

Report No. DODIG-2015-013, “Military Housing Inspections–Republic of Korea,” October 28, 2014

The DoD OIG identified 646 deficiencies that could affect the health, safety, and well-being of warfighters and their families at military housing in the Republic of Korea. These electrical system safety, fire protection, and environmental health and safety deficiencies resulted from insufficient inspection, maintenance, and repair of housing facilities.

Report No. DODIG-2014-121, “Military Housing Inspections–Japan,” September 30, 2014

The DoD OIG identified 1,057 deficiencies that could affect the health, safety, and well-being of warfighters and their families at military housing in Japan. These electrical system safety, fire protection, environmental health and safety, and housing management deficiencies resulted from insufficient inspection, maintenance, and repair of housing facilities.

Army

Report No. A-2023-0057-FIZ, “Lead-Based Paint and Asbestos-Containing Material in Privatized Housing,” August 2, 2023

The Army Audit Agency found that the U.S. Army Installation Management Command’s (IMCOM’s) Housing Maintenance Quality Assurance and Environmental Hazard Oversight Program was established to provide a standardized assessment process. However, Army installation housing officials were not following the guidance to ensure that all assessments were done to evaluate home conditions for lead-based paint and asbestos-containing material. Specifically, the Army Audit Agency found that installation officials could not provide documentation confirming that 18 of 201 homes they reviewed had initial lead-based paint inspections. The Army Audit Agency found that 183 homes had documentation supporting that inspections occurred. Since all 201 homes had lead-based paint, the Army Audit Agency determined that additionally risk assessment were required. However, none of the homes had those additional risk assessments. Additionally, housing officials could not provide documentation to support that 82 homes had asbestos-containing material surveys. The Army Audit Agency also reviewed between occupancy maintenance checklists for 155 homes. The Army Audit Agency found that

152 of the 155 checklists were completed inconsistently and 121 of the 155 checklists did not have the required corresponding lead-based paint visual assessment forms.

Report No. A-2020-0042-FIZ, “Unaccompanied Personnel Housing,”
February 26, 2020

The Army Audit Agency determined that the Army achieved a 95 percent utilization rate for unaccompanied personnel housing when comparing General Fund Enterprise Business Systems with the total number of Soldiers assigned to each barrack. However, the rates did not accurately reflect how barracks were configured, used, and reported in the enterprise Military Housing (eMH) system. Specifically, the average utilization reported in eMH for the installations audited was about 80 percent. Therefore, Army Audit Agency report stated that the Army could not rely on information in eMH to make housing program and investment decisions regarding day-to-day operations and management of unaccompanied personnel housing.

Air Force

Report No. F2021-0010-020000 “Privatized Housing Maintenance,”
September 30, 2021

The Air Force Audit Agency determined the Department of the Air Force officials did not fully implement internal controls to ensure privatized housing maintenance was performed in accordance with established service quality and response timeliness requirements at all 15 installations reviewed. In addition, Department of the Air Force officials did not fully implement internal controls to ensure project owner performance incentive fee payment requests were validated for all 10 projects reviewed (over \$12.6 million in incentive fees).

Appendix C

Description of Military Housing

According to data provided in September 2023, there were 38,347 government-owned and government-controlled (GO-GC) family housing units and 798,433 GO-GC unaccompanied housing beds worldwide. Approximately 97 percent of GO-GC family housing is located outside the continental United States (OCONUS) and the rest is within the continental United States (CONUS). Table 3 provides a summary of the inventory of GO-GC military housing by type, location, and Service.

Table 3. GO-GC Military Housing Inventory, data provided in September 2023

Service	CONUS GO-GC FH Units	OCONUS GO-GC FH Units	Total FH Units	CONUS UH Beds	OCONUS UH Beds	Total UH Beds
Army	961	12,504	13,465	388,263	90,644	478,907
Navy	15	7,438	7,453	91,643	14,839	106,482
Marine Corps	81	1,788	1,869	123,532	30,290	153,822
Air Force	111	15,449	15,559	36,193	21,792	57,985
Space Force	0	0	0	1,237	0	1,237
Total	1,168	37,179	38,347	640,868	157,565	798,433

LEGEND

FH Family Housing

UH Unaccompanied Housing

Source: The DoD OIG, compiled from data provided by the Services.

