Report No. DODIG-2013-050 February 22, 2013

Inspector General
United States Department of Defense

Recovering Organizational Clothing and Individual Equipment from Civilians and Contractor Employees Remains a Challenge

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Acronyms

AMC	Army Materiel Command
CIF	Central Issue Facility
CIF-ISM	Central Issue Facility - Installation Support Module
CMO	Central Management Office
DPAP	Defense Procurement and Acquisition Policy
OASD(L&MR)	Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness
OUSD(AT&L)	Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics
OCIE	Organizational Clothing and Individual Equipment
SPOT	Synchronized Predeployment and Operational Tracker

INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
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FEB 22 2013

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION, TECHNOLOGY, AND LOGISTICS
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: Recovering Organizational Clothing and Individual Equipment From Civilians and Contractor Employees Remains a Challenge (Report No. DODIG-2013-050)

We are providing this report for your information and use. Despite the Army's efforts to improve controls over the tracking and recovery of clothing and equipment, we identified approximately $20 million in unreturned clothing and equipment issued to civilians and contractor employees who deployed from Fort Benning and Camp Atterbury between October 2006 and May 2012. Officials from the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics did not address the recommendations in a prior DoD Office of Inspector General report in a timely manner. As a result, inadequate procedures to recover clothing and equipment from civilians and contractor employees resulted in increased costs to replace clothing and equipment and potential loss of funds from uncollected debt.

We considered management comments on a draft of this report when preparing the final report. The Assistant Secretary of Defense for Logistics and Materiel Readiness responded on behalf of the Under Secretary of Defense for Acquisition, Technology, and Logistics. Comments from the Assistant Secretary of Defense for Logistics and Materiel Readiness conformed to the requirements of DoD Directive 7650.3; therefore, additional comments are not required.

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

cc:
Assistant Secretary of Defense for Logistics and Materiel Readiness
Director, Defense Procurement and Acquisition Policy

Report No. DODIG-2013-050 (Project No. D2012-D000LD-0067.000) February 22, 2013

Results in Brief: Recovering Organizational Clothing and Individual Equipment From Civilians and Contractor Employees Remains a Challenge

What We Did

Our objective was to determine whether the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (OUSD[AT&L]) established a working group and developed and implemented procedures to recover organizational clothing and individual equipment (OCIE) from civilians and contractor employees, as recommended in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facilities at Fort Benning and Related Activities," June 21, 2010. We also determined whether Army personnel implemented controls to mitigate risks associated with OCIE recovery.

What We Found

OUSD(AT&L) officials did not establish a working group or develop and implement procedures to recover OCIE from civilians and contractor employees. Instead, Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness officials discussed the prior report recommendations during existing working group meetings and agreed that the Army would serve as the lead agent and develop and implement corrective actions. However, neither the discussion nor the decision to delegate the responsibility to the Army was documented.

In addition, Defense Procurement and Acquisition Policy officials did not review contracting policies for necessary changes. This occurred because Defense Procurement and Acquisition Policy officials were waiting for the results from the working group before changing contracting policies.

Army officials from Army G-4, Army Materiel Command, and the central issue facilities at Fort Benning and Camp Atterbury implemented some controls to mitigate risks associated with recovery of OCIE. Despite these efforts to improve controls, many challenges related to the recovery of OCIE from civilians and contractor employees still existed and resulted in increased costs to replace unreturned OCIE, as well as potential loss of funds from uncollected debt. For example, we identified approximately $20 million in unreturned OCIE issued to civilian and contractor employees who deployed from Fort Benning and Camp Atterbury between October 2006 and May 2012. Improved procedures to recover OCIE from civilians and contractor employees should reduce costs for replacing unreturned OCIE and decrease the potential loss of funds from uncollected debt.

What We Recommend

We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics, implement corrective actions to address the recommendations in Report No. D-2010-069 and develop a time-phased plan with measurable goals and metrics regarding the implementation of recommendations in that report.

Management Comments and Our Response

The Assistant Secretary of Defense for Logistics and Materiel Readiness responded on behalf of the Under Secretary of Defense for Acquisition, Technology, and Logistics. Management comments were responsive to the recommendations. Although not required to comment, the Director, Supply Directorate, Army G-4, provided informal comments and agreed with the response from the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics. Please see the recommendations table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Under Secretary of Defense for Acquisition, Technology, and Logistics		1.a, 1.b, 1.c, and 2

Table of Contents

Introduction 1

Objectives 1
Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics and Army Responsibilities 1
Deployment Centers, Central Issue Facilities, and Organizational Clothing and Individual Equipment Issue Procedures 2
Joint Clothing and Textiles Governance Board and Advisory Group 3
Review of Internal Controls 3

Finding. Challenges Recovering Organizational Clothing and Individual Equipment From Civilians and Contractor Employees Remain 4

Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics Did Not Take Corrective Actions in Response to Prior Report Recommendations 4
Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness Did Not Effectively Address the Recommendations Through an Existing Working Group 5
Defense Procurement and Acquisition Policy Did Not Review Contracting Policies 6
Army Implemented Some Controls to Recover Organizational Clothing and Individual Equipment 6
Challenges With Organizational Clothing and Individual Equipment Recovery Remain 7
Limited Visibility of Redeployments 8
Inadequate Central Issue Facility Procedures to Recover Organizational Clothing and Individual Equipment or Obtain Reimbursement 8
Replacing Organizational Clothing and Individual Equipment and Uncollected Debts From Unreturned Organizational Clothing and Individual Equipment Affected DoD and Federal Budgets 10
Conclusion 11
Recommendations, Management Comments, and Our Response 12

Appendixes

A. Scope and Methodology 14
Use of Computer-Processed Data 15
Prior Coverage 15

Table of Contents (cont'd)

Appendixes (cont'd)

B. Report No. D-2010-069 Finding, Recommendations, and Internal Control Weaknesses 16
Army Controls Over Organizational Clothing and Individual Equipment Items Issued to Civilians and Contractor Employees 16
Internal Control Weaknesses Identified in Report No. D-2010-069 17
Recommendations From Report No. D-2010-069 17
Synopsis of Comments in Response to the Recommendations 18

Management Comments

Under Secretary of Defense for Acquisition, Technology, and Logistics 19

Introduction

Objectives

Our objective was to determine whether the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics (OUSD[AT&L]) established a working group and developed and implemented procedures to recover organizational clothing and individual equipment (OCIE) from civilians and contractor employees,[1] as recommended in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facility at Fort Benning and Related Army Policies," June 21, 2010.[2] While the recommendations were addressed to officials from OUSD(AT&L), we also reviewed whether responsible Army personnel implemented controls to mitigate risks associated with issuing and recovering OCIE. See Appendix A for a discussion of our scope and methodology.

