

United States Department of Defense

AGENCY FINANCIAL REPORT

FISCAL YEAR 2014

OTHER INFORMATION





OTHER INFORMATION

MANAGERS' INTERNAL CONTROL PROGRAM

The Department's management has a fundamental responsibility to develop and maintain effective internal controls to ensure Federal programs operate and Federal resources are used efficiently and effectively to achieve desired objectives. As discussed in the Management's Discussion and Analysis, managers throughout the Department are accountable for ensuring effective internal controls in their areas of responsibility. All DoD Components are required to establish and assess internal controls for financial reporting, mission-essential operations, and financial management systems.

Management-identified weaknesses are determined by assessing internal controls, as required by the FMFIA, the <u>Federal Financial Management Improvement Act</u> (FFMIA), and <u>OMB Circular No. A-123</u>, and fall into one of the following three categories:

- 1. FMFIA Section 2, Financial Reporting Material Weaknesses (see Table 2a, with detail in Table 2a-1).
- 2. FMFIA Section 2, Non-Financial Operations Material Weaknesses (see Table 2b, with detail in Table 2b-1).
- 3. FMFIA Section 4, Financial System Nonconformance Weaknesses (see Table 2c, with detail in Table 2c-1).
- 4. FFMIA, Compliance with Section 803(a), FFMIA.

Table 1. DoD IG-Identified Material Weaknesses in Internal Controls Over Financial Reporting									
Audit Opinion: Disclaimer									
Restatement: No									
Areas of Material Weakness	Beginning Balance	New	Resolved	Consolidated	Ending Balance				
Accounts Payable	1				1				
Accounting Entries	1				1				
Environmental Liabilities	1				1				
Government Property in Possession of Contractors	1				1				
Intragovernmental Eliminations	1				1				
Operating Materials and Supplies	1				1				
Reconciliation of Net Cost of Operations to Budget	1				1				
Statement of Net Cost	1				1				
Financial Management Systems	1				1				
Fund Balance with Treasury	1				1				
General Property, Plant & Equipment	1				1				
Inventory	1				1				
Accounts Receivable	1				1				
Total Material Weaknesses	13				13				

SUMMARY OF MANAGEMENT ASSURANCES

1. FMFIA SECTION 2, FINANCIAL REPORTING MATERIAL WEAKNESSES. Under the oversight of the DoD Financial Improvement Audit Readiness (FIAR) Governance Board, discussed in the FIAR Plan Status Report, the Department's assessment of the effectiveness of its internal controls over financial reporting identified 17 areas of material weakness in FY 2014. Table 2a lists the material weaknesses in internal controls over financial reporting, captured by end-to-end process and the assessable unit for the material weakness, and incorporates changes from the weaknesses reported in the DoD Agency Financial Report for FY 2013.

Table 2a. Summary of DoD-Identified Material Weaknesses in Internal Controls over Financial Reporting (FMFIA Section 2)									
Statement of Assurance: No assurance									
End-to-End Process	Areas of Material Weakness	FY 2014 Beginning Balance	New	Resolved	Consolidated	Reassessed	FY 2014 Ending Balance		
	Fund Balance with Treasury (FBWT)	1					1		
Budget-to-Report	Financial Reporting Compilation	1					1		
	Intragovernmental Eliminations	1					1		
	Health Care Liabilities	1					1		
Hire-to-Retire	Civilian Pay	1					1		
	Military Pay	1					1		
Order-to-Cash	Accounts Receivable	1					1		
	Contract/Vendor Pay	1					1		
Procure-to-Pay	Reimbursable Work Orders (Budgetary)	1					1		
Procure-to-Pay	Transportation of Things	0	1				1		
	Transportation of People	1					1		
	Financial Reporting of Valuation of Equipment	1					1		
Acquire-to-Retire	Real Property Assets	1					1		
	Environmental Liabilities	1					1		
	Inventory	1					1		
Plan-to-Stock	Operating Materials & Supplies (OM&S)	1					1		
	Military Standard Requisitioning and Issue Procedures (MILSTRIP)	1					1		
Total Financial Ro Weaknesses	eporting Material	16	1				17		

Table 2a-1 provides a brief description of each of the material weaknesses in financial reporting, with corrective actions and the target correction year.

Table	Table 2a-1. Brief Description of Material Weaknesses in Internal Controls over Financial Reporting								
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year				
1	Fund Balance with Treasury (FBWT) Ineffective processes and controls to reconcile transactions posted to the Department's FBWT accounts with the Department of Treasury's (Treasury) records. Collections and Disbursements are reported to Treasury but are not recorded in the Department's general ledger. Ineffective processes to provide sufficient and accurate documentation to support FBWT transactions and reconciling items.	FY 2005	Department-wide	Track and reconcile collection/disbursement activity from the core financial systems and associated feeder systems to the Department's general ledgers and to Treasury accounts. Develop an auditable FBWT reconciliation process, to include implementation of internal controls that ensure reconciling differences are resolved in a timely and accurate manner.	FY 2015				
2	Financial Reporting Compilation Ineffective processes and controls to prepare accurate financial statements supported by general ledger balances that align with Department strategic and performance plans. Inability to reconcile detaillevel transactions with the general ledgers and to provide adequate supporting documentation for adjustment entries. Accounting balances are unsupported due to inadequate financial management systems and related processes and procedures. Inconsistent procedures for recording Journal Vouchers and Standard Business Transactions (SBT) and retention procedures to ensure maintaining of proper supporting documentation.	FY 2007	Department-wide	 Implement a Standard Financial Information Structure (SFIS) to standardize financial reporting that aligns with the Department's mission. Implement controls that ensure adequate documentation exists to validate and support journal entries. Develop controls, processes, and policy and procedures that include the reconciliation of the Defense Agency Initiative (DAI) Trial Balance to the financial statements. Identify root causes for abnormal balances on the Report on Budget Execution and Budgetary Resources (Standard Form-133s) and develop mitigating internal controls. 	FY 2015				

Table	able 2a-1. Brief Description of Material Weaknesses in Internal Controls over Financial Reporting						
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year		
3	Intragovernmental Eliminations Ineffective processes and controls to collect, exchange, and reconcile intragovernmental buyer and seller transactions, resulting in unsupported adjustments. Inability to provide valid and complete supporting documentation in a timely manner.	FY 2008	Department- wide	Implement enterprise resource planning (ERP) systems and SFIS structure to correctly report, reconcile, and eliminate intragovernmental balances. Identify and implement reconciliations that provide for validation of the seller/buyer transactions. Implement controls to ensure adequate documentation exists to validate and support journal entries.	FY 2017		
4	Health Care Liabilities Insufficient financial reporting and accounting for all health care costs and the lack of processes to reconcile Medical Expense and Performance Reporting System data.	FY 2003	Department- wide	 Complete the implementation of new Enterprise Resource Planning (ERP) core financial systems for each Service in order to record accrual-based, patient-level cost accounting data. Develop and implement methodology for per capita rate to address the auditor identified weakness related to direct care. 	FY 2017		
5	 Civilian Pay Ineffective processes and controls to record civilian pay transactions and personnel actions in a timely, complete, and accurate manner. This includes unreliable supporting documentation for personnel actions and timekeeping, and inadequate reconciliations between Defense Civilian Pay System (DCPS) and the general ledger. 	FY 2011	Department-wide	Evaluate the sufficiency of the current SSAE 16 efforts. This includes determining whether the assessment includes all complete end-to-end processes. Develop and implement a methodology to reconcile DCPS to the general ledger. Implement controls to ensure supporting documentation exists, is reviewed, approved, validated, retained, and readily available.	FY 2015		

Tabl	e 2a-1. Brief Description of Ma	aterial Weak	nesses in Intern	al Controls over Financial Repor	ting
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year
6	Military Pay Ineffective processes and controls to record military pay transactions and personnel actions in a timely, complete, and accurate manner. This includes unreliable supporting documentation for personnel actions, and lack of reconciliations between Defense Joint Military Pay System (DJMS) and the general ledger.	FY 2011	Department-wide	Implement control processes that ensure supporting documentation exists, is reviewed, approved, validated, retained, and readily available. Implement reconciliations to address the completeness of data entered into the Defense Joint Military Pay System.	FY 2015
7	Accounts Receivable Ineffective processes and controls to ensure complete and accurate recording and sufficient documentation to support accounts receivable and related accruals. Lack of proper accounting and reporting for accounts receivable collections.	FY 2003	Department-wide	 Implement ERP systems to improve collections of public accounts receivables, aging of receivables, and minimize manual processes. Implement process improvements, such as training, guidance, and policy changes. Develop documentation in sufficient detail to address the edit checks and validations performed. Utilize the Tri-Annual Review process to monitor the status of dormant reimbursable agreement receivables and unfilled orders. Reviews will evaluate timeliness, accuracy, and completeness for closeout when applicable. 	FY 2015
8	Contract/Vendor Pay No standard process or format governing purchase request development, linkage with contract data, and payment. Untimely contract closeout and deobligation of funds. Insufficient policies governing the recording of obligations and accruals.	FY 2003	Department- wide	Implement controls to validate receipt and acceptance. Implement training, guidance and management oversight. Develop interfaces between data standardization repositories.	FY 2017

Table	e 2a-1. Brief Description of Ma	aterial Weak	nesses in Intern	al Controls over Financial Repor	ting
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year
9	Reimbursable Work Orders Inability to reconcile Reimbursable Work Order buyer and seller balances/transaction details to field activity systems in a complete and timely manner. Lack of evidence to support receipt and acceptance of goods and services, and the validity of open obligations. Inability to verify the timely and accurate collection of disbursements, and validate that recorded reimbursable agreements meet the time, purpose, and amount criteria.	FY 2011	Department-wide	Implement controls to validate receipt and acceptance of goods and services. Implement training, improved guidance, and management oversight related to Tri-Annual Reviews. Develop interfaces between data standardization repositories and accounting systems of record.	FY 2017
10	 Transportation of Things No effective controls are in place to prevent unauthorized use of Transportation Account Codes (TAC) or unauthorized shipments from occurring. The Department does not have standardized processes and procedures for Transportation of Things to support management evaluations, examinations, and audits. 	FY 2014	Navy	 Develop controls, processes, and policy and procedures for Transportation of Things. Implement control processes that ensure supporting documentation exists and is adequately reviewed, approved, and retained. 	FY 2017
11	Transportation of People Inadequate controls over transportation of people processes. This includes inadequate segregation of duties, lack of reconciliations, and untimely voucher filing.	FY 2011	Department- wide	 Develop plans to address segregation of duties internal control issues within the transaction system due to overlapping permission-level assignments, as well as demonstrating effective information technology general and application controls. Monitor open travel obligations and enforce supervisory review to ensure timely submission of travelers' vouchers. 	FY 2017

Tabl	Table 2a-1. Brief Description of Material Weaknesses in Internal Controls over Financial Reporting							
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year			
12	Financial Reporting of Valuation of Equipment Ineffective processes and controls to account for quantity and value of military and general equipment.	FY 2003	Department-wide	 Continue efforts to ensure that assets are recorded in the appropriate Accountable Property System of Record and can be reconciled to the general ledgers. Apply controls and procedures to manage equipment accountability, including adequate documentation to support ownership. Re-emphasized the importance of valuation by having the Services report progress and impediments quarterly. Report quarterly on progress in establishing accountable records for all GFP assets, correcting policy deficiencies, and ensuring controls are in place when property is furnished on contracts. 	FY 2017			
13	Real Property Assets Ineffective processes and controls to account for the quantity and value of real property. Inaccurate and untimely recording of transactions when construction in progress is transferred to real property accounts. Inadequate real property documentation.	FY 2003	Department- wide	 Implement business processes and management controls to reconcile real property records, and to ensure assets exist and records are complete. Implement periodic evaluations over the quality of real property data by making comparisons with physical assets and annual reconciliations. 	FY 2017			
14	 Environmental Liabilities Inability to provide assurance that clean-up costs for all of its ongoing, closed, and disposal operations are identified, consistently estimated, and appropriately reported. Unable to consistently report environmental liability disclosures and supporting documentation is not properly maintained and readily available for all environmental sites. 	FY 2001	Department- wide	 Implement systems, processes, and controls to ensure the accuracy of site-level liability data to report environmental liabilities. Develop "cost to complete" guidance and training procedures. 	FY 2016			

Tabl	e 2a-1. Brief Description of Ma	aterial Weak	nesses in Intern	al Controls over Financial Repor	ting
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year
15	 Inventory Insufficient policies and procedures to support inventory transactions, journal vouchers, and inventory valuation. Lack of clear audit trails to trace transactions from source documentation to the reported total dollar values on the Inventory line item on the financial statements. Lack of controls to provide assurance that inventory recorded in the financial statements exists and is complete. 	FY 2005	Department- wide	 Develop methodology and inventory condition code reports to support monthly journal vouchers (JV) related to inventory. Review all pre- and post-trial balance adjustments, determine reason for the adjustments, and trace to supporting documentation. Develop methodology to value inventory in the absence of historical costs. 	FY 2017
16	Operating Materials &Supplies (OM&S) Historical cost data is not maintained as required by Generally Accepted Accounting Principles (GAAP). Inability to perform and document annual physical inventories of OM&S and maintain clear audit trails to permit the tracing of transactions from source documentation. Government-owned/ Contractor managed inventory is not accounted for in DoD accountable property system.	FY 2005	Department-wide	 Document business and financial processes and controls to include tracking inventory values to historical cost. Develop interim auditable solution for Government owned/Contractor managed inventory. Identify and document the current inventory reconciliation processes, including key controls and financial transactions. 	FY 2017
17	Military Standard Requisitioning and Issue Procedures (MILSTRIP) Insufficient documentation of business and financial processes and controls to include transactions not accurately reconciled to the financial management systems of record and ineffective reconciliation process for unliquidated obligations (ULO).	FY 2013	Navy	Document business and financial processes to identify root causes, review and prioritize Federal Information System Controls Audit Manual (FISCAM) control testing, and ensure a comprehensive ULO reconciliation process.	FY 2015

2. FMFIA Section 2, Non-Financial Operations Material Weaknesses. The DoD Components use an entity-wide, risk-based, self-assessment approach to establish and assess internal controls for mission-essential operations. The material weaknesses in non-financial operational areas are categorized in separate reporting categories.

Table 2b lists the FY 2014 material weaknesses in the internal controls over non-financial operations. The Department did not identify any new material weaknesses in operations in FY 2014; however, the Department consolidated the Areas of Material Weaknesses to comply with OMB Circular A-136, *Financial Reporting Requirements*.

Statement of Assurance: Qualified									
Area of Material Weakness	Beginning Balance	New	Resolved	Consolidated ⁸	Reassessed	Ending Balance			
Acquisition	1					1			
Security	3			2		1			
Information Technology	1					1			
Comptroller and/or Resource Management	3			2		1			
Contract Administration	2			1		1			
Force Readiness	1					1			
Personnel and/or Organizational Management	3			2		1			
Property Management	1					1			
Supply Operations	1					1			
Total Non-Financial Operations Material Weaknesses	16			7		9			

⁸ Per OMB's revised Circular No. A-136, Financial Reporting Requirements, the column titled "Consolidation" has been added to Table 2b. This column represents the number of Department-wide material weaknesses from the beginning balance reported from preceding years and consolidated.

Table 2b-1 provides a brief description of each of the nine material weaknesses in internal controls over non-financial operations, the associated corrective actions, and the target correction year provided by the reporting Components.

Table 2b-1.	Brief Description,	DoD-Identified Materia	al Weaknesses in	Internal Controls	Over Non-Financial
Operations					

Орс	rations				
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year
1	Acquisition				
	DoD continues to experience program cost and schedule increases in its Major Defense Acquisition Program Portfolio Knowledge-based acquisition practices have not been consistently implemented across the acquisition portfolio.	FY 2011	Department- wide	Continue development and implementation of Better Buying Power initiatives designed to improve the operation of the defense acquisition system and enhance the skill of the acquisition workforce. Issue revised acquisition policy that implements key BBP initiatives and improves system performance.	Reassessed Annually based on Incremental Improve- ments
2	Security				
	There are weaknesses in DoD's management and assurance of the reliability and security of information technology infrastructures. Personally Identifiable Information (PII), which consisted of sensitive employee information, was improperly disposed of in recycle bins. Lack of effective oversight of Security Managers regarding Common Access Card (CAC) retrieval, which potentially lead to an inadvertent compromise of sensitive information.	FY 2006	Department-wide	 Develop and implement a uniform equipment request and loan tracking system for managing and tracking information. Create baseline metrics and define security administration compliance for information, personnel, and industrial security programs. Develop enhanced Ethics and Security Awareness training at all levels to ensure that personnel are trained to prevent the compromise of classified information. 	FY 2015
3	Information Technology				
	DoD financial and business management systems and processes are costly to maintain and operate, are not fully integrated and do not provide information that is reliable, timely, and accurate.	FY 2010	Department-wide	Complete relevant FISCAM testing, implement process standardization, and ensure compliance with information systems requirements in order to achieve FISCAM control objectives.	FY 2017

Table 2b-1. Brief Description, DoD-Identified Material Weaknesses in Internal Controls Over Non-Financial Operations

	rations Material Weaknesses	Year	DoD	Corrective Actions	Target Correction
	Material Weakilesses	Identified	Components	Our ective Actions	Year
4	Comptroller and Resource Management				
	 DoD's current business processes, policies and internal controls do not provide reliable, accurate and verifiable financial statements. The financial management workforce lacks adequate training in all financial management-related functions and the implementation of effective financial management processes, and procedures. Funds control process weaknesses resulted in the inability to adequately track funds consistent with existing laws and regulations. The lack of adequate funds control led to several Anti Deficiency Act violations. 	FY 2011	Department-wide	 Implement established guidance to enable Components to improve their processes, systems, and controls. Conduct competency gap analyses of current and expected future financial management workforce and develop training programs and guidance for strategic workforce planning. Enhance systems for tracking funds, publishing guidance, and scheduling training for personnel who perform funding-related functions. 	FY 2017
5	Contract Administration				
	 DoD must strategically manage services acquisition (SA), define outcomes, and capture data to do so. DoD continues to face challenges meeting FY competition goals and needs to address ill-suited contract arrangements as well as utilize incentives. Acquisition workforce needs to be appropriately sized, trained and equipped to meet the Department's needs. 	FY 2009	Department-wide	 Adopted standard taxonomy for services, appointed senior managers for acquisition of services in each Military Department, appointed Functional Domain Experts, goals established within 12 Services Portfolio Groups and monitor progress. Established Functional Integrated Product Team (SA FIPT). Better Buying Power 2.0 initiatives to boost competition are on-going such as quarterly MilDep briefings at the Business Senior Integration Group meetings, sharing best practices, etc. DoD achieved FY 14 competition rate of 58.7% against the goal of 58.0%. 	Reassessed Annually based on Incremental Improve- ments

Table 2b-1. Brief Description, DoD-Identified Material Weaknesses in Internal Controls Over Non-Financial Operations

Opo	perations										
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year						
	Contract Administration (cont'd)			Deployed Contracting Competency Assessment to assess proficiencies of workforce. Results will be used for workforce planning and training forecasts.							
6	Force Readiness										
	There is a lack of diversity within the Sea, Air, and Land (SEAL) Special Operations Forces which indicates a potential operational weakness. The Global War on Terrorism identified the need for an operational need for SEALs with diverse backgrounds. USTRANSCOM did not conduct quarterly Joint Patient Movement Expeditionary System (JPMES), which potentially hinders USTRANSCOM personnel from deployment readiness during Defense Security Cooperation Agency (DSCA) and other contingency events.	FY 2011	Department-wide	Implement diversity outreach initiatives that will review outreach and awareness activities to ensure that the Special Operations Forces is recruiting candidates with diverse backgrounds and skills. Finalize training plans for JPMES and conduct quarterly training exercises.	FY 2018						
7	Personnel and/or Organizational Management										
	DCMA did not prioritize and execute skills-based, on-the-job training that provided its employees with the competencies and practical skills needed to execute their job duties. The Department identified multiple inconsistencies in time keeping procedures.	FY 2009	Department-wide	Develop Defense Acquisition University (DAU) accredited courses and on-line learning assets to enhance the skills of the DCMA workforce. Implement a plan to address time and attendance issues, and conduct inspections of Command directorates to determine whether they are in compliance with time and attendance guidance.	FY 2016						

Table 2b-1. Brief Description, DoD-Identified Material Weaknesses in Internal Controls Over Non-Financial Operations

	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year
8	Property Management				
	The Department has not effectively trained staff or enabled sufficient tools to address accountability requirements in place to adequately oversee and execute personal property transactions, including government furnished property in the hands of contractors.	FY 2011	Department- wide	 Establish procedures and training on property management policies. Validate accountable property records and supporting documentation through existence and completeness testing. Establish accountable records that will identify property, to include Government Furnished Property. 	FY 2016
9	Supply Operations				
	The Government Accountability Office identified Department-wide weaknesses in the areas of asset visibility, inventory management, and materiel distribution.	FY 2011	Department- wide	Improve Supply Chain Management operations through better demand forecasting, asset visibility, and distribution processes.	Reassessed Annually based on Incremental Improve- ments

3. FMFIA SECTION 4, FINANCIAL SYSTEM NONCONFORMANCE WEAKNESSES. The Department requires financial system conformance with federal requirements and reports. The Department reported one weakness that includes a wide range of pervasive problems related to financial systems.

