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Inspector General
United States Department of Defense

Better Oversight Needed for the National Guard's Weapons of Mass Destruction Civil Support Teams

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Acronyms and Abbreviations

AAR	After Action Report
CBRNE	Chemical, Biological, Radiological, Nuclear, or High-Yield Explosives
JFHQ	Joint Force Headquarters
NGB	National Guard Bureau
NGB-J3/DO	National Guard Bureau-J3, Domestic Operations Directorate
NGB JoCC	National Guard Bureau Joint Coordination Center
SITREP	Situation Report
WMD CST	Weapons of Mass Destruction Civil Support Team

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

July 2, 2012

MEMORANDUM FOR CHIEF, NATIONAL GUARD BUREAU
ASSISTANT SECRETARY OF THE AIR FORCE (FINANCIAL MANAGEMENT AND COMPTROLLER)
AUDITOR GENERAL, DEPARTMENT OF ARMY

SUBJECT: Better Oversight Needed for the National Guard's Weapons of Mass Destruction Civil Support Teams (Report No. DODIG-2012-110)

We are providing this report for review and comment. We determined that the four Weapons of Mass Destruction Civil Support Teams (WMD CSTs) reviewed had plans in place to respond to chemical, biological, radiological, nuclear, or high-yield explosives and natural or man-made disasters. However, the National Guard Bureau did not have situational awareness of WMD CSTs' ability to immediately respond to a release of chemical, biological, radiological, nuclear, or high-yield explosives and natural or man-made disasters. We considered management comments on a draft of this report when preparing the final report.

DoD Directive 7650.3 requires that recommendations be resolved promptly. The National Guard Bureau comments on the recommendation did not state whether they agree or disagree with the recommendation; however their planned actions were partially responsive to the intent of the recommendation. The comments did not include specific actions to develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State. Therefore, we request that the Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, provide comments to the final report by August 1, 2012.

If possible, send a portable document format (.pdf) file containing your comments to audros@dodig.mil. Copies of the management comments must contain the actual signature of the authorizing official. We are unable to send classified comments electronicall, you must send them over the SECRET Internet Protocol Router Network (SIPRNET).

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

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

Results in Brief: Better Oversight Needed for the National Guard's Weapons of Mass Destruction Civil Support Teams

What We Did

We evaluated the planning and reporting of the National Guard's Weapons of Mass Destruction Civil Support Teams (WMD CSTs) in response to intentional or unintentional release of chemical, biological, radiological, nuclear, or high-yield explosives and natural or man-made disasters.

What We Found

The four WMD CSTs reviewed had plans for each phase of operation (pre-operational, operational, and post-operational) identified in the Army Field Manual 3-11.22, "Weapons of Mass Destruction-Civil Support Team Operations," December 2007. Those plans should improve the WMD CSTs' ability to prepare, prevent, protect, and respond to incidents involving chemical, biological, radiological, nuclear, or high-yield explosives and natural or man-made disasters.

However, the four WMD CSTs reviewed did not fully meet the reporting requirements to keep the National Guard Bureau aware of their movements and operations. Specifically, the WMD CSTs did not provide required termination, situation and after action reports, and complete information for after action reports. Also, the National Guard Bureau records showed that the WMD CSTs conducted 409 response, stand-by, and assist missions from FY 2008 through FY 2011, while the teams' records showed a total of 640 missions for the same time period. This occurred because National Guard Bureau-J3, Domestic Operations Directorate personnel did not clarify reporting expectations or adequately oversee how the WMD CSTs implemented the reporting requirements identified in the National Guard Regulation 500-3/Air National Guard Instruction 10-2503, "Weapons of Mass Destruction Civil Support Team Management." As a result, the National Guard Bureau did not have situational awareness of WMD CSTs' ability to immediately respond to a release of chemical, biological, radiological, nuclear, or high-yield explosives and natural or man-made disaster.

What We Recommend

We recommend that the Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State that verifies compliance with mission reporting requirements and provides feedback to WMD CST on omissions and errors.

Management Comments and Our Response

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, agreed that there is room to improve oversight of the WMD CST reporting process. However, the Director did not specifically state whether he agrees or disagrees with the recommendations but has planned actions that are partially responsive to the intent of the recommendations. The Director did not identify specific actions to develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State. We request that the Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, provide comments in response to this report by August 1, 2012. Please see the recommendation table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate	1, 2	

Please provide comments by August 1, 2012.

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Introduction

Objective

Our objective was to evaluate the adequacy of the planning and reporting of the National Guard's Weapons of Mass Destruction Civil Support Teams (WMD CSTs) in response to intentional or unintentional release of chemical, biological, radiological, nuclear, or high-yield explosives (CBRNE) and natural or man-made disasters. See the appendix for a discussion of our scope and methodology.

Background

On March 17, 1998, Secretary of Defense Cohen announced the creation of 10 Rapid Assessment and Initial Detection units to enhance the DoD's ability to respond to domestic incidents involving weapons of mass destruction. The Rapid Assessment and Initial Detection units were renamed to WMD CSTs, which emphasized their role in assisting civil authorities. Additional WMD CSTs were added in various phases starting in July 2001. DoD added the latest WMD CST in November 2010. At the time of the audit, there were 57 WMD CSTs, which included at least one in each State,[1] three territories (Guam, Puerto Rico, and the Virgin Islands), and the District of Columbia. We reviewed four WMD CSTs in California, New York, and Indiana.[2]

The WMD CST was the lead element of the National Guard's immediate response force capabilities as identified in the 2011 Army Posture Statement. In Public Law 109-364, "FY 2007 National Defense Authorization Act," October 17, 2006, Congress expanded the operational incidents for which a WMD CST could be used to include intentional or unintentional release of nuclear, biological, radiological, or toxic or poisonous chemical materials, and natural or man-made disasters in the United States that result or could result in the catastrophic loss of life or property.

In a March 9, 2004, news release, DoD reported that the WMD CST was able to deploy rapidly, assist local first responders in determining the nature of an attack, provide medical and technical advice, and prepare for the identification and arrival of follow-on State and Federal military response assets. Each team was made up of 22 full-time National Guard members, and was commanded by a lieutenant colonel, jointly staffed with Army and Air National Guard personnel, and consists of six sections: command, operations, communications, administration/logistics, medical, and survey.

Key Players in the WMD CST Program

The players in the WMD CST program include the National Guard Bureau-J3, Domestic Operations Directorate (NGB-J3/DO), National Guard Bureau Joint Coordination Center

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[1] California, Florida, and New York have two WMD CSTs.
[2] We visited the 9th WMD CST, Los Alamitos, California; 95th WMD CST, Hayward, California; 2nd WMD CST, Scotia, New York; and 53rd WMD CST, Indianapolis, Indiana.

(NGB JoCC),[3] Joint Force Headquarters-State (JFHQ-State) and the WMD CST. The NGB-J3/DO plans, programs, and oversees the National Guard's WMD CST program and facilitates communication between DoD and the National Guard of the States and territories. The NGB JoCC coordinates requests from other Federal agencies for WMD CST support with the appropriate JFHQ-State. The JFHQ-State coordinates requests for WMD CST support from local and state agencies. The JFHQ-State also validates WMD CST mission requests and forwards all required reports to the National Guard Bureau (NGB). The WMD CST, at the direction of the Governor, supports civil authorities at a domestic CBRNE incident site by identifying CBRNE agents/substances, assessing current and projected consequences, advising on response measures, and assisting with requests for additional support.

WMD CST Program Guidance

The WMD CST program used National Guard Regulation 500-3/Air National Guard Instruction 10-2503 (NGR 500-3/ANGI 10-2503), "Weapons of Mass Destruction Civil Support Team Management," January 2006; NGR 500-3/ANGI 10-2503, May 2011[4]; and Army Field Manual 3-11.22 (FM 3-11.22), "Weapons of Mass Destruction-Civil Support Team Operations," December 2007, in normal operations. The NGR 500-3/ANGI 10-2503 prescribes policies, procedures, and roles and responsibilities governing the employment of the National Guard's WMD CSTs in support of the National Guard Homeland Security Mission. The regulation also defines operational mission categories. Operational requests from local, State, and Federal agencies may fall into one of following mission categories:

- Response - Anytime a WMD CST deploys in response to a validated support request.
- Stand-by - Anytime a WMD CST deploys to provide expertise at an event where the WMD CST may be the only asset, or staged with other State assets, to conduct operations. This includes events identified by the State chain of command, protective details, incidents of national significance, or other special events.
- Assist - Includes but is not restricted to contingency operations liaison, capabilities briefs, technical assistance, mission reconnaissance, mutual support on how to minimize vulnerability to a CBRNE incident or as part of a national, state or local WMD Command Post Exercise or Field Training Exercise where unit capabilities are planned and demonstrated in accordance with scenario changes.