We focused our audit on the Central Issue Facilities (CIFs) at Fort Benning, Georgia, and Camp Atterbury Joint Maneuver Training Center (Camp Atterbury) at Camp Atterbury, Indiana. Fort Benning was the subject of Report No. D-2010-069. Additionally, in September 2011, Camp Atterbury assumed the responsibility for preparing contractors, not affiliated with the Logistics Civil Augmentation Program, for overseas deployments.

OUSD(AT&L) and Army Responsibilities

OUSD(AT&L) is responsible for logistics, maintenance, and sustainment support for all elements of DoD. OUSD(AT&L) has authority to establish DoD policy and develop implementing guidance on all matters relating to the clothing and textiles supply chain. The Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness (OASD[L&MR]), an office within OUSD(AT&L), is responsible for prescribing policies and procedures for the execution of DoD sustainment support, as well as advising and assisting OUSD(AT&L) in providing guidance to the military departments. Defense Procurement and Acquisition Policy (DPAP) is also an office within OUSD(AT&L) and is responsible for all contracting and procurement policy matters.

Within the Army, responsibilities related to the issue and recovery of OCIE to civilians and contractor employees reside with different organizations and commands. Army G-4 is responsible for providing and overseeing integrated logistics policies, programs, and plans, including property accountability. The Army Materiel Command (AMC) is responsible for developing, delivering, and sustaining Army materiel. AMC supports the

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[1] This report addresses contractors not affiliated with the Logistics Civil Augmentation Program. Those contractors go through a different deployment center.

[2] We did not address Recommendation (1)(b) from Report No. D-2010-069 related to ensuring individuals turn in their OCIE to the in-theater central issue facility and transfer custody of chemical biological equipment. The Army did not establish a fully functioning CIF in theater as planned and the Army tracks chemical biological equipment using different regulations and a different property accountability system. Therefore, we did not perform follow up on Recommendation (1)(b) during this audit.

civilian and contractor employee deployment mission at Camp Atterbury. Finally, the OCIE Central Management Office (CMO), which falls under AMC, centrally funds and manages most OCIE for civilians and contractor employees.

Deployment Centers, CIFs, and OCIE Issue Procedures

In preparation for deployment, DoD and Army policies require that civilians and contractor employees go to a deployment center to receive OCIE, as well as identification cards, medical screening, and training. Civilians can deploy and redeploy through the Continental United States Replacement Center at Fort Benning or the Individual Replacement and Deployment Operations center at Camp Atterbury. As of September 1, 2011, Army policy requires all contractor employees to deploy and redeploy through Camp Atterbury. "Department of the Army Personnel Policy Guide for Overseas Contingency Operations," August 2012, requires all personnel to redeploy to the same deployment center when they complete their tour of duty. Camp Atterbury CIF personnel reported that, from October 2010 through May 2012, approximately 16,000 civilian and contractor employees deployed through Camp Atterbury, and approximately 6,800 civilians and contractor employees redeployed there. Fort Benning CIF personnel reported that, from October 2009 through September 2011, approximately 26,600 civilians and contractor employees deployed through Fort Benning, and approximately 14,200 civilians and contractor employees redeployed there.

Both Fort Benning and Camp Atterbury have a CIF that is responsible for stocking, issuing, recovering, and accounting for OCIE. These CIFs issue OCIE to civilians and contractor employees from all Services and Defense agencies. Civilians and contractor employees receive OCIE at the CIF based on their mission and theater of deployment. At a minimum, the CIF provides equipment, such as duffel bags, body armor, a helmet, and a chemical biological mask. Additional items issued to civilians and some contractor employees (such as linguists and law enforcement officials) include clothing, safety glasses, and sleeping bags. On average, civilians receive OCIE, valued at about $5,300, and contractor employees receive OCIE, valued at about $3,400.

Army CIFs use the CIF-Installation Support Module (CIF-ISM) to track the issue and return of OCIE. When CIF personnel issue OCIE, CIF-ISM generates a clothing record for each individual that identifies the specific OCIE items issued, to include quantity and size, and whether the item must be returned upon redeployment.[3] CIF personnel use CIF-ISM to check a civilian or contractor employee's clothing record for unreturned OCIE.

[3] Civilians and contractor employees do not have to return some items, such as hats, socks, and boots.

Joint Clothing and Textiles Governance Board and Advisory Group

The Defense Logistics Agency established the Joint Clothing and Textiles Governance Board (the Governance Board) in accordance with DoD Instruction 4140.63, "Management of DoD Clothing and Textiles (Class II)," August 5, 2008. This Instruction requires the Director, Defense Logistics Agency, under the authority, direction, and control of the OASD(L&MR), to establish and chair a Governance Board that includes representation from the Military Services and other DoD Components. The Director, Defense Logistics Agency, established the Governance Board to ensure collaboration and DoD-wide integration of clothing and textiles activities, including planning, procurement, storage, and supply, to support military operations. The Joint Clothing and Textiles Advisory Group (the Advisory Group) is responsible for coordinating Governance Board efforts and recommending meeting dates and agendas. The Advisory Group meets monthly to research and address DoD clothing and textile issues, such as reducing inventory and adopting a standard combat uniform. The Advisory Group provides information and recommendations to the Governance Board, which meets at least annually. Although Defense Logistics Agency personnel officially chair the Governance Board and Advisory Group, representatives from OASD(L&MR) play a significant role on both the Governance Board and Advisory Group.