Table 2c. Conformance with Financial Management System Requirements (FMFIA Section 4) Statement of Assurance: Systems do not conform to financial management system requirements Beginning **Ending** New Consolidated **Non-Conformances** Resolved Reassessed Balance **Balance** 1. Financial Management 1 1 Systems **Total System Conformance Material** 1 1 Weaknesses

Table 2c-1, below, provides the description and corrective action plan for the material weakness related to internal control over financial systems.

Tal	Table 2c-1. Brief Description, Internal Control over Financial Systems Material Weakness										
	Material Weaknesses	Year Identified	DoD Components	Corrective Actions	Target Correction Year						
1	Financial Management Systems: The Department's financial systems were originally developed to meet the requirements of budgetary accounting and do not provide the capability to record costs and assets in compliance with current accounting standards. Improvements to the current systems environment are complicated by the use of and reliance upon many mixed systems that are not well integrated.	FY 2001	Department-wide	DoD Components have embarked on an effort to implement a compliant, end-to-end financial management system, anchored by ERPs that provide the core financial system as well as replacing many of the mixed (feeder) systems.	FY 2017						

FEDERAL FINANCIAL MANAGEMENT IMPROVEMENT ACT (FFMIA)

The DoD IG and the audit agencies within the Military Services have reported on the Department's noncompliance with FFMIA. The Department's noncompliance is due to its reliance upon legacy financial management systems by the various Components. These legacy financial systems, for the most part, do not comply with the wide range of requirements for systems compliance, in accordance with FFMIA and therefore do not provide the necessary level of assurance that the core financial system data or the mixed systems information can be traced to source transactional documentation. Table 2d reflects the Department's compliance with FFMIA.

Table 2d. Compliance with Section 803(a) of FFMIA									
	Agency	Auditor							
1. System Requirements	Lack of substantial compliance noted	Lack of substantial compliance noted							
2. Accounting Standards	Lack of substantial compliance noted	Lack of substantial compliance noted							
3. U.S. Standard General Ledger at Transaction Level	Lack of substantial compliance noted	Lack of substantial compliance noted							

IMPROPER PAYMENT AND PAYMENT RECAPTURE PROGRAMS

As previously discussed in the Management Discussion and Analysis section, beginning in 2002 Congress enacted legislation⁹ (collectively referred to as IPERA in this report) to help ensure Federal entities have strong financial management controls to better detect and prevent improper payments, and to report on these programs to the President and Congress in the annual Agency Financial Report. The Department's improper payments and payment recapture programs are reported in this section in the following subcategories:

- I. Risk Assessment
- II. Statistical Sampling Process
- III. Root Causes of Errors and Corrective Actions
- IV. Program Improper Payment Reporting
- V. Recapture of Improper Payment Reporting
- VI. Accountability
- VII. Agency Information Systems and Other Infrastructure
- VIII. Statutory and Regulatory Barriers
 - IX. Additional Information
 - X. Agency reduction of improper payments with the Do Not Pay Initiative

The Department reports improper payments in the following six categories:

Military Health Benefits – Disbursed by Treasury for the Defense Health Agency (DHA)

Military Pay - Disbursed by Defense Finance and Accounting Service (DFAS)

Civilian Pay - Disbursed by DFAS

<u>Commercial Pay</u> (vendor and contract payments) – Disbursed by DFAS, the Navy, and the U.S. Army Corps of Engineers (USACE)

Military Retiree and Annuitant Benefit Payments - Disbursed by DFAS

Travel Pay - Disbursed by DFAS, the Army, the Navy, the Air Force, and USACE

The DFAS, USACE, and DHA are the primary disbursing components within the Department. The Army, Navy, and Air Force report on travel improper payments that are not disbursed by DFAS.

I. Risk Assessment¹⁰

DFAS. The DFAS performed a risk assessment of its disbursements using Office of Management and Budget (OMB) criteria contained in <u>OMB Circular No. A-123, Appendix C</u>, Management's Responsibility for Internal Control. The DFAS also monitors changes in programs associated with OMB-mandated criteria (for example, a large increase in annual outlays, regulatory changes, or newly-established programs) to track unfavorable trends to allow early implementation of corrective actions.

⁹ <u>Improper Payments Information Act of 2002</u> (IPIA), as amended by <u>The Improper Payments Elimination and Recovery Act of 2010</u> (IPERA) and <u>The Improper Payments Elimination and Recovery Improvement Act of 2012</u> (IPERIA)

Refer to detail at <u>Under Secretary of Defense (Comptroller) > Financial Management > Reports > Government-wide Improper Payment Reporting</u> for Reporting Component Risk Assessments.

USACE. The USACE risk assessments for travel and commercial payments address the effectiveness of internal controls, such as pre-payment reviews, to prevent improper payments as well as system weaknesses identified internally or by outside audit activities. The U.S. Corps of Engineers Financial Management System (CEFMS) provides internal system standards that adhere to U.S. generally accepted accounting principles, as well as process controls that provide the safeguards to monitor and ensure that pre-payment examination requirements are met. The USACE also monitors changes in programs to track trends and implement corrective actions, as necessary.

DHA. The DHA risk assessment process is managed through contracts with an external independent contractor (EIC) to provide an independent, impartial review of reimbursements and claims processing procedures used by DHA's care contractors. The EIC identifies improper payments resulting from the contractors' noncompliance with DHA payment/reimbursement policies, regulations, and contract requirements. The risk level of programs is evaluated based on results of these compliance reviews.

Navy. Because the Navy's FY 2013 reporting included only six months of data, the Navy determined that its commercial payment disbursements would be high risk for FY 2014, when an entire year of transactions could be reviewed.

II. Statistical Sampling Process¹¹

The primary disbursing Components use statistically valid sampling methods designed to meet or exceed OMB's requirements of 90 percent confidence level, plus or minus (±2.5) percentage points, to estimate and project the Department's annual improper payments for each payment type. The smaller disbursing Components normally perform 100 percent post-payment reviews or a full review of payments above a certain dollar threshold, with random sampling for lower-dollar payments. All Department sampling plans were approved by OMB in FY 2013, and updated plans for DFAS Commercial Pay, DHA Military Health Benefits, and USACE Travel Pay were submitted to OMB for FY 2014.

Military Health Benefits. The EIC compliance reviews include three sample types: a payment sample, to ensure payment accuracy by identifying underpayment and overpayments; a denied payment sample, to ensure proper claim denial; and an occurrence sample, to ensure the accuracy in reporting healthcare data, regardless of payment accuracy. Paid samples are conducted as a stratified random sample based on paid amounts; denied samples are conducted as a stratified random sample based on billed amounts; and occurrence samples are conducted as a simple random sample with no stratification.

 Payment Samples: Samples for paid claims include between 4 and 12 strata, depending on the composition of the claims in the universe. Mathematical formulas are used to identify optimal strata boundary points, and sample sizes are calculated to yield an estimate with a minimum of 90 percent confidence ± 2.5 percentage points.

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¹¹ Refer to detail at <u>Under Secretary of Defense (Comptroller) > Financial Management > Reports</u> for Reporting Components Statistical Sampling Plans.

- <u>Denied Payment Sample</u>: Denied payment samples are limited to claims with \$0 government payment. The denied payment sample is similar in design to the payment sample, but the denied sample is stratified based on billed amount because the paid amount for a denied claim is equal to \$0.
- Occurrence Samples: Occurrence samples are intended to monitor and evaluate the
 accuracy of TRICARE Encounter Data (TED) record coding, versus the accuracy of the
 payment, by the Third Party Payment Contractors (TPPCs). These records are
 selected using a simple random sample. A sample of up to 350 records is selected for
 each occurrence sample, and each record in the sample contains approximately
 90 data fields that are evaluated for accuracy. The results from occurrence samples
 are used to monitor data accuracy only and do not affect the improper payment error
 rates; however, TPCCs are required to correct any improper payments identified
 during occurrence reviews.

The DHA continually evaluates the accuracy and design of its sampling methodologies for all contracts and implements revisions, if warranted by the distribution of audit universes or the outcome of compliance reviews. Based on recent GAO recommendation, DHA is reevaluating its sampling methodology for FY 2015 AFR reporting.

<u>Military Pay</u>. On a monthly basis the Department statistically samples Military Pay accounts stratified by Active Duty (Army, Navy, Air Force, and Marine Corps) and Reserve Components (Army Reserve, Army National Guard, Navy Reserve, Air Force Reserve, Air National Guard, and Marine Corps Reserve). The DFAS selects the accounts for each Component to review, and DFAS produces annual estimates of improper payments.

<u>Civilian Pay.</u> On a monthly basis, DFAS statistically samples Civilian Pay accounts stratified by Army, Air Force, Navy/Marine Corps, and Defense Agencies.

Commercial Pay

DFAS. In FY 2014, DFAS refined its statistical sampling methodology for the Commercial Pay program to incorporate GAO and DoD OIG recommendations. The agency assessed the risk of improper payments computed within the entitlement systems. Seven systems ¹² were identified as "at risk" of making improper payments based on historical post-payment and self-identified reviews, and the volume of outlays. These seven systems cover approximately 94 percent of the Commercial Pay program outlays.

The DFAS designed a stratified random sample by dollar amount to consider the wide-range of amounts within each of the seven contract and vendor pay systems. The overall variable sample size was calculated for the combined systems to produce a point estimate with a 95 percent confidence interval and a margin of error of ± 2.5 percent, and was allocated to each stratum with the Neyman Allocation method. Samples were randomly selected using the SPSS statistical software from the seven systems as a whole. Each invoice within the stratum had an equal probability of selection.

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¹² Computerized Accounts Payable System for Windows (CAPS), Defense Agencies Initiative (DAI), Enterprise Business System (EBS), General Funds Enterprise Business System (GFEBS), Integrated Accounts Payable System (IAPS), Mechanization of Contract Administrative Services (MOCAS), and One Pay (ONEPAY).

The sampling framework, designed by DFAS statisticians and reviewed by the DFAS Internal Review office, addressed the GAO and DoD OIG audit recommendation. The sampling framework also was submitted to OMB, and no issues were noted.

Navy. The Navy samples the contract and vendor payment population for those payments computed in its Enterprise Resource Planning (ERP) system. The standardized sampling framework was developed by the Navy's Financial Management Office and approved by statisticians in the Navy's Center for Cost Analysis, as well as by OMB. Trained Navy financial management staff extract data from the ERP and provide payment samples to the Commands. The Commands then review these payments to ensure they are legal and proper.

USACE. The post-payment reviews were conducted using a statistically valid (95 percent confidence level, ±2.5 percentage points) sample taken from the entire USACE Commercial Pay universe. In addition, the USACE Finance Center (UFC) used pre-payment controls, post payment contract audits, and data mining to prevent and identify improper payments in Commercial Pay.

<u>Military Retiree and Annuitant Benefit Payments</u>. On a monthly basis, DFAS statistically samples military retirement payments stratified by the retired and annuitant pay accounts. The reviews for retired and annuitant pay include sampling drilling reserve units, retiree offsets, survivor benefit plans, transfers to/from the Temporary Disability Retired List to the Permanent List, and Veterans Affairs offsets. Special reviews continue for Combat Related Special Compensation, Concurrent Receipt of Disability Payment, daily payroll accounts, newly established accounts, and other targeted areas.

Travel Pay

The Department. The Department's travel payments include those computed, paid, and reported independently by the military services and other Defense agencies. Department travel, as depicted in Table 3 at the end of this section, represents the combined results of the review of DFAS-disbursed travel payments as well as non-DFAS-disbursed travel payments for Army, Air Force, and Navy.

The DFAS reports the largest portion of DoD's travel payments made by the Defense Travel System (DTS), and Windows Integrated Automated Travel System (WinIATS) for the Department of the Army and select Defense Agencies. On a monthly basis, DFAS statistically samples DTS travel vouchers stratified by Military Service and the aggregate of the Defense Agency vouchers. The DFAS also statistically samples monthly WinIATS travel vouchers, stratified by Army activity and type of payment, for both Temporary Duty Travel (TDY) and Permanent Change of Station (PCS).

USACE. The UFC processes USACE travel payments using the CEFMS and WinIATS. The payment population includes both TDY and PCS travel voucher reimbursements. All PCS and TDY vouchers over \$2,500 are 100 percent reviewed for accuracy. The remaining vouchers are statistically sampled at 95 percent confidence level, ± 2.5 percentage points.

III. Root Causes of Errors and Corrective Actions

Military Health Benefits. The DHA projects a 0.87 percent error rate for Military Health Benefits improper payments for FY 2014. The DHA's purchased-care contracts are designed to include payment accuracy performance standards for processing military health benefit claims. Specifically, if improper payments exceed the payment accuracy performance standard, as stipulated in TRICARE policy manuals, or exceed more stringent purchased-care performance standards, the contractors are subject to financial penalties. Conversely, and if a contract requirement, if the purchased-care contractor's improper payments fall below the DHA TRICARE policy requirement or unique contract performance standard(s), the purchased-care contractor may receive a financial incentive award.

Purchased-care contractor payment accuracy performance is analyzed during the EIC quarterly and semi-annual compliance reviews. In addition to these reviews, annual reviews are conducted on claims representing underwritten healthcare costs that are paid by the managed-care support contractors (MCSCs). Confirmed overpayments are projected to the sample universe, and the MCSCs are liable for the total extrapolated error amount.

For the past several years, purchased-care contractors have been held to payment accuracy performance standards with either contract financial penalties or incentives, depending on the contract type and requirement(s). This contract design encourages contractors to keep payment error rates as low as possible to avoid financial penalties, or to obtain increased contract financial awards. Actual error rates have been consistently less than one percent. This contract design, combined with numerous pre- and post-payment controls, effectively curtails improper payments by the Department's purchased-care contractors and ensures the Government's risk for improper payments in the military health benefits program is low.

The formula used to calculate the DoD improper payment rate for the military health benefits program was changed in FY 2014. Specifically, the error rate is calculated as a percent of dollars paid versus dollars billed, and the errors identified in random samples were extrapolated using a weighted formula. Accordingly, the FY 2013 error rate cannot be directly compared with prior years.

<u>Root Causes</u>. The primary reasons for payment errors in the Military Health Benefits program for this reporting cycle are:

- Incorrect pricing of medical procedures and equipment, 37 percent
- Lack of authorization or pre-authorization, required prior to receiving medical care,
 16 percent
- Cost-share/deductible miscalculations, 10 percent
- All other causes combined, 37 percent

<u>Corrective Actions</u>. The DHA purchased-care contractors are monetarily incentivized or dis-incentivized, through payment accuracy performance standards, to reduce and/or eliminate improper payments. The fewer improper payments the contractors make, the less money is deducted from their reimbursements.

Additionally, details of the EIC compliance reviews are shared with the purchased-care contractors, DHA Program Offices, purchased-care contract Contracting Officers, and Contracting Officer Representatives to coordinate appropriate corrective action plans with the respective purchased-care contractor.

- Upon completion of an EIC compliance review, respective contractors review results, formulate an action plan to mitigate future findings and derive a process to avoid future improper payments.
- If warranted, contractor claims processing systems are modified to meet the Department's healthcare policy, reimbursement, or benefit requirements.
- If there is the potential that additional healthcare claims were processed in error, special ad hoc reports are pulled and adjustment actions are taken as appropriate.

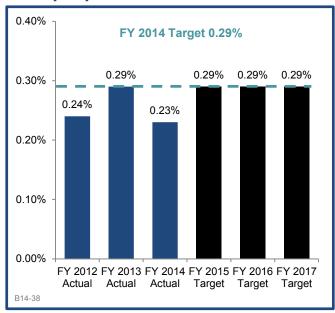
Each purchased-care contractor has its own business process for evaluating compliance review results and conducting root cause analyses to ensure the accuracy of future claims payment and developing internal corrective action plans. If required, DHA Contracting Officers and Contracting Officer Representatives issue contractor corrective action plans to

remedy and track noncompliance with TRICARE healthcare policy/regulations and purchased-care contract requirements.

Military Pay. As shown Figure 19, the Department estimates a 0.23 percent error rate in FY 2014 Military Pay, based on reviews and estimates from October 2013 through September 2014. Overpayments, which comprise 94 percent of the Military Pay improper payments, were not found in statistical sampling, but in debts established after a member has left the Military Service and through Active Duty debt collections reported by the Military Services.

Root Causes. The primary reason for recurring Military Pay errors is the high turnover in military payroll clerks. This

Figure 19. Improper Payment Rate – Military Pay1



primary reason is often the underlying cause of the next most common causes of Military Pay errors – the large amount of untimely or inaccurate information entered into pay systems, and administrative and documentation errors that occur during and between monthly pay periods (many Service Members are paid multiple times per month.) Entitlement changes, especially for deployed Service Members, can greatly change the amount due. Changes must be corrected in the following month's pay. Nonetheless, nearly 100 percent of improper payments for Military Pay are recovered when identified, or a collection action has been established to recover the amount.

The primary types of Military Pay improper payments result from administrative and documentation errors as described above. These entitlements are:

- Basic Allowance for Housing (50 percent) resulting from incorrect reporting of the entitlement.
- Base pay for Active Duty and incorrect Active Duty pay for Reservists (11 percent) resulting from incorrect reporting of the entitlement.
- Hostile fire/imminent danger pay (11 percent) resulting from incorrect reporting of the entitlement.
- Overseas Housing Allowance (6 percent) resulting from incorrect reporting of the entitlement.
- Family separation allowance, Active and Reserve, (6 percent) resulting from incorrect reporting of the entitlement.
- Miscellaneous categories, including results from underpayments, account for 16 percent of all improper payments. Miscellaneous categories include over 25 different entitlements.

<u>Corrective Actions</u>. Corrective actions taken include instituting more comprehensive training programs with standard desk procedures to provide a reference for new clerks. In addition, the Department, primarily through DFAS, advises the Military Services of the results of payment reviews and the associated root causes of the errors. The DFAS provides the Military Service financial managers with monthly reports on the results of statistical reviews, including the reasons for and dollar value of errors and year-to-date trends, to inform their training plans.