The 1996 legislation establishing the Military Housing Privatization Initiative (MHPI) authorizes the MILDEPs to enter into legal agreements with landlords.⁵⁵ The legal agreements allow the landlords to own, operate, and maintain privatized military

⁵⁵ Public Law 104-106, "National Defense Authorization Act for Fiscal Year 1996," "Title XXVIII—General Provisions," "Subtitle A—Military Housing Privatization Initiative," February 10, 1996.

Although the MILDEPs selected the landlords through a competitive process, the legal agreements are not enacted under the Federal Acquisition Regulation and the parties are not required to comply with the Federal Acquisition Regulation. We previously referred to the privatized military family housing project legal agreements as business agreements in Report No. DODIG-2022-004.

housing through 50-year leases.⁵⁶ According to data provided in September 2023, the MILDEPs have legal agreements with 14 landlords. As part of the MHPI, the MILDEPs privatized most of military family housing in the United States and its territories. Table 4 provides a summary of the inventory of privatized military housing by type, location, and Service.

Table 4. Privatized Military Housing Inventory, data provided in September 2023

Service	CONUS FH Units	OCONUS FH Units	Total FH Units	CONUS UH Beds ^{1,2}
Army	76,957	9,594	86,551	2,411
Navy	37,512	0	37,512	6,075
Marine Corps	20,667	2,576	23,243	0
Air Force	46,399	4,612	51,011	0
Space Force	3,496	0	3,496	0
Total	185,031	16,782	201,813	8,486

LEGEND

FH Family Housing

UH Unaccompanied Housing

¹ According to data provided in September 2023, only the Navy and the Army had privatized unaccompanied housing.

² According to data provided in September 2023, none of the Services had OCONUS privatized unaccompanied housing.

Source: The DoD OIG, compiled from data provided by the Services.

⁵⁶ According to the FY 1996 NDAA that established the MHPI, privatized military family housing projects may include acquisition or construction of housing units suitable for use as military housing units. Specifically, each privatized military family housing project involves a landlord that acquires existing military family housing units from a MILDEP. The landlord maintains, constructs, and demolishes privatized military family housing units to meet community needs. Each legal agreement is unique to the associated privatized military housing project. For example, some installations host multiple privatized military housing projects, project phases, or landlords. Additionally, some landlords are responsible for a single privatized military housing project at a single installation, while other landlords are responsible for multiple privatized military housing projects. The legal agreements between the MILDEPs and the landlords outline the management, operation, and maintenance of privatized military housing projects.

Figure 7. eMH Housing Inspection Checklist (cont'd)

Mold/Moisture Control							
Measurements and Readings (More than one reading may need to be taken to enable a representative reading for level)							
	Outdoor Readings	Main Floor Readings	Second Floor Readings	Third Floor / Basement Readings	Crawl Space Readings	Attic Readings	Comments
Temperature	68° F - 80° F (per comfort)						
Dew Point	< 55° F						
Relative Humidity	30% - 50%						

Yes No

Is the unit free of visible mold, water damages/stains, and persistent dampness/moisture on all surfaces and surface coverings?

Is the unit free of any visible signs of leaks at plumbing fixtures or appliances?

Is the unit free of any strong musty odors?

Does the unit have a drainage system or does the water drain away from the structure?

Is the unit free of any visible standing water against the foundation?

If you answered "No" to any question above, please provide details:

Pest Management

Yes No

Does the unit appear to be free of pests?

Are there pest management methods in place to ensure unit is free of infestation?

If you answered "No" to any question above, please provide details:

Asbestos

Yes No UNK

Does the unit have an asbestos inventory assessment?

Is potential asbestos containing material free of visible damage (walls, ceilings, fibrous pipe, insulation, tile flooring, etc.)?

If you answered "No" to any question above, please provide details:

Water

Yes No UNK N/A

Have sink faucets been sampled for lead in drinking water or are they scheduled for sampling?

Does the resident have access to the Consumer Confidence Report for drinking water and is the water supply tested in accordance with the Safe Drinking Water Act and state regulations (As applicable/US locations only)?

Have other units in the building/neighborhood been tested for lead in water?

Does the unit have potable water?

Is the tap water free of any visual discoloration or oily consistency?

Is tap water free of any odors?

Does the unit have adequate water pressure?

Is the water temperature less than 120 degrees Fahrenheit?

If the unit has a water filtration system have the filters been changed according to the manufacturer's guidelines?