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 to provide reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. Report No. D-2010-069 identified internal control weaknesses related to the Army's recovery of OCIE from redeploying civilians and contractor employees. To address the internal control weaknesses, we made recommendations to OUSD(AT&L) officials concerning establishing a working group to address OCIE recovery problems and requirements for DoD Components, including proper contract language to hold DoD contractors liable for unreturned OCIE. OUSD(AT&L) officials agreed with the recommendations. Appendix B includes the finding, recommendations, and internal control weaknesses identified in Report No. D-2010-069, as well as a synopsis of OASD(L&MR) and DPAP comments to the final report.

During this audit, we determined that OUSD(AT&L) officials did not address the prior report recommendations in a timely manner, and as a result, some internal control weaknesses identified in Report No. D-2010-069 remained. We will provide a copy of the report to the senior official responsible for internal controls within OUSD(AT&L) and the Department of the Army.

Finding. Challenges Recovering OCIE From Civilians and Contractor Employees Remain

OUSD(AT&L) officials did not establish a working group or develop and implement procedures to recover OCIE from civilians and contractor employees. This occurred because OASD(L&MR) officials stated that they discussed the recommendations during existing working group meetings and agreed that the Army would serve as the lead agent and develop and implement corrective actions. However, neither the discussion nor the decision was documented.

In addition, DPAP officials did not review contracting policies for necessary changes. This occurred because DPAP officials stated that OCIE recovery is a logistics and inventory management problem and that they were waiting for results from the working group before changing contracting policies.

Although OASD(L&MR) and DPAP were responsible for addressing the recommendations, Army officials from Army G-4, AMC, and the CIFs implemented some controls to mitigate risks associated with recovering OCIE from civilians and contractor employees. For example, CIF personnel began screening civilians and contractor employees to determine whether they had unreturned OCIE before issuing OCIE for deployments.

Despite the Army's efforts to improve these controls, many of the problems related to the recovery of OCIE from civilians and contractor employees identified in Report No. D-2010-069 still exist, which resulted in increased costs to replace unreturned OCIE and potential loss of funds from uncollected debt. For example, we identified approximately $20 million in unreturned OCIE issued to civilian and contractor employees who deployed from Fort Benning and Camp Atterbury between October 2006 and May 2012. Improved procedures to recover OCIE from civilians and contractor employees should reduce costs for replacing unreturned OCIE and decrease potential loss of funds from uncollected debt.

OUSD(AT&L) Did Not Take Corrective Actions in Response to Prior Report Recommendations

Report No. D-2010-069 identified that the Army could not identify civilians and contractor employees with unreturned OCIE and that the Army did not recover or obtain reimbursement for unreturned OCIE. The report identified inadequate controls over the process for recovering or obtaining reimbursement for unreturned OCIE and identified approximately $2.5 million in unreturned OCIE issued between FY 2006 and FY 2007.

Officials from OASD(L&MR) agreed to establish a working group and develop and implement procedures to improve OCIE recovery, as recommended in the report. In addition, the Director, DPAP, agreed with the recommendation to require DoD Components to include proper clauses and contract language, so contracting companies could be held liable for unreturned OCIE. Through their agreement with the

recommendations, OUSD(AT&L) officials acknowledged that the problem of unreturned OCIE should be addressed at the OSD level. However, between June 2010 and June 2012, officials from OUSD(AT&L), including OASD(L&MR) and DPAP, did not take corrective actions on the prior report recommendations.

OASD(L&MR) Did Not Effectively Address the Recommendations Through an Existing Working Group

OASD(L&MR) officials did not establish a working group or develop and implement procedures to recover OCIE from civilians and contractor employees. OASD(L&MR) officials stated that, rather than establish a new working group, they discussed the recommendations during meetings of the Governance Board and Advisory Group, which were existing working groups. OASD(L&MR) officials stated that the Advisory Group discussed the findings and recommendations during a May 2011 meeting and agreed during the meeting that the Army would serve as the lead agent in addressing the recommendations. However, neither the meeting minutes nor the agenda from the May 2011 Advisory Group meeting supported the statements from OASD(L&MR) officials. Additionally, according to Army G-4 officials, neither the Advisory Group nor the Governance Board officially assigned the responsibility for the recommendations to the Army. Finally, OASD(L&MR) officials also stated that the Army provided a briefing on their plan to address the recommendations during a November 2011 Governance Board meeting. However, the briefing focused on OCIE modernization and did not address challenges with OCIE recovery.

> *According to Army G-4 officials, neither the Advisory Group nor the Governance Board officially assigned the responsibility for the recommendations to the Army.*

Although the prior report made recommendations on tracking and recovery of OCIE in June 2010, OASD(L&MR) officials waited approximately 2 years, until June 2012, to begin addressing those recommendations. The Advisory Group and Governance Board discussed the recommendations in June, July, and November 2012. The Advisory Group designated each recommendation from the prior report as a special interest item.
In June 2012, the Advisory Group agreed to develop standard metrics for reporting unreturned OCIE, and the Services agreed to provide status briefs at future meetings.
In July 2012, the Governance Board agreed with the Advisory Group decision to develop metrics and agreed that the Services should assist OASD(L&MR) officials in developing metrics to identify civilians and contractor employees who did not return OCIE.
In November 2012, the Advisory Group, including representatives from each Service, met and discussed problems related to management of OCIE issued to contractors and civilians. The Service representatives provided information related to their procedures for issuing, tracking, and recovering OCIE, as well as key issues and challenges, such as recovery of OCIE from contractors and the necessary contract language to hold contractors accountable for returning OCIE. The OUSD(AT&L) representative stated that the meeting was a good start to define the problems and determine the next step to address the problems. The Advisory Group plans to use this information to develop metrics that address unreturned OCIE and reimbursement.