In addition, the NGR 500-3/ANGI 10-2503 outlines reporting requirements for before, during, and after a WMD CST is deployed or participates in a mission. The regulation describes three reports that the WMD CSTs should prepare and submit to the NGB JoCC, through the JFHQ-State. These reports include the:

- Situation Report (SITREP) – WMD CST must provide SITREPs at specified times throughout the duration of the mission.

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[3] The entity, "National Guard Bureau Joint Coordination Center," is referenced in the National Guard Regulation 500-3/Air National Guard Instruction 10-2503, May 2011, and the entity, "National Guard Bureau Joint Operations Center," is referenced in the National Guard Regulation 500-3/Air National Guard Instruction, January 2006.
[4] Most of the documentation that we reviewed was for missions that occurred before the May 2011 version of the NGR 500-3/ANGI 10-2503. Therefore, we applied the January 2006 version of the NGR 500-3/ANGI 10-2503 to missions before May 2011 and the May 2011 version to missions that occurred after May 2011.

- Termination Report – WMD CST must submit a termination report to the incident commander prior to leaving the incident site. The WMD CST must also include a copy of the termination report in the After Action Report (AAR).
- AAR – WMD CST must complete an AAR within 5 duty days after terminating a mission.

The FM 3-11.22 focuses on the organization, mission, command and control, and operations of the WMD CSTs. The guidance addresses employment concepts, planning considerations, capabilities, and the type of support that WMD CSTs can provide during a response.

Review of Internal Controls

DoD Instruction 5010.40, "Managers' Internal Control Program (MICP) Procedures," July 29, 2010, requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified an internal control weakness for NGB-J3/DO. NGB-J3/DO personnel did not coordinate with JFHQ-State personnel to verify WMD CSTs compliance with mission reporting requirements and provide feedback to WMD CSTs on report omissions and errors. We will provide a copy of the report to senior officials responsible for internal controls at NGB-J3/DO and the NGB.

Finding A. WMD CSTs Had Plans in Place to Respond to Disasters

The four WMD CSTs had plans in place to respond to CBRNE and natural or man-made disasters. Specifically, the WMD CSTs reviewed had plans for each phase of operation (pre-operational, operational, and post-operational) identified in the FM 3-11.22. Those plans should improve the WMD CSTs' ability to prepare, prevent, protect, and respond to incidents involving CBRNE and natural or man-made disasters.

WMD CSTs Had Plans in Place for Each Phase of Operation

The four WMD CSTs had pre-operational, operational, and post-operational plans in place. The FM 3-11.22 and the NGR 500-3/ANGI 10-2503 identify different ways for meeting the planning requirements. Therefore, the plans varied among the WMD CSTs. These plans included, but are not limited to, yearly training guidance, standard operation procedures, and safety procedures.

Pre-Operational Phase Plans to Prepare WMD CSTs to Receive Mission Orders

All four WMD CSTs had plans in place to prepare them to receive and execute mission orders for the pre-operational phase.[5] Although the NGR 500-3/ANGI 10-2503, January 2006, does not require that WMD CSTs have garrison standard operating procedures, the NGR 500-3/ANGI 10-2503, May 2011, requires that each WMD CST publish garrison standing operating procedures detailing the unit operating procedures. The WMD CSTs developed garrison standard operating guidance that covered processes and procedures for each unit to follow while on garrison (home station), including the commander's training vision, philosophy, and intent; training guidance; and logistics. The operating guidance also includes information about the unit's plan to comply with managing personnel and maintaining equipment.

> *All four WMD CSTs had plans in place to prepare them to receive and execute mission orders for the pre-operational phase.*

In addition, the four WMD CSTs maintained copies of the JFHQ-State Contingency Plans for civil support operations. These contingency plans included instructions for the WMD CSTs to request assistance from and offer support to other WMD CSTs, when needed. Also, the 95th WMD CST developed plans to conduct emergency response drills to test their response to incidents. The Commander created an annual training plan based on the CBRNE spectrum, new trends, global events, and the needs of the State's first responders. Further, the 53rd WMD CST developed "Command Readiness Guidance" that addresses the Commander's vision and intent for readiness and training. The purpose of this guidance was to maintain an operational posture that ensured the 53rd WMD CST was fully manned, trained, and equipped to respond.

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[5] According to the FM 3-11.22, the preoperational phase begins after certification and continues until the WMD CST receives a validated deployment or mission order.

Additionally, the 2nd WMD CST had, "Logistics Standard Operating Procedures," to assist in daily management of logistics operations. The primary objective of the standard operating procedures was to ensure that the team was ready to deploy. Also, the 2nd WMD CST used the Standardization, Evaluation, and Assistance Team training checklist to ensure that the team met NGB training requirements. The Commander developed exercises to test the WMD CST's responses to different incidents.

Operational Phase Plans to Help WMD CSTs Execute Missions

The four WMD CSTs had plans in place to execute missions for the operational phase.[6] The WMD CSTs developed Tactical Standard Operating Procedures or a Tactical Standard Operating Guide that included processes and procedures the unit would follow from the initial alert to execution of the mission. Also, the 2nd WMD CST conducted its planning through an operation brief before the mission began to review site images, graphics, maps, and mission details. The 2nd WMD CST planned which mode of movement to use and coordinated with the State police for escort to the incident site, depending on traffic patterns. The 95th WMD CST used an operations checklist when responding to a mission. The operations checklist documented the situation, organizations present, CBRNE agents identified, and casualties. In addition, the 95th WMD CST developed a movement checklist to identify the situation, mission, personnel assigned to the mission, and maneuver plan.

> *The WMD CSTs developed Tactical Standard Operating Procedures or a Tactical Standard Operating Guide that included processes and procedures the unit would follow from the initial alert to execution of the mission.*

Post-Operational Phase Plans for WMD CSTs to Resume Operational Readiness

All four WMD CSTs had plans in place to resume operational readiness for the post-operational phase.[7] The WMD CSTs developed Tactical Standard Operating Procedures or a Tactical Standard Operating Guide, which included processes and procedures the unit will follow, after the mission, to prepare for redeployment. Those processes included personnel and equipment accountability, close out of all reports, medical screening, and reconstitution of unserviceable or consumed items. In addition, the 9th WMD CST developed Real World Response Mission Standard Operating Procedures that address procedures the unit will follow to prepare for redeployment after a mission is completed. The 95th WMD CST developed plans to conduct refit operations after a mission to ensure equipment is ready for the

> *The WMD CSTs developed Tactical Standard Operating Procedures or a Tactical Standard Operating Guide, which included processes and procedures the unit will follow, after the mission, to prepare for redeployment.*

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[6] According to the FM 3-11.22, the operational phase begins at the time of notification and ends when the team is formally relieved in place, has met the requirements outlined in the unit exit strategy, or has been released from the incident.

[7] According to the FM 3-11.22, the post-operational phase begins when the commander issues the order to cease operations at the incident site and begin redeployment activities. The post-operational phase ends when the unit has completed full reconstitution and resumes the operational readiness cycle.

next mission. The 2nd WMD CST used a post-operational checklist that provided guidance on refueling vehicles, washing vehicles, accounting for items, and submitting a closure report to the New York Joint Operation Center when the unit was ready for deployment.

Management Comments on the Finding and Our Response

National Guard Bureau Comments

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate agreed that the four WMD CSTs reviewed had plans in place to respond to disasters during the preoperational, operational and post operational phases.

Our Response

The Director's comments were consistent with the audit report.

Finding B. The National Guard's WMD CSTs Reviewed Need to Improve the Reporting on Missions

The four WMD CSTs did not fully meet the reporting requirements to keep NGB aware of their movements and operations. Specifically, the WMD CSTs did not provide required termination reports, SITREPs and AARs, and complete information for AARs. Also, NGB records showed that the WMD CSTs conducted 409 response, stand-by, and assist missions from FY 2008 through FY 2011, while the teams' records showed a total of 640 missions for the same time period. This occurred because NGB-J3/DO, personnel did not clarify reporting expectations or adequately oversee how the WMD CSTs implemented the reporting requirements identified in the NGR 500-3/ANGI 10-2503. As a result, NGB did not have situational awareness of WMD CSTs' ability to immediately respond to a release of CBRNE and natural or man-made disaster.