If you answered "No" to any question above, please provide details:

HVAC

Yes No N/A

Are all exhaust fans in working order (Kitchen, Bathroom, Laundry, etc.)?

Is dryer vent in working order?

Is heating system in working order?

Figure 7. eMH Housing Inspection Checklist (cont'd)

Kitchen							
Component	Rating	Condition	Comments				
Kitchen Doors							
Ceiling							
Flooring							
Walls							
Windows/Blinds/Sills/Sashes							
Pantry Door/Shelving							
Cabinet Doors/Drawers/Shelves							
Counter Tops and Sink(s)							
Caulk							
Microwave							
Sinks and Faucets (hot/cold)							
Dishwasher (operational)							
Garbage Disposal (operational)							
Refrigerator							
Range/Oven							
Appliance Light Bulbs (operational)							
Ventilation (Range)							
GFCI Protected Electric Outlet(s)							
Smoke Detectors							
Carbon Monoxide Detectors							
Lighting (Fixtures and Bulbs)							

Living Room/ Dining Room/ Den							
Component	Select RoomType		Select RoomType		Select RoomType		Comments
	Rating	Condition	Rating	Condition	Rating	Condition	
Interior Doors							
Stairs							
Handrails							
Ceiling							
Vinyl Flooring							
Tile Flooring							
Carpet Flooring							
Wood/Laminate Flooring							
Walls and Trim							
Windows/Sills/Sashes							
Window Blinds/Shutters/Shades							
Lighting (Fixtures and Bulbs)							
GFCI Protected Switch(es) and Outlet(s)							
Fireplace							
Fire Extinguisher							
Ceiling Fans							
Smoke Detectors							
Carbon Monoxide Detectors							

Laundry Room/ Mechanical Room/ Basement/ Sunroom							
Component	Select RoomType		Select RoomType		Select RoomType		Comments
	Rating	Condition	Rating	Condition	Rating	Condition	
Interior Doors							
Stairs							
Handrails							
Ceiling							
Vinyl Flooring							
Tile Flooring							
Carpet Flooring							
Wood/Laminate Flooring							
Walls and Trim							
Windows/Sills/Sashes							
Window Blinds/Shutters/Shades							
Lighting (Fixtures and Bulbs)							
GFCI Protected Switch(es) and Outlet(s)							
Fireplace							
Fire Extinguisher							
Ceiling Fans							
Exhaust Fans							
HVAC System(s)							
Smoke Detectors							
Carbon Monoxide Detectors							
Washing Machine Supply and Drain							
Clothes Dryer Vent Pipe							

Figure 7. eMH Housing Inspection Checklist (cont'd)

Bedrooms	Bedroom Location Description				Bathrooms	Bathroom Location Description			
Bedroom 1					Bathroom 1				
Bedroom 2					Bathroom 2				
Bedroom 3					Bathroom 3				
Bedroom 4					Bathroom 4				
Bedroom 5					Bathroom 5				

Bedrooms										
Component	Bedroom 1		Bedroom 2		Bedroom 3		Bedroom 4		Bedroom 5	
	Rating	Condition								
Bedroom Door										
Ceiling										
Flooring										
Walls and Trim										
Windows/Sills/Sashes										
Window Blinds/Shutters/Shades										
Lighting (Fixtures and Bulbs)										
Switches and Outlets										
Ceiling Fans										
HVAC (heaters/AC units/radiators/vents)										
Closet										
Smoke Detectors										
Carbon Monoxide Detectors										

Comments										

Bathrooms										
Component	Bathroom 1		Bathroom 2		Bathroom 3		Bathroom 4		Bathroom 5	
	Rating	Condition								
Bathroom Door										
Ceiling										
Flooring										
Walls and Trim										
Windows/Sills/Sashes										
Window Blinds/Shutters/Shades										
Lighting (Fixtures and Bulbs)										
GFCI Protected Switches and Outlets										
Closet										
Shelves										
Mirror										
Towel Racks										
Vanity Counter Top										
Vanity Knobs/Pulls										
Sink and Faucets (hot/cold)										
Toilet (operation)										
Caulk - Tub/Shower										
Faucets (hot/cold) - Tub/Shower										
Tub/Shower Drain										
Bathroom Hardware (tightened)										
Ventilation/Exhaust Fans										

Comments										

Figure 7. eMH Housing Inspection Checklist (cont'd)