DPAP Did Not Review Contracting Policies

DPAP officials did not review contracting policies for necessary changes, as they agreed to do in response to the recommendations. The Director, DPAP, agreed with a recommendation from Report No. D-2010-069, and referenced Defense Federal Acquisition Regulation Supplement Clause 252.225-7040, "Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the United States," which requires contractors to redeploy through deployment centers and return all OCIE to the point of issue, unless otherwise directed by the contracting officer. The Director, DPAP, stated that this clause is required in all contracts where contractor employees deploy overseas in support of contingency operations. The Director also stated that he would evaluate the need to improve the required clause in current and future contracts and provide supplementary procurement policy and guidance as necessary to enable the proper issue and return of OCIE, in consideration of the recommendations developed by the Advisory Group.

However, a DPAP representative stated that, as of October 2012, DPAP did not initiate corrective action in response to the recommendation because OCIE recovery is a logistics and inventory management problem. The DPAP representative also stated that they were waiting to hear back from the Advisory Group before changing contracting policies. The representative stated that OASD(L&MR) officials did not coordinate with DPAP or inform them of the outcome of the Advisory Group's discussions. The USD(AT&L) should require DoD Components to include proper language in new contracts and modify existing contracts to hold contracting companies liable for unreturned OCIE.

Army Implemented Some Controls to Recover OCIE

Although OASD(L&MR) and DPAP officials did not address the prior report recommendations in a timely manner, Army officials implemented some controls to mitigate risks associated with recovering OCIE from civilian and contractor employees. Officials at AMC, Army G-4, and the CIFs at Fort Benning and Camp Atterbury implemented controls that may help improve OCIE recovery. For example, in September 2011, AMC centralized the contractor deployment mission at Camp Atterbury because of unique contractor deployment requirements. Additionally, AMC established a recurring flight between Camp Atterbury and Kuwait to help ensure contractor employees redeployed through the CIF at Camp Atterbury. Camp Atterbury also began providing transportation from the Indianapolis airport to Camp Atterbury to help ensure civilians and contractor employees return to the CIF.

Army G-4 officials also implemented some controls to help improve recovery of OCIE from civilians and contractor employees. For example, Army G-4 prompted changes to the CIF-ISM database to distinguish individuals as "soldiers," "civilians," or "contractor employees." Before this change, CIF-ISM classified contractor employees as "civilians." Additionally, Army G-4 plans to modify the CIF-ISM system to capture additional information, such as the contracting company, contracting officer, and the contracting officer's contact information to help Army personnel follow up with the contracting officers on unreturned OCIE. Finally, in March 2012, Army G-4 officials began working with personnel from the Defense Manpower Data Center to obtain deployment

information from the Synchronized Predeployment and Operational Tracker (SPOT), which is a DoD system that tracks the locations of deployed contractors. Army G-4 officials plan to compare the SPOT deployment information with data from CIF-ISM to identify civilians and contractor employees who have redeployed but have outstanding OCIE.

CIF personnel at Fort Benning and Camp Atterbury also implemented additional measures to help improve OCIE recovery. Before issuing OCIE, CIF personnel at Fort Benning and Camp Atterbury reviewed CIF-ISM clothing records for civilians and contractor employees to identify whether they had any outstanding OCIE from previous deployments. If the clothing record showed outstanding OCIE, CIF personnel did not issue the same OCIE until the civilians or contractor employees returned the items or reimbursed the Government. CIF personnel also executed pre-deployment briefings, which emphasized to civilian and contractor employees their responsibilities for returning all OCIE upon redeployment. Finally, in May 2012, Camp Atterbury CIF personnel began offering a "Predeployment Success Seminar" to provide contracting companies with tips and methods for improving deployment and redeployment processing for their employees, including requirements to return OCIE.

Additionally, CIF personnel at Fort Benning and Camp Atterbury retained travel orders for civilians and letters of authorization for contractor employees. These documents identified the employee's information, such as phone number and address, as well as the name and contact information for the contracting officer. The prior report made a recommendation related to retention of contact information for civilians and contractor employees to enable CIF personnel to follow up on unreturned OCIE. By retaining travel orders and letters of authorization, CIF personnel at Fort Benning and Camp Atterbury maintained contact information necessary to follow up on outstanding OCIE. We concluded that these actions met the intent of Recommendation (3) from the prior report and closed the recommendation.

Challenges With OCIE Recovery Remain

Despite the Army's efforts to improve these controls, many of the problems related to the recovery of OCIE from civilians and contractor employees identified in the prior report still exist. In June 2010, the prior report made recommendations for DPAP and OASD(L&MR) officials to improve the visibility of civilians and contractor employees redeploying from theater. However, OUSD(AT&L) officials did not take timely corrective action to address the prior report recommendations. Therefore, the Army still had limited visibility over redeploying civilians and contractor employees. In addition, the CIFs at Fort Benning and Camp Atterbury did not have adequate procedures to effectively recover or obtain reimbursement from civilians and contractor employees for unreturned OCIE.

OUSD(AT&L) officials did not take timely corrective action to address the prior report recommendations. Therefore, the Army still had limited visibility over redeploying civilians and contractor employees.

Limited Visibility of Redeployments

The Army still had limited visibility of redeploying civilians and contractor employees. The prior report identified that the Army could not:

- determine when civilians and contractor employees returned from deployment,
- ensure civilians and contractor employees redeployed through a CIF, and
- identify civilians and contractor employees who did not return OCIE.

During our followup audit, CIF personnel still could not identify when civilians and contractor employees were scheduled to redeploy or whether they redeployed and still had unreturned OCIE. CIF-ISM contains records of all OCIE issued to civilian and contractor employees but does not track the locations of civilians and contractor employees. Although the SPOT system tracks the locations of deployed contractors and redeployment dates, CIF personnel did not use SPOT to identify civilians and contractor employees who redeployed. Additionally, the Army could not ensure that civilian and contractor employees redeployed from theater through a CIF. If civilians and contractor employees took the recurring flight from Kuwait to Camp Atterbury, the Army tracked them to ensure they returned their OCIE; however, CIF personnel stated that civilian and contractor employees could take commercial flights home and skip the redeployment process. In those situations, the Army still could not ensure that civilians and contractor employees redeployed through a CIF to return OCIE.