WMD CSTs Did Not Fully Meet Reporting Requirements

The WMD CSTs did not fully meet the reporting requirements identified in NGR 500-3/ANGI 10-2503. The NGR 500-3/ANGI 10-2503 requires WMD CSTs to submit termination reports at the conclusion of all response missions; and provide SITREPs and AARs for all response and stand-by missions. The WMD CSTs are required to submit these reports to the NGB JoCC through the JFHQ-State. The regulation also identified information that the reports should cover or include. Further, the regulation required the JFHQ-State to notify the NGB JoCC of all WMD CST missions. However, WMD CSTs did not provide all required reports, include complete information in the reports, and report missions consistent with the missions that NGB reported.

Termination Reports Omitted for Response Missions

The NGR 500-3/ANGI 10-2503 requires the WMD CST commander to provide a termination report to the incident commander before leaving the incident site and to submit the report through the JFHQ-State to NGB JoCC. However, this did not always occur. The 9th and 53rd WMD CSTs did not complete termination reports for the three response missions and eight response missions they conducted, respectively, from FY 2008 through FY 2011. The 95th and 2nd WMD CSTs did not complete termination reports because the teams did not participate in response missions from FY 2008 through FY 2011.

> *The 9th and 53rd WMD CSTs did not complete termination reports for the three response missions and eight response missions, respectively, from FY 2008 through FY 2011.*

The 9th and 53rd WMD CSTs stated that they conducted training to complete termination reports, but never prepared the reports at the conclusion of a response mission. Personnel from both WMD CSTs stated they "believed" that since NGR 500-3/ANGI 10-2503 requires the WMD CSTs to prepare termination reports for the incident commander, the team should only prepare a termination report, if the incident commander requested one. The 9th and 53rd WMD CSTs added that thus far, incident commanders did not request a termination report and

the teams did not receive any feedback from NGB requesting the report. As a result, WMD CSTs did not prepare termination reports after completing their response missions.

SITREPs and AARs Not Provided for All Response and Stand-by Missions

None of the WMD CSTs reviewed provided copies of SITREPs and AARs for all response and stand-by missions conducted from FY 2008 through FY 2011. NGR 500-3/ANGI 10-2503 requires WMD CSTs to prepare and provide SITREPs and AARs through JFHQ-State to NGB JoCC for all response and stand-by missions. Copies of these reports would provide NGB JoCC accurate information related to the WMD CSTs' operations and movements.

From FY 2008 through FY 2011, the four WMD CSTs reported a total of 199 response and stand-by missions (11 response missions and 188 stand-by missions). Of the 199 missions, the WMD CSTs provided SITREPs for 17 missions and AARs for 45 missions. The 9th and 53rd WMD CSTs conducted a total of 11 response missions during the period audited, but only provided SITREPs for 1 mission and AARs for 3 missions. During that same period, the 4 WMD CSTs conducted a total of 188 stand-by missions, but only provided SITREPs for 16 missions and AARs for 42 missions. Table 1 shows the number of SITREPs and AARs that each WMD CST provided for response and stand-by missions.

Table 1. Number of SITREPs and AARs That WMD CSTs Provided for Missions

From FY 2008 Through FY 2011						
WMD CSTs	**Response Mission**			**Stand-by Mission**		
	Mission List	SITREPs Provided	AARs Provided	Mission List	SITREPs Provided	AARs Provided
9th WMD CST	3	1	2	24	2	11
95th WMD CST	0	0	0	21	0	8
2nd WMD CST	0	0	0	20	14	12
53rd WMD CST	8	0	1	123	0	11
Total	11	1	3	188	16	42

The four WMD CSTs stated that the teams could not provide SITREPs and AARs for each mission because they did not maintain a record or copy of the reports; NGB did not request the reports; or, to complete the report was not a priority. For example, the 9th WMD CST stated the team did not have SITREPs for all missions because they did not log SITREPs completed by telephone. Also, the 9th WMD CST stated that the team completed AARs after every major incident, but only kept records for 2 years and cited NGR 500-3/ANGI 10-2503, January 2006, which states, "CST Commanders are responsible for ensuring that accurate and detailed operational records are maintained for at least 2 years." When we asked, the 95th WMD CST did

not provide a reason for the missing documentation. However, the Deputy Commander, 95th WMD CST, stated that he would inform his team of this issue.

Personnel from the 2nd WMD CST explained they did not provide SITREPs and AARs for missions from FY 2008 through FY 2009 because the NGR 500-3/ANGI 10-2503, January 2006, only holds WMD CST commanders responsible for maintaining mission records for 2 years. Additionally, for FYs 2010 and 2011, the Commander, 2nd WMD CST, stated that the team did not prepare reports for smaller missions, such as an assist mission, that may take an hour for one person to complete. Lastly, personnel from the 2nd WMD CST added that NGB never requested the missing reports; therefore, the team did not make completing the reports a priority.

The 53rd WMD CST stated they did not maintain SITREPs for response and stand-by missions because the team usually communicated SITREPs by e-mail, which they did not keep. Also, personnel from the 53rd WMD CST stated that the team did not maintain the AARs because of personnel turnover. The 53rd WMD CST agreed that the team needed to improve their procedures for filing and maintaining documentation.

Reports Provided Did Not Contain All Required Information

The four WMD CSTs did not include complete information in their AARs for each response and stand-by mission from FY 2008 through FY 2011, as required by the NGR 500-3/ANGI 10-2503. According to the NGR 500-3/ANGI 10-2503, the AARs will provide a thorough review of unit operations from first alert through return to home station. Because the AARs did not contain complete information, NGB did not have a complete picture of the units' operations during these missions.

Of the 199 response and stand-by missions, only 13 missions had complete AARs. The 13 missions represented 2 response missions and 11 stand-by missions. The 9th and 53rd WMD CSTs completed AARs for the two response missions. The 9th, 95th, and 53rd WMD CSTs completed AARs for the 11 stand-by missions. Table 2 shows the number of response and stand-by missions, the number of AARs provided and the number of those AARs that were complete.

Table 2. Number of Missions With Complete Information in AARs

From FY 2008 Through FY 2011						
WMD CSTs	**Response**			**Stand-by**		
	Missions Listed	AARs Provided	Complete AARs	Missions Listed	AARs Provided	Complete AARs
9th WMD CST	3	2	1	24	11	2
95th WMD CST	0	0	0	21	8	6
2nd WMD CST	0	0	0	20	12	0
53rd WMD CST	8	1	1	123	11	3
Total	11	3	2	188	42	11

Three WMD CSTs did not include complete information in their AARs for each response and stand-by mission because the WMD CSTs stated that the teams "thought" they were providing the required information or did not receive feedback from NGB requiring changes to the AARs. Specifically, the 9th WMD CST stated that the team included all of the information they believed was required for each report. When we asked, the 95th WMD CST did not provide a reason for the incomplete AARs. The Deputy Commander, 95th WMD CST, stated the team would work on improving in this area. Also, the 53rd WMD CST stated that the team never received feedback from NGB about their information. As a result, the 53rd WMD CST would not know if the information was inadequate. Since the AARs did not contain complete information, NGB did not have a complete picture of the units' operations during these missions.

Additionally, one WMD CST did not follow the guidance in the NGR 500-3/ANGI 10-2503. The 2nd WMD CST stated that this occurred because the team did not use the guidance to format their AARs and NGB never informed them that the information included in the AARs was incomplete. Therefore, personnel from the 2nd WMD CST stated that they never "felt the need to change the type of information provided."

The WMD CSTs and NGB Differed in Mission Reporting

The missions that the four WMD CSTs reported did not always match the missions reported by the NGB JoCC for the WMD CSTs. According to NGR 500-3/ANGI 10-2503, the WMD CSTs are required to report missions through the JFHQ-State to the NGB JoCC.

From FY 2008 through FY 2011, NGB reported a total of 409 missions (response, stand-by, and assist) for the four WMD CSTs and the WMD CSTs reported a total of 640 missions. Table 3 provides the number of missions that each of the four WMD CSTs and NGB reported from FY 2008 through FY 2011.

Table 3. Reported Missions From FY 2008 Through FY 2011

	NGB	WMD CST
9th WMD CST	57	117
95th WMD CST	17	48
2nd WMD CST	73	175
53rd WMD CST	262	300
Total	409	640

The differences in missions that the WMD CSTs and NGB reported were because all missions conducted were not reported to NGB, the WMD CSTs classified missions differently than the NGB JoCC, or NGB did not communicate with the WMD CSTs to request accurate mission data. Because of the difference in WMD CST missions reported, NGB did not have an accurate count of the missions in which the WMD CSTs participated.