Follow-up Actions		
<input type="checkbox"/> None	<input type="checkbox"/> Mold/Water Intrusion/Dampness	<input type="checkbox"/> Life, Health, and Safety
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Submitted Work Order	<input type="checkbox"/> Created Service Log
<input type="checkbox"/> Lead Based Paint	<input type="checkbox"/> Notified Chain of Command	
<input type="checkbox"/> Other Environmental Hazards	<input type="checkbox"/> Reported to Privatized Management	
Overall Unit Inspection Results		
<input type="checkbox"/> Pass		
<input type="checkbox"/> Pass with non-Health and Safety Condition		
<input type="checkbox"/> Fail		
Installation/Garrison Commander Waiver <input type="checkbox"/> Yes <input type="checkbox"/> No		
Installation/Garrison Commander Waiver		
Installation/Garrison Commander Signature		
Inspection Comments		

Source: eMH Program Office.

Appendix E

The enterprise Military Housing (eMH) information management system is the authoritative source for all military housing data. Figure 8 is an excerpt of an Environmental Health and Safety (EHS) module housing unit report exported from eMH.

Figure 8. Excerpt of an eMH EHS Module Housing Unit Report

EHS Topic	EHS Topic Description	EHS Group	EHS Rating	Findings	Housing Action
Accessibility	Housing units constructed or renovated to the Americans with Disabilities Act (ADA) standards are considered Accessible. Installations have a requirement for five percent (5%) of housing inventory to be Accessible.	Environment	Missing Data - Rating analysis for this topic is incomplete due to missing data	Required data is missing to complete all Ratings.	Populate the required data fields in EHS
Environmental Mitigation	Strategies, policies, programs, actions, and activities that, over time, will serve to avoid, minimize, or correct the impacts of human activity on the natural environment.	Environment	Not Applicable - This topic does not apply to this property	There are no Environmental Mitigation actions in this neighborhood/campus.	No Action Required.
Asbestos	Asbestos is a group of six naturally occurring minerals composed of soft, flexible fibers that are heat-resistant. Asbestos is still used in U.S. consumer products (< 1% of the product). Asbestos Containing Materials (ACM) have an asbestos content of at least one percent. Exposure to asbestos causes cancers and other diseases, including mesothelioma and asbestosis.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	Required data is missing to complete all Ratings.	Populate the required data fields in EHS
Drinking Water / Plumbing	Review of unit, and building, water quality, including lab tests and periodic visual inspections for water appearance, smell, pressure and temperature.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	Required data is missing to complete all Ratings	Populate the required data fields in EHS
HVAC	Heating, Ventilation and Air Conditioning (HVAC) systems include heating, mechanical ventilation (e.g., exhaust fans), where applicable cooling equipment and associated ducts, filters and registers.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	There is Family housing inspection information missing for this property.	Conduct a complete housing inspection per Service guidance, or at the next change of occupancy.
HVAC	Heating, Ventilation and Air Conditioning (HVAC) systems include heating, mechanical ventilation (e.g., exhaust fans), where applicable cooling equipment and associated ducts, filters and registers.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	Required data is missing to complete all Ratings	Populate the required data fields in EHS
Lead Based Paint (LBP)	LBP is defined as paint or other surface coatings that contain at least: 1 milligram per centimeters square (mg/cm ²) of lead; 0.5 percent lead; or 5,000 parts per million lead by dry weight. An LBP hazard may be caused by any condition that allows exposure to LBP that is deteriorated or present in chewable surfaces, friction surfaces or impact surfaces, and that would result in adverse human health effects. Note: In 1978 the Consumer Product Safety Commission banned the residential use of LBP that contained greater than or equal to 0.06 percent or 600 ppm of lead.	Health	Not Applicable - This topic does not apply to this property	This property is not included in U.S. Environmental Protection Agency's (EPA's) "Target housing", therefore federal Lead-Based Paint (LBP) regulations do not apply to this property.	No action required.