The Army still faced limited visibility of civilian and contractor employees who are redeploying because OUSD(AT&L) officials did not take timely corrective actions to address the prior report recommendations. The USD(AT&L) should implement corrective actions to identify civilians and contractor employees who returned from deployment but did not return OCIE.

Inadequate CIF Procedures to Recover OCIE or Obtain Reimbursement

The CIFs at Fort Benning and Camp Atterbury did not have adequate procedures to effectively recover or obtain reimbursement for outstanding OCIE from civilians and contractor employees. Army Regulation 735-5, "Policies and Procedures for Property Accountability," February 28, 2005, outlines the procedures for recovering unreturned OCIE or obtaining reimbursement. The procedures depend on whether the individuals returning from deployment are civilians or contractor employees and whether they admit liability for the unreturned items. However, in all cases, CIF personnel must fill out the appropriate paperwork to initiate a claim[4] for the unreturned OCIE and must follow up on outstanding claims until they reach resolution.

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[4] Army Regulation 735-5 requires CIF personnel to use a DD Form 200, "Financial Liability Investigation of Property Loss (FLIPL)," or a DD Form 362, "Cash Collection Voucher/Statement of Charges," to initiate a claim against a civilian or contractor employee for unreturned OCIE. CIF personnel use CIF-ISM to initiate the claim and generate the appropriate form. Each claim represents a debt to the Government for the value of unreturned OCIE.

DoD Regulation 7000.14-R, "Financial Management Regulation," volume 10, chapter 18, "Contractor Debt Collection," and Army Regulation 735-5 further outline the processes for collecting debt from contracting companies. First, CIF personnel forward the claim to the contracting officer for the contract. The contracting officer determines whether the contractor employee is liable for the unreturned OCIE and issues a formal request for return of OCIE or payment of debt within 30 days of the date of the request. The contracting officer provides a copy of the request to the debt collection office. If the debt collection office is unsuccessful in obtaining reimbursement within 60 days of the due date, officials from the debt collection office refer the debts to the Defense Finance and Accounting Service. The Defense Finance and Accounting Service then refers all debts older than 180 days to the Department of the Treasury in accordance with section 3711, title 31, United States Code, and the Debt Collection Improvement Act of 1996.

Although Fort Benning CIF personnel initiated claims against contractor employees who had unreturned OCIE, personnel subsequently wrote off the liability and cleared contractor employees' clothing records without receiving payment for the unreturned OCIE. Fort Benning CIF personnel stated that they attempted to forward claims to contracting officers to recover OCIE or obtain reimbursement from contractor employees, but they were generally unable to resolve the claims with the contracting officers. CIF personnel also stated that in 2008, they were directed to close outstanding claims and write-off debts for contractor employees with unreturned OCIE if follow up attempts were not successful after 100 days. However, CIF personnel could not provide documentation supporting this directive. Between FY 2010 and FY 2012, Fort Benning CIF personnel closed 364 claims and wrote off debts, valued at approximately $587,700, because each claim was older than 100 days. Closing these claims cleared the individual's clothing record of all unreturned OCIE. Therefore, if an individual subsequently deployed, he or she could receive additional OCIE. However, according to DoD and Army policy, CIF personnel should have continued to pursue these claims, through the contracting officers, until they were resolved.[5]

Between FY 2010 and FY 2012, Fort Benning CIF personnel closed 364 claims and wrote off debts, valued at approximately $587,700, because each claim was older than 100 days.

Camp Atterbury CIF personnel did not have procedures in place to recover or obtain reimbursement for unreturned OCIE from civilians and contractor employees. When an individual redeployed through the Camp Atterbury CIF and did not pay for unreturned OCIE, CIF personnel at Camp Atterbury initiated a claim with the appropriate paperwork. After generating these claims, CIF personnel kept them on file until the individual paid or returned the outstanding OCIE. According to CIF personnel, civilians

[5] As of September 2011, the contractor deployment mission moved from Fort Benning to Camp Atterbury. In FY 2012, Fort Benning CIF personnel closed only 6 claims (1.6 percent of the 364 claims) valued at approximately $11,500. Therefore, while DoD and Army policy require CIF personnel to follow up on these claims, the processes for closing claims and writing off debts for unreturned OCIE were largely discontinued at Fort Benning.

and contractor employees had 30 days from their redeployment to either mail a certified check or return the missing OCIE. However, if the individual did not return the OCIE or pay the debt within the allotted 30 days, CIF personnel did not follow up with the individual or the contracting officer.

Replacing OCIE and Uncollected Debts From Unreturned OCIE Affected DoD and Federal Budgets

Limited visibility of redeployments and inadequate procedures for obtaining unreturned OCIE or reimbursement, which were problems identified in Report No. D-2010-069, resulted in increased costs to replace OCIE and potential loss of funds from uncollected debts. The Army, through the OCIE CMO, centrally funds most OCIE issued to civilians and contractor employees. When civilians and contractor employees redeploy through a CIF to return OCIE, CIF personnel inspect all items, clean and repair them as necessary, and then reissue the OCIE to other individuals. When civilians and contractor employees do not return OCIE, the Army must purchase new OCIE to ensure the CIFs maintain an adequate supply, which results in increased costs for the Army. Even when civilians and contractor employees reimburse the Government for unreturned OCIE, the funds go to the Treasury Department, not to the Army or DoD. Additionally, inadequate procedures for referring debts to contracting officers and pursuing resolution resulted in potential loss of funds from the Federal budget.

We identified approximately $20 million in unreturned OCIE between October 2006 and May 2012. For example, from October 2009 through May 2012, we identified approximately $931,000 of unreturned OCIE from civilians and contractor employees who redeployed through Fort Benning and Camp Atterbury. For each of these claims, civilians and contractor employees acknowledged having unreturned OCIE items. The following table outlines the number of claims and total dollar value of unreturned OCIE for Fort Benning and Camp Atterbury.