All Missions Were Not Reported to NGB

The 9th and the 53rd WMD CSTs reported missions that were inconsistent with the missions that NGB reported for these WMD CSTs because the WMD CST or the JFHQ-State decided not to report all missions to NGB. For example, the Commander, 9th WMD CST, stated that the team conducted many assist missions but only informed NGB of the ones they "believed to be significant." The WMD CST Commander further explained that the team followed what they "believed was the intent of NGR 500-3/ANGI 10-2503."

Personnel from JFHQ-Indiana J3 stated that, effective October 1, 2010, responsibilities for the 53rd WMD CST transitioned from the Chief of Staff to the JFHQ-Indiana J3, and some missions might not have been reported to NGB under the Chief of Staff. JFHQ-Indiana J3 also explained that they might not have reported some missions to NGB during the time JFHQ-Indiana J3 was not operating at 24/7 because of lack of funds. However, personnel from JFHQ-Indiana J3 stated that they forwarded everything received from the 53rd WMD CST to NGB.

For FY 2010 and FY 2011, the Commander, 2nd WMD CST, stated that the team did not prepare reports for smaller missions, such as assist missions, that may take an hour for one person to complete. Therefore, NGB did not receive reports on all assist missions. Personnel from the 2nd WMD CST stated that they reported all other missions as required to NGB. Personnel from the 95th WMD CST stated that they reported their missions to NGB as required. The WMD CSTs attributed inconsistencies to mission categorization and lack of feedback from NGB.

WMD CSTs Categorized Missions Differently Than NGB

The missions that the WMD CSTs reported varied from the missions that NGB reported for these WMD CSTs because the WMD CSTs and NGB did not categorize missions similarly. From FY 2008 through FY 2011, the 9th WMD CST and NGB categorized missions differently. For example, in FY 2009, the unit categorized one mission as a stand-by mission, but NGB categorized the mission as a response. Also, the unit categorized one mission as an assist mission that NGB categorized as training.[8] In FY 2011, the unit categorized two missions as assist missions, but NGB categorized the missions as exercises.

> *The missions that the WMD CSTs reported varied from the missions that NGB reported for these WMD CSTs because the WMD CSTs and NGB did not categorize missions similarly.*

In FY 2010, the 95th WMD CST categorized two missions as assist missions, but NGB categorized these missions as stand-by missions. In FYs 2008, 2009, and 2011, the 2nd WMD CST and NGB categorized missions differently. For example, in FY 2009, the unit categorized one mission as a stand-by mission that NGB categorized as an assist mission. Also, in FY 2011, the unit categorized two missions as training that NGB categorized as assist missions.

Further, in FYs 2009 and 2010, the 53rd WMD CST and NGB categorized missions differently. In FY 2009, the unit conducted:

- 10 assist missions that NGB categorized as training missions,
- 1 stand-by mission that NGB categorized as a training mission,
- 4 assist missions that NGB recorded as 1 training mission,
- 3 stand-by missions that NGB recorded as 1 stand-by mission, and
- 2 assist missions that NGB recorded as 1 training mission.

In FY 2010, the unit conducted seven assist missions that NGB categorized as either training or exercise missions, two assist missions that NGB recorded as one training mission, and two assist missions that NGB recorded as one exercise.

NGB Did Not Communicate With the WMD CSTs to Request Accurate Mission Data

The four WMD CSTs reported missions that were different than the missions that NGB reported for the WMD CSTs because NGB did not inform them that the mission data was not accurate or request any changes or additional information. The 9th WMD CST personnel stated that the team included all of the information they "thought" was required for each report. The Commander, 2nd WMD CST, stated that NGB required the team to send a quarterly forecast of the missions, instead of the log of the actual missions; and the Commander stated that he "thought the reporting requirements were satisfied at the NGB level." Personnel from the 53rd and 95th WMD CSTs stated that the teams did not know that their information was inaccurate. Also, personnel from the four WMD CSTs stated that they did not receive feedback from NGB about

[8] Training missions did not have the same reporting requirements as response, stand-by, and assist missions.

the information they sent forward. As a result, the teams would not know if the information provided was inaccurate or that NGB needed more information.

NGB-J3/DO Needs to Improve Oversight of WMD CSTs' Reporting

NGB-J3/DO did not clarify reporting requirements or adequately oversee how the WMD CSTs implemented the reporting requirements in the NGR 500-3/ANGI 10-2503. NGB-J3/DO was responsible for overseeing the implementation of the reporting requirements in the NGR 500-3/ANGI 10-2503, which requires the WMD CSTs to report their operations and movements through the JFHQ-State to the NGB JoCC. However, NGB personnel did not verify that the WMD CSTs submitted all required reports for missions (terminations, SITREPs, and AARs), submitted AARs contained complete information, and all missions that the WMD CSTs completed were accounted for. Also, NGB personnel did not communicate with the WMD CSTs through the JFHQ-State to obtain any additional data or to inform them of changes to mission data such as categorization of missions.

NGB-J3/DO was responsible for overseeing the implementation of the reporting requirements in the NGR 500-3/ANGI 10-2503, which requires the WMD CSTs to report their operations and movements through the JFHQ-State to the NGB JoCC.

Personnel from the NGB JoCC explained that receiving and compiling data from the WMD CSTs was an additional duty and because the personnel were contractors, they could not directly communicate with WMD CSTs to reconcile mission numbers and follow-up on reports that were not sent to the NGB JoCC from the JFHQ-State. NGB-J3/DO officials need to develop an oversight process to ensure that they receive pertinent data to make informed decisions.

Conclusion

The four WMD CSTs reviewed did not fully meet reporting requirements to keep NGB aware of the teams' movements and operations. Specifically, the WMD CSTs did not provide all required reports, include complete information in the reports and report missions consistent with missions that NGB reported for the WMD CSTs. Accurate reporting is vital for maintaining NGBs' situational awareness of the WMD CSTs' operations and movements and it allows NGB to know the status of the WMD CSTs if they are needed to respond to a release of CBRNE and natural or man-made disaster.

Management Comments on the Finding and Our Response

Summaries of management comments on the finding and our response are in Appendix B.

Recommendations, Management Comments, and Our Response

We recommend that the Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State that:

1. Verifies compliance with mission reporting requirements, and

2. Provides feedback to Weapons of Mass Destruction Civil Support Teams on omissions and errors.

National Guard Bureau Comments

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, stated that he agrees that there is room to improve oversight of the WMD CST reporting process. Specifically, the Director indicated that NGB-J3 will take steps to clarify reporting requirements and mission categorization, verify compliance of WMD CSTs with reporting requirements in the NGR 500-3/ANGI 2503, conduct periodic reviews of mission reports, establish an Operations and Reporting category as part of the WMD CST Standardization Evaluation Assessment Team program, develop an Operations checklist to incorporate in the team's assessments, and establish an improved feedback process to ensure accuracy of data received and recorded.

Our Response

The Director did not specifically state whether he agrees or disagrees with the recommendations; however, the actions planned are partially responsive to the intent of the recommendations. We commend the Director's planned steps to verify compliance of the WMD CSTs with reporting requirements and establish an improved feedback process between NGB and the States. However, the Director did not identify specific actions to develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State. We ask the Director to provide additional comments in response to the final report by August 1, 2012.

Management Comments on the Report and Our Response

National Guard Bureau Comments

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, provided comments on the content of the audit report. The majority of the comments addressed the Director's preferences for editing and presenting the information in the report. Specific examples addressed in our response include the Director's suggestions that we reorder the list of required reports, add information on Operational Readiness Situation Reports and the Standardization Evaluation Assessment Team, and change the name of "NGB JoCC" to the "National Guard Coordination Center" throughout the audit report.

Our Response

We considered the Director's editorial and presentation comments when preparing the final report. We did not reorder the list of required reports because we based the order on reporting requirement similarities, not on the order in which reports were submitted. We reviewed the Operational Readiness Situation Reports but we did not include them in our audit results because they were not required for missions. We also reviewed the Standardization Evaluation Assessment Team program and determined that the program did not evaluate the planning and reporting of missions. Therefore, we did not include the program in the scope of our audit. In addition, we did not change the name of the "NGB JoCC" to the "National Guard Coordination Center" because the latest guidance, NGR 500-3/ANGI 10-2503, updated May 2011, uses the name "NGB JoCC" throughout the document. In addition, the Director did not provide documentation supporting the name change from the "NGB JoCC" to "National Guard Coordination Center."

Appendix A. Scope and Methodology

We conducted this performance audit from June 2011 through March 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We evaluated the WMD CSTs' planning and reporting in response to intentional or unintentional release of CBRNEs and natural or man-made disasters from FY 2008 through FY 2011. From a total of 57 WMD CSTs located across the continental United States and three territories (Guam, Puerto Rico, and the Virgin Islands), we identified the following four WMD CSTs to review:

- 9th WMD CST, Los Alamitos, California;
- 95th WMD CST, Hayward, California;
- 2nd WMD CST, Scotia, New York; and
- 53rd WMD CST, Indianapolis, Indiana.