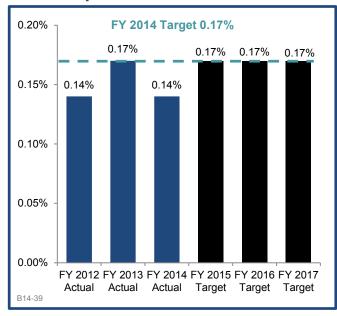
Independent public auditors performed a Statement on Standards for Attestation Engagement No. 16 (SSAE 16), completed June 2014, on the effectiveness of select internal controls for DFAS Military Pay and Disbursing Operations and issued an unqualified opinion with no material weaknesses identified.

<u>Civilian Pay</u>. As shown in Figure 20, the Department projects a 0.14 percent error rate for Civilian gross pay payments, primarily overpayments, for FY 2014.

Root Causes. The Civilian Pay improper payments primarily were caused by untimely or inaccurate entry of information into the pay systems.

- Time and attendance, 36 percent
- Overseas and other allowances,
 43 percent
- Late personnel actions,
 21 percent

Figure 20. Improper Payment Rate – Civilian Pay



The Defense civilian payroll systems, like most government payroll systems, base their time and attendance submissions on anticipated versus actual hours worked; therefore, the Department must correct overpayments and underpayments in a subsequent pay period.

Errors in overseas Civilian Pay accounts often occur due to payment of an entitlement that erroneously continued after the employee has returned to the United States. These improper payments often result from inaccurate personnel actions generated by human resources offices. Corrections subsequently are generated by human resource offices and transmitted to the civilian payroll system. These corrections result in re-computing pay and allowances and creating a collection (Accounts Receivable) action to offset the overpayment. The initial improper payments are discovered through various sources, such as agency reviews, bi-weekly exception reports, and employee or supervisor notification.

Corrective Actions

The DFAS continues to advise Components of the results of payment reviews and the associated reasons for errors that result in improper payments to civilian employees. The DFAS also advises Components on best business practices to prevent future improper payments and participates at various conferences to instruct personnel on how to correctly submit information to help prevent improper payments.

Independent public auditors performed a Statement on Standards for Attestation Engagement No. 16 (SSAE 16) on the effectiveness of select internal controls for DFAS Civilian Pay and Disbursing Operations, completed June 2014, and issued an unqualified opinion with no material weaknesses identified.

Commercial Pay

DFAS. The DFAS implemented an improved sampling methodology in FY 2014, stratified by invoice dollar amount, to conduct statistically valid reviews of invoices computed in the Mechanization of Contract Administrative Services (MOCAS) contract payment system, the DFAS legacy commercial pay systems (IAPS, ONEPAY, CAPS), and the Army (GFEBS) and Defense Agency Component ERPs (DAI and EBS.)

Based on the revised statistical sampling¹³ methods, the FY 2014 total estimated commercial improper payments is \$2.9 million, with a 95 percent confidence interval between \$2.8 million and \$3.1 million, and an estimated 0.001 percent error rate. The DFAS also collects data on contractor-identified improper payments and regularly performs analyses to inform its preventative efforts.

<u>Root Causes</u>. The majority of errors in Commercial Pay improper payments are caused by vendor billing errors. Improper payments identified from quarterly random sample reviews include:

- Voucher Examiner Error No deduction taken from the invoice to offset progress payments, 28 percent;
- Vendor Billing Errors, 28 percent;
- Interest penalties, 28 percent (underpayments);

¹³ Refer to detail at <u>Under Secretary of Defense (Comptroller) > Financial Management > Reports</u> for Reporting Components Statistical Sampling Plans.

- Overpayment Entitlement Errors, 14 percent; and
- Miscellaneous errors, 2 percent.

<u>Business Activity Monitoring (BAM) Tool</u>. Using the BAM tool, DFAS identifies and prevents improper payments in DoD's five largest commercial payment systems, which includes MOCAS, CAPS-Windows, IAPS, One-Pay, and EBS. These systems account for 87 percent of all DoD commercial payment dollars. The DAI and GFEBS ERPs initially did not feel BAM would be cost-effective. Recently, the Army requested an overview to determine if BAM would prove helpful for GFEBS at a reasonable price.

Since the Department rolled out BAM in August 2008, pre-payment reviews have prevented more than \$8.4 billion in improper payments. Ongoing payment error analyses allow for the continual enhancement of BAM logic and improved disbursement accuracy.

This year, DFAS refined or developed new system edits (also called integrity checks) to improve BAM's ability to identify improper payments before disbursement. Some examples of the success of these new edits and integrity checks in preventing improper payments in FY 2014 include:

- A Wrong Vendor Paid enhancement that detected over \$12 million in potential improper payments.
- A modification to the Invoice Outlier (unexpected result) edit broadened the ability to detect potential overpayments. Since July 2013, over \$52 million in potential improper payments were identified that, without this modification, might not have been identified.

The DFAS identifies and monitors the root cause for all improper payments by researching supporting documentation and assigning an assessment (reason) code that identifies the type and cause of the improper payment. In addition, root causes of improper payments detected by BAM are reviewed and analyzed monthly and through other formal reviews. Root cause analysis is shared with the DFAS payment offices on a monthly basis and is used to identify areas for operational improvement. The information is also used to implement refinements to BAM and develop new integrity checks.

Corrective Actions. Corrective actions include:

- Ongoing training for pay technicians to increase their ability to compute and input accurately.
- The MOCAS contract input team initiated a new report that identifies contracts with recoupment rates that will receive a 100 percent review from a lead to ensure accurate input.
- Continued work with Contracting Officers to simplify contract terms and eliminate the need for manual calculations.
- The MOCAS front-end analysis team, which reviews high dollar invoices for accuracy, changed their process from sampling the entire population in queue to sampling the population that is getting ready to disburse. This change facilitates more focused reviews on areas of risk.

 Continued electronic commerce improvement initiatives, such as the automation of third party payments, aimed at minimizing manual intervention and improving quality.

The DFAS currently is adding Procedures Guidance and Instruction (PGI) data to enhance detection capability within MOCAS. The PGI is an initiative that created special payment instruction codes and fields. These new data elements present an opportunity for new integrity checks to be created within the BAM tool for MOCAS.

Another initiative to reduce improper payments includes outreach to reduce vendor billing errors caused by duplicate manual and electronic submission of invoices. In addition, the Department conducts manual reviews to ensure it meets all Certifying Officer Legislation requirements prior to certifying payment, such as ensuring proper documentation and correct payment amounts before disbursement.

Independent public auditors performed a Statement on Standards for Attestation Engagement No. 16 (SSAE 16) on the effectiveness of select internal controls for DFAS Contract Pay and Disbursing Operations and issued an unqualified opinion with no material

weaknesses identified (completed April 2014).

USACE. As shown in Figure 21, USACE projects a zero percent error rate in improper payments for Commercial Pay for FY 2014. The USACE functions as the real estate agency for the Department, responsibility for leasing office space military recruiters. This responsibility applies to small offices in rural and semi-rural areas as well as larger spaces in more urban areas.

Navy. The Navy projects a zero percent error rate in improper payments for Commercial Pay for FY 2014. Preventing, detecting, and correcting improper payments is a top priority for the Navy. The Navy's

Figure 21. Improper Payment Rate – USACE Commercial Pay



commitment to compliance with IPERA and its amendments include activities such as:

- Reconciling the payment universe to ensure all programs are captured for review.
- Reviewing programs to identify additional corrective actions to achieve reduction targets.
- Identifying and designating Senior Accounting Officials at the Military Service level for the Navy and the Marine Corps to oversee and report on their improper payment programs.

The Navy's continuing emphasis on accountability and integrity, at every level, underscores its commitment to achieve the goals set forth in IPERA. The Navy continues to report progress through monthly performance reviews with the Assistant Secretary of the Navy for Financial Management and Comptroller as well as through monthly financial operations metrics meetings with the OUSD(C) Deputy Chief Financial Officer.

Management has taken several additional steps to ensure its ERP adheres to IPERA requirements.

- Assigned responsibility for monitoring oversight of the Navy's IPERA Program.
- Identified Oversight Officials, responsible for preparing and updating the Navy's annual IPERA sampling plans, drawing monthly samples, and reviewing and monitoring IPERA test results.
- Issued desk procedures and provided training to staff that identifies step-by-step instructions on how to conduct IPERA reviews, and in the event that improper payments are identified, how to identify root causes and corrective actions to address them.
- Issued the Navy ERP Compliance Guide to the Commands in the Navy ERP in June 2013. The handbook defines and standardizes procedures associated with IPERA requirements.

Military Retirement. Based on FY 2014 reviews, DFAS projects a 0.03 percent error rate for improper payments in the Military Retirement program (refer to Figure 22), with almost the entire amount related to payments made to deceased retirees and annuitants.

Root Causes. Eligibility for military retired pay ends on the retiree's date of death. Prompt reporting of a deceased retiree's death can help avoid possible financial hardship to the Service Member's annuitant by expediting the correct calculation and processing of the monthly benefit. Family members or executors are required to return any overpayments of the decedent's military retired pay.

Figure 22. Improper Payment Rate – Military Retirement



The delay in notifying the payroll activity of the death of a Military Retiree results in unavoidable overpayments to deceased retirees. Our review of confirmed overpayments to deceased retirees in FY 2014 disclosed that the Department recovered approximately 96 percent of the overpayments within 60 days, demonstrating the effectiveness of controls within the retired pay system once the Department is notified of a retiree's death.

<u>Corrective Actions</u>. The Department's control processes to prevent, identify, and reduce overpayments to deceased retirees and annuitants include:

- Validating existence of retiree and/or annuitant, if living outside the United States.
- Annual certification of existence for all annuitants.
- Periodic, random certifications for retirees over a certain age.
- Validating military retiree's existence if payments are returned and/or if benefit account was suspended for several months due to bad check/correspondence address.

Early detection and data mining efforts, along with partnerships with other Federal and state entities, are used to detect improper payments. The Department takes a proactive approach to ensure the accuracy of Military Retiree payments by routinely comparing retired and annuitant payroll master file databases with the Social Security Administration's Death Master File, and periodically comparing records with the Office of Personnel Management's deceased files, Department of Veterans Affairs' database, and with individual states with sizable retiree and annuitant populations (e.g., Texas, California, and Florida). Payments for military retirees identified as deceased are suspended pending validation of death or validation of continued eligibility. The Department's expanded definition of acceptable source documents for notice of death has allowed DFAS to initiate earlier reclamation actions, thereby enhancing faster recovery of overpaid funds. Refer to the Do Not Pay discussion, later in this section, for discussion on the Department's use of the Social Security Death Master File.

Travel Pay.

Department. The Department projected a 7.0 percent error rate for travel improper payments for FY 2014, representing Military DTS trip records and WinIATS Temporary Duty (TDY) and Permanent Change of Station (PCS) vouchers for both civilians and military members, which are computed and disbursed by DFAS. In addition, the 7.0 percent error rate includes travel reimbursements disbursed outside of DFAS by the Army, Navy, and Air Force.

<u>DTS Root Causes</u>. The primary reasons for DTS improper payments are voucher input errors by the traveler and/or the approving official's failure to catch the error(s) before reimbursement occurs. The errors identified in the sample include:

- Per Diem (51 percent): The Department incorrectly reimbursed the traveler for lodging expenses without validating the claim with receipts, and/or reimbursed for meals at an incorrect rate.
- Reimbursable Expense (24 percent): Because of traveler mistakes when completing vouchers in DTS, the Department incorrectly reimbursed airfare, non-travel related expenses, and/or rental car expenses.
- Missing Documentation (25 percent): The Department reimbursed claimed lodging, airfare or rental car expenses that were not supported with a receipt.

<u>DTS Corrective Actions</u>. On a quarterly basis, DFAS provides the Defense Travel Management Office (DTMO) and DoD Components with error trend reports. The DFAS post-payment review personnel give presentations at various DTS training sessions and brief Senior Service executives on these post-payment review statistics, trends, and input errors. Any improper payments identified are forwarded to the appropriate Debt Management Monitor to establish a debt and recover the improper payment. Also, the Department has implemented a DTMO Compliance Tool, discussed in the Do No Pay discussion later in this section.

<u>WinIATS Root Causes</u>. The primary reasons for WinIATS improper payments are voucher input errors by the traveler and/or the approving official's failure to catch the error(s) before reimbursement occurs. The error types include:

- Per Diem (91 percent): Per diem/meals and incidental expenses and lodging paid at the incorrect rate, not at all, or when unauthorized.
- Reimbursable Expense (2 percent): Airfare, household goods storage, and lodging tax paid incorrectly or not at all.
- Other miscellaneous (7 percent).

<u>WinIATS Corrective Actions</u>. The DFAS implemented several steps to prevent improper payments, including:

- Post-payment reviewers meet monthly with Travel Pay operations personnel to discuss findings and preventative measures. Travel Pay examiner training programs, based on post-payment review findings and recommendations, are ongoing.
- Pre-payment validations and cross checks have been implemented to ensure the traveler was not previously reimbursed for the same trip through WinIATS or another travel system, therefore avoiding a duplicate payment.

USACE. The Army Corps Engineers reduced its Travel Pay error rate from 1.43 percent to 0.40 percent over the course of the past 12 months (refer to Figure 23). The USACE implemented refresher training for all approving officials and travelers, which dramatically impacted the error rate. Also, the USACE Finance Center (UFC) performs a 100 percent audit of all airline credits issued against travelers' individually billed travel card accounts. This ensures that all airline credits, issued as a result of flight changes, are properly recouped.

Figure 23. Improper Payment Rate – USACE Travel Pay



Root Causes. Travel Pay errors generally occur for two reasons:

- Travelers make mistakes when completing their travel vouchers.
- Approving Officials (AO) fail to properly review travel vouchers before approval.

<u>Corrective Actions</u>. The USACE continues to educate travelers and travel AOs through required training, including refresher training for seasoned travelers and AOs. Additionally, all AOs are required to complete fiscal law training every three years to maintain their certification eligibility.

When improper payments are identified, the UFC notifies the parties involved to determine the circumstances surrounding the error and to assist them in identifying business process improvements to prevent future recurrences. These areas are also covered thoroughly in refresher training.

HURRICANE SANDY

In FY 2013, the Department received approximately \$112.7 million for Hurricane Sandy-related repairs and assistance, which was distributed among the three Military Departments. The funds provided to both the Department and the U.S. Army Corps of Engineers (USACE) were rolled into programs that already were reporting improper payment estimates; therefore, no new sampling or estimation methodologies were required under <u>OMB Memorandum 13-07</u>, Accountability for Funds Provided by the Disaster Relief Appropriations Act.

The U.S. Army Corps of Engineers (USACE) – Civil Works received over \$5 billion for Hurricane Sandy-related repairs and assistance, and used transactional identifiers for commercial and travel payments related to these disaster-related disbursements to review all for accuracy. No improper payments were found related to the Hurricane Sandy travel and Commercial Pay disbursements.

 The USACE uses multiple processes to mitigate the risk of improper payments for all programs, including those associated with Hurricane Sandy. The USACE Financial Management System (CEFMS) provides internal system standards that adhere to Generally Accepted Accounting Principles (GAAP) as well as system and process controls

The USACE also uses post-payment recovery audit processes via data-mining to mitigate and recover improper payments. The USACE data-mining uses ten different scenarios to identify possible improper payments. Any items identified as a potential improper payment are reviewed for a final determination and recovery action initiated if improper. Post-payment audits/recoveries also are conducted via statistical sampling, 100 percent review, other audits/review, as well as through voluntary refunds and analysis.

IV. Program Improper Payment Reporting

Table 3 summarizes DoD's improper payment reduction outlook and total program outlays (payments) from FY 2013 through FY 2017.

	Table 3. Improper Payment Reduction Outlook																		
			FY 2013	}			F	Y 2014			FY 2	015 Estii	mate	FY 20	16 Estin	nate	FY 20	17 Estin	nate
Program	Outlays (\$B)	IP (%)	IP Over (\$M)	IP Under (\$M)	IP Total (\$M)	Outlays (\$B)	IP (%)	IP Over (\$M)	IP Under (\$M)	IP Total (\$M)	Outlays (\$B)	IP (%)	IP (\$M)	Outlays (\$B)	IP (%)	IP (\$M)	Outlays (\$B)	IP (%)	IP (\$M)
Military Health Benefits ^{1,2}	\$ 20.5	0.32	\$ 60.3	\$ 7.3	\$ 67.6	21.2	0.87	153.1	31.4	184.4	\$ 21.8	1.75	\$381.4	\$ 22.6	1.75	\$395.5	23.5	1.75	410.5
Military Pay ³	\$ 98.7	0.29	\$258.5	\$ 28.1	\$286.6	110.6	0.23	234.4	15.3	249.8	\$ 94.0	0.29	\$272.6	\$ 93.5	0.29	\$271.2	93.5	0.29	271.2
Civilian Pay ³	\$ 57.0	0.17	\$ 96.4	\$ 0.0	\$ 96.4	55.6	0.14	80.0	0.00	80.0	\$ 57.0	0.17	\$96.9	\$ 56.5	0.17	\$ 96.1	56.5	0.17	96.1
Military Retirement ³	\$ 56.6	0.04	\$ 19.9	\$ 0.01	\$ 19.9	56.5	0.03	19.3	0.07	19.3	\$ 43.5	0.04	\$ 17.4	\$ 44.1	0.04	\$ 17.6	44.1	0.04	17.6
DoD Travel Pay ^{4,5,7}	\$ 7.3	6.5	\$421.1	\$ 53.7	\$474.8	6.6	7.0	424.7	33.5	458.2	\$ 8.5	Note 7	Note 7	\$ 8.5	Note 7	Note 7	8.5	Note 7	Note 7
DFAS Commercial Pay ³	\$ 352.6	0.03	\$ 49.4	\$ 67.9	\$117.3	305.0	0.001	2.8	0.10	2.90	\$ 392.5	0.03	\$117.8	\$ 384.7	0.03	\$115.4	384.7	0.03	115.4
USACE Travel Pay	\$ 0.16	1.43	\$ 2.1	\$ 0.175	\$ 2.28	0.15	0.4	0.6	0	0.6	\$.15	1.0	\$1.5	\$ 0.15	1.00	\$1.5	\$0.15	1.0	\$1.5
USACE Commercial Pay	\$ 21.7	0.0	\$ 0.0	\$ 0.0	\$ 0.0	18.7	0	0	0	0	\$ 20.0	0.03	\$ 6.0	\$ 20.0	0.03	\$ 9.0	\$20.0	.03	0
Navy ERP Commercial Pay ⁶	\$1.2	0.0	\$0.0	\$ 0.0	\$ 0.0	4.4	0	0	0		\$ 4.5	N/A	N/A	\$ 4.5	N/A	N/A	\$4.5	N/A	N/A

- Note 1: DHA reports 12 months in arrears; therefore, FY 2014 reporting represents FY 2013 data. The error rate increase resulted from a small number of high-dollar claim errors assessed that significantly affected the annual error rate.
- Note 2: DHA now uses 1.75% as its out-year target because that is the new contractual performance standard. The FY 2015-2017 outlays estimates were calculated using the OMB CPI-U Annual Averages and Percent Change Table. As DHA reports 12 months in arrears the FY 2013 CPI-U medical percent change was used to calculate the FY 2014 outlay estimates, while the FY 2015 and 2016 medical percent changes were used to calculate the FY 2016 and 2017 outlay estimates respectively.
- Note 3: Out-year reduction targets for Mil Pay, Civ Pay, Mil Retirement, and DFAS Commercial Pay represent a continuation of the very low IP rates experienced in FY 2014.
- Note 4: DoD Travel Pay includes travel data from DFAS and for the Army, Navy, and Air Force for vouchers paid outside of DTS.
- Note 5: DoD Travel Pay represents DFAS and Navy travel vouchers settled from July 2013 through June 2014; Army and Air Force follow the normal fiscal year.
- Note 6: Since no improper payments were identified for FY 2014, out-year reduction targets are not applicable.
- Note 7: Modified out-year reduction targets are under development for DoD Travel Pay and will be included in the FY 2015 AFR.