Table. Outstanding Claims for Unreturned OCIE for Fort Benning and Camp Atterbury Between October 2009 and May 2012

Location	Number of Claims	Total Dollar Value of Outstanding OCIE (rounded to nearest hundred)
Fort Benning	364	$587,700
Camp Atterbury	870	$343,300
Totals	**1,234**	**$931,000**

As stated earlier, Fort Benning CIF personnel stated that they attempted to follow up with the civilians, contractor employees, or contracting officers to recover OCIE or obtain payment for the items, but eventually wrote off the liabilities after 100 days. Similarly, Camp Atterbury CIF personnel stated that they did not attempt to follow up with civilians, contractor employees, or contracting officers to recover the items or obtain reimbursement.

In addition, between October 2006 and September 2010, the Fort Benning CIF issued $18.9 million of OCIE to civilians and contractor employees, which was still unreturned as of May 2012. Civilians accounted for $6.6 million of the unreturned OCIE, and contractor employees accounted for $12.3 million of the unreturned OCIE. Because of the timeframe, many civilians and contractor employees might have returned from deployment but did not process through a CIF to return their OCIE items, as required. Therefore, since the Army must purchase items to replace unreturned OCIE, improved procedures to recover OCIE from civilians and contractor employees should reduce costs for replacing unreturned OCIE and decrease potential loss of funds from uncollected debt. The USD(AT&L) should implement corrective actions to obtain unreturned OCIE or reimbursement from civilians and contractor employees.

Conclusion

While the Army initiated steps to improve the controls over the tracking and recovery of OCIE, this is the second report on internal control weaknesses over those processes. The challenges identified in 2010, such as limited visibility of redeploying civilians and contractor employees, still remained, and resulted in increased costs to replace unreturned OCIE. Furthermore, inadequate procedures for pursuing debts from unreturned OCIE contributed to the increased potential loss of funds from debts. Over the last 6 years, we identified close to $20 million in unreturned OCIE that, if recovered, should reduce some costs for replacing OCIE.

Through their agreement with the prior recommendations, OUSD(AT&L) officials acknowledged that the problem of unreturned OCIE should be addressed at the OSD level. In particular, OASD(L&MR) and DPAP have the authorities in their respective functional areas to implement positive change and make improvements in this area. To ensure these changes and improvements, the USD(AT&L) should initiate corrective action, including a time-phased plan with measurable goals and metrics, to address the recommendations regarding OCIE recovery from civilians and contractor employees.

Recommendations, Management Comments, and Our Response

We recommend that the Under Secretary of Defense for Acquisition, Technology, and Logistics:

1. Implement corrective actions to address all recommendations, with the exception of Recommendation (1)(b), in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facilities at Fort Benning and Related Activities," June 21, 2010, specifically:

a. Identify civilians and contractor employees who returned from deployment but did not return organizational clothing and individual equipment.

b. Obtain unreturned organizational clothing and individual equipment or reimbursement from civilians and contractor employees.

c. Require DoD Components to include proper language in new contracts and modify existing contracts to hold contracting companies liable for unreturned organizational clothing and individual equipment.

Under Secretary of Defense for Acquisition, Technology, and Logistics Comments

The Assistant Secretary of Defense for Logistics and Materiel Readiness responded on behalf of the Under Secretary of Defense for Acquisition, Technology, and Logistics. The Assistant Secretary agreed and stated that the Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness, in collaboration with the Director, Defense Procurement and Acquisition Policy, the Military Departments, the Defense Logistics Agency, and other organizations as required, will develop corrective actions to address all recommendations, with the exception of Recommendation 1(b), in the prior report. The Assistant Secretary stated that corrective actions will include the following:

- developing procedures for all DoD OCIE issue facilities to identify, track, and report to the proper authorities, civilians and contractor employees who returned from deployment but did not return OCIE;
- developing system links between the contractor tracking system and OCIE issue facilities to automate notifications of contractor employment status;
- assessing records and initiating actions to obtain unreturned OCIE or reimbursement from civilians and contractor employees;
- publishing a memorandum from the Director, Defense Procurement and Acquisition Policy emphasizing the need for DoD Components to include proper language in new contracts to hold contracting companies liable for unreturned OCIE; and
- identifying and modifying existing contracts to hold contracting companies liable for unreturned OCIE.

Our Response

Comments from the Assistant Secretary of Defense for Logistics and Materiel Readiness were responsive. Therefore, no further comments are required.

2. Develop a time-phased plan with measurable goals and metrics regarding implementing recommendations in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facilities at Fort Benning and Related Activities," June 21, 2010.

Under Secretary of Defense for Acquisition, Technology, and Logistics Comments

The Assistant Secretary of Defense for Logistics and Materiel Readiness stated that the Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness will develop a time-phased plan with specific corrective actions, measurable goals, and metrics for tracking and implementing recommendations in the prior report by February 28, 2013. The Joint Clothing and Textile Advisory Group will review the plan at its meetings to track progress and provide oversight.

Our Response

Comments from the Assistant Secretary of Defense for Logistics and Materiel Readiness were responsive. Therefore, no further comments are required.

Department of the Army Comments

Although not required to comment, the Director, Supply Directorate, Army G-4 provided informal comments and agreed with the response from the Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics. The Director stated that Army G-4 will participate with the working group that OUSD(AT&L) is establishing to develop and implement procedures to recover OCIE from civilians and contractors. The Director also stated that Army G-4 has ongoing improvements to CIF-ISM, with the goal of creating e-mail alerts to key personnel responsible for managing OCIE and contract enforcement.

Appendix A. Scope and Methodology

We conducted this performance audit from January 2012 through November 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 concluded that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We excluded from our review follow up on Recommendation (1)(b) from Report No. D-2010-069. As noted on page 1, this recommendation related to ensuring civilians and contractor employees turned in OCIE to the in-theater CIF before returning from deployment and ensuring they transferred custody of chemical-biological equipment before redeploying. However, we did not include this in our review because the Army did not establish a fully functioning CIF in theater as planned and the Army tracks chemical biological equipment using different regulations and a different property accountability system.