We selected the 9th, 95th, and 2nd WMD CSTs because they were located in States with more than one WMD CST. We selected the 53rd WMD CST because of low scores on the NGB's WMD CST Standardization, Evaluation, and Assistance Team evaluation.*

We met with personnel from NGB-J3/DO and NGB JoCC to gain a better understanding of the WMD CST Program and NGB policies. The NGR 500-3/ANGI 10-2503 and the FM 3-11.22 provide the WMD CSTs with instruction on roles and responsibilities and processes and procedures that the WMD CSTs are required to follow for their missions.

During our visits to California, New York, and Indiana, we met with personnel from NGB JFHQ to discuss their roles and responsibilities in the planning and reporting processes of the WMD CST units assigned to them. In addition, while visiting the various NGB JFHQ-State offices, we interviewed personnel from the Joint Operations Center, the U.S. Property and Fiscal Office, Internal Review, and the State Internal Control Administrator.

At the various WMD CST sites, we interviewed personnel within the command, operations, logistics, and communication components. We focused on the WMD CSTs' planning throughout the pre-operational, operational, and post-operational phases. We

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* According to NGB, the Standardization, Evaluation, and Assistance Team conducts field evaluations of the 57 WMD CSTs to assess the degree of compliance with law, policy and doctrine; assist CST Commanders in developing programs to maintain compliance; provide NGB detailed information for use in CST management decisions; and to assure Congress and the DoD of program oversight.

assessed whether the WMD CSTs had planning procedures in place to respond to CBRNE and natural or man-made disasters. Also, we reviewed their standard operating procedures and their plans for obtaining additional resources.

We reviewed the four WMD CSTs' reporting for response, stand-by, and assist missions completed from FY 2008 through FY 2011. We identified a total of 640 missions that the WMD CSTs documented from FY 2008 through FY 2011. We compared these results with the response, stand-by, and assist missions that NGB JoCC recorded for the same period of time to identify any inconsistencies.

In addition, we reviewed the mission documentation the WMD CSTs maintained for a total of 199 response and stand-by missions conducted from FY 2008 through FY 2011. The documentation included termination reports for all response missions and, SITREPs and AARs for response and stand-by missions. For the 199 response and stand-by missions conducted, the WMD CSTs maintained SITREPs for 17 missions and AARs for 45 missions. We further reviewed the 45 AARs provided to assess the completeness of these reports. We also checked for the termination reports that the WMD CSTs maintained for the 11 response missions.

Use of Computer-Processed Data

We did not use computer-processed data to perform this audit.

Prior Coverage

During the last 5 years, the Government Accountability Office (GAO) issued two reports discussing National Guard's Weapons of Mass Destruction Civil Support Teams. Unrestricted GAO reports can be accessed over the Internet at http://www.gao.gov.

GAO

GAO Report No. 08-311, "Enhanced National Guard Readiness for Civil Support Missions May Depend on DOD's Implementation of the 2008 National Defense Authorization Act," April 16, 2008

GAO Report No. 06-498, "National Guard Bureau Needs to Clarify Civil Support Teams' Mission and Address Management Challenges," May 31, 2006

Appendix B. Management Comments on Finding B and Our Response

The National Guard Bureau provided comments on Finding B of the report. For the full text of the National Guard Bureau's comments, see the Management Comments section of the report.

Management Comments on Omission of Termination Reports

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, did not agree with the statements obtained from the WMD CST units that they believed they should only prepare termination reports if the incident commander requested one. He indicated that the NGR 500-3/ANGI 10-2503 specifically states that the WMD CST commander will provide a detailed summary of WMD CST activities in the form of a termination report to the incident commander while on scene.

Our Response

The Director's comments were consistent with the finding and the NGR 500-3/ANGI 10-2503.

Management Comments on SITREPS and AARs Not Provided for All Response and Stand-by Missions

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, indicated that NGR 500-3/ANGI 10-2503 did not specifically require WMD CSTs to provide SITREPs and AARs for stand-by missions. He stated that NGR 500-3/ANGI 10-2503 did require the team to submit reports when they deploy, redeploy, and then reassume the ready status for the next operations. Also, the Director stated that if a unit remains at its home station and does not deploy to the stand-by mission site, the unit would not submit required reports.

The Director also commented on statements from the WMD CSTs that, "the team did not prepare reports for smaller missions" or "NGB never requested the missing reports." He stated that if the team never submitted reports because they did not deploy, then NGB would not be notified that a mission was taking place. Therefore, NGB could not request missing reports.

Our Response

According to NGR 500-3/ANGI 10-2503, stand-by missions occur anytime a team deploys to provide WMD CST expertise at an event where the WMD CST may be the only asset or staged with other State assets to conduct operations. Given that the NGR 500-3/ANGI 10-2503 requires the team to submit SITREPs and AARs when the WMD CST deploys and defines a stand-by mission as anytime a team deploys, the team is required to submit SITREPs and AARs for stand-by missions. NGB did not request these reports for all stand-by missions. When the WMD CSTs did not deploy, they classified the mission as an assist mission. SITREPs and AARs are not required for assist missions since the team does not deploy.

The Director combined statements from unrelated sections of the report. The Director's statement about smaller missions relates to assist missions. We did not state that assist missions needSITREPs and AARs. The statement that the WMD CSTs made about NGB never requesting the missing reports relates to SITREPs and AARs for response and stand-by missions.

Management Comments on Reports Provided Did Not Contain All Required Information

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate stated that if the reporting process is not followed or if reports are submitted to the State Joint Operations Center but not forwarded to NGB, then NGB would not know that a mission occurred. He further stated that without an initial SITREP and subsequent update reports, NGB would not know to request an AAR for a mission that NGB had no knowledge had occurred, limiting their situational awareness. Additionally, the Director stated that the probable causes for NGB's lack of updated situational awareness are personnel shortage and the units and States not following the proper reporting process identified in NGR 500-3/ANGI 10-2503. The Director also commented that NGB's manpower level may be insufficient to support the mission tracking and required reporting activities of all 57 WMD CSTs without reliance on the teams and States to follow the reporting process.

Our Response

Although the Director stated that NGB would not know that a mission occurred if the WMD CSTs did not follow the reporting process for AARs or if NGB did not receive the AARs submitted through the State, it does not negate NGB's responsibility to ensure the reporting requirements they established in the NGR 500-3/ANGI 10-2503 are followed. Based on NGB's statement about current manning levels affecting their ability to review and track missions, NGB may want to evaluate the current reporting process and requirements in the NGR 500-3/ANGI 10-2503.

Management Comments on WMD CST and NGB Differences in Missions Reported

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, stated that in 2010, the National Guard Coordination Center[i] began sending quarterly WMD CST mission tally reports. He indicated that in response to the mission tally reports, NGB requested that the units reconcile their numbers with the State Joint Operations Center to ensure that the reports and types of missions conducted were forwarded to NGB. The Director commented that based on the NGR 500-3/ANGI 10-2503, the notification process begins at the State level with the validation of the support request and then deployment of the WMD CSTs, which requires immediate reporting. The Director stated NGB would not know to request mission

[i] The team did not replace the NBG JoCC with the term National Guard Coordination Center throughout the report because NGB did not provide documentation showing the name change.

updates if the WMD CSTs never notified NGB that a mission took place. He also stated that NGB must place increased emphasis on both State Joint Operations Center and WMD CST for accurate and timely mission reporting. Further, the Director commented that National Guard Coordination Center and the WMD CST Program Office must increase scrutiny of reports that the WMD CSTs submitted and NGB will use the Standardization Evaluation Assistance Team program to assess the WMD CSTs' compliance with reporting and operations as part of NGB's management control process.

Our Response

The Director's comments were generally consistent with the intent of the report. During our assessment of the four WMD CSTs, the units did not provide any documentation that showed NGB requested the WMD CSTs to reconcile mission numbers quarterly. However, with the proposed increased emphasis on both the State Joint Operations Center and the WMD CSTs, NGB could have a more accurate count of the missions that the WMD CSTs participate in. We appreciate the Director's comments that NGB will the use of the Standardization Evaluation Assistance Team program to aid NGB with the assessment of the WMD CST's compliance with reporting and operation requirements.