V. Recapture of Improper Payment Reporting

Policy Compliance Tool. In December 2012, the Department established the Travel Policy Compliance Program, mandated by the National Defense Authorization Act for Fiscal Year 2012. Managed by the DTMO, the program was established to ensure travel claims do not exceed reasonable or actual expenses as well as to minimize inaccurate, unauthorized, overstated, inflated, or duplicate travel claims. The Travel Policy Compliance Tool, an automated application, reviews DTS travel vouchers in near real time and identifies potential improper payments. If a potential improper payment is identified, travelers and their Approving Official are notified via e-mail to either submit a corrected claim or explain why the claim is correct. Service administrators can run reports to review all identified errors and track corrections.

The DTMO Compliance Program not only ensures travel claims are paid in accordance with regulations and assists in recouping funds, but it also mitigates budget cuts for travel, improves post-pay audits, educates travelers and administrators on travel policy, and identifies travel trends, training needs, and opportunities for greater controls in the future.

Beginning in December 2012, a limited number of organizations from all four Military Services selectively used the Travel Policy Compliance Tool as part of a pilot that included three areas of inquiry. As of September 30, 2014, all DoD Components using DTS are actively using the Compliance Tool, and all DTS vouchers are being examined using the ten areas of inquiry. In FY 2014, as a result of all DoD Components using the tool, the pilot ended and the efforts transitioned to a full program.

As of September 30, 2014:

- \$8,062,602 in errors were identified.
- \$619,340 in payment errors were corrected without any funds due back to the Government.
- \$912,076 in errors were corrected and are awaiting collection.
- \$1,947,449 in errors were corrected and the funds have been recovered.

The DTMO has identified over 40 additional queries and currently is working to add these queries based on availability of funds. In addition to examining DTS vouchers, the Compliance Tool Program has expanded to include additional data sources, such as Government Travel Charge Card (GTCC) data, and is now comparing amounts claimed on vouchers with amounts charged on the GTCC to identify potential overpayments. As new data sources become available, they may be used to identify additional errors.

Use of the Compliance Tool provides a mechanism to greatly facilitate DoD's collections and improve our recovery rate for Travel Pay overpayments. In addition, funds recovered from prior years can be re-allocated for use in current year appropriations, in accordance with Public Law 111-204, The Improper Payments Elimination and Recovery Act of 2010.

DFAS. For the most part, the Department continues to use its internal staff and procedures to identify and recovery overpayments. The DFAS recovery percentages remain close to the 85th percentile, as required by OMB; therefore, it would not be cost-effective to contract with a private sector firm to perform this function, which although not paid with appropriated funds, would still cost the Department time and money in technical and other forms of contractor assistance. The DFAS has not used an external recovery audit firm, as it historically had not proven cost-effective. The use of the BAM tool on the front-end of commercial payment transactions continues to provide a successful means of both preventing improper payments and thereby reducing the need to pursue overpayment recoveries.

In compliance with IPERA, as well as the <u>Debt Collection Improvement Act of 1996</u>, the Department uses a number of other methods to prevent, identify, and collect improper payments. For example, DFAS has implemented a Centralized Offset Program to look across the Defense agencies for opportunities to offset debts within the first 90 days of delinquency. Once this deadline passes, DFAS transfers the debts to the Treasury Department, no longer waiting until day 180 as allowed by statute, to utilize all debt collection tools available earlier in the debt lifecycle to increase the likelihood of collecting the debt. During FY 2014, the Centralized Offset Program requested and confirmed 784 offsets totaling approximately \$14 million.

USACE. The UFC utilizes a data mining tool as part of its post-payment/payment recapture program. This tool searches for potential errors, such as duplicate, missing, or suspicious invoices, as well as specific types of recurring payments. There are ten scenarios built into the data mining tool, which searches 100 percent of all USACE commercial payments. The use of a data-mining tool complements the pre-payment system edits built into CEFMS. Payment safeguards include a requirement to match a receiving report with an invoice and thereby prevent use of duplicate invoice numbers for the same obligation.

DLA. The Defense Logistics Agency run a fuels tax recovery program that is not, strictly speaking, a recovery audit exercise; nonetheless, this program recovered about \$13 million in each of the last two fiscal years and predicts that FY 2014's recoveries will compare favorably with this figure. Tax recoveries fluctuate depending on changing tax laws and the amount of DLA's energy business.

DHA. The DHA uses a number of different mechanisms to prevent, identify, and collect improper payments, to include claims auditing by an EIC and internal DoD agencies for all private-sector payments. This process utilizes post-payment review techniques, performed internally and by external contractors, paid from the proceeds of recovered funds.

Contract payments comprise a large volume of transactions with high-dollar values; therefore, DHA is vigilant to ensure payment accuracy. In addition to the post-payment reviews, the DHA also utilizes various internal manual and automated prepayment initiatives to prevent overpayments and underpayments.

The DHA conducted a pilot study to evaluate its ability to identify and recover funds that are owed from private health care providers, resulting from overpayments that occurred as a result of secondary insurance payment errors. The pilot study will provide an accurate assessment of the potential recoveries and cost effectiveness if a full recovery audit is initiated, and will review ten of the largest-volume institutional providers. The pilot results indicated that this type of account review would be cost-effective, and a Request for Proposal may be issued in FY 2015.

Table 4 summarizes the recovery auditing identifications and collections for 2014.

	Table 4. Payment Recapture Audit Reporting															
Program	Type of Payment	Amount Subject to Review (CY)	and	Amount Identified for Recovery (CY)	Amount Recover- ed (CY)	% of Amount Recover- ed out of Amount Identified (CY)		% of Amount Outstanding out of Amount Identified (CY)	to be Collectab-			Amounts Recover- ed (PYs)	for Recovery	Cumulati- ve Amounts Recove- red	ng	ned Not
DTMO Compliance Tool ¹	DTS Travel	\$ 8.0B	\$ 8.0B	\$ 6.5M	\$ 1.95M	27%	\$ 4.2 M ²	60%	\$0.55M ³	7.0%	\$1.2M	\$140K	\$8.2B	\$2.1M	\$5.5M ⁴	\$675K
USACE ⁵	Contract Pay	\$ 18.7	\$ 18.7	\$ 0.0M	\$ 0.0M	N/A	\$ N/A	N/A	\$ 0.0M	0%	\$ 59.4M	\$ 59.4M	\$ 59.4M	\$ 59.4M	\$ 0.0M	\$ 0.0M

[&]quot;K" represents thousands; "M" represents millions; "B" represents billions.

Note 1: The Defense Travel Management Office's (DTMO) Compliance Tool began as a pilot in December 2012, and transitioned to full implementation, with all DTS organizations participating as of fiscal year end.

Note 2: Action not taken to correct \$3.5M as of September 30, 2014. Travelers were notified of \$600K in August and \$1.9M in September 2014.

Note 3: \$545K in errors were eliminated through voucher correction; therefore, no collection is necessary. Additionally, the amount identified for recovery was reduced from \$7.0M by the \$545K.

Note 4: \$1M of this amount is being collected through a repayment plan.

Note 5: USACE uses its Oracle data mining tool within CEFMS to perform recovery auditing on contract payments.

Table 5 summarizes DoD's annual targets related to its payment recapture audit efforts for FY 2014 through FY 2017.

	Table 5. Payment Recapture Audit Targets												
Program	Type of Payment	CY Amount Identified (\$M)		CY Amount Recovered (\$M)		CY Recovery Rate (Amount Recovered/ Amount Identified)	CY + 1 Recovery Rate Target	CY + 2 Recovery Rate Target	CY + 3 Recovery Rate Target				
DTMO (DTS)	Travel	\$	6.5M ¹	\$	1.95M	27.0%	40%	55%	85%				
USACE Commercial \$ 0.		0.0	\$	0.0	0.0%	100.0%	100.0%	100.0%					
Note 1: This fi	gure does not incl	ude th	e errors deter	mined	to not be ov	erpayments (\$545k	().						

Table 6 presents an aging schedule of overpayments collected outside of efforts of payment recapture audits.

Table 6. Aging of Outstanding Overpayments										
Program	Type of Payment	CY Amount Outstanding (0 – 6 Months) (\$M)	CY Amount Outstanding (6 Months – 1 Year) (\$M)	CY Amount Outstanding (Over 1 Year) (\$M)						
DFAS Commercial Pay	Commercial ^{1,2}	4.40	1.60	-						
Military Retirement Pension ² 1.50 -										
	Note 1: Figures based on overpayments identified and paid during FY 2013. Note 2: After 120 days, most debts are transferred to Treasury for collection.									

Table 7 presents a summary of how cumulative amounts recaptured have been used.

Table 7. Disposition of Recaptured Funds										
Program	Type of Payment	, , , , , , , , , , , , , , , , , , ,		Management Improvement	Original Purpose (\$M)	Office of Inspector General	Returned to Treasury			
USACE ¹	Commercial	\$20,000 per annum	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0			
DTMO (DTS) ²	Travel	Under Review	\$ N/A	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0			

Note 1: No overpayments identified; therefore, no funds recovered in FY 2014 using recovery auditing.

Note 2: No recoveries have yet been re-allocated.

Table 8 summarizes improper payments identified and recovered outside of payment recapture audits for the years 2004-2014.

Table 8. Overpayments Recaptured Outside of Payment Recapture Audits												
Source of Recovery	Amount Identified (CY)		Amount Recovered (CY)		Amount Identified (PY)		Amount Recovered (PY)		Cumulative Amount Identified (CY+PYs)		Cumulative Amount Recovered (CY+PYs)	
DFAS Commercial Pay ¹	\$	162.30M	\$	156.30M	\$	141.60M	\$	137.20M	\$	1.9B	\$	1.8B
Military Retirement ²	\$	19.30M	\$	17.80M	\$	19.90M	\$	18.30M	\$	281.90M	\$	263.40M
Military Pay ^{3 4}	\$	236.90M	\$	198.50M	\$	258.50M	\$	219.30M	\$	1.02M	\$	867.30M
Civilian Pay ³	\$	80.00M	\$	80.00M	\$	96.40M	\$	96.40M	\$	508.50M	\$	508.50M
DoD Travel Pay	\$	4.70M	\$	0.03M	\$	3.70M	\$	0.10M	\$	11.90M	\$	0.33M
USACE Commercial Pay ⁷	\$	5M	\$	5M								
USACE Travel Pay ⁵	\$	0.6M	\$	0.6M	\$	0.7M	\$	0.5M	\$	2.1M	\$	1.9M
Defense Health Agency (DHA) Health Benefits Contracts ⁶	\$	4.4M	\$	4.4M	\$	136.1M	\$	245.1M	\$	140.5M	\$	249.5M

[&]quot;M" represents millions. "B" represents billions.

- Note 1: Overpayments are based on the date payment was made or debt incurred. Prior year amounts shown in the OMB Max database do not reflect further collections or adjustments made in subsequent fiscal years.
- Note 2: FY 2014 amounts identified and recovered are based on 100 percent review of deceased retiree and annuitant accounts. Recoveries normally run 90 days behind; therefore, FY 2014 recoveries will not be completed until December 31, 2014.
- Note 3: In-service collection dollars are used as a proxy for recovery amounts because actual results from statistical reviews are negligible.
- Note 4: Recoveries provided in CY for Military Pay include out-of-service debt collections. Because debt recoveries are tracked for 12 months for AFR purposes, collections may not be realized until the end of FY 2015.
- Note 5: The balance of USACE Travel Pay recoveries are in the process of collection through salary offset or have been appealed to the Civilian Board of Contract Appeals for final determination.
- Note 6: DHA contract improper payments and recoveries are reported 12 months in arrears to accommodate its 100 percent post-payment review.
- Note 7: These recoveries resulted from self-identified overpayments, not a recovery auditing program.

VI. Accountability

The Under Secretary of Defense (Comptroller)/Chief Financial Officer is the Accountable Official for the Department and is responsible for ensuring that, to the greatest extent possible, all DoD disbursements are accurate.

Certifying Officer Legislation, <u>10 U.S.C. 2773a</u>, holds Certifying and Disbursing Officers accountable for government funds. In accordance with this law, pecuniary liability attaches automatically when there is a fiscal irregularity, i.e., (1) a physical loss of cash, vouchers, negotiable instruments, or supporting documents, or (2) an improper payment. This is further captured in the <u>DoD Financial Management Regulation (DoDFMR)</u>, <u>Volume 5</u>, <u>Chapter 33</u>, entitled "Certifying Officers, Accountable Officials, and Review Officials." The Department's efforts to recover overpayments from a recipient must be undertaken in accordance with the debt collection procedures outlined in the <u>DoDFMR</u>, <u>Volume 5</u>, <u>Chapter 28</u>, "Management and Collection of Individual Debt," and <u>DoDFMR</u>, <u>Volume 10</u>, <u>Chapter 18</u>, "Contractor Debt".

The DoD FMR contains other policies that specifically address Improper Payments (<u>DoDFMR Volume 4, Chapter 14</u>) and Recovery Auditing (<u>DoDFMR Volume 10, Chapter 22</u>). Beginning in Quarter 3, FY 2013, all reporting DoD Components were required to begin downloading their improper payment reports to the DFAS ePortal, as the Office of the Deputy Chief Financial Officer's Accounting & Finance Policy Directorate was designated as the Executive Agent to manage this information and its associated reporting requirements. This centralized electronic system allows the reporting Components to access improper payment information without regard to the time zone in which they are located. More importantly, it allows management to ensure all Components' submissions are timely and accurate.

Tracking Corrective Action Plan Progress. A new mechanism will be used beginning FY 2015 to track corrective action plan progress. The Financial Improvement and Audit Readiness (FIAR) Directorate uses a tool called the Notice of Findings and Recommendations Tracker, or NFR Tracker, to monitor audit readiness tasks and corrective actions. This tool provides a method to record corrective actions for each Improper Payment program, to set milestones and interim goals, and to monitor progress toward more long-term objectives. The tool will also be configured to notify officials, via e-mail, when milestone dates are approaching, and also will require a justification when a milestone or goal misses its deadline.

Because DoD Travel currently has the highest error rate among all DoD-reported programs, initial focus will be placed here to achieve measurable progress more quickly. The Department is very focused on reducing overall Travel spending; reducing improper payments and increasing recoveries is another way to reach that goal.

VII. Agency Information Systems and Other Infrastructure

The Department has much of the information and infrastructure needed to reduce improper payments. The Department uses the BAM tool and the Do Not Pay portal to identify potential improper payments prior to disbursement.

The Department's ongoing migration from a legacy system environment to new ERP systems presents a number of challenges and opportunities to prevent and detect improper payments. This migration also can enhance the Department's ability to improve its debt collection and recovery auditing abilities. The Department is addressing these areas both from a payment integrity as well as audit readiness perspective.

VIII. Statutory and Regulatory Barriers

The primary barriers in preventing improper payments in Military Pay are the statutory entitlements and regulatory monthly pay schedule. For DHA collections, there are contractual requirements that allow up to 270 days, instead of the standard delinquency deadline of 180 days, to be transferred to the Treasury under the Debt Collection Improvement Act of 1996.

IX. Additional Information

The Department is positioning itself to be fully compliant with additional elements required by the Improper Payments Elimination and Recovery Improvement Act (IPERA) for FY 2014 reporting. As part of the effort toward auditability, each of the Defense disbursing Components is diligently reviewing and reporting on all payments that are subject to IPERA, and ensuring the processes used are compliant with laws and regulations.

The Department continually looks for opportunities to improve its methodologies, and the post-payment review teams are far from complacent. The Department is implementing recommendations from both the DoD Inspector General's IPERA Compliance Review for FY 2013 (DoDIG Report No. D-2014-059), and from the GAO Report No. GAO-13-227 on improper payments, to guide our progress in our future improper payment efforts.

X. Agency Reduction of Improper Payments with the Do Not Pay Initiative

The Do Not Pay (DNP) Initiative (detailed reporting in Table 9), as currently implemented, is programmed to look at the vendor, the invoice amount, and the dollar amount of the payment. Improper payments may still occur at some later point due to reasons that DNP does not detect. For example DNP cannot detect a duplicate payment, because the vendor name, invoice amount, and payment amount would still be correct; the duplicate invoices would not appear on the match list.

DFAS. The DFAS sends a weekly batch file to the DNP database and receives results the next day. The DFAS then researches these results to determine if the proposed payment is proper based on established business rules. To date, DFAS has not identified any potential improper payments using the DNP list.

The DFAS bumps against all the DNP databases with the exception of the DEBT Check, for which we already have a process in place called the Treasury Offset Program, and the Credit Alert System, which does not apply to Commercial Payments. In addition to the weekly non-Treasury disbursed pre-payment review, a small group of Treasury-disbursed payments are checked: pre-payments on a weekly basis, and post-payments on a monthly basis.

USACE. The USACE matches its payment files daily in the DNP Portal to prevent any improper payments.

DHA.

<u>Individual Payments</u>. The DHA processes relatively few (1-5) case recoupment refunds each month for small dollar amounts (\$5-\$5,000). The Single Online Search service is utilized pre-payment for 100 percent of all case recoupment refunds to verify (1) a business or individual has not been placed on the List of Excluded Individuals/Entities (LEIE), and (2) an individual has not died. Any matches will be referred to the DHA Office of General Counsel.

<u>Vendor, Contract Payments</u>. The DHA processes approximately 200 routine payments per month for 23 unique contractor payees. The Single Online Search service is utilized pre-payment once a month to verify a DHA contractor payee has not been placed on the Excluded Parties List System (EPLS) or the List of Excluded Individuals/Entities (LEIE). Any matches are referred to the assigned Contracting Officer. The risk, however, lies outside of DHA because DHA contractors are not required to utilize the Do-Not-Pay database, and there is no current mechanism in place to require the contractors to use the Do-Not-Pay databases at the prepayment phase to comply with IPERA.

Navy ERP. Navy ERP transactions are included in the DFAS Do Not Pay Figures.

Table 9. Implementation of the Do Not Pay Initiative to Prevent Improper Payments

Death Master File (DMF) Matching and Excluded Parties List (EPLS)

	# of Payments Reviewed	\$ of Payments Reviewed	# of Payments Stopped	\$ of Payments Stopped	# of Improper Payments Reviewed and Not Stopped	\$ of Improper Payments Reviewed and Not Stopped
DFAS Non- Treasury Disbursing Office (NTDO)	\$11,950,521*	\$733,384,581,004**	0	0	0*	0*
DFAS Reviewed Treasury Disbursing Office (TDO)	41,464	\$ 5,103,958,963	0	0	0*	0*
USACE Reviews with the DMF	420,877	\$ 16,207,916,851	0	0	0	0
DHA Reviews with DMF & EPLS	336	\$ 297,806,052	0	0	0	0

^{*} DNP specifically looks at the vendor. Improper payments identified at some later point are improper due to other reasons that DNP does not have the capability to detect. For example: DNP cannot detect duplicate payments.

Navy ERP transactions included in DFAS DNP figures.

USACE transmits 100% of its pending commercial payments on a daily basis to match against the Death Master File (DMF) and the Excluded Parties List System (EPLS).

Military Retiree and Annuitant Pay - File Matching with the DMF outside of DNP

For the past ten years, before the Do Not Pay initiative, the Defense Manpower Data Center (DMDC) has had a computer matching agreement with the Social Security Administration (SSA) to use its Death Master File to identify potential accounts that need to be suspended or cancelled as a result of a retiree's or annuitant's passing. As part of the end-of-month processing, DFAS produces two files (one for retirees, one for annuitants) that are sent to DMDC to match or "bump" against the monthly DMF file. The results are compiled and forwarded to DFAS.

DFAS then runs its match process to suspend pay accounts (but not cancel) and to notify next of kin that this action was based on information received from SSA. This correspondence contains instructions on how to close out the account or reactivate if the death was mistakenly reported by SSA; however, this is rare.