We reviewed agendas, meeting minutes, briefings, and other documentation related to the Joint Clothing and Textiles Governance Board and Advisory Group meetings held between May 2011 and November 2012. We reviewed Federal Acquisition Regulation and Defense Federal Acquisition Regulation Supplement clauses related to contractor deployment. We also reviewed DoD and Army guidance related to property accountability, materiel management, and civilian and contractor deployment.

We reviewed documentation for outstanding OCIE issued to civilians and contractor employees from the CIFs at Fort Benning and Camp Atterbury. Specifically, at Fort Benning, we reviewed logs for outstanding DD Forms 200, "Financial Liability Investigation of Property Loss (FLIPL)," dated October 2010 through March 2012. We reviewed supporting documentation for a nonstatistical sample of these claims to verify the accuracy of the logs. At Fort Benning, we also reviewed a CIF-ISM query to identify the amount of OCIE issued to civilians and contractor employees by the Fort Benning CIF between FY 2007 and FY 2010 that was still outstanding, as of May 2012. At Camp Atterbury, we reviewed documentation for outstanding DD Forms 362, "Cash Collection Voucher/Statement of Charges," dated March 2011 through May 2012.

We conducted site visits to and interviewed personnel at Fort Benning, Georgia, and Camp Atterbury, Indiana. We attended meetings of the Joint Clothing and Textiles Governance Board and Advisory Group in June, July, and November 2012. In addition, we interviewed personnel from the following organizations.

- Office of the Under Secretary of Defense for Acquisition, Technology, and Logistics, Arlington, Virginia
- Office of the Assistant Secretary of Defense for Logistics and Materiel Readiness, Alexandria, Virginia
- Defense Procurement and Acquisition Policy, Arlington, Virginia
- Defense Manpower Data Center, Alexandria, Virginia

- Office of the Assistant Secretary of the Army for Acquisition, Logistics, and Technology, Arlington, Virginia
- Headquarters, Army G-4, Arlington, Virginia
- Army Materiel Command, Redstone Arsenal, Alabama
- OCIE Central Management Office, Aberdeen Proving Ground, Maryland
- Program Executive Office – Enterprise Information Systems, Alexandria, Virginia

Use of Computer-Processed Data

We relied on data from CIF-ISM to support our audit findings and conclusions. Specifically, we relied on DD Forms 200 and DD Forms 362 generated by CIF-ISM for unreturned OCIE. We also relied on data generated by a query from CIF-ISM.

To assess the reliability of this data, we reviewed documentation related to the transactions, obtained information from the project manager regarding system controls, observed various access controls at the CIFs, and reviewed accreditation reports for the system. Based on this information, we determined that the data were sufficiently reliable for the purposes of this report.

Prior Coverage

During the last 5 years, the Department of Defense Office of Inspector General (DoD OIG) issued one report discussing the recovery of OCIE from civilians and contractor employees. Unrestricted DoD OIG reports can be accessed at http://www.dodig.mil/pubs/index.cfm.

DoD OIG

DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facility at Fort Benning and Related Army Policies," June 21, 2010

Appendix B. Report No. D-2010-069 Finding, Recommendations, and Internal Control Weaknesses

Report No. D-2010-069 identified one finding, four recommendations, and five internal control weaknesses. The following sections outline the details from the audit report.

Army Controls Over Organizational Clothing and Individual Equipment Items Issued to Civilians and Contractor Employees

The Army's process for issuing OCIE ensured that civilian and contractor employees received the required clothing and equipment. However, the Army's process for recovering OCIE from civilians and contractor employees on completion of their mission needs improvement. The amount and value of unreturned, recoverable OCIE issued to civilians were unavailable. However, of 940 contractor employees who deployed during FYs 2006 and 2007 and subsequently returned home, 749 (about 80 percent) did not turn in recoverable OCIE, valued at $2.5 million, as required by the Army's Personnel Policy Guidance. Items were not recovered because management controls for recovering or obtaining reimbursement for the items were inadequate. Specifically, the Army did not develop procedures and controls to:

- capture information necessary to identify and hold accountable civilians and contractor employees for OCIE issued to them before deployment,
- determine when civilians and contractor employees returned from deployment,
- identify civilians and contractor employees who did not return their recoverable OCIE,
- ensure processing of returning civilians and contractor employees through a Continental United States Replacement Center and a CIF to return recoverable OCIE, and
- recover the items or obtain reimbursement for unreturned, recoverable OCIE.

As a result, the Army was unable to determine the amount and value of unreturned OCIE and had to expend resources to replace the items. Additionally, we determined that items such as Kevlar vests and Enhanced Small Arms Protective Inserts were offered for sale on Web-based auction sites. If the Army had implemented adequate controls for recovering OCIE from civilians and contractor employees who ended their deployment, the Army could have put at least $2.5 million to better use. During the audit, the Army began to retain documentation, planned to initiate a process to determine when contractor employees returned from deployment, and modified the Kuwait CIF mission to allow turn-in of OCIE. The Army still needs to ensure that civilians and contractor employees process through a CIF and return recoverable OCIE.

Internal Control Weaknesses Identified in Report No. D-2010-069

Report No. D-2010-069 identified that internal control weaknesses in the Army existed as defined by DoD Instruction 5010.40, "Managers' Internal Control (MIC) Program Procedures," January 4, 2006. Specifically, the report stated that Army G-4 (Logistics) did not have processes to:

- capture information necessary to identify and hold accountable civilians and contractor employees for OCIE issued to them before deployment,
- determine when civilians and contractor employees returned from deployment,
- identify civilians and contractor employees who did not return their recoverable OCIE,
- ensure processing of returning civilians and contractor employees through a Continental United States Replacement Center and a CIF, and
- recover the items or obtain reimbursement for unreturned, recoverable OCIE.

Therefore, the Army could not identify civilians and contractor employees who did not return OCIE, and the Army could not recover or obtain reimbursement for unreturned OCIE.