Management Comments on WMD CST Missions Categorized Different From NGB

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate, stated that some WMD CSTs may perceive a mission differently than NGB. He commented that if NGB had a question or needed clarification about a mission that the WMD CSTs reported, NGB would normally ask the unit to explain the mission category chosen based on those identified in the NGR 500-3/ANGI 10-2503. The Director also stated that if NGB determined that the mission category needed to be changed, NGB notified the unit by e-mail. He commented that if the unit did not make the change, there would be a mission category discrepancy in the units' records. However, the Director then stated that when NGB changed a mission category they did not provide feedback to the WMD CSTs. Further, the Director indicated that NGB will provide clarification to units and States on the mission categorization, incorporate a review of reports by the National Guard Coordination Center quarterly, and ensure compliance with guidance during Standardization Evaluation Assistance Team inspections.

Our Response

During our assessment of the four WMD CSTs, the WMD CSTs did not provide any documentation that showed NGB provided feedback to the WMD CSTs on mission category changes. In addition, we indicate in the report that the units stated that they did not receive any feedback of mission category changes from NGB. The Director first stated in his comments that NGB provided feedback to the teams through e-mail and then later acknowledged that NGB did not provide feedback on mission category changes. Ensuring NGB provides feedback to the WMD CSTs could decrease mission categorization errors.

Management Comments on NGB Not Requesting Accurate Mission Data From the WMD CST

The Director, National Guard Bureau-J3, Domestic Operations and Force Development Directorate stated that he used information that the teams provided on their quarterly training forecast of events/training and in requested reconciliations at the conclusion of a training quarter. He indicated that National Guard Coordination Center used SITREPs to develop the consolidated mission tally report. Additionally, the Director stated that NGB did not request the actual mission logs from the units, but assumed that these logs were used to develop the units' quarterly summary. To improve oversight of mission reporting, the Director indicated that NGB will use the monthly Operational Readiness SITREP to capture the WMD CST mission log data. The Director commented that this should eliminate NGB from making a determination of mission type and not providing feedback the unit, help determine if any mission reports are missing, and identify discrepancies between the types of missions that the WMD CSTs reported and NGB recorded.

Our Response

We mention that NGB asked for quarterly forecasts of training/events but did not request actual mission logs according to WMD CSTs. Also, the units stated that they did not receive feedback from NGB requesting complete and accurate data. Therefore, the units continued to provide the same type of incomplete information in their reports. However, we appreciate the Director's comments on actions that NGB will take to improve oversight of mission reporting.

National Guard Bureau Comments

NATIONAL GUARD BUREAU
1636 DEFENSE PENTAGON
WASHINGTON DC 20301-1636

NGB-J3 17 April 2012

MEMORANDUM FOR Inspector General, Department of Defense, ATTN: Ms Amy Matthews, 4800 Mark Center Drive, Alexandria, VA 22350-1500

SUBJECT: National Guard Input to DoD IG Report, Project No. D2011-D000LA-0226.000, March 12, 2012 entitled "Better Oversight Needed for the National Guard's Weapons of Mass Destruction Civil Support Teams"

1. Reference DoD IG Report, Project No. D2011-D000LA-00226.000, "Better Oversight Needed for the National Guard's Weapons of Mass Destruction Civil Support Teams," dated 12 March 2012.

2. Per your memorandum the National Guard response has two enclosures: Enclosure 1 is a response to the DoD IG report content and Enclosure 2 is a response to the report recommendations.

3. The National Guard POC is [redacted]

COL, SC
for

Encl as

DAVID L. HARRIS
Major General, USA
Director, Domestic Operations &
Force Development

DOD IG REPORT DATED MARCH 2012

PROJECT NO. D2011-D000LA-0226.000

"BETTER OVERSIGHT NEEDED FOR THE NATIONAL GUARD'S WEAPONS OF MASS DESTRUCTION CIVIL SUPPORT TEAMS"

ENCLOSURE 1

NATIONAL GUARD BUREAU COMMENTS TO CONTENT of the DRAFT DoD IG Report

GENERAL:

1. The **Reports process noted in NGR 500-3 follows**: *Request is received by State which validates request for use of WMD-CST on mission, from "Alert" notice WMD-CST begins reporting process on mission to be conducted, State JOC forwards reports to NGB NGCC, NGB NGCC receives reports, reviews reports, makes notifications to NG staff and designated partners and then consolidates the missions tally. WMD-CSTs provide AARs to include the Termination report (provided at incident site to the Incident Commander).*

2. **Inconsistent throughout the report: The Process for submission of mission reports** IAW NGR 500-3, Chapter 6 is ... *WMD-CST submits reports thru State JOC to NGB JoCC (NGCC).*

3. **Reports are submitted, in order**, when WMD-CST is deployed by the governor/states IAW NGB 500-3 ... **reports order should read;** *" SITREPs, Termination Report, and AAR..."*

4. **Use of term NGB "communicates"** ..**should read** "*provides feedback*" .... which is the term used in the DoD IG recommendation.

5. **Change term** : NGB "reported" missions... **should read** NGB*" recorded"* missions – WMD-CST thru the State JOC submit reports to NGCC, NGB NGCC receives, reviews, provides summary to NGB and partners and then consolidates the mission tallies reported by the units. NGB J3 should review the AAR submissions and provide feedback on information and details required.

6. **In the preparation for the DoD IG review,** NGB J3 CST Program Office and NGB J3 NGCC provided the consolidated report of missions that NGB had received and reported to higher ….. in the timeframe of this DoD IG review, thru the reporting process noted, from the four identified WMD-CSTs, NGB had received 409 response and standby mission reports and recorded those reports. NGB did not receive the 640 mission reports the WMD-CSTs stated they conducted. 231 mission reports never made it from the WMD-CSTs through the JFHQ State to the NGCC.

7. **All reference to** NGB JoCC **should be changed to read** *NGB NGCC*

SPECIFIC COMMENTS: (comments made on the content by page)

EXECUTIVE Summary:
Page i.

What we did

ADD last sentence: *NGB supports 57 operational WMD-CSTs in 50 States, three territories (Guam, Puerto Rico and Virgin Islands) and the District of Columbia*.

What we found:

The comment is: "The WMD-CSTs reviewed" change to read: The four WMD-CSTs reviewed…"
Add lead sentence to second paragraph: *NGB has published and updated regulatory guidance (NGR 500-3, WMD-CST Management) which specifies policy and procedures for this Program.*

Change Sentence: "Specifically, the WMD-CSTs did not provide (reports) …. **To read**: "*Although WMD-CSTs did provide monthly Operational Ready SITREP (OR SITREPs) on their overall status (personnel, training and equipment), when deployed to missions, the WMD-CST did not provide …. IAW the regulatory guidance*. "

Change sentence: "As a result, the NGB did not have situational awareness of WMD-CSTs…"
To Read: "As a result, the NGB did not have *accurate* situational awareness of WMD-CSTs…"

What We Recommend:

Change sentence: "We recommend that the Director, NGB J3, develop a written oversight plan in coordination with personnel from each (State) that verifies compliance with mission reporting requirements and provides feedback ....." T**o read**: "We recommend that the Director, NGB J3, develop a written oversight plan in coordination with personnel from each (State) that *validates missions* and verifies compliance with mission reporting requirements and provides feedback ....."

DRAFT Report
Page 1.

Background

Change sentence: At the time of the audit, there were 57 WMD-CSTs,.....and District of Columbia. **Add** : *(two CSTs in California, Florida and New York.)*

Change sentence: "The WMD-CST was the lead element..." **To read** "The WMD-CST are the lead element..."

Change: " In Public Law 109-364, ...WMD-CST could be used to include intentional....
To read " In Public Law 109-364, ...WMD-CST could be used from only *known or suspected WMD-incident* to include intentional...."

Change sentence "In a March 9, 2004, news release, DoD reported that the WMD-CST was able..." **To read** "*Upon certification of each WMD-CST by the SECDEF to Congress a DoD media release is made which reports* that the WMD-CST *is* able.... "

Change sentence: "Each team was made up of 22 fulltime NG members, and was commanded by a Lieutenant Colonel .... " **To read** "Each team *is* made up of 22 fulltime, *Title 32 AGR* NG members, *who serve under the command and Control of the Governor* and *are* commanded by a Lieutenant Colonel ...."

Page 2:

Change sentence: "The NGB J3 plans, programs and oversees the NG WMD-CST program ..." **To read:** "The NGB J3 provides *policy and guidance*, plans, programs and oversees the NG WMD-CST program ..."