The vast majority of these monthly benefits are paid via Electronic Funds Transfer. The disbursement system suspends payment to prevent additional benefits from being improper paid. Any EFT payment that was mistakenly disbursed is automatically reclaimed from the bank account after the official notification of death is processed. The normal recovery rate hovers around 95 percent within 60 days of the official death confirmation.

^{**} Data is based on Invoice and invoice amount vs. payment. The data represents invoices in a non-pay status submitted on a weekly basis so the invoice can be submitted multiple times per month.

FREEZE THE FOOTPRINT

As part of the Federal initiative to promote efficiencies, the Department is committed to effectively managing its inventory of real property assets and disposing of excess properties. As reflected in the Future Years Defense Program, the Department proposed \$4 billion in savings, when compared to the FY 2014 budget request, by funding only the most critical facilities and ensuring construction projects support only requirements remaining after force structure adjustments.

Through our partnership with General Services Administration (GSA) and Office of Management and Budget, the Department's "Freeze the Footprint" plan ensures that our total square footage of domestic office and warehouse inventory does not exceed the square footage baseline that existed in FY 2012.

As reflected in Table 10, in FY 2013 the Department reduced the total square footage in its owned offices and warehouses by nearly 10 million square feet (SF), or 3 percent. The 10 million SF decrease is comprised of the reduction in DoD Military Departments' and Washington Headquarters Services (WHS) office and warehouse space that offset a slight increase experienced by the United States Army Corps of Engineers civil works assets. This reduction in real property square footage was achieved through a variety of methods, though the current austere funding environment significantly constrained demolition as an option for eliminating real property assets that are structurally too old and worn out.

Table 10. Freeze the Footprint Baseline Comparison

Baseline Comparison – Total DoD Office and Warehouse Square Footage						
(SF in Millions)	FY 2012 Baseline	FY 2013 Data	Change (FY 2012 – FY 2013)			
Square Footage	313.52	303.55	-9.97			

Note: As reported in the DoD Annual Freeze the Footprint Report for 2014.

Additionally for FY 2013, the Department's GSA occupancy agreement square footage was reduced from the FY 2012 baseline, with over 319 thousand SF (2 percent) no longer leased by the Department. Though Annual Operating Costs (AOC) are required to be reported in the Federal Real Property Profile (FRPP), actual operating costs are not currently available at the constructed asset level for the Department's real property inventory. For reporting purposes at this time, AOC is calculated using a mathematical formula to reasonably break out consolidated data and increase the result by inflation to try to reflect individual asset costs. The use of the inflation factor explains the slight increase in operating costs reported in Table 11.

Table 11. Reporting of O&M Costs – Owned and Direct Lease Buildings

Reporting of O&M Costs – Owned and Direct Lease Buildings						
(\$ in millions)	FY 2012 Reported Costs	FY 2013 FRPP Data	Change (FY 2012 – FY 2013)			
Operating and Maintenance Costs	1,396	1,398	1.73			

SCHEDULE OF SPENDING

The Schedule of Spending (SoS) provides an overview of how and where the Department spends (obligates) its money during the year. Specifically, the SoS presents the Department's total budgetary resources and total fiscal year-to-date obligations, on a combined basis. The SoS uses the same underlying data that is used to produce the combined Statement of Budgetary Resources (SBR), but reports the obligations by the items or services purchased (object class), such as personnel compensation, assets, grants, etc.

The Department recognizes the importance of providing this spending summary and has been working diligently to capture and ensure accurate and complete object class data in the financial systems. As of the end of FY 2014, all Defense Agencies' financial information was integrated in the Department's financial reporting system, which will greatly reduce manual effort in producing the SoS, and will continue to work on improving the object class data; however, the Department was unable to produce the Schedule of Spending for this year's reporting.

The Department is working with the Office of Management and Budget to produce a reliable Schedule of Spending and will publish this schedule in the Department's FY 2015 Agency Financial Report.

INSPECTOR GENERAL'S STATEMENT OF MANAGEMENT AND PERFORMANCE CHALLENGES FOR FY 2014

Each year, the Inspector General, DoD (DoD IG) prepares a statement that summarizes what he considers to be the most serious management and performance challenges facing the Department and a brief assessment of the Department's progress in addressing these challenges. The DoD IG cited challenges are in addition to those identified by the Government Accountability Office in its February 2013 biennial report, entitled <u>High Risk Series</u>, An Update.

For FY 2014, the DoD IG identified challenges in the following seven categories:

- Financial Management
- Acquisition Processes and Contract Management
- Joint Warfighting and Readiness
- Cyber Security
- Health Care
- Equipping and Training Afghan National Security Forces
- The Nuclear Enterprise

Detailed discussion of the DoD IG's statement and the Department management's response follows.



U.S. and Colombian paratroopers track during a free fall as part of Fuerzas Comando 2014 at the Colombian National Training Center on Fort Tolemaida, Colombia. The U.S. Service Members are assigned to Special Operations Command South. The jump symbolizes the strong partnership between both nations.

Photo by Maj. Edward Lauer

SUMMARY OF IDENTIFIED CHALLENGES

1. IG-Identified Challenge: Financial Management

1-1A. Achieving Financial Statement Audit Readiness

IG Summary of Challenge

The Department's financial management challenges impair its ability to provide reliable, timely, and useful financial and managerial data to support operating, budgeting, and policy decisions. Gaps in the financial framework harm the accuracy, reliability, and timeliness of budgetary and accounting data and financial reporting, reducing the effectiveness of decisions made by leaders at all levels. The key to solving the Department's financial management problems is the production of auditable financial statements and receiving unmodified opinions on them.

Achieving auditable financial statements is a long-standing and daunting task. The success of the DoD financial improvement and audit readiness (FIAR) effort depends on the Department's ability to accomplish the following:

- Resolve material internal control weaknesses to ensure internal controls are properly designed, properly implemented, and working effectively.
- Sustain improvement in internal controls and systems to provide consistent and repeatable financial data used in decision making and reporting.
- Effectively develop and implement the financial improvement effort by monitoring DoD progress in achieving milestones, developing comprehensive improvement initiatives across DoD functional areas, and holding managers accountable for the timely implementation of these efforts.

Congress requires the Department to validate its Statement of Budgetary Resources (SBR) and the other DoD financial statements as audit ready by September 30, 2014, and September 30, 2017, respectively. However, the Department continues to struggle with effective and timely development and implementation of their business transformation efforts. Furthermore:

- <u>Public Law 111-383, Section 881</u> requires the Department to establish interim
 milestones to achieve audit readiness of its financial statements earlier than
 September 30, 2017. These interim milestones for Military Departments and Defense
 Components call for the achievement of audit readiness for each major element of the
 SBR, such as "civilian pay, military pay, supply orders, contracts, and the funds
 balance with the Treasury."
- <u>Public Law 112-81, Section 1003</u> requires the Department have a plan that includes interim objectives and a schedule of milestones for each Military Department and for the Defense agencies, to support the goal of validating the SBR as audit ready by September 30, 2014. The Department must aggressively pursue the development and implementation of comprehensive improvement initiatives and must monitor progress according to interim milestones. The Department may need to revise these initiatives and milestones as it identifies additional deficiencies and corrective actions as a result of DoD's iterative FIAR process.
- <u>Public Law 112-239</u>, <u>Section 1005(b)(1)</u> requires that the plans to achieve audit readiness of the SBR "by September 30, 2014, include steps to minimize one-time fixes and manual work-arounds, be sustainable and affordable, and not delay the full auditability of financial statements."

• <u>Public Law 113-66, Section 1003(a)</u> requires that the Secretary of Defense ensure that a full audit of the DoD financial statements for FY 2018 is performed and the results of the audit submitted to Congress not later than March 31, 2019.

Although the Department did not meet the 2014 deadline for full SBR audit readiness, the Department continues to make progress. Because the Department recognized that it could not achieve SBR audit readiness by 2014, an incremental approach to achieving SBR audit readiness was implemented. The Department has chosen to address SBR audit readiness incrementally by focusing on the current year information contained in the SBRs of the General Funds.

Specifically, the limited scope FY 2015 SBR audits will be on current-year appropriation activity and transactions, which the Department calls the "Schedule of Budgetary Activity" (SBA). As a result, the Department's initial audit efforts will focus on the SBA. The Department plans on achieving audit readiness for the SBR by the 2017 due date that was originally planned for all financial statements. Since the 2014 deadline for SBR audit readiness has been a challenge for the Department, meeting the 2017 deadline for all DoD financial statements to be audit ready remains an even more significant challenge as the Department must also focus on the audit readiness of the remaining portions of the SBR, implementation of the enterprise resource planning systems (ERPs), and achieving audit readiness of the full financial statements. Additionally, results of the FY 2015 SBA audits may identify additional internal control weaknesses that require corrective action, which may further delay the Department's plans for achieving audit readiness.

The Department must continue to develop and implement a comprehensive plan that identifies the interim objectives and schedule of milestones to achieve audit readiness of the full SBR for both the General and Working Capital Funds. In addition, the interim milestones must address the existence and completeness of each major category of DoD assets, which includes general equipment, real property, inventory, and operating material and supplies, to achieve audit readiness of the full financial statements.

1-1B. Achieving Financial Statement Audit Readiness

IG Assessment of Progress

Although the Department is far from reaching an unmodified opinion on its financial statements, it has made progress. The DoD senior leadership has placed an increased emphasis on achieving this goal. The DoD IG believes this increased senior leadership emphasis is essential to the Department's ability to meet its internal milestones as well as to make progress in achieving full SBR audit readiness and meet the 2017 audit readiness mandates.

Despite pervasive and long-standing Department financial management problems, the U.S. Army Corps of Engineers – Civil Works, and various Defense agencies, such as the Defense Commissary Agency and Defense Contract Audit Agency, and the Military Retirement Fund, have received unmodified audit opinions. The Department must sustain its achievements as well as advance in the remaining significant areas.

The Department continues to make progress toward meeting the 2014 audit readiness goal of the SBR; however, the Department has modified its strategy based on the U.S. Marine Corps (USMC) audit experience. The Military Services now plan to assert audit readiness on the SBA. The USMC encountered many challenges during this first type of audit, which resulted in disclaimers of opinion in FY 2010 and FY 2011. However, progress was seen in the Corps' ability to produce supporting documentation on transactions within the SBA, and the USMC achieved an unqualified opinion on its FY 2012 SBA. As a result, the USMC is undergoing subsequent SBA audits. The USMC, the Navy, and the Department are using USMC experience to correct weaknesses, as well as prepare the other Military Services for their eventual SBR audits.

The <u>May 2014 FIAR Plan Status Report (FPSR)</u> only addressed audit readiness for certain aspects of the SBR and stated that the Department did not expect every Component to achieve a clean audit opinion on its SBA in FY 2015. The Department reported in the November 2011 FPSR, and continued to report in the May 2014 FPSR, that it had significantly changed its audit goals to include achieving audit readiness of the General Fund SBR by the end of FY 2014, in addition to achieving audit readiness of all DoD financial statements by the end of FY 2017. However, in the November 2012 FPSR, the Department reported it would limit first-year SBR audits in FY 2015 to audits of schedules containing only current-year appropriation activity, that is, a Schedule of Budgetary Activity (SBA).

Additionally, in the May 2013 FPSR, the Department reported that the initial audits of the General Fund SBA would not include balances from prior year activity. The Department would also begin audits of the complete SBR only after achieving successful audits of current-year appropriation activity. Meaningful progress in FY 2014 for the SBR audit-readiness goal will be critical, and this will continue to be a high-visibility area.

1-1C. Achieving Financial Statement Audit Readiness

Department Response

The Department generally agrees with the DoD IG's assessment of the Department's status and progress in achieving financial statement audit readiness. The Department's goal of achieving audit readiness on the SBR remains the same. However, the strategy for achieving that goal has been modified to limit the scope of initial audits.

The Department has focused consistently on achieving SBR audit readiness by September 30, 2014. Audit readiness means strengthening internal controls and improving financial practices, processes, and systems used to manage the Department's budgetary resources so there is reasonable confidence the information can withstand an audit by an independent auditor. The Department modified the strategy to limit the scope of initial audits to focus on current year budgetary transactions reported on a Schedule of Budgetary Activity (SBA). The SBAs rely on the same internal controls and financial practices, processes, and systems as the SBR and contain a substantial subset of the financial information reported on the SBR.

The change in strategy was based on lessons learned from the U.S. Marine Corps SBR audit. The Marine Corps was unable to produce documentation supporting historical transactions associated with SBR beginning balances quickly enough to meet the audit timelines. Historical documentation (for example, requisitions, receiving reports, and invoices) exists primarily in paper form and is dispersed across various commands and activities. The Marine Corps was, however, able to produce documentation for current-year transactions, and in December 2013, the Marine Corps became the first DoD Military Service to receive an unmodified (clean) audit opinion on its FY 2012 SBA.

The Department's modified strategy implements a sensible and cost effective approach to validating SBR audit readiness by way of SBA audits in FY 2015 through FY 2017. Beginning balances will be addressed during the SBA audits and will be audit ready by September 30, 2017, prior to full financial statement audits in FY 2018. This sensible approach has been favorably received by the Government Accountability Office (GAO) and the DoD IG.

1-2A. Modernizing Financial Systems (Enterprise Resource Planning)

IG Summary of Challenge

To develop effective financial-management processes throughout the Department, the Department has begun to implement new financial management systems and business processes. The DoD IG believes properly planned and integrated systems, with strong internal controls, are critical to providing useful, timely, and complete financial management data and to achieving auditability. Timely and effective implementation of the enterprise resource planning systems (ERPs) is critical for the Department to achieve its financial improvement and audit readiness goals.

The Department noted in the May 2014 FIAR update that the ERPs continue to be essential to the Department's audit readiness efforts. However, not all ERPs will be fully deployed for the FY 2015 SBA audits or the 2017 readiness deadlines. This will require the Department to continue to rely on legacy systems.

1-2B. Modernizing Financial Systems (Enterprise Resource Planning)

IG Assessment of Progress

The Department plans to spend about \$15 billion to develop and implement ERPs. These systems have experienced cost increases and schedule delays. The Department noted that some ERPs will not be fully deployed by the 2014 and 2017 audit readiness dates, and therefore, it must continue to rely on legacy systems. This will increase the risk that the audits of the FY 2015 SBR, or a schedule of current year budget activity, will not be successful and may not result in unmodified opinions, and that the Department will not meet the goal of full financial statement audit readiness by September 30, 2017. Reliance on legacy systems, along with schedule delays and poorly developed and implemented ERPs, will diminish the savings expected from transforming operations through business system modernization.

Furthermore, without fully deployed ERPs, the Department will be challenged to produce reliable financial data and auditable financial statements without resorting to extreme efforts, such as data calls or manual work-arounds, to provide financial data on a recurring basis. For example, the Department reported in the May 2014 FIAR Plan Status Report that the Air Force ERPs will not be fully deployed by 2014. As a result, the Department may need to rely on a combination of ERPs and legacy business and financial systems to conduct the SBA and SBR audits.

The Department has not reengineered its business processes to the extent necessary. Instead, it has often customized commercial ERPs to accommodate existing processes, which creates a need for system interfaces and weakens controls built into each ERP system. The ERPs were designed to replace numerous subsidiary systems, reduce the number of interfaces, standardize data, eliminate redundant data entry, and provide an environment for end-to-end business processes while being a foundation for sustainable audit readiness. However, the numerous interfaces between the ERPs and existing systems may be overwhelming and inadequately defined. Each interface presents a risk that the system might not function as designed, and each prevents the linking of all transactions in an end-to-end process. The Department needs to ensure ERP system development addresses the required business processes and functions.

Without the effective and timely development and implementation of ERP systems, and without senior-level governance, the Department will continue to struggle to improve its financial management processes, achieve long-term sustainability of those improvements, and timely, and meaningful financial management information for internal and external users. Recent audits continue to find that system program managers have not configured systems to

report U.S. Government Standard General Ledger financial data using the DoD Standard Financial Information Structure (SFIS).

Additionally, other audits have found that the Department has not sufficiently reengineered its business enterprise architecture processes nor incorporated the functionality in ERP systems. The Department has established certification requirements, and the Deputy Chief Management Officer and Deputy Chief Financial Officer have established validation and certification procedures for implementing SFIS requirements and ensuring business process reengineering has taken place; however, these procedures were not stringent enough to ensure compliance. The Department needs to continue to improve its validation and certification procedures.

1-2C. Modernizing Financial Systems (Enterprise Resource Planning)

Department Response

The Department is committed to improving financial processes through the implementation of ERPs. In support of these efforts, the Department has been working diligently to improve business processes and oversee the development of the ERPs in support of auditability.

While it is true that legacy systems will continue to be used, the ERPs that have been implemented resulted in phasing out dozens of legacy systems. Several of the Department's ERPs support the 2017 auditability goal. Where the Department is dependent on legacy systems, the Components' Financial Improvement Plans incorporate those actions necessary to ensure that accurate, reliable financial information is reported.

Modernizing DoD business systems is a key aspect of our overall effort to achieve and sustain auditability. The Department plans to achieve the audit goals with a combination of both target and legacy systems. While taking proactive steps to align individual ERP programs with auditability outcomes, we also are focused on delivering audit-ready processes and controls that will remain outside the ERP systems. This will allow us to develop a sustainable business environment that can be cost-effectively audited.

The ERP programs, by their very nature, are designed to:

- Handle detail transactions in a defined, end-to-end process;
- Enforce process and execution standardization among implementing organizations;
- Manage consolidated business data in a single repository that allows centralized access control, and
- Facilitate the flow of information both within an organization and with external stakeholders.

These design principles within the ERPs directly enable the capabilities that are essential to auditability, such as the ability to trace all transactions from source to statement and to recreate a transaction; documented, repeatable processes and procedures; demonstrable compliance with laws, regulations and standards; and a control environment sufficient to reduce risk to an acceptable level.

Essentially, ERPs are acquired with industry best practices/"to-be" processes embedded within them. Each of the ERPs' programs went through significant, up-front blueprinting and gap analysis to determine which configuration or customization would be necessary for the system to work within its particular business environment. The Department has focused on properly enforcing compliance with the target financial management environment, built on a backbone of the core ERP systems and aligned with the Business Enterprise Architecture's end-to-end processes.

The Department's investment management process ensures:

- Investments are aligned to functional strategies;
- The Department makes more informed investment decisions;
- · Legacy systems that are no longer required are eliminated;
- Enhanced interoperability, and
- The Department transforms to an environment where business applications can be rapidly deployed on a common computing infrastructure.

The investment review process also ensures each investment is an appropriate use of taxpayer dollars and aligns to the Department's business architecture and our shared goal of delivering agile, effective and efficient business solutions that support and enable our warfighters.

To implement this investment management process, the Deputy Chief Management Officer issued guidance to ensure the Department continues to treat its business system investments with the purpose and discipline that will enable cost savings to be redirected to critical operational needs of the warfighter. The guidance, updated annually, includes an integrated business framework to align broad, DoD strategy with functional and organizational strategy to guide system implementations. The integrated business framework uses Functional Strategies and Organizational Execution Plans (OEP) to help achieve the Department's target business environment.

The Financial Management (FM) Functional Strategy describes the Department's financial management business mission area's strategic vision, goals, target environment, and expected outcomes over the next five years. Key components of the FM functional strategy include FM data standards, process/system improvements, and how to leverage technology to assist the Department improve efficiency and effectiveness of FM processes.

In response to OSD Principal Staff Assistants' (PSA) functional strategies, the Military Departments and Defense Agencies develop OEPs that describe how their business system portfolios will achieve the PSA's directions and initiatives. The OEPs also provide more detailed information on how information technology investments align to the functional strategy initiatives.

1-3A. Improper Payments

IG Summary of Challenge

Improper payments, a long-standing problem in the Department, are often the result of unreliable data, a lack of adequate internal controls, or both, which increases the likelihood of fraud. As a result, the Department lacks assurance that billions of dollars of annual payments are disbursed correctly. The Department's inadequate financial systems and controls hamper its ability to minimize improper payments. In addition, the pace of operations and volume of Department spending create additional risk for improper payments, and both hinder the Department's ability to detect and recover those improper payments.