Recommendations From Report No. D-2010-069

We recommend that the Director, Defense Procurement and Acquisition Policy:

1. Establish a working group to include officials from the U.S. Central Command, Defense Finance and Accounting Service, Defense Logistics Agency, Office of the Deputy Assistant Secretary of the Army (Procurement), Office of the Deputy Chief of Staff of the Army G-4 (Logistics), Navy, and Air Force to improve recovery of Organizational Clothing and Individual Equipment. The working group should develop procedures to:

(a) Identify civilians and contractor employees who returned from deployment but did not turn in the recoverable Organizational Clothing and Individual Equipment they were issued.

(b) Ensure all civilians and contractor employees turn in their recoverable Organizational Clothing and Individual Equipment items to the in-theater central issue facility before returning from deployment, and enforce the requirement to transfer custody of protective chemical-biological equipment to supply as required by the Personnel Policy Guide for Overseas Contingency Operations.

(c) Obtain recoverable Organizational Clothing and Individual Equipment or reimbursement from civilians and contractor employees whose employees did not turn in their recoverable Organizational Clothing and Individual Equipment items.

(d) Obtain unreturned recoverable Organizational Clothing and Individual Equipment or reimbursement for unreturned Organizational Clothing and Individual Equipment issued to civilians and contractor employees in prior years.

2. Implement the procedures developed by the working group.

3. Require central issue facility personnel to retain civilians' and contractor employees' contact information to enable the CIF to contact them if they do not return Organizational Clothing and Individual Equipment.

4. Require DoD Components to include proper clauses and contract language in new contracts and modify existing contracts so that contractors can be held liable for the recoverable Organizational Clothing and Individual Equipment issued by central issue facilities to deploying employees but not returned on mission completion.

Synopsis of Comments in Response to the Recommendations

The Director, DPAP, partially agreed with Recommendations 1-3, regarding the establishment of a working group to improve the recovery of OCIE. Since the policies and procedures relating to the issuance of OCIE to contractors and civilians is a logistics management function, the Director, DPAP, recommended that the lead for the working group reside with OASD(L&MR) with support from Joint Chiefs of Staff J4 and the Under Secretary of Defense for Personnel and Readiness. The Director, DPAP, agreed to provide the necessary technical input on procurement policies and instructions and to make recommendations to provide the necessary procurement policy support. The Director, DPAP, coordinated this response through OASD(L&MR). Officials from OASD(L&MR) did not provide any additional comments to the report.

The Director, DPAP, agreed with Recommendation 4, stating that the Defense Federal Acquisition Regulation Supplement Clause 252.225-7040, "Contractor Personnel Authorized to Accompany U.S. Armed Forces Deployed Outside the United States," identified contractor deployment requirements, to include procedures for processing through deployment centers and contractor requirements relating to the issuance and return of military clothing and protective equipment. The Director, DPAP, added that the clause is required in all contracts where contractors are deployed from the United States to locations overseas in support of contingency operations. The Director, DPAP, agreed to evaluate the need to improve the required clause in current and future contracts and provide additional procurement policy and guidance as necessary to enable the proper issuance and return of Army and service issued OClE in consideration of the recommendations developed by the working group.

Under Secretary of Defense for Acquisition, Technology, and Logistics Comments

ASSISTANT SECRETARY OF DEFENSE
3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

LOGISTICS AND
MATERIEL READINESS

JAN 3 1 2013

MEMORANDUM FOR ASSISTANT INSPECTOR GENERAL FOR READINESS, OPERATIONS AND SUPPORT

THROUGH: DIRECTOR, ACQUISITION RESOURCES AND ANALYSIS

SUBJECT: Response to DoDIG Draft Report on "Recovering Organizational Clothing and Individual Equipment From Civilians and Contractor Employees Remains a Challenge," (Project D2012-D000LD-0067.000)

As requested, I am providing responses to the general content and recommendations contained in the subject report.

Recommendation 1 (a, b, c): Implement corrective actions to address all recommendations, with the exception of Recommendation (1)(b), in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facilities at Fort Benning and Related Activities," June 21, 2010, specifically:

a) Identify civilians and contractor employees who returned from deployment but did not return organizational clothing and individual equipment (OCIE).
b) Obtain unreturned organizational clothing and individual equipment or reimbursement from civilians and contractor employees.
c) Require DoD Components to include proper language in new contracts and modify existing contracts to hold contracting companies liable for unreturned organizational clothing and individual equipment.

Response: Concur. The Assistant Secretary of Defense for Logistics and Materiel Readiness (ASD(L&MR)), in collaboration with the Director of Defense Procurement and Acquisition Policy (D,DPAP), the Military Departments, the Defense Logistics Agency, and other organizations as required, will develop corrective actions to address all recommendations, with the exception of Recommendation 1(b), in the DoDIG Report No. D-2010-069. Corrective actions will include:

- Develop procedures for all DoD OCIE issue facilities to identify, track, and report to the proper authorities, civilians and contractor employees who returned from deployment, but did not return OCIE.

- Develop system links between contractor tracking system and issue facilities to automate notifications of contractor employment status.

- Perform records assessment and initiate actions to obtain unreturned organizational clothing and individual equipment or reimbursement from civilians and contractor employees.

- Publish memorandum from the D,DPAP emphasizing the need for DoD Components to include proper language in new contracts to hold contractors liable for unreturned organizational clothing and individual equipment.

- Identify and modify existing contracts to hold contracting companies liable for unreturned organizational clothing and individual equipment.

Recommendation 2: Develop a time-phased plan with measurable goals and metrics regarding implementing recommendations in DoD Office of Inspector General Report No. D-2010-069, "Central Issue Facilities at Fort Benning and Related Activities," June 21, 2010.

Response: Concur: ASD(L&MR) will develop a time-phased plan with specific corrective actions, measurable goals, and metrics for tracking and implementing recommendations in DoDIG Report No. D-2010-069 by February 28, 2013. To track progress and provide oversight, plan execution will be reviewed in the Joint Clothing and Textile Governance Board Advisory Group meetings.

If additional information is required, my point of contact is [redacted] ODASD(SCI), at [redacted]

Alan F. Estevez

2

Inspector General
Department of Defense