Sentence not accurate: "The NGB JoCC coordinates requests from other federal agencies for WMD-CST support with the appropriate JFHQ-State." **Change sentence to read**: "*The State JOC usually receives, coordinates and validates WMD-CST response or support requests from local State and federal agencies. NGB J3 will coordinate NSSE events with States and could initiate the WMD-CST support as part of the NG Response Management Plan (RMP). NGB J3 NGCC receives reports of WMD-CST deployment, notifies NG Staff agencies and consolidates total mission numbers for the NGB J3.* "

WMD-CST Program Guidance.

Change sentence: "...CST FM, Dec 07, in normal operations." **To read** "...CST FM, Dec 07, *which specifies doctrine and operations conducted by WMD-CSTs.*"

Change sentence: "The regulation also defines operational mission categories. Operational requests from local, State, and federal agencies may fall .... " **To read**: "The regulation *provides reporting guidance and* defines operational mission categories. Operational requests *are submitted to the State for validation* from local, State, and federal agencies may fall..."
Change Sentence: "The regulation describes three reports that the WMD-CSTs should prepare and submit to the NGB JoCC, through the JFHQ-State. **To read**: The regulation describes *four* reports that the WMD-CSTs should prepare and submit to the *NGB NGCC*, through the JFHQ-State.

Add Bullet:
These reports include:

- Operational Ready Situation Report (OR SITREP) - WMD-CSTs are all on the NG Response Management Plan (RMP) monthly. This report provides NGB J3 and NGCC an overall capabilities and available status (i.e. overall, personnel, training and equipment) of the unit. NGB receives these unit reports five days prior to the month and then gets updates on a daily, weekly or once a month schedule dependent on the units RMP deployment category.

Page 3:

Change sentence: "The FM 3-11.22 focuses on the organization, mission,..." **To read:** The FM 3-11.22 *serves as the foundation of WMD-CST doctrine* and focuses on the organization, mission,..."

Page 3 (continued)

Change sentence: "The guidance addresses employment concepts, planning considerations, capabilities, and type of support…." **To read:** "The guidance addresses *capabilities,* employment concepts, planning considerations, and type of support…."

Review of Management Controls.

Add Sentence to middle of the paragraph: *The CST Management Regulation, Chapter 15, establishes the Standardization, Evaluation and Assistance Team (SEAT) program which conducts periodic assessments of WMD-CST compliance IAW published guidance. It was not determined whether CST missions and operational reporting is reviewed during these visits. However, the SEAT does develop and update checklists which identify requirements and are used to ensure that each WMD-CST is meeting published guidance and policies.*

Change Sentence: " NGB J3 did not coordinate with JFHQ- State personnel to verify…" **To read:** " NGB J3 did not *adequately* coordinate with JFHQ- State personnel to verify…."

Page 7.

Finding B:

Change sentence: "Specifically, the WMD-CSTs did not provide required termination reports, SITREPs and AARs, and complete information for AARs. " **To read**: "Specifically, the WMD-CSTs did not *always* provide required *SITREPs, termination reports, and AARs*, and complete information for AARs."

Change Sentence: "Also, NGB records showed that the WMD-CSTs conducted 409 responses,…." **To read:** "Also, NGB *NGCC* records showed *from receipt of reports submitted by the States* that the WMD-CSTs conducted 409 responses,…

Change sentence: "As a result, NGB did not have situational awareness of WMD-CSTs ability to immediately respond …." **To read** "As a result, NGB did not have *complete* situational awareness of WMD-CSTs *status and unit's* ability to immediately respond …."

Page 7. (continued)

WMD-CSTs did not Fully Meet Reporting Requirements. Sentence two - Order of reports should read: *provide SITREPs, submit termination reports…and complete AARs for all response and standby missions.*

Change next sentence: "The WMD-CSTs are required to submit these reports to the NGB JoCC through the State JFHQ-State." **To read**; "The WMD-CSTs are required to submit these reports through the State JFHQ-State *to the NGB NGCC* ."

Page 9:

Reports Provided Did not Contain All Required Information.

Change last sentence of first paragraph: "Because the AARs did not contain complete information, NGB did not have a complete picture of the units' operations during these missions." **To read**: "Because the AARs did not contain complete information, NGB did not have a complete *record* of the units' operations during these missions."

Page 10:

First sentence: "Three WMD-CSTs did not include complete information in their AARs for each response…" **To Read:** "Three WMD-CSTs did not include complete information in their *submitted* AARs for each response…"

Change sentence: "Since the AARs did not contain complete information, NGB did not have a complete picture of the unit's operations during these missions." **To read**: "Since the AARs did not contain complete information, NGB did not have a complete *historical* picture of the unit's operations during these missions."

The WMD-CSTs and NGB Differed in Mission Reporting.

Change Sentence: "From FY 2008 through FY2011, NGB reported a total of 409 missions…and the WMD-CSTs reported a total of 640 missions." **To read**: "From FY 2008 through FY2011, NGB reported *receiving* a total of 409 missions … and the WMD-CSTs reported *conducting* a total of 640 missions."

Add NOTE: *For consistency the reporting process outlined in the WMD-CST Regulation is that a WMD-CST will submit the operational reports through the State JOC and the State JOC then forwards those submissions to the NGB NGCC.*

Page 11.

Change sentence "The differences in missions that the WMD-CSTs and NGB reported were because all missions conducted were not reported to NGB , the WMD-CST classified missions differently than the NGB JoCC, or NGB did not communicate with the WMD-CSTs to request accurate mission data."
To read: The differences in missions that the WMD-CSTs and NGB reported were because all missions conducted were not reported to NGB. Further, the WMD-CST classified missions differently than NGB *NGCC*, *and when the mission classification change was made at NGB, that feedback was not provided to the WMD-CSTs nor was a request for more accurate mission data made*."

Page 12.

NGB Did Not Communicate with the WMD-CSTs to Request Accurate Mission Data

Change the sentence: " The four WMD-CSTs reported missions that were different that the missions that NGB reported for the WMD-CSTs.... " **To read** " The four WMD-CST reported missions that were different that the missions that NGB *recorded* for the WMD-CSTs.... "

Page 13.

NGB J3, Domestic Operations Directorate Needs to Improve Oversight of WMD-CST Reporting

Change sentences: "However, NGB personnel did not verify that the WMD-CSTs submitted all required reports for missions (Terminations, SITREPs, and AARs), submitted AARs contained complete information, and all missions that the WMD-CSTs completed were accounted for. Also, NGB personnel did not communicate with the WMD-CSTs through the JFHQ-State to obtain any additional data or to inform them of changes to mission data such as categorization of missions."

To read: "However, NGB personnel did not verify that the WMD-CSTs submitted all required reports for missions (*SITREPs, Terminations,* and AARs), submitted AARs contained complete information, and all missions that the WMD-CSTs *conducted* were *accurately recorded*. Also, NGB *J3* personnel did not *provide adequate feedback on mission status changes or on the need for the unit to submit added data on mission reported*.

Conclusion

Change the sentence: "The four WMD-CSTs reviewed did not fully meet the reporting requirements to keep NGB aware of the teams' movements and operations."
To read "The four WMD-CSTs reviewed did not fully meet the reporting requirements to keep NGB aware of the teams' movements, operations, *and ready status*.."

DOD IG REPORT DATED MARCH 2012

PROJECT NO. D2011-D000LA-0226.000

"BETTER OVERSIGHT NEEDED FOR THE NATIONAL GUARD'S WEAPONS OF MASS DESTRUCTION CIVIL SUPPORT TEAMS"

ENCLOSURE 2

NATIONAL GUARD BUREAU COMMENTS TO THE DOD IG RECOMMENDATIONS

DoD IG RECOMMENDATION: That the Director, National Guard Bureau-J3, Domestic Operations Directorate, develop a written oversight plan in coordination with personnel from each Joint Force Headquarters-State that:

1. Verifies compliance with mission reporting requirements, and
2. Provides feedback to Weapons of Mass Destruction Civil Support Teams on omissions and errors.

NGB Response: The DoD IG specified focus of this audit was to evaluate the Planning and Reporting of NG WMD-CSTs in response to intentional and unintentional release of CBRN and natural or manmade disasters that result in or could result in catastrophic loss of life or property.

Finding A: Concur. The four WMD-CSTs, reviewed, had plans in place to respond to disasters (preoperational, operational and post operational plans in place. The FM 3-11.22 and the NGR 500-3/ANGI 10-2503 identify different ways for meeting the planning requirements. Therefore, the plans varied among the WMD CSTs. These plans included, but are not limited to yearly training guidance, standard operating procedures, and safety procedures.

Finding B: Non Concur.