The Department faces difficulties in the completeness and accuracy of its improper payment reviews and the information reported. Additionally, the lack of an auditable Statement of Budgetary Resources (SBR) leaves the Department unable to reconcile outlays to the quarterly or annual gross outlays reported in the SBR to ensure all required payments for reporting purposes have been captured. These areas require improvement before the Department will be able to provide complete and accurate information on its estimated amount of improper payments.

1-3B. Improper Payments

IG Assessment of Progress

Although the Department made strides to improve the identification and reporting of improper payments and took many corrective actions to implement recommendations made by the DoD IG, more work is needed to improve controls over payments processed throughout the Department.

The Department complied with five of the six improper payment reporting requirements for FY 2013. Although improper payment rates for the reported payment programs were below the Office of Management and Budget established threshold, the Department did not achieve its improper payment reduction targets for five of eight payment programs with established targets. Further, for the second consecutive year, one of the payment programs did not meet its target rate. Not attaining reduction targets indicates that additional corrective actions are needed to reduce improper payments. In addition, the Department had deficiencies in the methodologies for five of the nine payment program areas that could affect the reliability of DoD's improper payments estimates.

We commend the Department on aggressively pursuing recovery of identified improper payments, but unless it continues to improve its methodology for reviewing all its disbursements, it likely will not identify and accurately estimate the amount of improper payments. As a result, the Department will likely miss opportunities to identify causes of improper payments and implement effective corrective actions to prevent future improper payments.

1-3C. Improper Payments

Department Response

The Department appreciates DoD IG's recognition of our efforts to minimize improper payments and our aggressive pursuit to recover identified improper payments. The Department has addressed the sampling methodology deficiencies to improve the integrity of the post-payment review results, and we continue to take ownership and corrective actions to address the recommendations in the latest DoD IG and GAO reports.

While the Department continually strives to reduce improper payments, it should be noted that the payment error rates experienced in most of DoD's programs already are very low, many lower than half of one percentage point (detailed reporting on the DoD improper payment program is addressed in the found in the "Other Information" section of this report).

The Department is collaborating with OMB to consider establishing more reasonable tolerance levels around the target reduction goals that consider the cost effectiveness of required remediation plans when the goals are not met or when actual payment error rates are very low. All of these actions, coupled with the Department's progress toward achieving audit readiness, will increase public confidence in the Department's stewardship of taxpayer dollars as well as strengthen the fundamentally sound DoD improper payments program.



A Marine walks ahead of a legged support system at Marine Corps Training Area Bellows on Oahu, Hawaii. The legged system is designed to carry supplies, including water, food and ammunition, through rough terrain.

Photo by Cpl. Matthew Callahan

2. IG-Identified Challenge: Acquisition Processes and Contract Management

2-1A. Enhancing the Acquisition Workforce

IG Summary of Challenge

The Department's senior leadership remains dedicated to continuously improving the size and the capabilities of its acquisition workforce. While the Department has made progress in growing its workforce to meet the demands placed on it by the volume and complexities of its programs and contracts, the Department needs to shift its focus to sustain the number of resources needed to execute the acquisition mission and increase opportunities for training and development.

In addition to improving the professionalism of the acquisition workforce, which is an initiative of Better Buying Power 2.0 (explained in Section 2-1B, below), Department leaders remain concerned over the effects of budget uncertainty and cuts. The budget instability decreases morale and negatively impacts the ability to recruit, train, and retain skilled acquisition professionals. The Department also faces significant challenges in the acquisition community resulting from an aging workforce. Over the next decade, over 50 percent of the acquisition workforce will be eligible for retirement. Accordingly, it will be critical that the Department plan for and invest in targeted training, education, and certification of the acquisition workforce left to succeed those leaving.

2-1B. Enhancing the Acquisition Workforce

IG Assessment of Progress

Since reaching a maximum strength of 152,326 civilian and military personnel in 2012, the Department has since seen a decline of 1.3 percent in overall strength, to 150,247 personnel, in the third quarter of FY 2014. The issues related to the DoD acquisition workforce, however, do not relate only to the number of resources, but to the quality and the capability of the personnel the Department employs. For FY 2015, the Department plans to invest approximately \$500 million using the Defense Acquisition Workforce Development Fund, of which the President requested \$212.9 million in direct appropriations from Congress to support strategic objectives and continuous improvement of the defense acquisition workforce. Keeping in line with current initiatives, the funding will support both the remaining hiring of personnel to complete the rebuilding initiative and limited hiring for critical needs. It also will support training, development, and improvement of the acquisition workforce needed to increase buying power; modernize and reset our military force; improve acquisition outcomes; and ensure future technological superiority. As efforts in these areas continue, oversight and commitment remains imperative.

2-1C. Enhancing the Acquisition Workforce

Department Response

The Department concurs with the DoD IG's statements on the challenge and progress made in enhancing the acquisition workforce. Consistent with the President's FYs 2014 and 2015 budget requests and the *Quadrennial Defense Review 2014* (QDR) objectives, strong leadership emphasis and initiatives will continue to move us toward objectives to improve acquisition productivity, increase buying power, and increased efficiencies. A necessary element of achieving these objectives requires continuous improvement and resources to sustain and strengthen the capability and professionalism of the acquisition workforce.

2-2A. Weapon System Acquisition

IG Summary of Challenge

The Department remains challenged in its management of Major Defense Acquisition Programs (MDAPs), which declined from 85 in 2012 to 80 in 2013. While the number of programs within DoD's portfolio decreased between FY 2012 and FY 2013, the overall cost of the programs increased by \$14.1 billion. Furthermore, DoD programs cannot stay within the confines of cost and schedule estimates, as demonstrated by cost growth of over \$14.1 billion and average schedule delays of over two months. With the expectation that defense budgets will continue to decline in the future, it will be more important than ever for the Department to identify opportunities to reduce costs and achieve efficiencies in its processes throughout the lifecycle.

2-2B. Weapon System Acquisition

IG Assessment of Progress

Four years ago, DoD implemented the first iteration of the Better Buying Power and two years later, implemented the second set of initiatives known as Better Buying Power 2.0. While there is evidence that progress was made in areas such as program affordability, life-cycle costing and bottom-up estimating, competitive contracting, and program management, the cost and schedule growth attributable to the acquisition of major defense programs remained significant and demonstrated the need for additional work.

The DoD IG audits continue to identify significant programmatic issues, such as poorly defined requirements, duplicate and redundant capabilities, incomplete system testing, improper fielding, and procurement quantities in excess of what is needed to successfully execute its mission. The enormity of the investment in weapon systems acquisition and the role it plays in making U.S. forces capable warrants continued oversight and a long-term commitment to process improvement. The need to continue support for the warfighter and the potential for savings argue against complacency.

2-2C. Weapon System Acquisition

Department Response

Weapons Systems Acquisition has been and continues to be a high priority for DoD leadership. This commitment is reflected in the Department's <u>Better Buying Power (BBP) Initiatives</u> and more recently in the interim revision of <u>DoD Instruction 5000.02</u>, which describes the policies applicable to the defense acquisition system. The DoDI 5000.02 revision, issued in November 2013, institutionalizes many of the BBP initiatives. Key policy changes include affordability constraints for every program; a requirements decision point to ensure requirements are well understood, technically achievable, and affordable; enhanced emphasis on thoughtful business arrangements, to include better use of contract incentives and maintenance of a competitive environment; more effective developmental and operational testing – and much more.

Department acquisition leadership aggressively monitors implementation of these policies via the Under Secretary of Defense for Acquisition, Technology, and Logistics (USD AT&L) Business Senior Integration Group, program decision events, and careful review of periodic reports. Our objective is continuous, incremental improvement based on pragmatism and evidence.

2-3A. Contract Management

IG Summary of Challenge

The Department continues to struggle to provide consistent effective oversight of its contracting efforts. The Department continues to face contracting deficiencies in these areas: obtaining adequate competition in contracts; defining contract requirements; overseeing contract performance; obtaining fair and reasonable prices; and maintaining contract documentation for contract payments.

Service contracts represent more than 50 percent of the Department's contract spending. The Department faces several challenges in contract oversight and administration of services contracts. Without proper oversight, which DoD IG audits continue to identify, the Department cannot be certain that contractors are performing in accordance with contract requirements, may have overpaid for increases in contract costs, and cannot ensure that services are performed. This leaves the Department vulnerable to increased fraud, waste, and abuse.

The Department continues to face challenges in obtaining fair and reasonable prices for parts. Audits first started identifying problems with price-based acquisition and commercial pricing in the late 1990s, and it was not until 2008 that legislative changes allowed Contracting Officers to request information on labor costs, material costs, and overhead rates for commercial items.

More recently, the Department has moved to new performance-based logistics (PBL) arrangements, which have added a new challenge to obtaining fair and reasonable prices for parts since the Services now are procuring parts from the weapons systems contractors instead of other sources, such as the Defense Logistics Agency (DLA). These parts often are purchased unnecessarily and at higher prices rather than utilizing existing DLA inventory.

2-3B. Contract Management

IG Assessment of Progress

The Department continues to strengthen contracting and has issued policy, procedures, and guidance addressing current contracting challenges. The Department began the Better Buying Power (BBP) effort in 2010 and continued with the second phase of the initiative, BBP 2.0, in April 2013. The BBP 2.0 has seven areas of focus, and three of those help the Department address the following contract management challenges: promote effective competition; improve tradecraft in acquisition of services; and incentivize productivity and innovation in industry and Government.

To promote effective competition, BBP 2.0 emphasizes competition strategies, with initiatives to create and maintain competitive environments and increase small business roles and opportunities. When competition is applied effectively, it results in lower costs to the Government, greater innovation from industry, and added savings to the taxpayer.

Because service contracts make up the majority of the Department's purchases, the BBP 2.0 area of improving tradecraft in the acquisition of services is very important. For the acquisition of services, the Department is focusing on assigning senior managers, improving requirements definitions, preventing requirements creep, and strengthening contract management outside the normal acquisition chain, among other initiatives.

As part of its goal of incentivizing productivity and innovation in industry and government, BBP 2.0 will increase effective use of Performance Based Logistics (PBL) arrangements, by which the Department has achieved improved readiness at significant savings, when PBL arrangements are properly structured and executed. However, PBL success depends on the workforce having the expertise and support to properly develop and implement the PBL concept.

Even with the implementation of BBP 2.0, the Department continues to struggle with implementing Federal Acquisition Regulation revisions on the use of cost-reimbursement contracts. Contracting activities are still challenged in documenting:

- 1) The approval for a cost-reimbursement contract was at least one level above the Contracting Officer;
- 2) Cost-reimbursement contracts were justified;
- 3) How the requirements under the contract could transition to firm-fixed price in the future;
- 4) That Government resources were available to monitor the cost-reimbursement contract; and
- 5) That contractors had an adequate accounting system in place at contract award.

2-3C. Contract Management

Department Response

The Department agrees with the DoD IG's summary of challenges and assessment of progress and continues to work aggressively to resolve the long-standing material weaknesses in contract management. Key initiatives include:

Efforts to Improve Competition

The USD(AT&L) recently announced measures to boost competition in contracting at the field level for lower-dollar value services contracts, where there is more opportunity for improvement. The USD(AT&L) memorandum, entitled "Actions to Improve Department of Defense Competition," dated August 21, 2014, identifies actions to improve competition consistent with BBP 2.0 Initiatives to Promote Effective Competition. The memorandum encourages collaboration and sharing of best practices that have been successfully employed to increase competition, improve quality and performance, and lower cost for supplies and services. Specific actions include:

- Address competition on a quarterly basis at the Business Senior Integration Group meetings to track and manage progress in competition using expanded competition metrics to identify opportunities for improvement.
- Employ business intelligence tools to identify opportunities for improvement.
- Require contracting officers to obtain feedback on competitive solicitations in which more than one offer was expected based on market research, yet only one offer was received, and
- Require active market research using mandatory Request for Information notices on non-competitive acquisitions.

The August 21, 2014 memo announced publication of "<u>Guidelines for Creating and Maintaining a Competitive Environment for Supplies and Services in the Department of Defense</u>." The guidelines are intended to provoke thought about the various approaches that may be employed to competitively fulfill the Department's requirements.

Improve Tradecraft in Acquisition of Services

Services acquisition continues to play a critical role as the Department begins reducing the size of the force and appropriately balancing the mission requirements against the unique capabilities provided by the three types of labor in the Department's total workforce: uniformed military, DoD civilians, and contractors.

As stated in the DoD IG progress assessment, the <u>USD(AT&L)</u> recognized the need to develop more guidance, metrics, and oversight for services acquisition and focused these efforts through the BBP Initiatives. The <u>Principal Deputy USD(AT&L)</u> has been appointed as the DoD Senior Services Manager leading the contracted services initiatives, with the Deputy Director, Defense Procurement and Acquisition Policy (DPAP), Services Acquisition (SA), focused on day-to-day leadership and oversight of the Department's efforts, as detailed below.

The USD(AT&L) appointed DoD Functional Domain Experts (FDEs) to serve as the DoD-level lead for his or her respective Portfolio Group or Portfolio Category. The FDEs will actively oversee the life-cycle process for the contracted services within their portfolio, including forecasting and budgeting, requirements definition and validation, procurement, active management, and oversight of contracted services.

The USD(AT&L) also directed the development of a new DoD Instruction on Defense Acquisition of Services, which will:

- Establish policy, assign responsibilities, and provide procedures for identifying, assessing, reviewing, and validating requirements for the acquisition of services;
- Establish a simplified and flexible management framework for translating approved services requirements into stable, affordable, and well-managed programs;
- Authorize decision authorities, consistent with statutory and regulatory requirements for the acquisitions of services, to tailor the procedures to best achieve cost, schedule, and performance objectives; and
- Provide additional capability and oversight of services contracts.

The Department also is engaged in developing data capabilities to help stakeholders (including resource sponsors, Military Departments, and FDEs) understand and actively manage the services we are buying. The DPAP developed a Business Intelligence tool to provide visibility into our spending and allow greater management and oversight.

The Services Acquisition Functional Integrated Product Team (SA FIPT) is leading new and leveraging ongoing initiatives, to include development/deployment of formal Service Acquisition training for SA stakeholders, both Defense Acquisition Workforce Improvement Act (DAWIA) and non-DAWIA populations, in the lifecycle management of services contracts. The SA FIPT has identified competencies for services stakeholders and identified/endorsed five online modules (CLCs 011, 222, 007, 004, & 017), two classroom classes (ACQ101 and ACQ265), and one mission-assistance capability (Services Acquisition Workshop) related to improving services acquisitions for use within and outside of the DAWIA workforce. Work continues on completing both competency and full curriculum development.

Better Buying Power 2.0 Initiatives

The Better Buying Power (BBP) 2.0 Implementation Guidance of April 24, 2013, included specific direction to "Increase effective use of Performance-Based Logistics." The following recent policies and guidance address use of Performance Based Logistics (PBL) and assist the defense acquisition workforce in developing effective PBL product support arrangements.

- On November 23, 2013, Acting Assistant Secretary of Defense for Logistics & Materiel Readiness (ASD[L&MR]) issued a memorandum, entitled "Performance Based Logistics Comprehensive Guidance."
- On May 27, 2014, the ASD (L&MR) (Acting) issued the DoD PBL Guidebook. The Guidebook is designed to serve as both a reference manual for experienced PBL practitioners as well as a practical "how-to" guide for "new-to-PBL" logisticians. The guidebook provides PBL best practices and practical examples (tenets, analytics, metrics, and draft RFP information) for developing performance-based arrangements.

 Additionally, the Defense Acquisition University (DAU) has incorporated PBL learning assets into the Life Cycle Logistics curriculum and is working to incorporate performance-based learning assets into Program Management, Contracting, Systems Engineering, and Business/Financial Management curriculum.

An initiative implemented in <u>BBP 2.0</u> is "Continue to increase the cost consciousness of the Acquisition Workforce – change the culture" under the "Improve the Professionalism of the Total Acquisition Workforce" focus area. The Director, DPAP, continues to focus on improving the capability of the contracting workforce to include quality-focused initiatives to strengthen the capability and readiness. In FYs 2013 and 2014, DPAP prepared to reassess the proficiencies of the contracting workforce to determine if progress has been made to address competency gaps identified from the 2009 competency assessment and to determine if new training gaps exist. In the third quarter of FY 2014, the competency reassessment was deployed to the 30,000 member contracting workforce. The results of the competency assessment will be used for the basis of human capital actions/workforce planning; updated/initiating training, increasing/improving leadership developmental opportunities, and the results allow the Department to make informed and sustained investments in the workforce.

The DPAP continues to collaborate with DAU on the curriculum for the contracting, purchasing, and industrial property career fields. The new curriculum incorporates more pricing, competition, contract administration, services acquisition, small business, and the BBP initiatives. Efforts to improve acquisition workforce staffing and training continued in FYs 2013 and 2014. Courses CLC 106, COR With a Mission Focus, and CLC 222, Contracting Officer Representative, are ranked number one and number three amongst the "most taken" DAU online learning assets.

As recent as June 9-13, 2014, the Director of Defense Pricing and the Director of DPAP hosted a collaborative event for pricing subject matter experts from across the Department. Representatives from the Air Force, Army, Navy, Defense Logistics Agency (DLA), Missile Defense Agency (MDA), Defense Contract Audit Agency (DCAA), and Defense Contract Management Agency (DCMA) participated. The event included advanced training on topics such as contract incentives, subcontractor pricing, the Truth in Negotiations Act, and commercial pricing, and also included time devoted to each Component sharing best practices, examples of overcoming pricing challenges, and pricing success stories. Sessions on subcontract analysis/subcontracting issues, commercial item pricing, and effective incentive contracting, as well as vigorous discussions on these topics, enabled the participants to share experiences with strategies which have proven successful, and to brainstorm about possible further evolutions of these strategies. The Senior Leader Question and Answer session on competition/source selection allowed the participants to not only get the DPAP perspective on the process, but to engage in dialogue about some of the issues currently being experienced across the Department. Going forward, it is expected that the participants will avail themselves of these connections with other pricing experts across the Department to develop robust approaches to address the most complex pricing issues facing the DoD Components.

The Department developed the Contracting Officer Representative Tracking (CORT) tool to track and maintain COR assignment. The web-based tool, hosted on the Wide Area Workflow portal, enables Military Departments and Defense Agencies to manage nomination, training and tracking of their respective cadres of CORs and the contract(s) assigned to each COR. As of September 4, 2014, there were 50,288 registered CORs. Of the number registered, the Army has 31,578 users.

In addition to the BBP and BBP 2.0 initiatives, DCMA continued to both establish new and to refine existing capabilities to assist the Acquisition Workforce in making better business decisions. The DCMA stood up a commercial pricing cell to assist Procuring Contracting Officers in making commercial item determinations and to facilitate the cost reasonableness of commercial items. Calendar year 2014 marks the first full year DCMA had fully-staffed and operational Integrated Cost Analysis Teams (ICATs), comprised of dedicated business and technical pricing personnel located at 11 major contractor divisions. Expectations are for the

ICATs to more aggressively pursue opportunities to reduce costs in the supply chain in their proposal pricing efforts, including targeted engagements at second and third tier suppliers. The DCMA initiated a formalized process for coordinating and selecting locations for the conduct of overhead should-cost reviews to maximize benefit for the Department.



A Seaman signals to pilots in an MH-60S Seahawk helicopter as it picks up supplies from the flight deck during a vertical replenishment aboard the guided-missile destroyer USS Arleigh Burke in the Persian Gulf. The Arleigh Burke is deployed in the U.S. 5th Fleet area of responsibility supporting maritime security operations and theater security cooperation efforts. The Seahawk is assigned to Helicopter Sea Combat Squadron 26.