Figure 8. Excerpt of an eMH EHS Module Housing Unit Report (cont'd)

EHS Topic	EHS Topic Description	EHS Group	EHS Rating	Findings	Housing Action
Mold / Moisture Control	Monitoring indoor moisture sources (i.e., plumbing leaks, exterior moisture infiltration, condensation, etc.) to avoid, or minimize, indoor mold growth.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	There is Family housing inspection information missing for this property.	Conduct a housing inspection per Service or Privatized housing guidance, or at the next change of occupancy.
Other IAQ Inspection	Measures the air quality within a unit as it relates to the health, comfort, and well-being of building residents.	Health	Low-No Risk - There is little to no identified risk associated with this topic	There is no apparent health risk to Family Housing residents, as the indoor relative humidity in this property is within design parameters (30%-60%).	Continue periodic Heating, Ventilation and Air Conditioning (HVAC) inspection and maintenance and indoor air quality inspections per Service or Privatized housing guidance, or at the next change of occupancy.
Pest Management	The prevention and management of pests that may adversely affect the health and well-being of residents, structures, material, or property.	Health	Low-No Risk - There is little to no identified risk associated with this topic	There is no apparent health risk to Family Housing residents as this property is included in an Integrated Pest Management (IPM) plan and the latest housing inspection indicated there were no signs of pests.	Continue to manage the property per Integrated Pest Management (IPM) Plan, including: Provide new resident Pest Management disclosures; Support the annual Installation Commanding Officer (ICO) review of Privatized housing IPM plans, per FY20 National Defense Authorization Act, section 3014 (NDAA Sec. 3014).
Radon	A colorless, odorless, radioactive gas formed by the decay of uranium. It exists in varying amounts in all soils, rocks, and some groundwater supplies worldwide. Under certain conditions, it can infiltrate into and concentrate to unacceptable levels in buildings.	Health	Missing Data - Rating analysis for this topic is incomplete due to missing data	There is missing or incomplete current validated Radon test data for this property.	Complete Radon testing, per applicable Service or Privatization guidance. Provide New Resident Radon Disclosures, noting that testing information is not currently available.

Source: eMH Program Office.

Management Comments

Under Secretary of Defense for Acquisition and Sustainment



ACQUISITION
AND SUSTAINMENT

THE UNDER SECRETARY OF DEFENSE
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

AUG 09 2024

MEMORANDUM FOR PROGRAM DIRECTOR, RESEARCH AND ENGINEERING DIVISION,
SPACE, INTELLIGENCE, ENGINEERING, AND OVERSIGHT,
OFFICE OF THE INSPECTOR GENERAL

SUBJECT: Evaluation of the DoD's Health, Safety, and Environmental Hazard Identification and Remediation in Military Housing (Project No. D2022-DEV0SR-0001.000)

I appreciate the DoD Office of the Inspector's General's review of the Department's compliance with military housing requirements related to health, safety, and environmental hazard identification and remediation in the FY 2020 through 2024 National Defense Authorization Act (NDAA). As requested, I am providing responses to the general content and recommendations contained in the subject report. Additionally, I have enclosed a comment matrix with proposed edits to the report supported by key policies to enhance Service member quality of life.

Recommendation 1: The Under Secretary of Defense for Acquisition and Sustainment (USD(A&S)) direct the Chief Housing Officer (CHO) to develop a plan of action and milestones to correct the specific implementation deficiencies in the FY 2020, FY 2021, and FY 2023 NDAA discussed in this report, including current implementation status, a gap analysis of the remaining military housing oversight requirements, and description of the correlation between DoD actions and the language within the NDAA requirements.

Response: Concur. Not later than September 20, 2024, I will direct the CHO to develop a plan of action and milestones to correct the specific implementation deficiencies in the FY 2020, FY 2021, and FY 2023 NDAA discussed in this report.

Recommendation 2: The USD(A&S) update the appropriate DoD 4165 series policies to address policy changes related to the reform requirements in the FY 2020, FY 2021, FY 2023, and FY 2024 NDAA, and incorporate and codify the requirements from outdated memorandums, such as the Under Secretary of Defense for Acquisition, Technology, and Logistics Memorandums issued on September 10, 2013, April 16, 2014, and April 29, 2014.

Response: Concur. Not later than June 30, 2025, my organization will update the appropriate DoD series policies to address policy changes related to the reform requirements in the FY 2020, FY 2021, FY 2023, and FY 2024 NDAA, including incorporating and codifying requirements from outdated memorandums.

Recommendation 3: The CHO direct the Deputy Assistant Secretary for Housing (DASD(H)), in coordination with the Military Departments (MilDeps), to perform an assessment and document the feasibility of extending the implementation of military housing oversight requirements in the FY 2020, FY 2021, and FY 2023 NDAA to

Under Secretary of Defense for Acquisition and Sustainment (cont'd)

government-owned and government-controlled unaccompanied housing (UH) where those requirements were not included in the FY 2024 NDAA.