DoD IG Narrative summary: The National Guard's WMD CSTs reviewed need to improve their reporting on missions. The four WMD-CSTs, reviewed, did not fully meet reporting requirements to keep NGB aware of their movements and operations. Specifically, the WMD-CSTs did not provide required termination reports, SITREPs and AARs. Also, NGB NGCC records showed that the WMD CSTs conducted 409 response and stand-by missions from FY 2008 through FY 2011, while the teams' records showed a total of 640 missions for the same time

period. This occurred because NGB-J3, Domestic Operations Directorate personnel did not clarify reporting requirements identified in the NGR 500-3/ANGI 10-2503. As a result, NGB did not have situational awareness of WMD-CSTs' ability to immediately respond to a release of CBRNE and natural or man-made disaster.

NGB Comment on Narrative: As stated in the report, the WMD-CSTs are required to submit reports to the NGB JoCC (now the NGCC) through their respective JFHQ-State. However, WMD-CSTs did not provide all required reports, include complete information in the reports, and report missions consistent with the missions that NGB reported. The teams (9th and 53rd) stated that they "believed" the team should only prepare a termination report, if the incident commander requested one. In the NGR 500-3/ANGI 10-2503, chapter 7-15, it specifically states "prior to leaving the incident site, the WMD-CST Commander will provide the IC a detailed summary of WMD-CST activities while on scene in the form of a Termination Report". It goes on to read "A copy of this report will be included in the AAR and submitted through the JFHQ-State to the NGB JoCC". Nowhere in the NGR 500-3 does it state that this will be done only if requested by the Incident Commander.

As stated in the report, as in discussions between NGB and the DoD IG Team, none of the WMD-CSTs reviewed provided copies of SITREPs and AARs for all response and stand-by missions conducted from FY 2008 through FY 2011. NGR 500-3/ANGI 10-2503 does not specifically require a WMD-CST to provide SITREPs and AARs for stand-by missions. NGR 500-3/ANGI 10-2503 does require that the reports (SITREPs, Termination report and AAR) are submitted when a unit deploys, redeploys, and then reassumes the ready status for the next operation. If a unit remains at home station and does not deploy to the stand-by mission site, the reports required would not be submitted. The WMD-CST teams involved in this DoD IG review stated to the DoD IG team that "the team did not prepare reports for smaller missions" or "NGB never requested the missing reports". If the unit never submitted reports as they did not deploy, then NGB would not be notified that a mission was taking place. That said, how could NGB request missing reports for a mission that did not occur?

As stated in the report, the four WMD-CSTs did not include complete information in their AARs for each response and stand-by mission from FY 2008 through FY 2011, as required by the NGR 500-3/ANGI 10-2503. The WMD-CSTs stated that the teams "thought" they were providing the required information. Further, they stated that based on not receiving NGB feedback the unit felt their submissions were adequate and required no changes. Again, if the reporting process was not followed, or reports were submitted to the State JOC but not forwarded to NGB, then NGB would not know that a mission was occurring. Without an initial SITREP and subsequent update reports NGB would not know to request an AAR for a mission that NGB had no knowledge the event was occurring.

Under the current manning level within the WMD-CST program office and the NGCC, and without units and States following the proper reporting process indentified in NGR 500-3 , NGB staff lack of update situational awareness and

information would have caused issues with review, validation, and follow on requests addressing operational issues and the need for follow on documentation. For missions that NGB did have knowledge of, NGB J3 NGCC and the WMD-CST Program Office have only one person each to review and track mission is the probable cause of the systemic failure identified. The current NGB manpower level may be insufficient to support the mission tracking and required reporting activities of all 57 WMD-CSTs without reliance on the teams and States to follow the reporting process. This is an area that NGB needs to improve.

As stated in the report, the missions that the four WMD-CSTs reported did not always match the missions reported by the NGB JoCC for the WMD-CSTs. The differences in mission numbers either occurred because all missions were not reported to NGB, the WMD-CSTs classified missions differently than the NGB JoCC, or NGB did not communicate with the WMD-CSTs to request accurate mission data. The WMD-CSTs also stated that they had conducted many assist missions but only informed NGB of the ones they "believed to be significant". Starting in 2010, the NGCC POC began to send out a quarterly WMD-CST mission tally reports which identified reports received. Units were requested to reconcile their numbers with the State JOCs to ensure that the reports and types of mission conducted were forwarded to NGB. On average only 7 WMD-CSTs responded with changes to their mission numbers. The notification process begins at the State level with the validation of the support request and then deployment of the unit which as noted in the regulation requires "immediate reporting." If NGB was never notified that a mission is taking place, NGB would not know to request mission updates. NGB must place increased emphasis on both State JOCs and WMD-CSTs for accurate and timely mission reporting. Further, NGB NGCC and the WMD-CST Program Office must increase scrutiny of submitted reports and WMD-CSTs reporting and operations will be renewed in the management controls process using SEAT to assess compliance.

As stated in the report, the missions that the four WMD-CSTs reported varied from the missions that NGB annotated/identified because the WMD-CSTs and NGB did not categorize missions similarly. It is true, that some WMD-CSTs may perceive a conducted mission differently than NGB. When the report is received and NGB has a question, normally NGB will ask the unit for clarification in light of the mission categorizations identified in NGR 500-3/ANGI 10-2503. If NGB determines that the mission classification needs to be changed, the unit is notified by email. If the unit does not then change their mission classification in their records, a discrepancy will exist. NGB will provide clarification to units and States on the mission categorization, will incorporate a review of reports by the NGB NGCC quarterly, and will ensure compliance with guidance during SEAT inspections.

As stated in the report, the four WMD-CSTs reported missions that were different than the missions that NGB reported for the WMD-CSTs because NGB did not inform them that the mission data was not accurate or request any changes or additional information. NGB acknowledges that feedback was not provided when

a mission category was changes. However, NGB did use information provided by teams on their quarterly training forecast of events/training. At the conclusion of a training quarter, NGB NGCC requested a reconciliation of training and missions conducted. NGB also used the SITREPs as valid missions conducted to develop the consolidated mission tally report. NGB has not requested the actual mission logs units but assumed that these logs were used to develop the unit's quarterly summary. These reports and logs should be maintained at the unit location IAW NGR 500-3/ANGI 10-2503 guidance and should be reviewed as part of the SEAT compliance inspection. To improve oversight of mission reporting, NGB will use the monthly OR SITREP to capture the WMD-CST mission log data. This should eliminate NGB making a determination of mission type and not providing the unit feedback, will help determine if any mission reports are missing, and also identify discrepancies between the types of missions reported and what NGB has recorded.

Summation: During the DoD IG review process, it appears that NGB did not clearly present the WMD-CST deployment validation and reporting processes. Specifically, the WMD-CSTs are under the control of the governor and the State develops a validation process for WMD-CSTs. When deployed, WMD-CSTs submit mission reports thru the State JOC and in turn, the State JOC should immediately submit these mission reports to NGB NGCC fro accurate situational awareness. Although mission numbers vary, as is noted. NGB can only record what is received from the WMD-CSTs and States. Per NGR 500-3/ANGI 10-2503, "States must ensure clear reporting procedures are in place for timely, accurate reporting of WMD-CST movements and operations to the NGB JoCC. The request for initial deployment of the WMD-CST will be reported to the NGB JoCC using NGB form 500." NGB could not confirm that the DoD IG team, that after visiting units they had conducted a reconcile of mission reports and numbers at the JFHQ-State. Nor could NGB that the DoD IG had validated that States had an established procedure to submit all WMD-CST reports to NGB, or, if the reports had been submitted to whom these reports were sent.

Recommended improvements:

NGB J3 agrees that there is room to improve oversight for WMD-CSTs' Reporting process. Specifically, NGB J3 will take the necessary steps to:

- Clarify reporting requirements and mission categorization as noted in NGR 500-3/ANGI 10-2503, the NGB-J39 WMD-CST Branch Chief will draft an All-States memorandum clarifying the WMD-CST reporting requirements for each mission type. This memorandum will be delivered to each JFHQ-State
- Verify compliance of WMD-CST with reporting requirements IAW NGR 500-3 /ANGI 10-2503 and revise if required.

- Conduct periodic reviews of mission reports to ensure that units are following published guidance for and provide required reports for missions (i.e. SITREPs, Termination packet and AAR.)
- Establish a new category for Operations and Reporting as part of the WMD-CST SEAT program. Develop an Operations checklist and incorporate as an assessment category of SEAT visits in FY13.
- Establish an improved feedback process internal to NGB and external with the States to ensure accuracy of data received and recorded. NGB-J39 will gather mission log information as part of the WMD-CST monthly ORSITREP submission. These reports will then be consolidated and used to validate missions reported conducted during the month. This will ensure that WMD-CST numbers and mission types are accurate and accounted for.

Inspector General
Department of Defense