Photo by Petty Officer 2nd Class Carlos M. Vazquez II

3. IG-Identified Challenge: Joint Warfighting and Readiness

3-1A. Joint Warfighting and Readiness

IG Summary of Challenge

The United States removed its combat troops from Iraq and is drawing down its presence in Afghanistan. The lead for security responsibility in Afghanistan has transitioned to the Afghan government. The drawdown of forces from Afghanistan will continue to challenge the Services as they deal with retrograde and reset equipment, with much of the equipment being returned after exceeding utilization rates in many of their design operating parameters. The Department will be challenged to maintain the readiness of the forces as equipment is repaired or replaced.

The Services are engaged in a strategic rebalance to the Asia-Pacific region while continuing to maintain the global presence needed to protect national interests. While undergoing this rebalance, the Department will need to address a wide spectrum of challenges, ranging from increased reliance on uncertain host nation infrastructure to vast areas of responsibility – both requiring pre-positioning and the need for enhanced knowledge of various languages and cultural, ethnic, and religious sensitivities. The Department also continues to address emerging terrorism and instability challenges in AFRICOM's area of operation. Growth in AFRICOM's operational partnering mission raises the issue of sufficiency of its resources to address the terrorist threat. The Department returned some facilities in Europe and continues to move toward the completion of the Strategic Alliance in Korea. Global conflict and crises will continue to impact the Department's rebalancing and resetting. It is critical that the Department address these challenges to ensure our military is agile, flexible, and ready for the full range of contingencies during this time.

Meanwhile, the new budget reality is being sensed across the Department, especially in areas such as maintenance of existing equipment and systems, fielding and implementation of new systems, and the frequency and extent of training and exercises. The impact of sequestration was felt almost immediately as the Navy adjusted repair and overhaul schedules for ships and the Air Force began restricting flying hours for squadrons. The Services and the combatant commands need to ensure that the impact of the current sequestration, as well as future budget reductions, has minimal impact on the ability to respond to future threats. The Services will be challenged to review their existing force structures and make necessary changes or adjustments, especially when those changes or adjustments involve paradigm shifts in how we view future scenarios.

3-1B. Joint Warfighting and Readiness

IG Assessment of Progress

The Department must assess warfighter capabilities and readiness across the full range of strategic, operational, and tactical considerations. This assessment includes large questions, such as whether the joint force is capable of achieving the strategic objectives set forth in the *National Security Strategy*, to the tactical focus on individual unit readiness. The Department is making progress in addressing the many difficulties in the drawdown in Afghanistan, resetting equipment, and ensuring the long-term viability of the all-volunteer force. However, the Department must also be ready to address fiscal challenges; if not addressed, those fiscal challenges will overtake any improvements or enhancements the Department intends to make in the near term.

The National Security Strategy released in January 2012 placed increased emphasis on the Pacific theater. The realignment of forces from Okinawa, Japan, to Guam still faces formidable challenges, which have increased projected costs and schedules.

The Services will have to train to fight in conventional and unconventional scenarios, and they will be challenged to do so with diminishing resources while maintaining their readiness.

The Department must also provide the necessary levels of oversight to ensure that forces returning from Afghanistan, and their families, continue to receive the medical and other support they need.

As the drawdown continues in Afghanistan, the Department must ensure that adequate oversight of equipment being returned and the equipment reset process is properly managed so that only unusable equipment is disposed and that which is new is fielded to intended users. The DoD IG recently reported on concerns with the security of equipment staged for retrograde in Afghanistan. We also identified concerns with the contract oversight of the multimodal contract used to facilitate the transporting of equipment to the United States for reset.

Efforts to redeploy military units around the globe will enable the Services to better shape and focus their force structure to provide greater flexibility in responding to threats.

3-1C. Joint Warfighting and Readiness

Department Response

Turmoil around the world continues, ranging from the threat presented by ISIL in Iraq to the potential of an Ebola pandemic. Despite our continued high operations tempo, the Department remains committed to ensuring deployed forces around the globe are trained, equipped, and ready to perform their assigned missions. Deploying capable and ready forces for current operations continues to impact the non-deployed forces' ability to prepare for full spectrum operations. Non-deployed forces are focusing their available training time to prepare for their next mission in support of Operation Enduring Freedom, or training to full spectrum readiness hedging against the need to execute other potential contingencies.

The ongoing reduction of forces from Afghanistan has reduced the stress on forces in the near term; however, fiscal constraints will result in tough decisions on materiel, manpower, and infrastructure that could negate the positive aspects expected from the reductions in operational stress. Additionally, even with the reduction of ground forces in the Central Command area of responsibility, it is anticipated the demand for Naval and Air Forces will continue unabated for the foreseeable future.

The Department is continually developing and refining comprehensive plans for both resetting and rebalancing the total force, which includes all Reserve Component forces, in the most effective and efficient manner possible. We recognize the most important part of maintaining joint warfighting capability and readiness is caring for the all-volunteer force and their families. During these times of fiscal austerity, particularly the potential to return to Budget Control Act funding levels, finding the proper balance between maintaining readiness, force structure sizing, modernization, and future threats remains the highest priority of the Department's leadership.

4. IG-Identified Challenge: Cyber Security

4-1A. Cyber Security

IG Summary of Challenge

Although the Department has operated in the information and cyberspace environment for years, making "cyber" a new domain of warfare in the 2010 Quadrennial Defense Review (QDR) brought it into the forefront of warfighter planning. However, bringing the cyber domain into parity with the more easily distinguished and widely developed air, land, and sea domains will remain a challenging task for the near future.

As described in the National Military Strategy for Cyberspace Operations, cyberspace threats generally fall within six categories: traditional, irregular, catastrophic, disruptive, natural, and accidental. Addressing the rapidly increasing threats in the cyber domain is a priority. As such, developing offensive as well as defensive operations within the domain takes specialized equipment along with uniquely trained personnel.

In the relatively short life of the newly described cyber domain, the Department has developed strategies for both offensive and defensive operations. In a June 12, 2013, statement before the Senate Committee on Appropriations, the Commander, United States Cyber Command stated, "We are improving our tactics, techniques, and procedures, as well as our policies and organizations. This means building cyber capabilities into doctrine, plans, and training – and building them in a way that senior leaders can plan and integrate such capabilities as they would capabilities in the air, land, and sea domains." As stated by the Department's past Chief Information Officer, "There will never be a time that we can assume a comfort posture." As such, the Department must be ever vigilant to continuously invent and reinvent how it operates in the cyber domain.

4-1B. Cyber Security

IG Assessment of Progress

The Department has made strides in developing strategies for operating in the cyber domain, developing frameworks for evaluating risks, and building its cyber workforce strategy for the future. The Department is establishing cyber support elements at several geographic combatant commands to provide both technical capability and expertise for the combatant commander. The Department continues to develop, refine, and implement programs and processes for the five initiatives identified in the Department of Defense Strategy for Operating in Cyberspace. The Department continues to invest in cybersecurity capabilities by expanding the cyber forces that will defend the networks, degrade adversary cyber capabilities, and support defense of National infrastructure.

In March 2014, the Department issued instructions for the Risk Management Framework (RMF) for DoD Information Technology (IT). The instructions describe how cybersecurity requirements for DoD information technologies will be managed through RMF, consistent with the principles established by the National Institute of Standards and Technology. Also in March 2014, a new instruction on cybersecurity was issued to establish a cybersecurity program to protect and defend DoD information and information technology. The *Quadrennial Defense Review 2014* commits the Department to dedicate additional resources to cybersecurity. Lastly, the Department continues to increase the number of high-level positions with a cyber leadership role. However, unlike in the air, land, and sea domains, accomplishments can be quickly overcome by the stream of threats, and the Department must continue to challenge all military, civilian, and contractor employees to successfully implement cyber security while operating in the cyber domain.

4-1C. Cyber Security

Department Response

The Department continues to make progress in ensuring the strategic goals of the cyber environment are met. To ensure cyber security for the nation, the Cyber Mission Force was created. The Cyber Mission Force continues to mature to respond to cyber security demands of the nation. Several programs have been put in place to ensure the Cyber Mission Force is properly manned, trained, and equipped.

The Assistant Secretary of Defense for Global Strategic Affairs has been assigned the role of Principal Cyber Advisor to inform the Secretary of Defense on policy related to the Cyber Mission Force. The Department is examining the role of the National Guard and Reserve Component for the Cyber Mission Force. The department is leveraging cyber National Guard forces to coordinate train, advise, and assist the Cyber Mission Force. Using the National Guard in this capacity allows the Department to take advantage of the knowledge and training of both the military and private sectors. In addition, the Department is ensuring a right sized, properly trained and equipped civilian cyber force by ensuring the proper hiring policy and authority is in place to recruit the talent needed. Lastly, the Department is taking action to create a persistent training environment is available to certify the Cyber Mission Force is properly trained.

Per the National Defense Authorization Act for FY 2014, the Department recently submitted a report to Congress which made recommendations across a range of issues in support of cyberspace, including the manpower, recruitment, retention, roles, mission requirements, training, infrastructure and structure for the Reserve Components (RC). This report also addressed how the Military Services supply personnel to the Cyber Mission Force.

4-2A. Cyber Workforce

IG Summary of Challenge

According to the National Initiative for Cyber Security Education, as the world grows more connected through cyberspace, a highly skilled cyber security workforce is required to secure, protect, and defend our nation's information systems. While the demand for cyber security professionals is high, the supply is relatively insufficient. For example, according to one leading research director, "Top-notch cyber-threat hunters and tool builders are in short supply. There are probably fewer than 800 of them in the entire country."

In the current environment of economic uncertainty and fiscal constraints, the Department faces a significant challenge in filling the multitude of cyber positions it needs to operate, defend, and protect its networks. The Center for Strategic and International Studies issued a report, "A Human Capital Crisis in Cybersecurity," April 2010, identifying a national shortage of skilled cyberspace personnel that could potentially impact DoD's operational readiness and put national security at risk. Additionally, the most recent Government Accountability Office report, High Risk Series, An Update, February 2013, includes strategic human capital management and identifies information technology management/cybersecurity as a Government-wide mission critical occupation. As of 2014, DoD is in the process of building its cyber mission force to provide effective defense of the nation, support combatant command military operations, and defense of DoD Information Networks. However, it is still imperative that the Department continue focused efforts to recruit, train, and retain a cyber workforce in the competitive national environment to meet the threat.

4-2B. Cyber Workforce

IG Assessment of Progress

Training and retaining a skilled cyber force is one of the biggest gaps in the cyberspace domain. The Department has taken steps recently to build its cyber workforce. On November 21, 2013, the Deputy Secretary of Defense issued the "Department of Defense

Cyberspace Workforce Strategy," identifying six strategic focus areas for building and maintaining a competent and resilient cyber workforce. For example, the Army developed a new military occupational specialty and graduated its first class of cyber network defenders in November 2013 as a means to building a cyber workforce. Also, the Deputy Secretary of Defense included funding in FYs 2014 and 2015 to field the approximately 6,000 personnel cyber mission force. In addition, the Department will add additional military and civilians to perform other cyberspace functions for U.S. Cyber Command, the combatant commands, and the Services related to defending networks, degrading adversary cyber capabilities, and supporting defense of national infrastructure. In addition, the 2014 budget adds resources to increase the quality and throughput of DoD's training pipeline. Although the Department has made progress in beginning to build a cyber workforce, it must maintain momentum through implementation to ensure the resourcing initiatives allow DoD to recruit, train, and retain a competent cyber workforce.

4-2C. Cyber Workforce

Department Response

The Department has set a goal of 6,000 personnel trained, equipped, and working as the Cyber Mission Force by the end of fiscal year 2016. To facilitate success, the Department is ensuring the proper policy and authorities are in place to hire the right personnel to meet this goal. While personnel with cyber security skills remain in high demand, the Department has put incentives in place to attract world class talent.

The Department also is conducting the Civilian Cyber Workforce Challenges study, which will examine the current human resources systems and practices in place at the National Security Agency and United States Cyber Command to ensure that human resources and funding systems are flexible for a dynamic community.

Lastly, the Services are creating occupational series specifically for cyber missions. These new career fields will replace the existing model of taking personnel from disparate career fields to become part of the Cyber Mission Force. Instead, the new career fields will be used to supply personnel to the Cyber Mission Force.

To ensure the Cyber Mission Force is properly trained, the Department continues to mature the United States Cyber Command Training and Readiness Manual. This document details individual training requirements for the Cyber Mission Force. It has seen wide distribution and coordination throughout the Department throughout the creation process.

The Department continues to prioritize cyber workforce and has developed a strategy for providing a phased cyber workforce development that is large enough and strategically structured to secure, protect, and defend Department networks. Budget constraints, including indiscriminate cuts, put that strategy at risk.

5. IG-Identified Challenge: Health Care

5-1A. Health Care

IG Summary of Challenge

The Military Health System (MHS) must provide quality care for 9.6 million beneficiaries within fiscal constraints while facing increased user demand, legislative imperatives, and inflation. These factors make cost control difficult in the public and private sectors. Over the last decade, health care costs continued to grow substantially, and MHS costs have been no exception. The DoD FY 2014 appropriations for health care were \$32.7 billion, which is an increase of about 80 percent since FY 2005, and which has almost tripled since FY 2001 appropriations of \$12.1 billion. However, the Department's appropriations slightly decreased by \$16 million from FY 2013. The Department reported that growing health care costs will limit its ability to fund medical readiness requirements.

Health care fraud is another challenge in containing health care costs. Health care fraud is among the top five categories of criminal investigations of the DoD IG's Defense Criminal Investigative Service (DCIS). Specifically, as of March 31, 2014, DCIS had 322 health care cases representing 19.8 percent of the 1,725 open cases. The Defense Health Agency reported that during calendar year 2013, its program integrity unit managed 388 active investigations, opened 212 new cases, and responded to 931 leads or requests for assistance.

As the Military Health System continues to adapt to budgetary and force transformation constraints, the Department must maintain the medical readiness of the force. Challenges will include public health, suicide prevention, access to care, pre- and post-deployment health care, medication management, and Reserve Component health care. The Department continues to enable the recovery and transition of wounded, ill, and injured Service Members by using Wounded Warriors programs and the Integrated Disability Evaluation System. Due to the drawdown in Iraq and Afghanistan, the Military Services will be challenged with "right-sizing" their medical transition programs.

5-1B. Health Care

IG Assessment of Progress

The Department's efforts in controlling health care costs, while still ensuring our service men and women and their families receive the care they need and deserve, will continue to be a challenge. The MHS is focusing on many areas to manage health care costs per capita. Three managed-care support contracts are in effect; however, award protests resulted in staggered implementation of the new-generation TRICARE contracts. These contracts provide incentives for customer satisfaction and contractors for managed care support as partners in support of medical readiness. The Department continues to examine how the MHS purchases health care from the private sector.

The Department identified areas that assist in managing costs, including the use of the TRICARE Mail Order Pharmacy program. The DoD IG reported in July 2013 that the TRICARE Mail Order Pharmacy Program was more cost efficient than the retail program due to the difference in the cost of the pharmaceuticals. The Defense Health Agency Pharmacy Operations Directorate implemented an aggressive communication plan to encourage the increased use of receiving prescription drugs through the mail to reduce costs.

Also, through the authority provided in Section 703 of the FY 2008 National Defense Authorization Act, DoD obtains federal pricing discounts in the TRICARE retail network pharmacies in the form of refunds from pharmaceutical manufacturers. According to the Defense Health Agency, as of May 2014, DoD achieved savings to the Defense Health Plan of \$493 million through the program. Finally, according to the Defense Health Agency, DoD achieved savings through DoD and VA joint pharmaceutical purchase contracts totaling \$30 million in 2014, with further potential contracts pending totaling \$129 million.

However, the Department continues to struggle with containing costs in the TRICARE Overseas Program. DoD IG reported in April 2014 that the Defense Health Agency and its overseas contractor officials did not negotiate rates in any of the 163 overseas locations, which represented \$238 million in health care payments in FY 2012. TRICARE payments increased from \$21.1 million in FY 2009 to \$63.8 million in FY 2012, or about 203 percent, in six, high-dollar volume locations without negotiated rates or other cost containment measures. The Department did not agree to implement cost containment measures for these locations, but did agree to implement cost containment measures, similar to rates established by the Centers for Medicare and Medicaid Services, in the U.S. territories.

Since 2011, the IG has extensively assessed the efficiency and effectiveness of medical care and transition programs for wounded, ill, and injured Service Members. The Services have refined and improved these transition programs and have implemented plans to continually assess ongoing requirements.

The MHS Quadruple Aim Concept focuses on four factors in providing quality health care to DoD beneficiaries: readiness, population health, experience of care, and cost. Continuing to implement the MHS Quadruple Aim Concept should improve quality and reduce costs by focusing on improved care coordination and delivering care in the appropriate setting. Additionally, the MHS identified optimization of the pharmacy practices and implementation of the patient-centered medical home as strategic initiatives, both of which aim to increase the quality of health care while reducing its cost.

5-1C. Health Care

Department Response

The Department acknowledges the summary of the DoD IG's challenges and assessment of the Department's progress regarding health care.



An Airman positions a Service Member for a CT scan at the Craig Joint Theater Hospital on Bagram Airfield, Afghanistan.

Photo by Staff Sgt. Evelyn Chavez

6. IG-Identified Challenge: Equipping and Training Afghan Security Forces

6-1A. Afghan National Security Forces

IG Summary of Challenge

Between now and the end of CY 2014, the Department will continue to develop the Afghan National Security Force's (ANSF) capability to take ultimate responsibility for Afghanistan's security. Challenges include:

- Developing ministerial capability to plan and manage resources and human capital;
- Ensuring enabling-force capabilities (combat support and combat service support elements) are fielded prior to withdrawal of Coalition capabilities;
- Measuring and reporting ANSF operational readiness and effectiveness;
- Professionalizing the ANSF;
- Ensuring the ANSF logistical system can support an independent and sustainable security force; and
- Preparing for post-2014 operations.

Coalition force drawdown and retrograde have added significant challenges as ANSF completes the transition to full Afghan government responsibility for security.

Security Ministries. The Department must continue its focus on advising and assisting the development of the resource management capabilities of the Ministry of Interior and Ministry of Defense. Budget planning and execution, training and development of human resources, increasing the ranks of civilian professionals, and leader emphasis on command and control of logistics are key areas for continued emphasis. Ensuring the capacity of the ANSF and U.S./NATO command to maintain accountability and control over direct funding and equipment provided via the U.S. Afghan Security Forces Fund remains a key challenge. Additionally, coordination between the Afghan National Army (ANA), Afghan National Police (ANP), Afghan Air Force (AAF), and Special Operations Forces will be important to ensuring a multi-layered, long-term defense against insurgents and criminals.

Enabling Force Capabilities. Completing the fielding of "enablers," or military capabilities essential to building ANSF's capacity to accomplish its missions, is increasingly important. Fielding and integration of combat and support capabilities in the ANA and ANP will remain a priority. As Coalition advisors and trainers are withdrawn, the Department must take steps to mitigate the impact of the withdrawal of coalition provided enabler capability. Additionally, the Department must continue to identify, assess, and address the training, advice, and assistance requirements for fielding enabling capabilities beyond 2014.

Assessment of ANSF Progress. Assessing capabilities and identifying capability gaps will become more difficult during Coalition force withdrawal. The Department's visibility of the operational readiness and effectiveness of ANSF units is diminishing as the number of partner units and advisors continue to decrease. The challenge is to ensure sufficient skilled and qualified advisors are in key positions to continue assessing and developing ANSF leadership, command and control, and critical units.

Professionalization. The Department must continue to support ANSF's current efforts to professionalize the force. Command reports show recruitment and management of initial training at the enlisted and officer levels are becoming ANSF strengths. Developing quality leadership, managing effective training at all army and police levels, providing career development opportunities, and maintaining accurate personnel records have all been identified as areas requiring a sustained effort to build a professional army and police force.