Response: Concur. Not later than December 13, 2024, the CHO and (DASD(H)), in coordination with the MilDeps, will perform an assessment and document the feasibility of extending the implementation of military housing oversight requirements in the FY 2020, FY 2021, and FY 2023 NDAA's to government-owned and government-controlled UH where those requirements were not already included in the FY 2024 NDAA.

Recommendation 4: The CHO direct the DASD(H), in coordination with the MilDeps and the DoD Comptroller, to develop a plan of action and milestones to correct deficiencies in the condition of DoD government-owned and government-controlled UH, including a comprehensive assessment of the condition of DoD government-owned and government-controlled UH and identification of resources necessary to correct deficiencies in the condition of the condition of DoD government-owned and government-controlled UH.

Response: Concur. Not later than December 13, 2024, the CHO will direct the DASD(H), in collaboration with the MilDeps and DoD Comptroller, to develop a plan of action and milestones to correct deficiencies in the condition of DoD government-owned and government-controlled UH. These efforts will build upon the DoD UH Tiger Team's progress in developing new policies and standards to address the quality of life for Service members living in barracks and dormitories.

Recommendation 5: The CHO direct the DASD(H), in coordination with the MilDeps and the DoD Comptroller, to perform an assessment and document the feasibility of alternatives for the future management of funding for government-owned and government-controlled UH, such as the expansion of UH privatization, separate appropriations, and funding targets with accountability standards.

Response: Concur. Not later than September 20, 2024, the CHO will direct DASD(H), in coordination with the MilDeps and DoD Comptroller, to perform an assessment and document the feasibility of alternatives for the future management of funding for government-owned and government-controlled UH.

Please contact [REDACTED] if additional information is required.



William A. LaPlante

Acronyms and Abbreviations

AFB	Air Force Base
ASD(EI&E)	Assistant Secretary of Defense (Energy, Installations, and Environment)
ASD(R)	Assistant Secretary of Defense (Readiness)
CHO	Chief Housing Officer
DASD(Con)	Deputy Assistant Secretary of Defense (Construction)
DASD(H)	Deputy Assistant Secretary of Defense (Housing)
DoDI	DoD Instruction
DoDM	DoD Manual
DoD OIG	DoD Office of Inspector General
eMH	Enterprise Military Housing
FH	Family Housing
GO-GC	Government-Owned, Government-Controlled
JBAB	Joint Base Anacostia–Bolling
JBLM	Joint Base Lewis–McChord
MCBQ	Marine Corps Base Quantico
MHPI	Military Housing Privatization Initiative
MHO	Military Housing Office
MILDEP	Military Department
NBSD	Naval Base San Diego
NDAA	National Defense Authorization Act
ODASD(H)	Office of the Deputy Assistant Secretary of Defense (Housing)
OSD	Office of the Secretary of Defense
SecDef	Secretary of Defense
UH	Unaccompanied Housing
USD(A&S)	Under Secretary of Defense for Acquisition and Sustainment
USD(P&R)	Under Secretary of Defense for Personnel and Readiness

Glossary

DoD housing. Family and unaccompanied housing that the DoD owns, leases, obtains by permit, or otherwise acquires. This is also referred to as “Government-controlled housing.” It does not include privatized housing.

Family members. Persons who make up a Service member’s “family.” See also “dependent,” which can be used as a preferred term when appropriate.

Family. Comprised of a member of the Military Services, DoD civilian, or DoD-sponsored civilian and dependents, or of a member married to a member. Families are eligible to occupy military family housing.

Military housing. DoD housing and privatized housing.

Privatized housing. Military family or military unaccompanied housing acquired or constructed by an eligible entity pursuant to the military housing privatization initiative (MHPI) legislation. This housing may be located on Government property leased to the entity, typically for 50 years. This housing is not DoD-owned, but is one of the housing choices available to Service members. Privatized housing can be located on or near military installations within the United States and its territories and possessions.

Unaccompanied Housing. Military housing for unaccompanied personnel, for both enlisted and officers, and for permanent party members, trainees, and students.

Unaccompanied personnel. Personnel who either have no dependents or who are geographically separated from all dependents.



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