Post-2014 Operations. Although no decision has been made on when the transition of DoD's security cooperation and assistance activities to the Department of State will occur, the Department should begin planning for an eventual transition. With the recent announcement by the President of a ceiling of 9,800 U.S. troops in 2015 in Afghanistan, reducing that presence to a Kabul-based presence, with a strong security assistance component by the end of 2016, careful deliberate planning is required to ensure timely progress in the development of a future DoD Office of Security Cooperation to provide ongoing security cooperation and support for the ANSF.

6-1B. Afghan National Security Forces

IG Assessment of Progress

Despite the current challenges in Afghanistan, much progress has been made. Most of the challenges above are recognized in Command reports as Coalition and ANSF priorities.

Since force levels are at over 95 percent of personnel end strength objective in both the ANA and ANP, and are approaching 90 percent of personnel end-strength objectives in the AAF, the emphasis on ANSF development has shifted from force quantity, or growing the force, to force quality – sustaining and professionalizing the force.

Ministerial development is a primary emphasis, and the Coalition is increasing resource management training for security ministry personnel. Ministerial advisors are delivering assessments of the security ministry departments, reporting departmental setbacks as well as successes, and planning and revising training milestones and objectives as necessary. However, lack of sufficient experienced and trained advisors remains a challenge that the Command is trying to address.

With Coalition support, ANSF is committed to fielding a wide array of combat and combat support enablers that will provide ANSF the capability to operate independently and sustainably. Although ANSF logistics and force sustainment is still a primary concern as a force enabler, recent DoD IG assessments have noted some increased understanding and appreciation of the ANSF logistics system at the unit level.

Additionally, the shortage of qualified volunteers with sufficient education remains a challenge for ANSF; nevertheless, ANSF continues to support human capital development and training, particularly literacy training. The literacy program is on course to fully transition to ANSF ownership in January 2015. Literacy training is now mandatory for all ANA and ANP recruits.

The ANSF has taken responsibility for its own training. Coalition reports confirm that the number of Afghan trainers has increased steadily over time, easing the burden on the Coalition Forces to provide military and civilian trainers between now and December 2014. Reportedly, ANSF is also managing its non-commissioned officer (NCO) and officer ranks more aggressively, for example, taking action to meet ANP and ANA non-commissioned officer (NCO) shortages by training and promoting qualified and experienced enlisted soldiers and junior NCOs.

Importantly, operational readiness and effectiveness of the ANA and ANP continues to show improvement. The Regional Command (RC) ANSF Status Report (RASR) in March 2014 assessed 62 of 85 key headquarters and units as either fully capable or capable, the two highest definition levels. With the decrease in advisor teams and advisor resources at the Corps and Police Headquarter level, Coalition forces are shifting to using Afghan reporting to understand ANSF capabilities. Challenges remain in getting reliable data with this newly developed ANSF self-assessment tool.

The ANSF assumed the lead for security nationwide on June 18, 2013 and remains on target to assume full responsibility for Afghanistan security by the end of 2014. Coalition forces have assumed a Train, Advise, and Assist role rather than a combat role, except for

force protection and certain counter-terrorism operations conducted with ANSF. As a consequence, Coalition casualties have been significantly reduced, but ANSF casualties have commensurately increased. The Coalition is providing equipment to mitigate this trend to the extent possible, especially with respect to Improvised Explosive Device (IED) attacks, which account for many of the ANSF wounded or killed.

The Coalition is monitoring the performance of ANSF in the current fighting season to determine its strengths and weaknesses. According to the "Report on Progress Toward Security and Stability in Afghanistan," issued in April 2014 by the Secretary of Defense, the Ministry of Defense (MOD) and the Ministry of Interior (MOI) continued to make progress in both budget execution and accountability, and critical support functions, but still required coalition assistance and are expected to require support for the near future, particularly with logistics and facilities. There were ministerial developmental shortfalls in acquisition and financial management; strategic plans and policy; and human resource management. The ANSF capability development shortfalls were in command and control (C2), leadership, combined arms integration, training, and logistical sustainment. Developmental shortfalls consisted of counter-IED, medical, fire support coordination, special operations capabilities, including counterterrorism (CT), and air power. The Afghan Security Institutions and ANSF both continued to rely on support from ISAF to mitigate these shortfalls and gaps.

6-1C. Afghan National Security Forces

Department Response

The Department concurs with the DoD IG's assessment.



A Soldier assigned to 16th Combat Aviation Brigade flies the American flag from the back of a CH-47 Chinook helicopter over southern Kandahar province, Afghanistan. The pilots and crew chiefs fly American flags to present—with certificates—to Service Members as part of aviation tradition.

Photo by Staff Sqt. Bryan Lewis

7. IG-Identified Challenge: The Nuclear Enterprise

7-1A. Redefining the Importance of the Nuclear Enterprise and Overcoming Past Neglect

IG Summary of Challenge

Following the Soviet Union's collapse in 1991, the United States began to shift from a nuclear weapon-centric Cold War posture to a more dynamic and flexible force structure. Two Strategic Arms Reduction Treaties (START) and the 2010 Nuclear Posture Review (NPR) culminated in further steps to reduce the role of nuclear weapons in U.S. security strategy. Moreover, the NPR directs the Department to strengthen non-nuclear capabilities and reduce the role of nuclear weapons in deterring non-nuclear attacks. The shift in strategic priorities caused a cultural crisis throughout the nation's nuclear forces, particularly in the Air Force.

In June 2013, President Obama affirmed that the United States will maintain a credible deterrent, capable of convincing potential adversaries that the adverse consequences of attacking the United States, or its allies and partners, far outweigh any potential benefit they may seek to gain through an attack. The President reaffirmed that as long as nuclear weapons exist, the United States will maintain a safe, secure, and effective arsenal that guarantees the nation's defense and that of U.S. allies and partners.

The President has supported significant investments to modernize the nuclear enterprise and maintain a safe, secure, and effective arsenal. However, mishaps in the DoD nuclear enterprise, ranging from cheating scandals to fundamental errors in sustainment and acquisition, have tarnished the reputation of those providing the nation's nuclear deterrent, while budgetary constraints have hampered modernization.

Just as both the inadvertent transfer of nuclear warheads and the discovery of Intercontinental Ballistic Missile (ICBM) fuses accidentally shipped to Taiwan eroded the confidence in the bomber and logistics communities, several other high-profile incidents struck at the core of trust and reliability of the ICBM community in 2013 and 2014.

7-1B. Redefining the Importance of the Nuclear Enterprise and Overcoming Past Neglect

IG Assessment of Progress

This past year witnessed a setback in public perception of the integrity and professionalism of the nuclear force, primarily in the ICBM leg of the nuclear triad. A probe into cheating was launched in 2013 after a drug trafficking investigation involving missile launch officers revealed information on classified tests stored on cell phones. The investigation into the cheating resulted in the firing of nine commanders and the disciplining of 79 nuclear officers. This incident followed on the heels of failed inspections and disciplinary action for missile launch officers who had fallen asleep at their post. Finally, two Flag Officers were relieved of their nuclear duties due to off-duty incidents. The incidents throughout 2013 and 2014 resulted in both the Secretary of Defense and the Secretary of the Air Force acknowledging that systemic problems exist in the ICBM community.

In January 2014, Secretary of Defense Hagel initiated an internal DoD review and an independent review of the entire nuclear enterprise in response to the cheating scandal and other failures in the ICBM community. The charter for the internal review directed an examination of the nuclear mission of both the Air Force and the Navy, to include personnel, training, testing, command oversight, mission performance, and investment.

In addition, the Secretary of the Air Force, the Chief of Staff of the Air Force, and the Chief Master Sergeant of the Air Force visited all three ICBM wings in January 2014 to gather feedback

from the Force and to reinforce Air Force standards and expectations. The Secretary of the Air Force developed a seven-point action plan to address systemic problems in the nuclear community and delivered the action plan to Secretary Hagel in March 2014.

Air Force Global Strike Command developed the Force Improvement Program, which pulled input directly from airmen at the organizational level on the most pressing issues. The command is pressing forward with a series of initiatives under the Force Improvement Program to change and improve the culture of the airmen who perform the nuclear mission. Building on the success of the Force Improvement Program's results from the ICBM wings, Air Force Global Strike Command initiated a similar effort for the B-52 wings at Minot Air Force Base (AFB) and Barksdale AFB, as well as the B-2 wing at Whiteman AFB.

Assessing the impact of these initiatives is premature, but this massive commitment of resources by senior leadership likely will improve morale and reinforce standards and expectations. As part of our FY 2015 project planning process, we are looking at potential projects that would follow up on these issues and corresponding Air Force actions.

7-1C. Redefining the Importance of the Nuclear Enterprise and Overcoming Past Neglect

Department Response

The Department concurs with the DoD IG's assessment.



An unarmed AGM-86B Air-Launched Cruise Missile is released from a B-52H Stratofortress over the Utah Test and Training Range during a Nuclear Weapons System Evaluation Program sortie. Conducted by Airmen from the 2nd Bomb Wing, Barksdale Air Force Base, La., the launch was part of an end-to-end operational evaluation of 8th Air Force and Task Force 204's ability to pull an ALCM from storage, load it aboard an aircraft, execute a simulated combat mission tasking, and successfully deliver the weapon from the aircraft to its final target.

Photo by Staff Sgt. Roidan Carlson

7-2A. Modernizing the Nuclear Force in the Face of Declining Resources

IG Summary of Challenge

The U.S. nuclear triad of land-based Intercontinental Ballistic Missiles (ICBMs), submarine-launched ballistic missiles (SLBMs), and heavy bombers has served for decades in providing a survivable and capable deterrent force. In essence, the triad has only been modernized twice – once in the early 1960s and once in the 1980s. Every one of the systems, to include the Nuclear Command, Control, and Communications (NC3) system, will require significant modernization or replacement in the next two decades. Both the Senate and House Armed Service Committees are concerned with sustainment and replacement efforts in the DoD nuclear enterprise. Similarly, the Defense Science Board Standing Task Force on Nuclear Weapons Surety states that failures continue in fundamental areas, negatively affecting the fielded forces and the replacing or upgrading of old equipment.

7-2B. Modernizing the Nuclear Force in the Face of Declining Resources

IG Assessment of Progress

The Services have initiated several programs to transform the aging nuclear force into a modern, nuclear-deterrent arm capable of operating into the latter part of the 21st century. Renovating the nuclear enterprise entails sustaining nuclear assets and developing replacement systems that integrate the latest technologies. When completed in 2030, almost every component of the strategic nuclear force will be replaced or updated.

Air Force

Long Range Strike Bomber (LRS-B): The LRS-B is funded and in the acquisition cycle. The Air Force released a request for proposal and anticipates vendor selection in FY 2015. However, Air Force leaders have issued contradictory statements regarding whether the first bomber variant will be nuclear capable. This ambiguity raises questions about the Air Force's strategic message that the nuclear mission is its number one priority, and is strikingly similar to the Air Force's acquisition strategy to procure conventional F-35s first before producing a nuclear variant. Additionally, the Air Force has not announced a commitment to require the LRS-B to be hardened against Electro-Magnetic Pulse (EMP). Any plans for future nuclear weapon platforms must consider the existing threat environment.

<u>Sustaining current bombers</u>: While the LRS-B is in development and production, the current fleet of bombers still needs sustainment, both for conventional and nuclear missions. Some of the systems and particular parts are showing aging issues that affect the fleet's readiness and reliability. Similar to other nuclear platforms, as these systems age, more parts fail for the first time, many with old or obsolete technologies. The cost to create a manufacturing base for parts that are no longer available is prohibitively expensive

<u>Air Launched Cruise Missile/Long Range Stand-Off (ALCM/LRSO)</u>: The LRSO effort will develop a weapon system to replace the Air Force's ALCM, operational since 1986. The LRSO weapon system will be capable of penetrating and surviving advanced Integrated Air Defense Systems from significant stand-off ranges to prosecute strategic targets. The ALCM is well past its expected operational lifetime, but the LRSO missile will not begin development in fiscal year 2015, as was scheduled; instead, development will slip by three years, deferring almost \$1 billion in spending beyond FY 2018.

<u>B61-12</u>: The B61 family of nuclear gravity bombs, which include components dating to the 1960s, is going through a life extension process to preserve capabilities while consolidating the variants currently fielded. This process is a joint venture with the Department of Energy (DOE), which requires that the Air Force synchronize its schedules with DOE to field life extension programs without further delay. The weapon's planned modernization is required for

integration with the anticipated nuclear variant of the F-35, when it is nuclear capable, and the LRS-B.

Minuteman III/Ground Based Strategic Deterrent: The National Defense Authorization Act of 2007 directed the Air Force to sustain the Minuteman III (MMIII) ICBM until 2030. The MMIII has received several generations of sustainment and modernization, most recently focusing on propulsion replacement, guidance replacement, and Mk21 fuse refurbishment. At the same time, the Air Force must balance investment between the legacy system and the new Ground Based Strategic Deterrent (GBSD). The GBSD refers to the yet-to-be-determined follow-on to the MMIII. The requirement for the new GBSD was expressed in the April 2010 Nuclear Posture Review (NPR), which stated the "...U.S. Nuclear Triad of ICBMs, SLBMs, and nuclear capable heavy bombers will be maintained..." Thus, DoD began an initial study of alternatives in fiscal years 2011 and 2012. The studies identified a range of possible deployment options, with the objective of defining a cost-effective approach that "supports continued reductions in U.S. nuclear weapons while promoting stable deterrence," and "Exploring new modes of ICBM basing that enhance survivability and further reduce any incentives for prompt launch." Federally-mandated budget cuts, coupled with parts obsolescence for the legacy MMIII, put both sustainment of the MMIII and acquisition of the new GBSD at risk.

<u>Security Helicopter</u>: Despite continued congressional urging and a decade of studies highlighting the inadequacy of the UH-1 helicopter as an ICBM missile field security platform, the Air Force is still using aircraft with combat time dating to the Vietnam war. The FY 2014 budget request did not include funds for replacing the previously terminated Common Vertical Lift Support Platform, raising concerns in the Senate Armed Services Committee that the Air Force's number one priority to sustain an effective nuclear deterrent is being insufficiently supported.

National Airborne Operations Center (NAOC) E-4B: Aircraft availability has not met mission needs over the last two and a half years. In FY 2013, the lack of aircraft negatively manifested itself through significantly reduced training sorties jeopardizing aircrew proficiency. Additionally, the E-4Bs existing Very Low Frequency/Low Frequency system is mechanically/electronically obsolete and unsustainable.

Integrated Tactical Warning and Attack Assessment (ITW/AA): The ITW/AA enterprise's mission is to provide timely, accurate and unambiguous warning of air, missile, and space attacks against North America to the U.S. President, the Prime Minister of Canada, the Chairman of the Joint Chiefs of Staff, Combatant Commands, and other forward users. The ITW/AA is composed of Air and Space Missile Warning Missions, with sensors and forward users located worldwide, and at correlation centers at Peterson AFB, Cheyenne Mountain AFS, Offutt AFB, and Vandenberg AFB. Portions of this legacy system are unsustainable, and plans for replacement systems have been delayed.

Navy

Ohio Class Submarine Replacement: The current Ohio class of ballistic missile submarines (SSBN) were commissioned between 1984 and 1997, and their lifetime has been extended from 30 to 42 years – unprecedented for a nuclear submarine. Additional Ohio life extensions are unrealistic, and these SSBNs will begin to be retired at a rate of one per year in 2027. Ohio replacement construction must begin in 2021 to commence its first Strategic Patrol in 2031. The FY 2013 budget delayed delivery of the first new SSBN by two years, which produced manageable risk for the future transition. Additional delays are not manageable and would create a gap in at-sea strategic requirements.

<u>Fixed Submarine Broadcast System (FSBS)</u>: The existing Low Frequency/Very Low Frequency stations were designed and built in different periods from 1953 to 1983. Consequently, each station is unique, and all are suffering from varying degrees of component obsolescence. System efficiencies are relatively low, which results in excessive energy consumption and complicated logistics support. This past year, the DoD IG examined the FSBS and concluded that while the transmitter equipment was well maintained, the supporting infrastructure at the geographically-isolated sites is on the verge of failing.

Nuclear Command, Control, and Communications (NC3)

The NC3 system is a large and complex system-of-systems comprised of numerous land, airborne, and space-based components used to assure connectivity between the President and nuclear forces. The NC3 system remains a primary concern for Congress. The National Defense Authorization Act of 2012 directed the then Assistant Secretary of Defense for Networks, Information and Infrastructure, in coordination with the service secretaries, to submit a report on the NC3 architecture and long-term strategy. More recently, the Senate Armed Services Committee report accompanying a bill for the National Defense Authorization Act for Fiscal Year 2013 mandated GAO to assess DoD's efforts to sustain and improve the NC3 system. These concerns for NC3 stem from the multitude of aging and obsolete legacy systems that require modernization and replacement.

7-2C. Modernizing the Nuclear Force in the Face of Declining Resources

Department Response

The Department concurs with the DoD IG's assessment.



A convoy follows a payload transporter (PT) through the weapons storage area at Malmstrom Air Force Base, Montana. The PT returned after maintenance crews removed the last multiple independently targetable reentry vehicle in the Air Force intercontinental ballistic missile inventory from a Minuteman III, helping bring the Air Force towards compliance with the New Strategic Arms Reduction Treaty and comply with direction from the 2010 Nuclear Posture Review.

Photo by Senior Airman Katrina Heikkinen

7-3A. Lack of an Integrated End-to-End Governance Process

IG Summary of Challenge

No integrated, end-to-end governance process exists for the DoD nuclear weapon enterprise. Existing forums are generally effective, but are separate entities, either in substance or process, that are not viewed as part of an integrated, whole-DoD effort.

7-3B. Lack of an Integrated End-to-End Governance Process

IG Assessment of Progress

With isolated exception, coordinated senior-level leadership attention dedicated to nuclear issues in the Department is insufficient. The Congressional Budget Office estimates that the nation is faced with \$296 billion of nuclear weapon-related decisions to be made over the next 10 years. Without centralized and integrated management, these decisions will be made with an eroded capability to properly analyze these issues.

No governance structure exists that empowers a single DoD organization to ensure that capabilities are planned, resourced, modernized, and sustained as an integrated program of record in all DoD Services and organizations. Multiple committees, including the Nuclear Weapons Council, the Senior Nuclear Oversight Council, and the National Leadership Command, Control, and Communication Executive Management Board, have overlapping memberships to address various issues in the nuclear enterprise. Most committees, however, are not full-time bodies and cannot be expected to delve deeply into the details of every programmatic decision. Additionally, many of these committees are merely advisory or coordination bodies, unable to commit resources. The absence of a DoD-wide nuclear enterprise governance structure has resulted in gaps, seams, and overlap among these committees.

Not having clear delineations of responsibility is a trend throughout most of the DoD IG's recent nuclear enterprise reports. This trend may be hard to overcome for NC3 systems with multiple organizations hosting portions of it, but in other instances we find examples where responsibility is shared or uncertain.

Notable exceptions have recently occurred. The Deputy's Management Action Group effectively provided some specific programmatic direction for the Services, and the DoD Chief Information Officer established organizations to oversee Nuclear Command, Control, and Communications.

7-3C. Lack of an Integrated End-to-End Governance Process

Department Response

The Department concurs with the DoD IG's assessment, but notes that the Department is leading a congressionally mandated council for NC3. The Council on Oversight of the National Leadership C3 System, which was established in the FY 2014 National Defense Authorization Act, comprises DoD stakeholders to address declining resources for NC3 modernization. The Council members include the USD(AT&L), USD Policy, Vice Chairman of the Joint Chiefs of Staff, the Director of the National Security Agency, the DoD CIO, and the Commander of U.S. Strategic Command.

